STOP. A GLOBAL TOBACCO INDUSTRY WATCHDOG

Industry Brief

Southern African Region

Turning a Blind Eye: BAT's Potential Complicity in Illicit Trade in Southern Africa

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New analysis by the University of Bath, a partner in STOP, suggests that British American Tobacco (BAT), with the help of its South African service provider, Forensic Security Services (FSS), managed to work with law enforcement agencies, undertake surveillance and disrupt competitors in South Africa. Ironically, evidence also indicates the company could well have been complicit in smuggling its own product in the region.

In South Africa, BAT has tried to portray itself as a legitimate stakeholder and partner of government agencies in the fight against illicit tobacco trade (ITT). The company was not only able to shape the public discourse on ITT, but also control the direction and focus of law enforcement interventions.

An analysis based on leaked industry documents, coupled with interviews, trade data analysis and business reports, allowed us to piece together evidence which may indicate BAT's complicity in smuggling in the region.

To what extent BAT had an impact on illicit trade carried out by competitors in the region is unclear. According to Francois van der Westhuizen, an ex-FSS whistleblower who was interviewed by the BBC, the FSS and BAT operations, conducted in the name of anti-illicit trade, did not, to his knowledge, lead to any prosecutions. Van der Westhuizen also alleged these operations did not focus on stopping BAT's products from entering the illegal market.[1]

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BAT: The dominant player in South Africa's cigarette market

Since the 1999 merger between the U.K.-based multinational BAT and South Africa's Rothmans International, and thanks in large part to Rothmans' predominant position in the market at the time, BAT South Africa (BATSA) has had by far the highest market share in the country, at 71.9% two decades on.[2] By 2019, the company held the five leading legal brands in South Africa.[3]

The BAT Heidelberg factory in South Africa is the 8th largest in BAT's global operations[4] with "the capacity to produce more than 27 billion cigarettes a year for local and export markets."[5] This accounts for a large majority of South Africa's annual cigarette production. In 2014, roughly 30 billion sticks were manufactured across South Africa.[6] In June 2014, BAT stated that "70 per cent of production [at BAT's Heidelberg factory] is for the local market and 30 per cent is for exports to over 27 countries."[7] This suggests that roughly 8 billion cigarettes were likely legally exported by BAT from South Africa annually, making up roughly two-thirds of the country's exports around that time.[8]

Given the nature and scale of BAT's monitoring tactics, from using tracking devices, beacons, drones, police security cameras, informants, undercover agents and extensive liaison with law enforcement, BAT likely had a good idea of how many cigarettes its local competitors manufactured as well, legally or otherwise. Various internal BAT documents show that the amount of sticks South African competitors manufactured was paltry in comparison to what BAT produced.[9, 10]

A 2011 BATSA PowerPoint presentation noted that the vast majority of illicit cigarettes in South Africa came from Zimbabwe and the United Arab Emirates (UAE)—with only 0.8 billion illicit cigarettes of the 6.3 billion illicit cigarettes manufactured locally. In other words, only 13% of the illicit problem was due to local South African manufacturers.[11]

Another 2010 BAT document listed yearly production volumes of its local competitors[12]:

- Savannah Tobacco (Zimbabwe): 1.1 billion sticks
- Breco (Zimbabwe): 1.6 billion sticks
- Cut Rag (Zimbabwe): 620 million sticks
- Westhouse (South Africa): 780 million sticks

This same document predicted that for the following year just over 1% of the cigarettes consumed in South Africa would be "locally produced tax evaded genuine product," the rest being smuggled into South Africa from abroad.[13] Indeed, weekly reports by FSS on local competitors from 2013-2015 indicated an increase in local production in Zimbabwe. However, combined annual production estimates based on these weekly figures would amount to 2.5-6.9 billion cigarettes, again much lower than what BAT reportedly manufactured in its Heidelberg factory.[14]

This raises the question of why BAT went to such great lengths to disrupt its competitors, even though their market share was comparatively small. On September 13, 2021, in response to the allegations put forward in the BBC Panorama documentary and the Bureau of Investigative Journalism Smoke Screen podcast, BAT publicly stated that the company had "long been committed to fighting the global criminal trade in illicit tobacco." The statement went on to note that, "As part of those efforts, BAT has sought to assist national law enforcement agencies in providing support and, in the past, intelligence on suspected illicit operators."[15]

Our own analysis suggests that part of the reason may have been that BAT's domestic sales volumes had been steadily decreasing in recent years—from almost 18 billion cigarettes in 2012 down to just 11.4 billion in 2019—thanks to a decline in smoking prevalence and a growing illicit market, putting pressure on BAT to find ways to maintain profit.[16]

In the meantime, BAT's official cigarette exports out of South Africa appear to have remained steady and even increased sharply in 2016 (Figure 1). A closer look at cigarette export data and internal documents, however, raises further questions about the legality of those exports, and indeed BAT's involvement in facilitating smuggling of its own products manufactured in South Africa by oversupplying certain markets and not controlling its supply chain.

BAT in South Africa

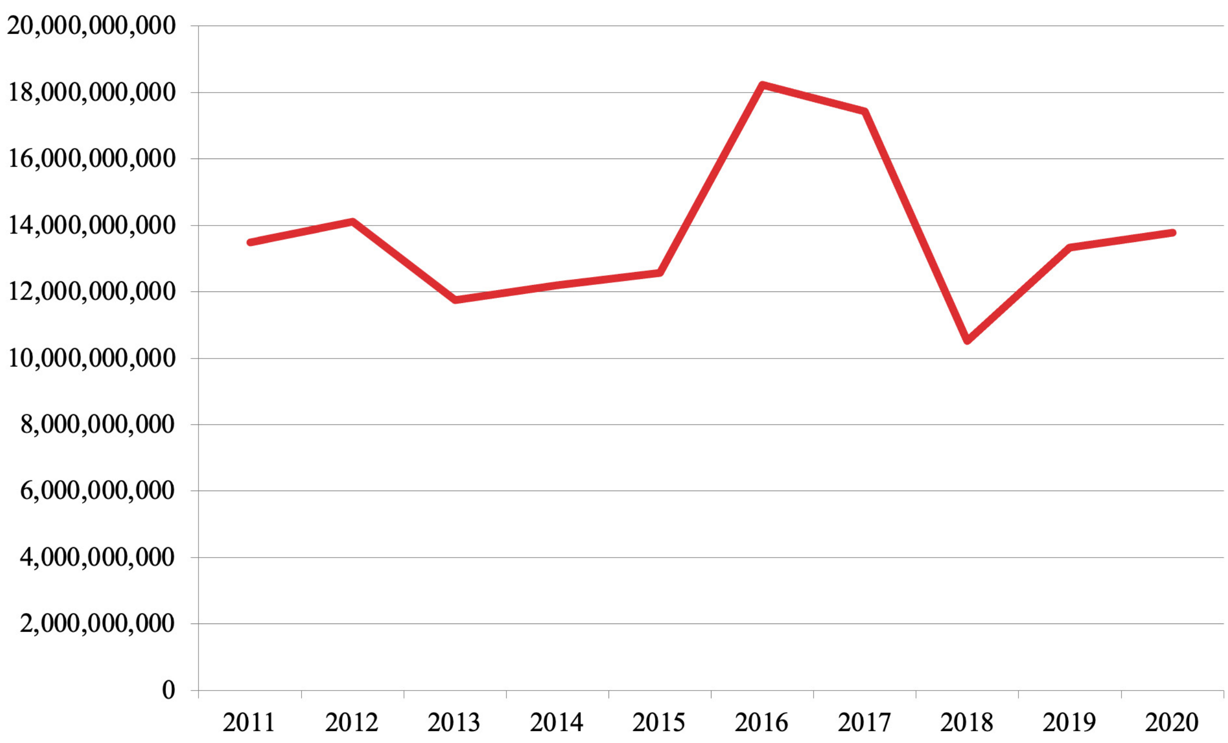
BAT market share:
71.9% (2019 - Euromonitor)

BAT production:
27 billion sticks (2019 - BAT)

BAT domestic sales:
11.4 billion sticks (2019 – Euromonitor)

BAT exports:
Unclear (8.1 billion in 2014 – BAT)

Figure 1. South Africa's cigarette exports, 2011-2019



Source: SARS Trade Statistics; UN Comtrade

BAT's lack of supply chain control

An analysis of leaked tobacco industry documents suggests it is no surprise that BAT products ended up smuggled to other countries. BAT lacked either the willingness or ability to control its own supply chain in South Africa and evidently elsewhere, too. Within South Africa, one BAT document outlined BATSA's own "route to market" setup, featuring hundreds of wholesalers, cash-and-carry customers, and resellers, including on the informal market, in addition to thousands of direct supply retailers, which demonstrated clear vulnerabilities—or opportunities—for smuggling.[17]

A telling admission by BAT to a U.K. tribunal

Internal BAT procedures for tracking diverted genuine products were brought into question in tribunal proceedings between the U.K.'s Revenue and Customs Agency (HMRC) and BAT in 2013. These focused on oversupply by BAT of hand-rolling tobacco into Europe, "where the nature or circumstances of the supply made it likely that it would be resupplied to persons who were likely to smuggle the tobacco into the UK."[18]

Giving evidence to the Tribunal, one senior BAT Globe House executive claimed that his specialized anti-illicit trade unit was not responsible for investigating the smuggling of genuine BAT product, suggesting instead that it was the responsibility of BAT's security team.[19] A security manager would also later tell the HMRC that investigating seizures of genuine product was not, in fact, the responsibility of BAT's security team, either.[20]

Ultimately, HMRC's Business Tax Team concluded that "BAT did not investigate the smuggling of genuine product."[21] BAT was ultimately fined for oversupplying hand-rolled tobacco to Benelux countries, product which was then smuggled back to the U.K.[22]

This lack of internal clarity as to who should be in charge of monitoring and addressing diversion of company products to the illicit market may be a testament to BAT's failure to properly secure its own supply chain.

Codentify

BAT's preferred track and trace technology, Codentify, has also been widely criticized by academics and experts for its inefficiency, ineffectiveness, opacity and industry control.[23] Despite those well-known flaws, which could possibly enable BAT to continue its alleged complicity in illicit trade, BAT pushed for Codentify to be adopted by law enforcement in South Africa.[24, 25]

BATSA's Heidelberg factory was used to showcase Codentify to various international delegations,[26] primarily through the Tobacco Institute of South Africa (TISA). A draft agenda of a TISA Engagement Conference in November 2012, which BAT organized and officials from numerous governments and IGOs attended, included a session on Codentify featuring representatives from BAT, Interpol and Swiss Customs.[27]

An October 2012 internal BAT presentation noted that a Codentify pilot had concluded in 2010, saying: "TISA and BATSA have engaged the Authorities extensively during and after."[28] The document goes on to note reservations from both the South African Revenue Service (SARS) ("SARS has requested TISA to do further engagement with the other small local manufacturers to reduce their fear of a new system being put in place to monitor volume and T&T") and the Department of Health (which "has also voiced its concern and will not support an 'Industry' solution'").[29]

Cigarette exports out of South Africa: A potentially suspicious picture

As the largest tobacco company in Africa, with tens of billions of cigarettes manufactured and shipped across the continent, BAT's volume of smuggled cigarettes far outweighs its local competitors' with untold consequences for public health, governance and the rule of law. Below are some of the countries where BAT's activities might warrant further investigation.

Mozambique

In just a five-month period, between January and May 2014, hundreds of thousands of BAT cigarettes were seized at the Lebombo crossing between Mozambique and South Africa.[30] These included brands from BAT Mozambique (Grande Turismo or GT, Safari) and BAT Zimbabwe (Everest, Kingsgate, Madison), in addition to others manufactured in several BAT factories including Heidelberg in South Africa (Pall Mall, Peter Stuyvesant, Rothmans, Dunhill, Kent, Craven A).[31]

The Safari and Everest brands were highlighted in a TISA presentation as "non-compliant re warnings and markings," suggesting these could have been illicitly imported into South Africa from the neighboring countries.[32]

Namibia

There are other exports from South Africa that could potentially be questionable, although there is not enough reliable data on specific company exports by BAT to be sure. One such country is Namibia. A World Bank report on ITT described Namibia "as a transit country, with illicit cigarettes being routed from China and the United Arab Emirates (UAE) through Namibia's Walvis Bay port mostly to South Africa, but also other neighbouring countries in SACU [Southern African Customs Union]."[33] What is less documented is how cigarettes from South Africa seem to have been oversupplied to Namibia.

Between 2011 and 2019, Namibia recorded imports from South Africa equivalent to 581 billion cigarettes (a staggering figure for a country whose inhabitants only smoke a combined 729 million cigarettes a year).[34] During that period, South Africa only reported 20 billion cigarettes exported to the country—561 billion cigarettes fewer than Namibia reported (a discrepancy that could almost fill 122,000 shipping containers or five Ever Given ships of the type which blocked the Suez Canal in March 2021). [35]

Figure 2. Excerpt from a BATSA presentation to TISA (Safari cigarettes are manufactured by BAT Mozambique and Everest cigarettes are manufactured by BAT Zimbabwe)

Source: BATSA Presentation

Much of that discrepancy occurred in the early 2010s (Figure 3) but in May 2020, at the start of South Africa's cigarette ban aimed at curtailing the COVID-19 pandemic, "South Africa exported about as many cigarettes to Namibia as the entire country smokes in a year,"[36] which may suggest round-tripping (where cigarettes are exported from a country and then smuggled back in), ghost exports (where cigarettes never actually leave a country) or Namibia being used as a smuggling hub towards other destinations. Who manufactured and shipped those cigarettes remains unknown, given that companies are not required to publicly disclose production and export figures—a major knowledge gap for ITT analysis. It is important to stress that it is currently not known how much, if any, of these exports belong to BAT.

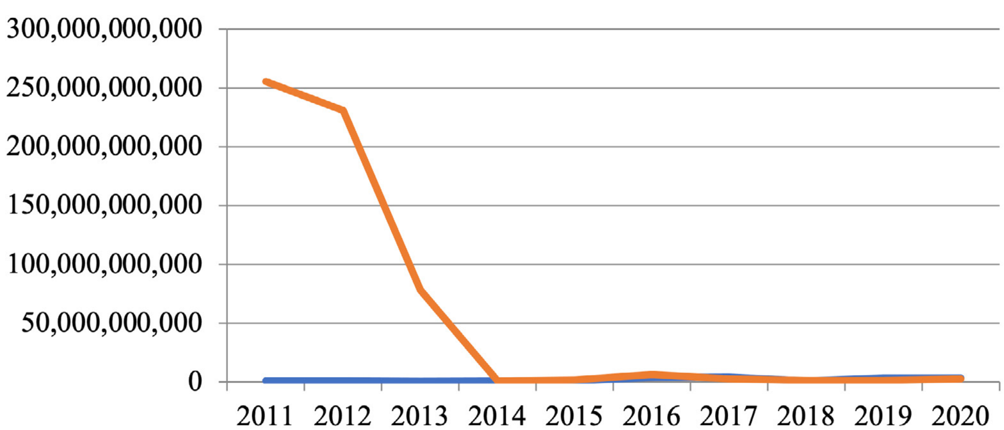
West Africa

BAT's cigarettes from South Africa also go further afield. Between 2011 and 2019, Mali was South Africa's top export partner with over 28 billion cigarettes shipped in total. A recent investigation into BAT's activities in West Africa by the Organized Crime and Corruption Reporting Project (OCCRP) alleged that BAT intentionally oversupplied Mali, "knowing its product would be fodder for traffickers."[37]

OCCRP estimated "there may be up to 4.7 billion surplus cigarettes in Mali every year—the equivalent of around 470 shipping containers of extra cigarettes. Some of them are produced in the country, but more are imported, almost all of them from South Africa."[38]

The Heidelberg factory has been one of the main sources of cigarettes exported legally and illegally throughout West Africa for many years.[39] A 2007 internal document highlights how BAT's primary supply chain was set up across Southern and West Africa. It notably discusses BAT's "route to market" from the Heidelberg factory and others in Africa to consumers across West Africa, and its many related challenges along the supply chain including "inadequate distribution, Pall Mall [BAT brand notably manufactured in South Africa] license revoked" in Burkina Faso,[40] "recovering distribution, heavy financial burden" in Côte d'Ivoire,[41] "insolvency" of distributor in Cameroon,[42] "importation issues with [BAT distributor] SONATAM" in Mali (2007),[43] and "control of BAT imports" (2007).[44]

Figure 3. Cigarette exports (in sticks) from South Africa to Namibia as reported by South Africa (blue) and Namibia (red)



Source: UN Comtrade

Cigarette imports into South Africa: Did BAT push for fire-safer cigarette regulation to undermine competition whilst smuggling its own products?

In May 2011, the South African government introduced a new regulation (which entered into force in November 2012), requiring all cigarettes manufactured, sold or imported in the country to be designed to self-extinguish if left unattended. On the face of it, decreasing the risk of fires through "reduced ignition propensity," or RIP, cigarettes makes sense; similar legislation has been introduced in other countries.[45] However, even though the tobacco industry often opposes new tobacco-related regulations, internal documents, outlined below, show how BAT was in fact a supporter of this regulation in South Africa.

Publicly, BAT deplored the measure, citing commonly used industry arguments that yet another tobacco control measure would lead to thousands of job losses, the closure of its Heidelberg factory and a rise in illicit trade.[46] But behind the scenes, BAT, through its service provider, FSS, may have been pushing for that same regulation. According to an affidavit by FSS whistleblower Francois van der Westhuizen, FSS's top officials allegedly "worked on legislation, specifically at the instruction of BAT, in terms of which representations were made to the legislature to introduce a reduced ignition propensity grade of paper to be used in wrapping the cigarette."[47]

Why would BAT push for the introduction of a regulation which, at first glance, would lead to an increase in their own production costs and delays? For four main potential reasons:

1. This would increase the compliance burden of smaller competitors with far fewer resources than BAT. As Van der Westhuizen alleged in his affidavit, the strategy was that "BAT knew, well in advance of the RIP Regulation" and thus "tailored its entire factory and stock to comply with RIP in advance."[48] In contrast, upon implementation, there would be a window within which non-RIP compliant competitor products would be in the market—"simply a matter of logistics and time as well as selling out the old stocks."[49]

2. BAT and FSS could use this as an easy tool to identify and seize non-RIP compliant competitor products and arrest individuals involved, in cooperation with law enforcement. As Van der Westhuizen alleged, "The objective of the maximum disruption would then be achieved. BAT would be pleased. Everybody at FSS got a bonus."[50] This was seen by BAT as both "an opportunity to create space"[51] for BAT products (and thus more sales and profit) and to publicly appear as a responsible partner to governments.[52]

3. This new regulation could help BAT sell more (RIP-compliant) cigarettes in South Africa, both thanks to a lower amount of competitor cigarettes in circulation due to increased disruption, and arguably to a potential increased demand for cigarettes overall, with RIP cigarettes going out more easily, leading to more people lighting up and thus buying more cigarettes. Indeed, one academic study found that smokers in New York, where RIP regulation was introduced, "found that smokers were three times more likely than smokers in other states to report that their cigarettes often went out between puffs."[53]

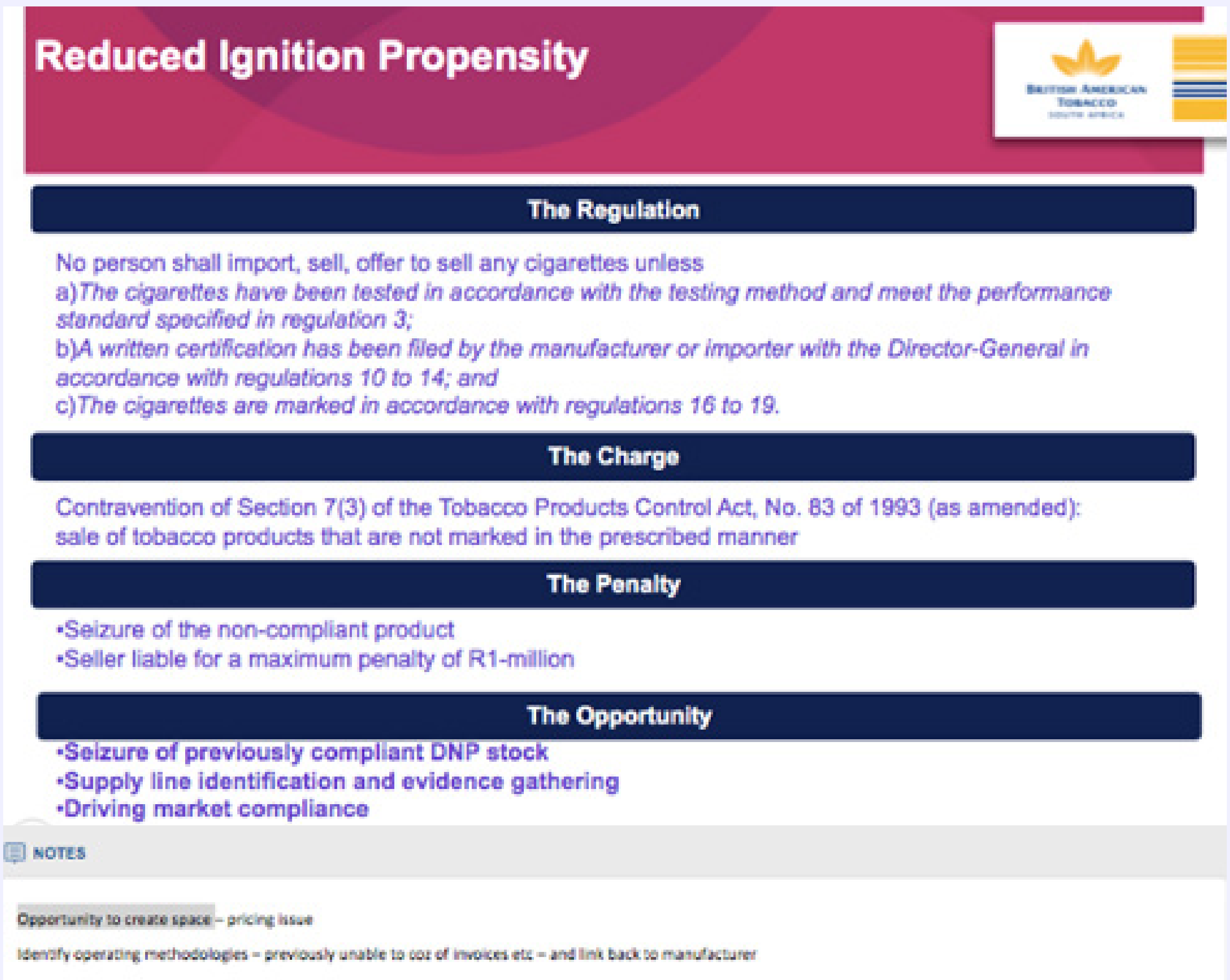
4. Last but not least, RIP regulation did not seem to entirely stop the flow of BAT's own non-RIP cigarettes. Seizure data shows that hundreds of thousands of non-RIP compliant BAT Mozambique cigarettes were seized at the Lebombo border crossing with South Africa between January and May 2014 alone.[54] It is unclear if the numbers had increased due to the RIP regulations. Another internal email discussed

a Customs Border Control Unit seizure at a BAT distributor warehouse of non-RIP BATSA products in late November 2012, after the regulation entered into force.[55] Again, even a BATSA presentation to TISA in August 2013 included Safari (BAT Mozambique) and Everest (BAT Zimbabwe) in a list of brands "non compliant re warnings and markings."[56]

This suggests that while pushing authorities to crack down on competitor products not meeting RIP regulation, BAT was itself complicit in smuggling cigarettes not compliant with the regulation that the company had indeed pushed for in the first place.

The story of the RIP regulation is BAT's anti-smuggling strategy wrapped up in one case study:

- Push for government intervention to seemingly address a real issue.
- Appear as a responsible partner to government and law enforcement.
- Crack down on competition.
- Meanwhile, sales of legal and illegal BAT products appear to continue largely unabated.



Source: Leaked document, RIP Implementation 181112.ppt

Conclusion

These findings raise serious questions about BAT's potential complicity in facilitating smuggling from South Africa. A recent report by the Research Unit on the Economics of Excisable Products (REEP) at the University of Cape Town suggested that cigarette manufacturers were getting around the recent COVID-19-related ban of tobacco products in the country "by exporting vast increases in cigarette volumes to neighbouring countries, that are then promptly smuggled back across the border into South Africa and sold on the black market."[57]

BAT is certainly not the only tobacco company involved in alleged illegal activities in South Africa. Smaller competitors may have indeed accounted for a larger share of illicit distribution during the COVID-19 lockdown cigarette ban, as per the REEP analysis. However, as former SARS executive Johann van Loggerenberg put it in his book, *Tobacco Wars:*

"In my view, the behemoths need to be held to a much higher standard than their smaller competitors. They have different scales of available resources, their nature and operations are larger, and the oversights and controls that guide their businesses are also different."[58]

Despite this evidence suggesting BAT's potential involvement in smuggling, the company tried to portray itself as a responsible, legitimate partner of governments in the fight against illicit trade. It framed this illicit trade as a market that is dominated by local manufacturers and distributors and international smugglers.[59] And yet via regulatory capture and through FSS, BAT may have aggressively infiltrated, disrupted and dismantled many of these competitors.

BAT has stated that "Acting responsibly and with integrity underpins the foundations of our culture and values as a company. BAT is committed to the highest standards of corporate conduct and transparency wherever we operate."[60] Despite these claims, many questions remain.

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