

MOZAMBIQUE

2021

TOBACCO
INDUSTRY
INTERFERENCE
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Introduction

Mozambique signed WHO FCTC on June 18, 2003, ratified on November 9, 2016 and it entered into force for Mozambique on 14 July 2017. The Government of Mozambique is making efforts towards enacting and implementing a Comprehensive Tobacco Control Policy, although knowing that tobacco sub-sector contributes approximately 34% to the total agriculture exports. However, the government considers tobacco industry as a determining factor in the structural transformation and increased competitiveness of the national economy.¹

There is an urgent need to promote economically viable alternatives to tobacco production to prevent possible social and economic adverse impacts on populations whose livelihoods depend largely on tobacco cultivation. Obviously, the shift to promote economically viable alternatives to tobacco will not be easy.

Poverty remains high, with up to 46.1% of the population living below the national poverty line in 2014/15, down only by 6.7 percentage points from rates prevailing at the beginning of the 2000s: 52.8% in 2002/3. In absolute terms the number of poor people in Mozambique has remained relatively unchanged. Other measures of basic wellbeing, such as maternal mortality (489 deaths per 100,000 live births in 2015), infant mortality (53.3 deaths per 1,000 live births in 2017), primary completion rates (46.4% in 2007) or access to electricity (24.2% of the population in 2016) also remain problematic and below regional averages, despite large investments going into social sectors over the past two decades (source?). Moreover, improvements in living standards have not been evenly spread across the country, with improvements heavily concentrated in urban areas and in the southern part of the country.

Tobacco production in Mozambique is governed by the Regulation on the Promotion, Production and Marketing of Tobacco (Ministerial Diploma 176/2001) and by the contracts established between the Mozambican State and the tobacco concession companies. The Tobacco Regulation sets out the principles governing the concessions and the role of the companies. The Mozambican model is made up of three interrelated elements: (a) the interconnected input and production markets, (b) a production scheme on contract as the predominant form of production and (c) the adoption of monopsonic territorial concessions. There are about 130,000 to 150,000 farmers growing tobacco in Mozambique.

¹ Nguenha, N.; Cunguara, B.; Bialous, S.; Drope, J.; Lencucha, R. An Overview of the Policy and Market Landscape of Tobacco Production and Control in Mozambique. *Int. J. Environ. Res. Public Health* 2021, 18, 343. <https://doi.org/10.3390/ijerph18010343>
<https://www.mdpi.com/1660-4601/18/1/343>

The manufacturing industry has sectors of industrial activities, according to CAE-Rev2, one of which is the tobacco industry whose main products are processed tobacco and manufactured cigarettes. Due to the side effects of tobacco on human health, the tobacco industry, in the light of the instrument that guides industrial development (Industrial Policy and Strategy - PEI 2016-2025) is not indicated as a priority, and it benefits from the general measures to promote investment in the country.

The economic and social relevance of tobacco industries have a positive impact on the concessionary system of tobacco farming as they provide credit to farmers in the form of inputs for production (seed, fertilizer, pesticides and other production materials) and this creates welfare, income levels and livelihoods of households that directly or indirectly participate in tobacco production. Therefore, it is still a challenge for the Mozambique to shift tobacco production as a cash crop to other alternative cash crops, such as cotton, soybean, peanuts and sunflower.

There are more than 10,000 tobacco related deaths in Mozambique every year. The smoking prevalence among adults (15-64 years) is 12 percent and among teenagers (13-15years) is 5 percent. The main tobacco companies in the country are British American Tobacco, Mozambique Leaf Tobacco (local subsidiary of Universal Corp) and Emperor Tobacco Manufacturing which just started local production of cigarettes. In 2019, cigarette volumes were about 3.5 billion sticks.²

This is Mozambique's second report on implementation of the WHO FCTC Article 5.3. Mozambique has a total score of 64 same as last year's 64 points, which means there is no change or improvement.

This report uses a questionnaire developed by the Southeast Asia Tobacco Control based on Article 5.3 guidelines. The questionnaire uses a scoring system of 0 -5 where the lower the score the lower the interference from the tobacco industry.

² <https://www.researchandmarkets.com/reports/5189209/cigarettes-in-mozambique-2020>

Summary Findings

INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

The government does not accept, support or endorse policies or legislation drafted by or in collaboration with the tobacco industry neither it does not allow or invite the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. However, the 3-year Memorandum of Understanding the Ministry of Labour signed in 2018 with a tobacco industry funded NGO allows the group to participate in **revising the legal framework on child labour**.

INDUSTRY CSR ACTIVITIES

The tobacco industry has used strategies aimed at showing the decision makers that its industry promotes economic importance to the country by promoting tobacco farming and factory processing jobs. Mozambique as developing country is still at the certain extent, economic dependent on tobacco industry as the other alternative cash crops are still of long term. As the job opportunities are still scarce particularly to the youth and constraints in foreign earnings leaving the Country vulnerable to accepting Industry Corporate Social Responsibilities such as constructing schools, roads, etc.

The Ministry of Labour's MOU with the tobacco industry funded NGO, ECLT to address child labour is still valid but will end this year.

BENEFITS TO THE INDUSTRY

The tobacco industry benefits of incentives of 5% Corporate Tax and 10% of the total investment amount and there is no tax for tobacco export. It is worth mentioning that tobacco industry benefits from low wages paid to the workers/farmers involved in tobacco production as well as by cheap prices imposed to tobacco.

UNNECESSARY INTERACTION

During the last years, we can refer that unnecessary interaction are very scarce or we did not witness any single case of involvement of top decision makers such as President or Prime Minister in encounters with Tobacco Industry Owners. It is obvious, leaders at provincial level are reported as having contacts with tobacco industry staff particularly in events organized under Corporate Social Responsibility.

TRANSPARENCY

There is no procedure in place to guide public officials in the event they have to meet with tobacco industry in cases when such interactions are strictly necessary. This current status of Mozambique does not enable the country to have appropriate tobacco control legislation measures that is why there is high level of lack of transparency of tobacco industry in conducting its economic activities. Mozambique does not possess appropriate tools or enforcing measures to make the tobacco industry comply with its transparency requirements therefore it is undoubtedly that the level of tobacco interference will be so high as strategically Tobacco Industry uses the economic and social constraints to launch activities involving donations and funding based on Corporate Social Responsibility.

CONFLICT OF INTEREST

For the case of Mozambique, it is quite obvious, the lack of transparency contributes largely to conflict of interest. The level of conflict of interest is also high. There is controversy, in most of cases which occurs in the whereby the Tobacco Industry contribute for building a school or health facilities in this particular case, it is clear that the main objective of reducing the number of tobacco consumption will be diluted by this tobacco sponsorship. If in one hand tobacco industry refers that is contributing to access to education or to access to health on the other is promoting tobacco smokers in adolescents and youth contributing to tobacco addiction resulting as such to many diseases and deaths.

PREVENTIVE MEASURES

The government does not have a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives.

The tobacco industry is not required to submit information on tobacco production, manufacture, market share, marketing expenditures, revenues or any other activity, including lobbying, philanthropy and political contributions.

According to Decree No. 11/2007: The Regulation of Consumption and Marketing of Tobacco, "It is prohibited for the tobacco industry, and the competent government authorities, to disclose all the industry's expenses related to advertising, promotion and sponsorship."

Recommendations

Mozambique has ratified most recently the WHO FCTC which constitutes an important landmark for the country to launch a number of initiatives aimed at implementing successfully the FCTC provisions in the country. On the other hand, Mozambique's main objective is focused on eliminating extreme poverty, which unfortunately continues to affect large part of its population. That is why some strategic options are not the desired ones.

On the other hand, communicable diseases are on the top of Health Plan, allocating fewer resources to non-communicable diseases as in the cases of tobacco-related diseases control. Taking into account the current situation, the following recommendations are put forward:

1. Mozambique should as a matter of urgency, enact national TC Law, which incorporates WHO FCTC provisions, and adopt a National TC Plan aimed at the TC Act;
2. There is a need for provision of adequate resources for tobacco control programs;
3. Concerted efforts are needed among Government, Civil Society Organizations including NGOs and population at large to establish a common strategy with the aim of saving human lives;
4. Create necessary conditions for future generations to lead healthier more sustainable lives free from harms of tobacco use; and
5. There is also a need for more institutional implementation of education, communication, training and public awareness programs on tobacco use hazards to cover the most disadvantaged groups of population, particularly in rural areas.
6. With outbreak of Coronavirus 19 in 2020, the Tobacco Industry has a trend of reducing its production due to decline of number of smokers throughout the world, therefore this is a single opportunity to incentivize farmers to adopt alternative cash crops.
7. When the MOU with the ECLT to address child labour ends this year, the Ministry of Labour must not renew the MOU.

**2021 Tobacco Industry Interference Index
Results and Findings**

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ³ accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry ⁴ in setting or implementing public health policies in relation to tobacco control ⁵ (Rec 3.1)				3		
<p>The government does not accept, support or endorse policies or legislation drafted by or in collaboration with the tobacco industry neither it does not allow or invite the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy.</p> <p>The 3-year Memorandum of Understanding which the Ministry of Labour signed in June 2018 with the Elimination of Child Labour in Tobacco Growing (ECLT) Foundation, an NGO fully funded by the tobacco industry (see Q5), is still valid. This MOU has a provision that the ECLT also participates in revising the legal framework on child labour.</p>						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)			2			
<p>No. The government does not accept, support or endorse policies or legislation drafted by or in collaboration with the tobacco industry. However, it can be inferred that tobacco industry has influence in policy drafting because the government recognizes it has created thousands of seasonal job opportunities and support the smallholder farmers of tobacco which somehow contributes in employment policy and improvement of living conditions of farmers. According to tobacco industry⁶, through the trading of tobacco, smaller retailers pay taxes which contribute for the income for Government.</p>						
3. The government allows/invites the tobacco industry to sit in government interagency/		1				

³ The term "government" refers to any public official whether or not acting within the scope of authority as long as cloaked with such authority or holding out to another as having such authority

⁴ The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

⁵ "Offer of assistance" may include draft legislation, technical input, recommendations, oversees study tour

⁶ M Patricio V. Marquez, Konstantin Krasovsky & Tatiana Andreeva. Mozambique – Overview of Tobacco Use, Tobacco Control Legislation and Taxation, World Bank Group, Global Tobacco Control Program Country Brief

	0	1	2	3	4	5
multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8)						
No. The government does not allow or invite the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. Not Available.						
4. The government nominates or allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) ⁷ (Rec 4.9 & 8.3)		1				
The government does not nominate or allow any representatives from the tobacco industry (including state-owned) in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates.						
INDICATOR 2: Industry CSR activities						
5. A. The government agencies or its officials endorses, supports, forms partnerships with or participates in so-called CSR activities organized by the tobacco industry. (Rec 6.2)					4	
B. The government (its agencies and officials) receives contributions ⁸ (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec 6.4)						
<p>Honourable Mrs. Elina Judite Massengele, Governor of the Province of Niassa under strategic partnership with Mozambique Leaf Tobacco, inaugurated on 23rd October 2020 the Mepulage Primary School. In her statement the Governor refers that the inauguration of that school is placing Niassa in sustainable development route. The referred infra-structure will benefit 2,000 primary school students partly these students are children from tobacco farmers. This school was constructed by a Nico Construções Ltd. and costed an amount of 11,895,952.00 MT (Eleven millions, eight hundred thousand ninety and five, nine hundred fifty two Meticais) equivalent to US\$189,265.86.</p> <p>Under its Corporate Social Responsibility, Mozambique Leaf Tobacco will contribute in the construction of the main high way leading to various tobacco producing regions in the Administrative Post of Mualadzi, Chifunde district, Tete Province.</p>						

⁷ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

⁸ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

Through the subsidiary scheme, the Mozambique Leaf Tobacco Limited (MLT) implemented a Project entitled Kukula Project aimed at fighting the child labour, absenteeism and underachievement in primary schools through the preparation and distribution of free daily meals at schools.

More than 50 workers from Mozambique Leaf Tobacco received prevention material and equipment for Covid-19. According to news broadcasted by Radio Mozambique in Tete on 07th June 2020, besides the workers received other kits of face protection products and hand hygiene, under the scope of Covid-19 prevention.

In March 2019, Philip Morris International (PMI), of which tobacco industry is a subsidiary in Portugal, announced⁹ it will provide USD 400,000 to the Swiss Red Cross to support its humanitarian aid programme in Mozambique following the passage of Cyclone Idai. In the aftermath of one of the worst tropical cyclones on record to have affected Africa and the southern hemisphere as a whole, two million people have been affected, with thousands in urgent need of medical assistance, food, water and shelter.

The funds made available will also help to provide the means for people to make a living in the coming months, as the need will increase for those who have lost their properties and agricultural crops. "We are deeply saddened by the impact of Cyclone Idai," said Nicolas Denis, Vice President PMI LEAF. "The devastation is enormous and local communities are experiencing a very difficult time. Our thoughts are with all those affected. We are working with the Swiss Red Cross to contribute to humanitarian aid and support the country in its reconstruction."

PMI has no direct activity in Mozambique, but purchases an important volume of tobacco produced in the country.

PMI's tobacco supplier in Mozambique provides technical assistance to contracted farmers to implement sustainable agricultural practices and provides support in growing food crops such as maize, beans and groundnuts.

In addition to the above, the companies have supported the State in Social Responsibility Programs focused on the construction of schools, health centers, boreholes, community radios with TV, road and bridge repairs and programs on HIV / AIDS.

⁹ Philip Morris International. PMI supports relief efforts in Mozambique following cyclone Idai. 29 March 2019. <https://www.pmi.com/media-center/news/pmi-supports-relief-efforts-in-mozambique-after-cyclone-idai>



NO TO SMOKING AND NO SALES OF TOBACCO TO MINORS: CTA and BAT intensify their awareness campaigns for economic agents

The tobacco industry is conducting an awareness program educating the community in general and economic operators in particular, not to expose or sell tobacco products to under-18s, The Confederation of Economic Associations of Mozambique (CTA) is the official partner of Dialogue with Government, representing the private sector and works towards a better business environment in Mozambique, through the promotion of economic and regulatory reforms. British American Tobacco (BAT), is intensifying this awareness campaigns. On 20th August 2016¹⁰, activities were concentrated in the Malhampsene and Boane markets. These awareness campaigns are part of tobacco industry interference on government plans.

During the campaigns, stickers prohibiting the sale of tobacco products to minors are placed. CTA and BAT state that tobacco products should only be consumed by people over 18 years of age, aware of the risks associated with their decision. CTA, as a business association representing the interests of the private sector at national level, advocates the responsible conduct of commercial activities by its affiliates. This campaign is part of BAT's strategy to combat the sales of cigarettes to minors under 18 years of age, and aims to raise awareness among shopkeepers to avoid selling to minors. The strategy of the TI is to promote self-regulation and manipulate the government to believe it is not necessary to have a tobacco control law since the industry itself is taking care of the job.

In June 2018, the Ministry of Labour signed a 3-year Memorandum of Understanding (MoU) with the tobacco industry funded ECLT Foundation for US\$1.2million to address child labour and strengthen children's rights, particularly those in rural areas where tobacco is grown.¹¹ The MoU which

¹⁰ Confederation of Economic Associations in Mozambique (CTA), Memorandum of Understanding signed between CTA and BAT, 20th August 2016, 3-year Contract.

¹¹ <https://allafrica.com/stories/201806280081.html>

	0	1	2	3	4	5
is valid till 2021 is to focus on getting children out of child labour, community education and training, awareness and communication, institutional capacity building and revising legal frameworks. ¹²						
INDICATOR 3: Benefits to the Tobacco Industry						
6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)				3		
The Government does not accommodate requests from the Tobacco Industry for a longer time frame for implementation or postponement of tobacco control law. However currently tobacco control measures are not FCTC compliant – tobacco promotions and sponsorship (CSR activities) are not banned, there is no pictorial warning on cigarette packs and taxes are low keeping cigarettes cheap.						
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)					4	
In order to attract investments in Mozambique, through the Investment Law, the Tobacco Industry, depending on its localization, benefits of incentives of 5% Corporate Tax and 10% of the total investment amount and there is no tax for tobacco export.						
In August 2019, the President announced China will import 60,000 tons of tobacco produced in Mozambique by February 2020 and the need to boost production. This will make China the second largest importer and gives an endorsement for tobacco. ¹³						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ¹⁴) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)				3		

¹² <https://www.eclt.org/en/news-and-insights/natural-disasters-impact-on-child-labour>

¹³ Xinhua. China to import tobacco from Mozambique by 2020. 31 August 2019.

http://www.xinhuanet.com/english/2019-08/31/c_138352173.htm

¹⁴ Includes immediate members of the families of the high-level officials

	0	1	2	3	4	5
It is common that the presidential visits to the provinces and overseas, in most cases include the CTA (Confederation of Industry Association) in which tobacco industry is affiliated. So, in this kind of visits, the tobacco industry benefits from incentives given by the government to all industries. The current President refers in his speeches that farmers should increase the production of cash crops such as cotton, cashew nuts, sunflower, tobacco, etc. as the sale of these products (tobacco) would improve the livelihoods of local farmers. ^{15 16}						
9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)				3		
The Tobacco Industry in Mozambique collaborates with the Government in the Tobacco Anti-Smuggling Strategy. ¹⁷						
10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.	0					
There is no publicly available evidence related to the government entering into any new partnerships or non-binding agreements with the tobacco industry.						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)						5
There is no procedure in place to guide public officials in the event they have to meet with tobacco industry in cases when such interactions are strictly necessary.						

Commented [MA1]: If there is no procedure the score should be 5 – same as last year.

¹⁵ Xinhuanet.com. Mozambican President launches program to boost agriculture. 31 July 2020.

http://www.xinhuanet.com/english/2020-07/31/c_139252583.htm

¹⁶ Government expands cotton and cashew institutes. AllAfrica. 3 June 2020

<https://allafrica.com/stories/202006030614.html>

¹⁷ M Patricio V. Marquez, Konstantin Krasovsky & Tatiana Andreeva. Mozambique – Overview of Tobacco Use, Tobacco Control Legislation and Taxation, World Bank Group, Global Tobacco Control Program Country Brief

	0	1	2	3	4	5
12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)						5
There are no rules for the disclosure or registration of tobacco industry entities.						
INDICATOR 6: Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11)						5
There is no prohibition on contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions.						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0					
In Mozambique currently there is no information related to retired senior government Officials forming part of tobacco industry.						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)	0					
There is no record of current government officials holding any position in the tobacco business.						
INDICATOR 7: Preventive Measures						
16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)						5
The government does not have a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives.						
17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which						5

	0	1	2	3	4	5
they should comply in their dealings with the tobacco industry. (Rec 4.2)						
There is a Government Code of Conduct for Public Officials in general. However, there is nothing specific for implementation of Article 5.3.						
18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities. (5.2)						5
The Government does not require the tobacco industry to periodically submit information on tobacco production, manufacture, market share, etc.						
19. The government has a program / system/ plan to consistently ¹⁸ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
There is no plan/program to raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines.						
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)						5
The Government does not have a policy to disallow the acceptance of all forms of contributions/gifts including offers of assistance, policy drafts, or study visit invitations given to the government officials.						
TOTAL						64

¹⁸ For purposes of this question, "consistently" means: a. Each time the FCTC is discussed, 5.3 is explained. AND b. Whenever the opportunity arises such when the tobacco industry intervention is discovered or reported.

ANNEX A: SOURCES OF INFORMATION

I. TOBACCO INDUSTRY ACTIVITY

Tobacco Industry Information

Top 5 Transnational Tobacco Company	Market share
Mozambique Leaf Tobacco Company (Universal)	
British American Tobacco	
Emperor Tobacco	
Japanese Tobacco International	
Philip Morris International	

Commented [MA2]: Can you get the cigarette market share?

LOCAL TOBACCO COMPANIES

Top Local Tobacco Company	Market Share and Brands	Source
Mozambique Leaf Tobacco	1/3 = 4% of the agricultural products exported to overseas	KPMG Magazine Top 100 Companies
British American Tobacco	90% of market share in local market. Brands of cigarettes are as follow: Dunhill, Peter Stuyvesant, Pall Mall, GT and Safari.	Association of Industry, Commerce and Services
Emperor Tobacco		
Lobo Tobacco Industry Farm Lda.		
Escondidinho		

New Sources

Top 5 Newspaper/Dailies*	Type (Print/Online)
Noticias	Print and Online
Jornal Savana	Print and Online
Jornal o Pais	Print and Online
Jornal Zambeze	Print
Jornal Diario de Moçambique	Print

*Basis of Ranking: x Circulation x Popularity

HEALTH LAWS

1. There is no health law database
2. The primary source of the law listing to be searched:
Presidential decree 15-95 dated 29th December on National Health System (NHS)
3. Does the above sources include issuances? x **Yes** O No

ALL LAWS: There a centralized (all) law database.