

Tobacco Industry Corporate Social Responsibility (CSR), Extended Producer Responsibility (EPR) and Environmental, Social & Governance (ESG) Activities in Digital Media

This document is an excerpt from the forthcoming paper “Implementation of WHO FCTC Article 13 in Digital Media in Light of the New Tobacco Industry”

Background

CSR and ESG

Corporate Social Responsibility (CSR) and Environmental, Social & Governance (ESG) activities are now central to modern business strategies.[1] CSR initiatives aim to reflect corporate values and enhance reputation through environmental, philanthropic, ethical, and governance efforts. [2] ESG investing evaluates companies based on their environmental impact, social practices, and governance structures. [3]

CSR and EPR

Environmental CSR has evolved into environmental stewardship, emphasizing producer responsibility, especially through Extended Producer Responsibility (EPR) schemes that require businesses to manage the entire lifecycle[i] of their products.[4]

Tobacco EPR is now recognized in 27 EU member states under the EU Single-Use Plastics Directive (SUPD). And this has raised concerns as it allows the tobacco industry to engage in waste management, policy development, and brand itself as a responsible corporate entity.[5]

i. Link Between ESG and Extended Producer Responsibility (EPR)

BOX I

Examples of tobacco industry's "so-called" responsible activities that are widely promoted through digital media:

Concept	Initiative	Examples	Digital Media Strategy and Platforms Used
EPR	Recycling Initiatives	PMI's educational recycling videos,[6] JTI's website features and compliance updates about butt collection programs (JTI),[7] BAT's interactive maps for disposal locations[8]	Company websites, interactive tools, and social media campaigns on recycling and responsible waste management.[9],[10]
ESG	Sustainability and Governance	PMI's sustainability reports promoting IQOS,[11] JTI's community health programs,[12] BAT's environmental programs and ESG efforts (BAT).[13]	Digital reports, online press releases, social media updates, and investor relations sections on company websites.[14],[15]

CSR, ESG, and EPR Promotion in Digital Media

Alongside the growth of Tobacco Advertising, Promotion, and Sponsorship (TAPS) in digital media, the tobacco industry has also adapted by marketing itself with "socially responsible" claims through socially responsible activities including ESG, and EPR activities.

The leading tobacco transnationals have exploited digital platforms to promote environmental programs, such as Philip Morris International's (PMI) "Our World Is Not an Ashtray" campaign,[16] Japan Tobacco International's (JTI) butt collection programs[17], and British American Tobacco's (BAT) tree planting initiatives.[18] These 'so-called' socially responsible activities are often promoted by third parties likely funded by the tobacco industry.

Tobacco CSR and E-Cigarette Marketing

Tobacco transnationals like PMI have used digital platforms to mislead the public on the use/ safety/ value of e-cigarettes and Electronic Nicotine Delivery Systems (ENDS) under socially responsible banners. They created campaigns such as Unsmoke[19] and established the Global Action to End Smoking (GAES), formerly Foundation for a Smoke-Free World, to hold webinars and produce reports websites in favor of the new business.[20] Press releases that highlight contributions to wellness industries such as Vectura,[21] Medicago[22] (PMI), KBio (BAT)[23], and employee welfare, which are integral to their ESG reports, [24] are meant to bolster their credibility in the wellness field, and this tends to improve their ability to market addictive recreational products as safe.

These 'so-called' socially responsible activities are further publicized through tobacco ESG reports, global conferences (fig.1), news releases, social media accounts of individuals allied with the tobacco industry (fig.2), amongst other channels.

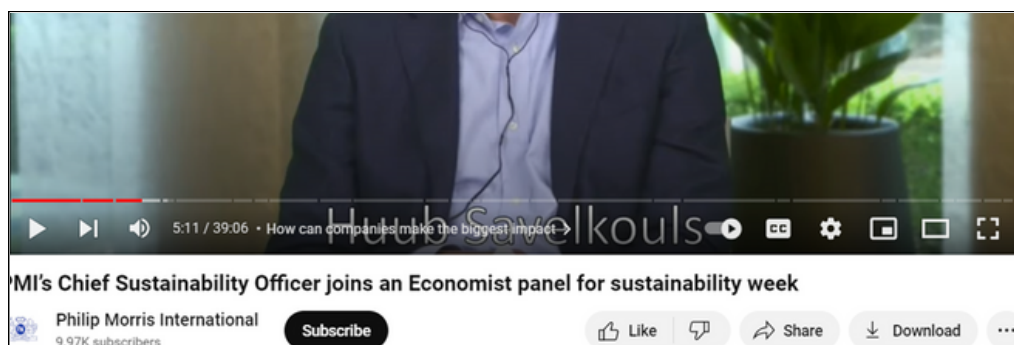


Fig.1 Philip Morris International's Chief Sustainability Officer, Huub Savelkouls, joined Thomas Fekete, Aris Vrettos, Rachel McGinley and Jan Piotrowski in an Economist Events webinar focused on Sustainability. Video uploaded on PMI's YT channel reaching **9.97k subscribers**.

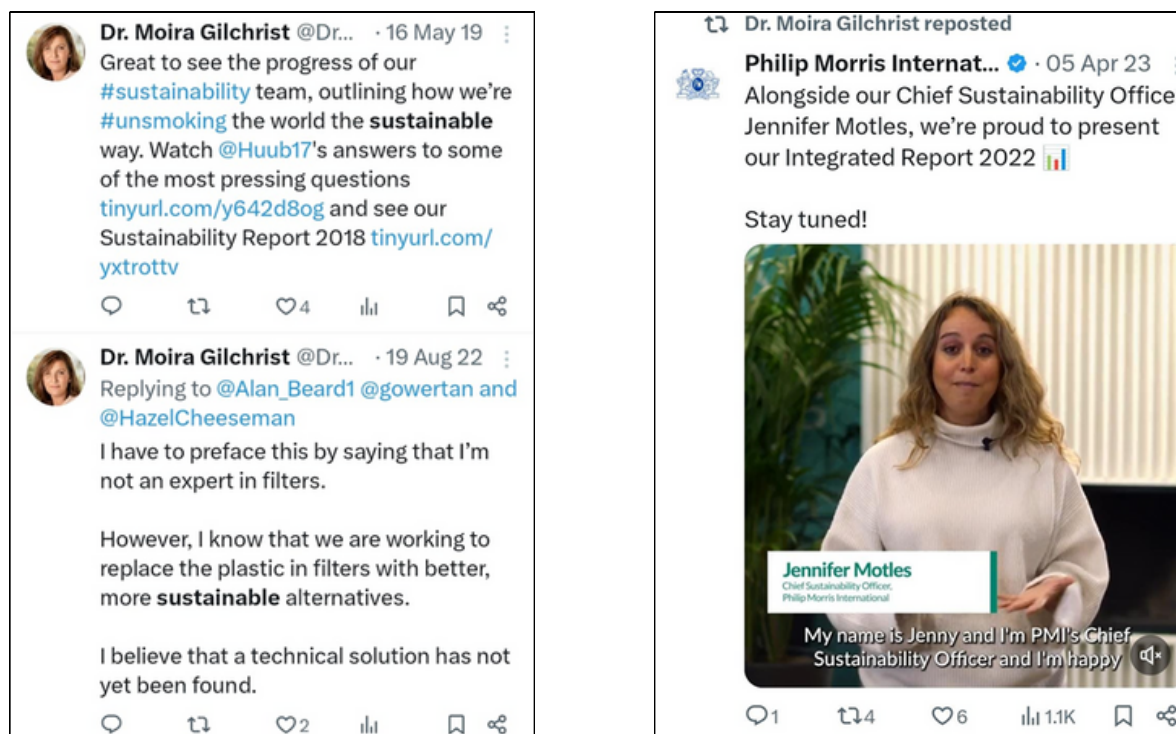


Fig.2 Two posts from the official X account of Dr. Moira Gilchrist, Chief Communications Officer at PMI reaching to **3,776 followers** and **1100 viewers**, respectively.

WHO FCTC Guidelines on Article 13: Tobacco Advertising, Promotion, and Sponsorship (TAPS)

The WHO FCTC Article 13 Guidelines recommend enforcing a comprehensive ban on all tobacco advertising, promotion, and sponsorship, including activities labeled as "socially responsible," covering both direct and indirect methods across all media platforms. These activities, intended to improve the public image of the tobacco industry, are seen as indirect promotion of tobacco use and are, therefore, prohibited.

Both the Ninth and Tenth Session of the Conference of the Parties (COP9 and I0) to the World Health Organization Framework Convention on Tobacco Control (WHO FCTC) have noted with concern on the ESG and EPR trends of the tobacco industry.

In February 2024, COP10 provided further guidance on implementing Art 13 in the world of digital media (Supplemental Guidelines to WHO FCTC Article 13 “Specific guidelines to address cross-border tobacco advertising, promotion and sponsorship and the depiction of tobacco in entertainment media for implementation of Article 13 (Tobacco advertising, promotion and sponsorship) of the WHO FCTC” [FCTC/COP10\(23\)](#)). In a separate decision, it also urged “Parties to counter the so-called corporate social responsibility activities of the tobacco industry, and to ensure that WHO FCTC objectives are not undermined through the industry’s implementation of extended producer responsibility systems;...” (“Implementation of Article 18 of the WHO FCTC” [FCTC/COP10\(14\)](#)).

Recommended Action Against Tobacco Industry’s ‘Socially Responsible’ Activities

Comprehensive advertising bans must be updated to counter the evolving trends in tobacco industry sponsorships disguised as CSR. According to the World Health Organization (WHO) Report on the Global Tobacco Epidemic, 2023,[25] though some countries may have stringent protections against tobacco advertising, many still need to strengthen their bans on tobacco sponsorships.

Among others, comprehensive sponsorship ban should include all forms of contributions, whether direct or indirect, regardless of their intent. This approach ensures a robust defense against the tobacco industry's attempts to use CSR as a marketing tool to attract a new generation into addiction.

Acknowledgements and Authorship

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GGTC empowers change-makers with cutting-edge strategies and tools to ensure that the health of millions around the world would not suffer at the hands of the tobacco industry.



References

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"Extended Producer Responsibility is an environmental protection strategy to reach an environmental objective of a decreased total environmental impact from a product, by making the manufacturer of the product responsible for the entire life-cycle of the product and especially for the take-back, recycling and final disposal of the product. The Extended Producer Responsibility is implemented through administrative, economic and informative instruments. The composition of these instruments determines the precise form of the Extended Producer Responsibility. Lindqvist's proposal came at a time when several European countries were initiating strategies to improve the end-of-life management of products, which resulted in almost all members of the Organization for Economic Co-operation and Development (OECD) establishing EPR policies as an approach to pollution prevention and waste minimisation. Germany introduced the first example of EPR in Europe in 1991 with a requirement that manufacturers assume responsibility for recycling or disposing of packaging material they sold. In response, German industry set up a 'dual system' for waste collection, picking up household packaging alongside municipal waste collections." Source: Multi-Material Stewardship Western. (2022). History of EPR. Available at: <https://www.mmsk.ca/residents/history-epr/> See also;
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