

The Gathering Storm

How illegal tobacco plans to ride out the Covid-19 pandemic

Criminality is preparing to reap rewards in the economic aftermath that will follow Covid-19



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TO CONSUMERS ILLICIT TOBACCO IS A VICTIMLESS CRIME

"To be honest, I don't really give it a second thought. I just know that I can get a pack of 20 for £6 and that feels like a win to me"

UK illegal tobacco consumer, 2020

PREPARING FOR THE GATHERING STORM

By Ian Monteith, Global Anti Illicit Trade Director, JTI.

The current global pandemic is causing turmoil right across the world and is affecting all forms of society and commerce in hitherto unheard of ways.

Behind this backdrop of global social upheaval organised criminals are, even now, preparing ways to exploit public anxiety and enrich themselves further through the trade in illicit tobacco. Our research across the globe, in fifty countries, has indicated that whilst restrictions imposed on populations by the pandemic may have hindered some aspects of illicit tobacco production and supply, it has far from halted it in its tracks.

It's now of increasing concern how these organised criminal groups will seek to further exploit public demand for cheap goods and capitalise on dwindling consumer confidence and buying power in the inevitable global recession that lies ahead of us. From experience, we know that any decline in affordability fuels the trade in illicit or counterfeit products, particularly where this may run in parallel to tax increases imposed in order to restore public finances.

Nowhere is this truer than when it comes to the trade in illegal tobacco.

The trade in illegal tobacco is underpinned by criminals who want to make money and consumers who are looking to save money. The current pandemic crisis creates conditions that are set to form a 'perfect storm' that will find some consumers inadvertently, and others willingly, consuming greater amounts of illegal tobacco product.



To deliver such change will require international LEA, government and industry co-operation. It will also necessitate governments and the legitimate trade working together to inform the public at an international and national level.

We at JTI will strive in partnership with Law Enforcement and Border Agencies to deliver the intelligence and support needed to help identify and seize illegal tobacco.

Ian Monteith

Global AIT Director

Corporate & Fiscal Affairs

JT International

Consumers continue to believe that the purchase and consumption of illicit tobacco is largely a victimless crime. To halt the spread of illicit product we need to inform the public not just about the hidden dangers of the products they are consuming but the wider social consequences of what they are buying.

The pandemic has already shown that given the right information and communication about the dangers of certain behaviours the public can change their actions when they see that it will make a difference.

AN EVER PRESENT CONCERN

Why we need to discuss illegal tobacco

Illegal tobacco is a problem that won't go away without intervention

The trade in illicit tobacco, as with many illegal products, is not going to go away easily. Whilst there are many reasons for this, its roots stem from consumers continuing to view the purchase or consumption of 'cheap' cigarettes as a largely victimless crime.

Which, it is not.

According to the World Bank, the global trade in illicit tobacco is reportedly worth an estimated \$40-50Bn each year to the criminal groups who produce, manufacture, smuggle, distribute and sell tobacco products on which there is no tax duty paid, nor any control over quality. Despite the vast profits generated from international tobacco crime there is relatively little risk of detection or punishment for the perpetrators, so unlike drug smuggling or people trafficking there's little deterrent to deflect from the appeal of the illegal tobacco trade.

The seditious effects of tobacco crime is undermining the controlled and legal market for cigarettes, depriving governments of \$Billions worth of tax income and introducing poorer quality tobacco products into the market. At its apex, the trade in illegal tobacco fuels the worst that society has to offer through its funding of criminal lifestyles.

Counteracting consumer perceptions of illicit tobacco as a victimless crime must become a priority if the struggle to eliminate illegal tobacco is to be won.

So, at the height of the current pandemic it is important to us, at JTI, to take stock of what impact the coronavirus crisis is having on the illegal tobacco trade and to explore what the effects of changed societal behaviour, new border controls, altered LEA (Law enforcement Authorities) priorities and lockdown restrictions may be having on criminal activity.

In this report we draw on the most recent and up-to-date intelligence available to us on the activities of organised crime and their reactions to Covid-19 from intelligence sources across 50 countries.

We also reference the activities of Governments and LEAs to examine what impact their policies are having on the ability of Organised Criminal Groups (OCGs) to operate.

Four key trends about the illicit trade have emerged during the pandemic lockdown

JTI's intelligence reporting has allowed us to construct a picture of how Covid-19 has affected the ability of OCGs to operate in the illicit tobacco market, what impact it's had on their modus operandi and, as a consequence, what lessons we can learn to combat their activities going forward.

1. There's little evidence that organised crime is 'fazed' by the pandemic: To the contrary, the evidence suggests that rather than running 'scared' into other forms of illicit trade, criminal groups are prepared to 'wait and see'

2. The production and supply of illegal product has been blunted rather than extinguished: Whilst some decrease in supply and production has been evident in more strictly controlled economies during Covid-19, Western markets in particular have seen relatively little reduction in the production and availability of illegal product despite initially finding it difficult to source technicians and skilled workers to work on illegal production.

3. Changed law enforcement priorities and border restrictions have been variable in limiting supply and the availability of illegal product: Whilst Governments and authorities in the Far East have been quicker to impose restrictions, those in the West particularly have failed to act with such precision. This has enabled criminal groups in these areas to make more effective contingencies.

4. The resourcefulness of criminals is such that the flow of illegal product is still manageable even when traditional sales outlets are put out of action. Technology has been increasingly deployed throughout the pandemic to enable sales of illicit product to continue, with WhatsApp and Facebook providing quick and easy methods of communication between the consumer and provider. This is a trend that's likely to persist.

**TRADE IN ILLICIT
CONTINUES IN COVID-19**



The challenges of supply

SMUGGLING MAY HAVE BECOME HARDER BUT IT HASN'T EVAPORATED DURING COVID-19

Smuggling has become harder, but it hasn't evaporated

.....



"I think the guys who normally I get my cigarettes from have found it a bit more tricky. There hasn't been as much as usual"

The challenges of supply

Getting the product to market, as opposed to producing it has, on balance, presented criminals with more of a problem.

Various changes in global border controls simultaneously stemmed some of the flow of people and product but it also created opportunities in other markets.

Increased policing in MENEAT* markets has meant more, not less, problems for OCGs trying to move people and product around, with LEAs reportedly more active in searches and making more seizures as a result. This lies in direct contrast to many other markets and territories where the situation has something of a status quo feel about it.

The movement of technicians and illegal product across the European Union hasn't been wholly unaffected by recent events with some reports of OCGs finding it difficult to transport goods and people within the EU.

But, whilst there have been problems for organised crime in its tobacco related activities there seem to be few, deep cutting, effects that have resulted in the complete shutdown of production, movement or supply.

For this we only have to look at the frequently chaotic ways in which governments have implemented restrictions in relation to Covid-19. Globally, there have been inconsistencies in how borders have been policed, closed to travellers and how goods and retail services have been shut down.

It's perhaps unsurprising to find that the biggest negative impact on criminal activity has occurred in the Far and Middle East markets where authorities, clearly learning the lessons of SARS and Asian Bird flu a decade ago, took drastic and immediate preventative action to restrict the movement of goods and services early on in the pandemic: 'those who've seen a panther before run faster'

As a result, it's here that we are seeing greater success in curtailing the illicit trade. Conversely, Western governments, who were mostly slow to respond to the emerging pandemic threat, gave OCGs more time to prepare for potential lockdown and plan how to work around the forthcoming restrictions

"It's been a bit more difficult to get hold of my usual supply, but there's always been an alternative"

* Middle East, Near East, Africa, Turkey



The challenges of enforcement

Changing priorities have different impacts globally

..... **Enforcement**

Changing priorities has allowed illegal activity to continue in the West whereas tighter sanctions in the Far East have been more effective in controlling the illicit trade

Altered states

The disparity in an effective response, at a governmental level, to Covid-19 between Middle Eastern and Asian markets and those in the West is also reflected in the way in which LEAs have been able to combat the trade in illegal tobacco.

Whereas markets in the Middle and Far East have, to a greater degree, intensified border checks and acted to collaborate more closely on border issues, Western and Eastern European markets have largely continued as normal or even re-prioritised away from illicit tobacco activities.

This is not necessarily a fault of LEAs themselves many of whom will have come under increasing pressure as a result of manpower shortages caused by the pandemic itself together with a refocusing of efforts to help police lockdown restrictions more widely in the population.

There are also cultural reasons that further explain the generally greater effectiveness of LEA activity in the Middle and Far East where local populations are typically more compliant and obedient to government and policing dictates in the wake of national crises. This explains why, regardless of production capabilities, OCGs have found it more difficult in these markets to sell their product as their customers rigidly adhere to Covid-19 regulations laid down by their relevant authorities.

This also means that with reduced policing at an overall level, thanks to a more compliant public, authorities here are often more able to pick and choose their targets for surveillance and conduct operations by working on specific intelligence about criminal activity as opposed to relying on random searches.

In the West, enforcement of the illicit trade seems to have changed little from before the pandemic struck. Whilst there's been some shift in priorities focussing away from illicit tobacco in Western Europe, the overall picture is more that of 'business as usual' with little direct government intervention or enhanced methods to curtail illegal tobacco threats.

It should be noted however, that Western Europe LEAs have had considerable success in tackling the illegal tobacco trade. There has been several very significant seizures in various WE countries since early April 2020 including seizures of illegal factories or their components in Czech Republic, Greece, Ireland, Belgium and Spain.

However, OCGs throughout Europe, in particular, have remained able to adapt to the restrictions imposed as a result of Covid-19.

"I don't think anyone really cares about you buying dodgy cigarettes do they? I don't see or hear anything about doing it"



The resourceful criminal

Where there's a will, there's a way

Criminal activity Finding workarounds

**WHERE THERE'S A
WILL, THERE'S A
WAY**

Despite the pandemic criminals are still operating, producing and selling illegal tobacco products if not at will, with some significant degree of confidence.

O*ur investigations across the world reveal that those involved in the illicit tobacco trade believe the end of the pandemic will bring them potentially greater rewards as economies and living standards suffer in the wake of the forthcoming economic meltdown.*

Already, markets across Eastern Europe, APAC and MENEAT have reported an upsurge in some of the prices of illicit tobacco as the human toll of the pandemic takes effect.

Prices are likely to be rising on the back of three factors

- 1. An inevitable reduction in availability of cheap or illegal tobacco**
- 2. Higher demand for tobacco generally during times of anxiety and stress which is likely to be a driver of increased consumption**
- 3. A decline in consumers' individual disposable incomes which is inevitably placing huge pressure on personal household budgets**

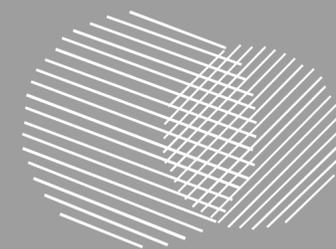
With these three elements driving demand we have a gathering storm looming for those criminals wanting to take advantage of the impact of Covid-19. It is therefore, unsurprising that we are seeing innovation in the illicit tobacco trade as OCGs find ways to beat the lockdown restrictions

Criminals are nothing if not resourceful.

We have heard reports of OCGs recruiting essential workers to deliver to their customers, of others obtaining funeral licences so they can drive and drop off from the back of the hearse, or hiding illicit tobacco under PPE and medical supplies to escape detection. However the largest transformation has been in the use of technology to help overcome their inability to sell face-to-face via traditional outlets and channels. Consequently, there has been a significant rise in the reported online sales of illegal tobacco in markets across Eastern and Central Asia and the middle and Far East where face-to-face sales have been more conventional for illicit transactions.

This has not been the case in Western Europe perhaps due to the already significant use of the internet for illegal sourcing by consumers. If anything, Western Markets have seen some evidence of increased pick-ups and home deliveries notably in Spain and the United Kingdom, and in the UK there's also reporting of legitimate 'high street' retailers stocking illegal tobacco.

"I've been smoking more than usual during lockdown so yeah the price I pay is important"



SOCIAL MEDIA AND MOBILE APPS ARE AIDING CRIMINAL ENDEAVOUR

Yet, it's perhaps the universal availability and access to Facebook and specifically WhatsApp applications that's continued to allow criminals to maintain contact with customers and arrange covert delivery of their product. This is most evident in countries in the MENEAT region where face-to-face transactions will have proved most problematic. Here, there is a significant uplift in reports of online communities and mobile apps being used to help keep the flow of product to the end user

Though far from being widespread, this is an interesting observation that may come to be a foretelling of the behaviour we should expect once the end of lockdown becomes a reality and retailers are faced with difficult choices about how to attract custom and return their revenues to former levels.



Little evidence of wholesale diversification

Though some movement into other forms of illegal activity are an inevitable side affect of Covid-19



However, where there is diversification into other areas by illicit it's more likely to be witnessed in the MENEAT region and to a lesser extent in parts of Eastern Europe/CIS markets where criminal gangs are seeking to exploit the Covid-19 situation by producing, selling or distributing fake or counterfeit PPE equipment. Yet, such diversification remains at the margins of wider criminal activity.

The opportunity presented by Covid-19 for OCGs to exploit demand for PPE, medical equipment and other goods has not gone un-noticed. But, it's not been a main focus for most

Instead of moving from illegal tobacco to other forms of criminality that, if caught, result in far stronger penalties and longer terms of imprisonment, our market intelligence suggests that many criminal gangs are prepared to bide their time and wait to see what the eventual relaxation of lockdown rules will bring.

There is little advantage for them to venture into other serious crime, including people trafficking, for financial gain just yet.





Tick Tock

**The economic time bomb under
our feet**

TO BENEFIT CRIMINALITY ECONOMIC DOWNTURN STANDS

Covid-19 is a global crisis. It is affecting, and will continue to affect, countries and economies across the globe differently.

According to the United Nations “The Covid-19 pandemic is far more than a health crisis: it is affecting societies and economies at their core. While the impact of the pandemic will vary from country to country, it will most likely increase poverty and inequalities at a global scale”.

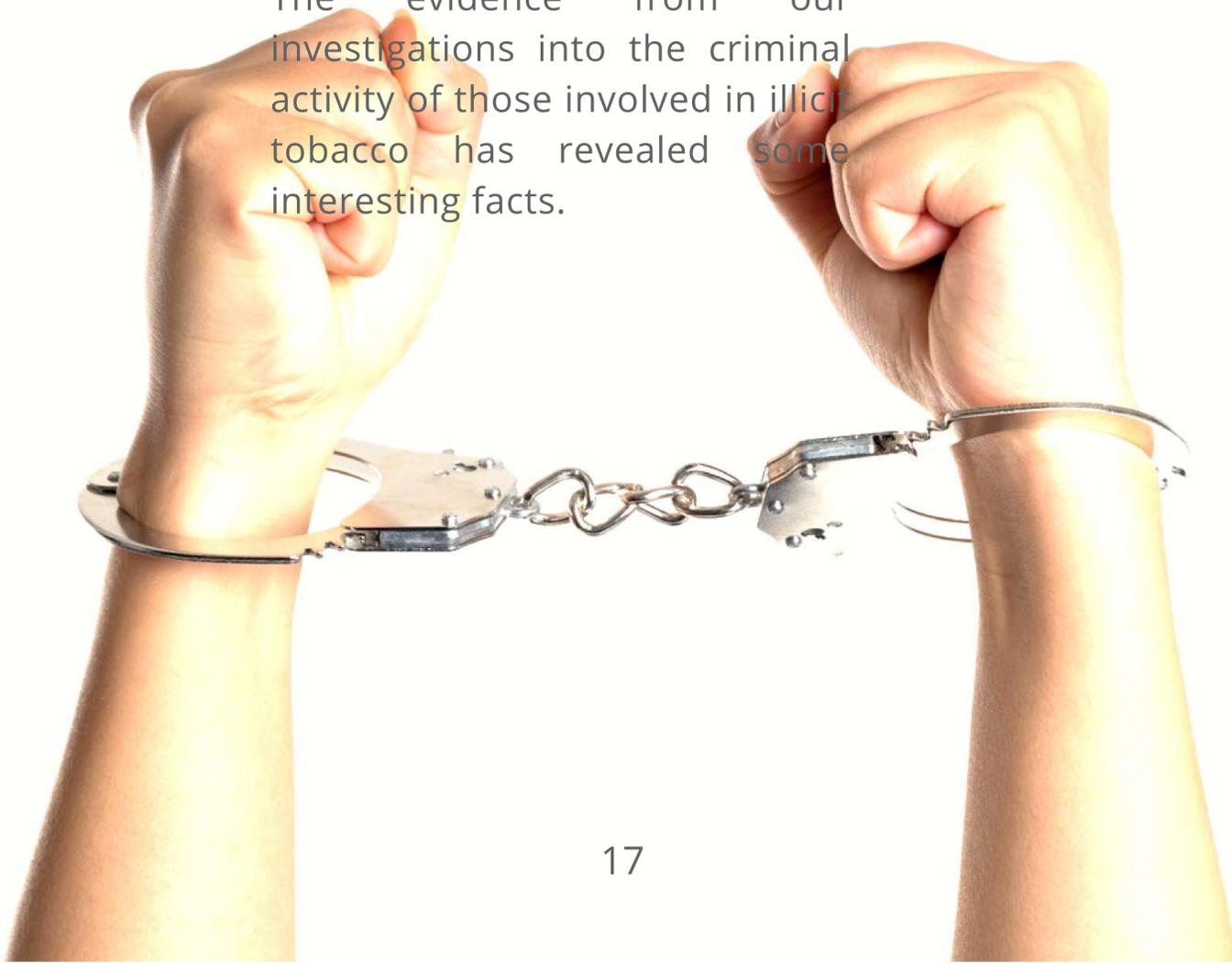
And, with the World Bank predicting a global contraction in GDP by 5.2% in 2020 and developed economies likely to shrink by up to 7%, we are headed for the worst global recession in over 100 years. This represents not just a challenge for governments and legitimate businesses but an opportunity which criminal gangs involved in illicit tobacco see ripe for further exploitation.

The evidence from our investigations into the criminal activity of those involved in illicit tobacco has revealed some interesting facts.

Yet, beyond physical restrictions lies a more pervasive truth. It’s that the criminals have time on their side.

With price increases for some illegal tobacco already on the move the danger is that organised criminals are merely waiting for the right moment to capitalise on what looks like an increasingly desperate economic situation.

Our investigations point to the fact that many groups are content to continue production of illegal product even with current restrictions in place as they sense greater opportunities as global economies move into meltdown



With less disposable income consumers are susceptible to the lure of illegal products



Despite Governments' attempts to shore up their economies through radical fiscal policies, the forecast is that globally unemployment will rise significantly and individual incomes will decline. This is a perfect feeding ground for those criminals seeking to take advantage of smokers who will be faced with less money and spending power on tobacco should Governments seek to redress their Covid-19 expenditure losses through increased duties on goods and services.

In this event we should expect that the stockpiles of illicit tobacco that have slowly been building over the past three months will be slowly re-introduced into the markets at increased prices, thereby continuing to make even greater profits for crime groups at the expense of legitimate business and public finances.

Consumer confidence is already under strain in a number of markets.

"Honestly, the last three months have been pretty worrying financially speaking. What the future holds who knows. But, we'll need to look at where we save money"



Taking back control

**How we can combat the illegal
trade in tobacco**

"Tobacco is so heavily taxed it seems unfair. I mean it's not an illegal product is it? To be honest, the more they keep putting the prices up, the more grateful I am knowing that I can get them more cheaply"



Ultimately, eradicating the illegal tobacco trade can only be achieved by reducing the source of demand.

With no consumer demand, the impetus and profit in supplying illicit product just doesn't exist.

This, however, is easier said, than done. As a society, we can take steps to reduce the impact of illegal tobacco by working together. This means both stepping up enforcement at borders, improving intelligence sharing between the tobacco industry and LEAs whilst simultaneously, exploring fiscal measures that will allow consumer confidence to grow and avoid the temptation to spend on illicit products.

Strong enforcement aligned with robust deterrents are the essential preventative ingredients to combat the illegal trade.

Co-operation between LEAs is also needed at both an international and national level along with a desire to increase the fines and punishments administered to those caught producing, distributing and selling illegal tobacco products.

At the same time we need to do more to inform consumers through co-ordinated global campaigns to increase awareness about the dangers of illicit tobacco and the consequences that arise through its trade.

No single measure on its own will be enough. But, through co-ordinated efforts we can begin to stem the tide and lighten the effects of the impending storm.

TAKING BACK CONTROL



Appendices:
Regional perspectives

WESTERN EUROPE

Living with the effects of indecisiveness

Across Western Europe the overall picture is one of relative stability for those involved in illegal tobacco. The impact of Covid has not been particularly damaging to those involved in the illicit production and supply of tobacco, with OCGs having the time they needed to adapt to the new normal.

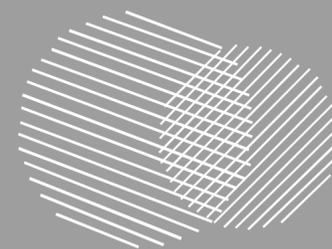
Though there's mention of it being harder for customers to buy illicit tobacco due to lockdown, selling online continued and with more home deliveries being made the illegal tobacco market seems relatively intact.

There have been some shifts in LEA priorities with the focus for some moving away from illicit tobacco. The overall picture is more that of 'business as usual' with little direct Government intervention or enhanced methods to curtail illegal tobacco threats.

In addition there's a reduction in physical presence within law enforcement due to a combination of working practices requiring the compliance with social distancing regulations and staff having to stay home to quarantine.



Yet the reduction in LEA presence has not led to a free pass for OCGs, with some significant success for LEAs since early April 2020; including seizures of illegal factories or their components in Czech Republic, Greece, Ireland, Belgium and Spain.



WESTERN EUROPE: CONSUMERS UNDER GREATER FINANCIAL PRESSURE

The financial impact that Covid has already had on populations across Europe will no doubt become the criminal gangs strongest card.

Over a third of European reports explicitly state that they expect the demand for illicit tobacco to increase and that the illegal trade of tobacco products will benefit directly from people experiencing financial hardship in the form of reduced incomes.

Given that the return to widespread economic growth is expected to be a long road then the opportunity for OCGs to exploit this dynamic is ripe.

EASTERN EUROPE

Hiding in plain sight made more difficult for OCGs

The experience of Eastern European countries varies considerably from Bosnia which reported no impact on OCG supply chain and production capabilities, to Moldova where OCGs saw decreases in production and a shortage of materials impacting on their business.

In a sign of how fluid the situation has become, some Eastern European markets were reporting an increase in smuggling into their respective territories and seeing an increase in drones and donkeys etc. being used to move across borders. In contrast to Western Europe, half of the Eastern European markets reported a reduction in smuggling due to the tightened restrictions on movements of goods and people.

Rather than cross border smuggling, it seems that where lockdown and movement restrictions are really making business tougher for OCGs is within the country. With road traffic massively reduced and certain traffic controls in place the ability to hide within plain sight has been severely compromised.



It's probably no surprise therefore that there's evidence of some OCGs diverting their attention to other sales channels to ensure that they continue to distribute illegal product with minimal disruption.

A rise in online and social media channels is increasingly prevalent in terms of sales distribution. There's a real expectation that the illegal tobacco trade in Eastern Europe will continue to grow post Covid as the economic crisis bites.

ASIA

Immediate action can yield results

Covid-19 and the associated lockdown that followed, has had a sizeable impact on many facets of OCGs means of conducting their illicit affairs.

In general terms, Governments throughout the Asia Pacific region reacted swiftly and decisively to stem the spread of the virus by imposing strict lockdown measures. Their actions severely limited the freedom of movement for people and goods both within their own jurisdictions as well as in cross-border terms. This, in turn, has had an immediate effect on OCGs ability to maintain their pre-Covid levels and means of supply, production and distribution.

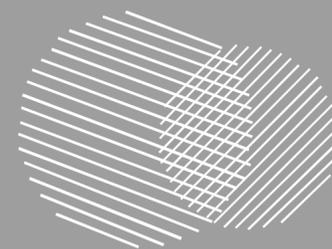
For the vast majority of Asia Pacific markets not only did production decrease but smuggling into the market also became a lot harder to execute and, as a result, reduced.

This makes a great deal of sense when we consider how many Governments across the region have adopted policies to closely monitor the import of goods as well as completely stopping the flow of people into, and out of, the country.



To counter the physical restrictions at border points, as well as the difficulties that strict in-country road controls have led to, OCGs within half the Asian Pacific markets studied have looked to online as a selling channel. Consequently, there has also been a noted rise in social media groups being set up to promote illicit goods for sale.

CULTURALLY PEOPLE IN ASIA WILL TYPICALLY COMPLY WITH LOCKDOWN RESTRICTIONS MAKING IT HARDER FOR OCGS TO OPERATE UN-NOTICED



ASIA: PRICES FOR ILLICIT ANTICIPATED TO INCREASE

There is a suggestion that customer demand for illegal tobacco has taken a slight downturn across the region during this period. However, that is offset by an anticipation of increased demand as the economic fallout from Covid takes an even greater hold. Information from some markets here suggests that prices of illegal tobacco will increase in response to this increased consumer demand.

The potential increase in profit margin to be had from higher demand and prices may well be responsible for reports indicating that non-nationals are looking to move into markets to conduct trade and sales. Consequently, some concerns are being voiced that this may lead to rival OCGs fighting to establish control over lucrative territories within the region.

MENEAT

A mixed picture all ways around

When looked at in the round, the MENEAT region suggests that OCG activity, from supply, to smuggling, to sales is all being compromised due largely to the strict movement limitations put in place by Governments.

However, given the vast geography this region covers, the different styles of governments, LEA capabilities and the respective populations cultural behaviours, there are difference at a country level. There's been a noticeable reduction of smuggling, production and supply chain capacity during the pandemic, mainly concentrated in the Middle East, rather than Africa, where illicit activity has continued and even grown.

Indeed, three times as many African countries report that smuggling has continued unabated. This increase in Africa is no doubt related to reports that borders have become more porous through a combination of LEAs being drawn away from combatting illicit smuggling activity as well as from a natural decline of resource due to staff quarantine measures. The ban on tobacco sales in South Africa is also fuelling and incentivising smugglers who have taken advantage of the porous borders.

It's also evident that in-country road controls across MENEAT are making it harder to move both stock and people, including getting street vendors into position to make face to face sales with customers.

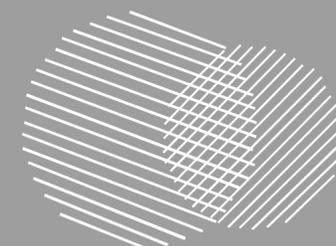


In response, OCGs in the region have started creating fake essential worker permits and trying to smuggle goods under the cover of PPE/medical equipment. There's evidence here that points towards OCGs diversifying into the supply of PPE and medicine throughout the region.

OCGs in the region have also taken to the digital space to conduct business. Around a third of our intelligence reports reveal that online sales have increased during the pandemic. Social media platforms are also becoming increasingly prevalent as a means to connect with end consumers, especially in the Middle East where a continued rise of social media as a sales channel is predicted.

Feedback from across the region is that overall demand for illegal product is expected to rise and that prices for illegal tobacco will rise in line with this trend.

A REGION THAT'S MORE LIKELY TO DIVERSIFY INTO OTHER ILLEGAL ACTIVITY TO TAKE ADVANTAGE OF THE PANDEMIC



MENEAT: USING SOCIAL AND TECHNOLOGY TO DISTRIBUTE ILLEGAL TOBACCO

Beyond looking for ways to circumvent the movement controls and diversifying their offerings, OCGs in the region have taken to the digital space to conduct business. Around a third of intelligence in the region reveals that online sales have increased during the pandemic whilst social media platforms are becoming increasingly prevalent as a means of doing business in illicit tobacco sales.

Although there's no great mention of the economic impact of Covid with regard to existing and future demand for illegal tobacco, feedback from within the region strongly indicates that demand will rise with a parallel expectation that prices for illicit will also increase in line with this demand. This view appears to be uniform across MENEAT without significant bias to one particular area or another

AMERICAS

OCGs are under pressure

In the short term OCGs have certainly seen the restrictions that Covid brought impact on their operations quite significantly, with a reduction in the supply of illicit goods and smuggling activities. Both of which are largely attributable to Government restrictions, as well as increased vigilance and activity of LEAs at border points and internal road checkpoints.

Restrictions on movement and business have significantly disrupted the production and retail sale of illegal tobacco in Canada, with key manufacturing and selling on native reserves shut down and closed to non-residents. The illegal importation of key inputs has been severely curtailed due to the closing of the border between Canada and the United States. Based on this lack of availability of contraband tobacco products, consumers have turned to the legal market.

The result of this downturn is being felt at the end of the chain where although customer demand is high it has become a lot harder for consumers to get their hands on illicit tobacco through their usual means.



Whilst there are no explicit references in the reports from this region indicating OCGs shifting to online channels there is a suggestion in Canada that legitimate retail stores will look to stock illicit tobacco products in order to service customers who will become increasingly led by price as their personal financial circumstances come under pressure.

As elsewhere, there are pointers towards OCGs using this lockdown period to stockpile tobacco and warehouse it until such time as restrictions are loosened and the threat posed by LEAs is lessened.

Methodology

This study is based on the findings of 63 field reports submitted by JT International resources across 50 separate international territories during April and May 2020.

The results of the initial market assessments were scrutinised by JTI's Anti-Illicit Trade Organisation before being coded, analysed and reported on by Intrinsic Insight Ltd, an independent market research consultancy based in London, United Kingdom.



COUNTRY GLOSSARY

WESTERN EUROPE

UK, Ireland, Spain & Greece

EASTERN EUROPE

Russia, Ukraine, Serbia, Romania, Moldova, Croatia and Bosnia

MENEAT

Jordan, Iraq, Egypt, UAE, KSA, Oman, Qatar, Kuwait, Bahrain, Pakistan, Lebanon, Morocco, South Africa, Nigeria, Malawi, Zimbabwe, Tanzania, Cyprus, Mozambique, Kenya, Ivory Coast

AMERICAS

Dominican Republic, Panama, Canada

ASIA

Malaysia, Taiwan, Singapore, Bangladesh, Thailand, Myanmar, Australia, China, Indonesia, Cambodia, Vietnam, Philippines, Laos, India



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