

CASE STUDY & POLICY SPOTLIGHT

Bangladesh: Prohibiting Tobacco Industry Corporate Social Responsibility (CSR) in Law



WHO FCTC [Article 5.3](#) Guidelines recommend that governments denormalize tobacco industry CSR while the WHO FCTC [Article 13](#) Guidelines consider this marketing and calls for prohibiting it.

Background: The Legislative Gap

Since 2013, Bangladesh's [Smoking and Tobacco Products Usage \(Control\) \(Amendment\) Act, 2013 \(Act No. 16 of 2013\)](#), prohibited tobacco advertising, promotion, and sponsorship, but did not categorically prohibit tobacco-industry CSR activities. It restricted only the use of company names, signs, trademarks, or symbols in such activities.

This partial ban allowed tobacco companies to shift from overt advertising to reputational embedding: high-visibility public benefit programmes — operated under proprietary names with no visible brand — that built goodwill among officials, created access to policymakers, and normalized the industry's public role. CSR in this context functions as a form of indirect advertising and political normalization, as expressly recognized in the World Health Organization Framework Convention on Tobacco Control (WHO FCTC) Article 5.3 Guidelines, which call on Parties to denormalize and, to the extent possible, regulate activities described as "socially responsible" by the tobacco industry.¹ (See Annex for examples)

While Bangladesh have fought off these and other types of tobacco industry interference by excluding tobacco industry representatives from public health policy bodies² and from Conference of the Parties (COP) to the WHO FCTC delegations,³ and the adoption of Article 5.3 implementation guidelines by the Ministry of Health and Family Welfare (March 2025) and the Ministry of Railway (June 2026);⁴ it has yet to adopt whole-of-government approach⁵ to this problem.

Civil Society Action to Expose Tobacco CSR

Bangladesh's Tobacco Industry Interference Index, authored by PROGGA ([Knowledge for Progress](#)), have been documenting CSR activities as a recurring interference pathway, noting: public officials attending industry CSR events;⁶ industry donations framed as development or environmental partnerships;⁷ and the absence of a comprehensive prohibition consistent with WHO FCTC Article 5.3 Guidelines.⁸ This led to dismal rankings in the Global Tobacco Industry Interference Index (GTII), especially in terms of tobacco CSR.⁹ In addition to monitoring, reporting, and alerting governments on tobacco industry interference, including CSR, PROGGA, along with other advocates sustained a multi-year campaign (from year 2018 to 2025) to expose CSR interference and drive the law reform.¹⁰ This includes peer-reviewed publication exposing industry tactics in undermining graphic health warning implementation;¹¹ media roundtables calling for a comprehensive CSR ban;¹² and public intervention in July 2025 when a government advisory committee proposed consulting tobacco companies during the ordinance drafting process — which was characterized as a violation of Article 5.3 and demanded be cancelled.¹³

The 2025 Legislative Reform

On 30 December 2025, the Government promulgated the [Smoking and Tobacco Products Usage \(Control\) \(Amendment\) Ordinance, 2025](#) — a comprehensive amendment to the 2005 Act introducing, among other measures: a total advertising and sponsorship ban across all media; 75 percent graphic health warnings; a complete ban on e-cigarettes or electronic nicotine delivery system (ENDS), heated tobacco products (HTP), and nicotine pouches; expanded smoke-free public place provisions; and prohibition on tobacco sales within 100 meters of educational institutions, hospitals, and children's facilities.

As part of the total ban on marketing, the Ordinance replaces the partial ban on CSR under Sub-section (3) of the 2013 Act with a categorical prohibition. The amended law prohibits: (i) use of the name, sign, trademark, or symbol of a tobacco manufacturer in any CSR programme; and (ii) any form of assistance to any business group, organization, or event or programme by tobacco company.

The second prohibition is of particular significance: it extends beyond branding restrictions to prohibit the underlying act of providing assistance, regardless of whether tobacco branding is used, closing the pathway by which companies operated programmes under neutral or proprietary names.

Violations are subject to up to three months' imprisonment, a fine of up to Tk 5,00,000 (USD 4100), or both, with repeat offences attracting double the penalty.

Bangladesh's new law reflects a robust implementation of Article 5.3 by addressing a documented channel of tobacco industry interference and denormalizing the so-called CSR of the tobacco industry. The law replaces a partial, branding-focused CSR restriction with a categorical prohibition. It bans the act of tobacco company providing assistance to any event or programme, including those in government. The effectiveness of this reform will depend on enforcement; interpretation — particularly whether indirect or rebranded development programmes are captured; and insulation from tobacco industry tactics that have evolved specifically to circumvent CSR bans. This latter risk can be mitigated through a whole-of-government code of conduct aligned with Article 5.3 implementation.

ANNEX

Documented Examples of Tobacco Industry CSR Activity in Bangladesh*

| Programme/ Activity | Description | Interference Concern |
|--|---|--|
| BONAYAN (BATB) | Annual sapling distribution and afforestation drives operated by British American Tobacco Bangladesh (BATB) under a programme name carrying no visible tobacco brand association. Promoted via social and mass media. | Reputational normalization; associating the industry with environmental responsibility while avoiding branding restrictions. |
| PROBAHO (BATB) | Safe drinking water project: BATB funded installation of water booths in public spaces. At least one inauguration event was attended by a Member of Parliament. | Direct official endorsement of tobacco industry activity; photo opportunities and public acknowledgement by elected officials. |
| COVID-19 Assistance (BATB and others) | During the COVID-19 pandemic, tobacco companies distributed | Access to and visible partnership with government; leveraging a |

| Programme/ Activity | Description | Interference Concern |
|---|--|---|
| | PPE, masks, sanitizers, and food supplies to government agencies and field administration — directly or through intermediary organizations. Simultaneously, companies secured government permission to continue production by framing cigarettes as an essential commodity. | public health crisis to embed the industry as a state partner and weaken control measures. |
| Sustainability Awards (BAT / CSR Window) | The Bangladesh Sustainability Excellence Awards, launched in December 2023 by CSR Window and a prominent English-language daily, carried British American Tobacco's global corporate slogan "A Better Tomorrow" — lending the industry a civil-society endorsement without overt tobacco branding. | Third-party laundering of industry reputation; illustrates the industry's adaptation when direct CSR is restricted, reframing activities as 'sustainability'. |
| Monetary Donations | Industry grants framed as contributions to community development or national resilience, publicly acknowledged by receiving public agencies. | Creates financial dependency and channels of access; blurs the boundary between philanthropic and lobbying activity. |

Note: All examples are drawn from the Bangladesh Tobacco Industry Interference Index 2025 (PROGGA) and associated PROGGA research and media documentation. The GTI 2025 Bangladesh country report covers April 2023 – March 2025 and predates the December 2025 Ordinance. The 2025 Ordinance's categorical CSR prohibition — covering both branding and the underlying act of providing assistance — is designed to address all categories above, including third-party and rebranded arrangements.

Acknowledgements and Authorship



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This brief is prepared by Deborah Sy and Mary Assunta of the Global Center for Good Governance in Tobacco Control (GGTC), with inputs from Hasan Shahriar from PROGGA (Knowledge for Progress). Additional research and formatting support by Farah Niazi of GGTC.

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

- ¹ “(6) Denormalize and, to the extent possible, regulate activities described as “socially responsible” by the tobacco industry, including but not limited to activities described as “corporate social responsibility”.” Source: Guidelines for implementation of Article 5.3. WHO FCTC. 2013. Available at: <https://fctc.who.int/resources/publications/m/item/guidelines-for-implementation-of-article-5.3>
- ² “The government has not invited the tobacco industry or its representatives to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy.” Source: Shahriar MH, Hasan MM, Zubair ABM. Bangladesh Tobacco Industry Interference Index 2025. PROGGA. Dhaka, Bangladesh. Nov 2025. Available at: <https://globaltobaccoindex.org/download/2173>
- ³ “There was no tobacco industry representative in the government delegation to the COP in previous years, or to COP10 session in 2023.” Source: Shahriar MH, Hasan MM, Zubair ABM. Bangladesh Tobacco Industry Interference Index 2025. PROGGA. Dhaka, Bangladesh. Nov 2025. Available at: <https://globaltobaccoindex.org/download/2173>
- ⁴ “the Ministry of Railway (MoR) in June 2023 and the Ministry of Health and Family Welfare (MoHFW) in March 2025 introduced “Guidelines for the Implementation of FCTC Article 5.3,” which ban such acceptance by their staffs and departments. Additionally, existing general orders and anti-corruption laws are in place and should be applicable across all government bodies.” Source: Shahriar MH, Hasan MM, Zubair ABM. Bangladesh Tobacco Industry Interference Index 2025. PROGGA. Dhaka, Bangladesh. Nov 2025. Available at: <https://globaltobaccoindex.org/download/2173>
- ⁵ Global Center for Good Governance in Tobacco Control (GGTC). (2025). Handbook on Country Practices in Preventing Tobacco Industry Interference. Bangkok: GGTC. Available at: <https://ggtc.world/knowledge/whofctc-article-53-policy-instruments/handbook-on-implementation-of-who-fctc-article-53-policies-and-practicesthat-protect-against-tobacco-industry-interference-2025>
- ⁶ “There has been at least one event where a Member of Parliament (MP) attended inauguration of safe drinking water booths, funded by PROBAHO program.” Source: Shahriar MH, Hasan MM, Zubair ABM. Bangladesh Tobacco Industry Interference Index 2025. PROGGA. Dhaka, Bangladesh. Nov 2025. Available at: <https://globaltobaccoindex.org/download/2173>
- ⁷ “The number of Corporate Social Responsibility (CSR) events and programs related to tobacco industry decreased during the reporting period, which is a continuation of previous trend. However, British American Tobacco Bangladesh (BATB) held several events under its flagship CSR programs such as BONAYAN (sapling distribution) and PROBAHO (safe drinking water projects).”
“Besides, Bangladesh Sustainability Excellence Awards, launched by CSR Window and a renowned English daily in December 2023, was also found to be carrying British American Tobacco's global company slogan “A Better Tomorrow”.” Source: Shahriar MH, Hasan MM, Zubair ABM. Bangladesh Tobacco Industry Interference Index 2025. PROGGA. Dhaka, Bangladesh. Nov 2025. Available at: <https://globaltobaccoindex.org/download/2173>
- ⁸ “(6) Denormalize and, to the extent possible, regulate activities described as “socially responsible” by the tobacco industry, including but not limited to activities described as “corporate social responsibility”.” Source: Guidelines for implementation of Article 5.3. WHO FCTC. 2013. Available at: <https://fctc.who.int/resources/publications/m/item/guidelines-for-implementation-of-article-5.3>
- ⁹ Assunta M. Global Tobacco Industry Interference Index 2025. Global Center for Good Governance in Tobacco Control (GGTC). Bangkok, Thailand. Nov 2025. Available at: <https://globaltobaccoindex.org/gti/2025>
- ¹⁰ Bangladesh - Tobacco Industry Interference Index. 2019-2025. Available at: <https://globaltobaccoindex.org/country/BD>
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- ¹¹ Shahriar MH, Hasan MM, Alam MS, et al. Tobacco industry interference to undermine the development and implementation of graphic health warnings in Bangladesh. Tobacco Control 2024;33:587-595.
- ¹² Tobacco a major barrier to Bangladesh's SDGs, NCD death reduction target: Experts. The Business Standard. 20 September, 2025. Available at: <https://www.tbsnews.net/bangladesh/tobacco-major-barrier-bangladeshs-sdgs-ncd-death-reduction-target-experts-1241146>
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- ¹³ Progga slams move to hold talks with tobacco industry. Press Release. 24 Jul 2025. Dhaka Tribune. <https://www.dhakatribune.com/bangladesh/387277/progga-slams-move-to-hold-talks-with-tobacco>