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How British American Tobacco's Tentacles Captured Southern Africa

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In January 2022, the first part of the long-awaited Commission of Inquiry into State Capture was published.¹ The report by the Zondo Commission, as it is known, has been described by academics as providing an ethical roadmap for South Africa for the future, and examines the complex subject of state capture and corruption.²

There are different definitions of what state capture alludes to, but Oxford University Dictionary calls it “the fact of somebody using their personal or professional status in order to influence political decisions to their advantage.”³

One of the agencies the Commission investigated was the South African Revenue Service (SARS). It looked at how SARS’ investigations into the tobacco industry had been curtailed by the dismantling of the special unit within SARS that had been investigating the illicit trade.

The special unit investigated the industry under the codename Honey Badger, but all the investigations came to a halt in 2014. Speaking to the Zondo Commission in March 2021 on state capture, the ex-SARS investigator, Johann Van Loggerenberg alleged that the investigations of Project Honey Badger “had not progressed since 2014,” due to the capturing of SARS.⁴

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Van Loggerenberg stated to the Commission that evidence uncovered in 2013 and 2014 “implicated inter alia members of the Anti-Illicit Tobacco Task Team, Hawks [South African Police Services’ Directorate for Priority Crime Investigation], National Prosecuting Authority, State Security Agency, South African Police Service, South African Police Service’s Crime Intelligence Division, private tobacco manufacturer BAT [British American Tobacco] South Africa, private security firm FSS, and state intelligence officers.” All these agencies and companies played a part into the reason that SARS’ investigations into the tobacco industry, which were years in the making, juddered to a halt, according to Van Loggerenberg.⁵

Although the capture of SARS has been well documented in South Africa for years by Van Loggerenberg and others, there are numerous other agencies in the region where the tobacco industry’s tentacles appear to have had a firm grip. This is despite the issue of state capture being a concern for over a decade in Southern Africa.

In 2009, the Organisation for Economic Co-operation and Development (OECD) held a workshop on regulatory governance in Cape Town and Pretoria.⁶ One of the participants of the Cape Town meeting outlined a definition of “regulatory capture,” where “a state regulatory agency created to act in the public interest instead acts in favor of the commercial or special interests that dominate in the industry or sector it is charged with regulating.” It was said the speaker from the OECD’s Directorate for Public Governance called it a “form of a government failure.”⁷

In the dozen years since that seminar there appears to have been systematic failure of many of South Africa’s key law enforcement agencies who may have allowed themselves to be captured by BAT and the trade organization, the Tobacco Institute of South Africa (TISA).

But South Africa is not alone. The tobacco company also appears to have managed to excessively influence many regulatory authorities and agencies from across Southern Africa.

This is important for three main reasons. First, it is essential for states to have robust regulatory governance structures in place that should be independent from the influence of large multinationals like BAT.

Second, South Africa is seen as a global leader in tobacco control and played a key role in the negotiation of the World Health Organization Framework Convention on Tobacco Control (WHO FCTC). South Africa signed the WHO FCTC on June 16, 2003, and the treaty entered into force for the country on July 18, 2005.⁸ This is important because Article 5.3 of the FCTC states: “In setting and implementing their public health policies with respect to tobacco control, Parties shall act to protect these policies from commercial and other vested interests of the tobacco industry in accordance with national law.”⁹

Third, it is widely agreed that tobacco taxes are one way of protecting health and therefore that tobacco smuggling undermines public health policies. Thus, regulatory agencies that work on tax or excise, smuggling, crime and border control all have an obligation under Article 5.3 to protect their operations from the influence of the tobacco industry. Sadly, this does not seem to be happening in Southern Africa.

Regulatory capture: A recap of what is known

In 2021, global tobacco industry watchdog STOP published a series of reports into BAT's alleged activities in South Africa.¹⁰ We believe there are serious questions to ask regarding the company and its service provider, FSS, concerning allegations that they spied on competitors via police CCTV, drones, vehicle trackers and other technologies, which may have included phone bugging with the intention of disrupting competitors' legal manufacturing and distribution processes in the name of anti-illicit trade, while potentially remaining complicit in illicit trade itself.

Many of these alleged operations appear to have been enabled by BAT's tentacle-like capture of various law enforcement agencies, but many were likely the actions of a company that appears to be operating as if it were above the law.¹¹ That report, along with material issued by our partners at the BBC,¹² the Bureau of Investigative Journalism (BIJ)¹³ and the Organized Crime and Corruption Reporting Project (OCCRP),¹⁴ should be read along with this briefing.

These reports, articles and films revealed that BAT and FSS, which was largely staffed with ex-law enforcement officials, may have been able to embed themselves into the very fabric of South African law enforcement activities in ways that still raise unanswered questions. In one audacious example, FSS obtained physical access to the Johannesburg Metropolitan Police Department (JMPD)'s CCTV control room, allowing it to potentially monitor 240 cameras, including one positioned outside its competitor's offices.¹⁵

One of those outstanding questions remains over the legality of BAT and FSS' operations. In response to our exposé in 2021, BAT stated: "We emphatically reject the mischaracterisation of our conduct by some media outlets," adding 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."¹⁶

The documents themselves suggest, however, that FSS knew it was treading on legal thin ice when it came to recruiting local enforcement agents to do their business, especially when disrupting trucks transporting cigarettes and managing to get access to the JMPD CCTV control room.

Regarding transporting trucks, one email chain between FSS staff relayed a message from a law enforcement contact advising that "constant disruption by the same LEA [local enforcement agency], might lead to allegations of harassment" and that the subject "might get a Court Order to stop actions." It would instead be preferable, they advised, to "continue to disrupt and retrieve documentation at other provinces," without using the same local enforcement agency.¹⁷

Other examples of alleged capture remain unreported. FSS appeared to nurture close relationships with staff in some of the highest positions of law enforcement agencies across South Africa who were employed in strategic locations that were beneficial for BAT. One South African Police Service (SAPS) commander was stationed in the northern province of Limpopo on the Zimbabwe border. As well as meeting FSS agents for debriefings, the security firm paid for the commander's "Vodacom Airtime."¹⁸ This expenditure was then invoiced to BATSA. It is not known why the SAPS commander had a phone contract financed by FSS, and whether it was a clean phone line to communicate with the security firm, or if others benefited from a similar arrangement.

The SAPS commander was one of a slew of LEA officers who appears to have aided the security firm in its operational activities in South Africa's northernmost province, in an area of vital strategic importance with tobacco imports crossing from Zimbabwe. He not only carried out cigarette seizures in the border area, but also made a written application to the Independent Communications Authority of South Africa (ICASA) for a dedicated radio frequency to be set up for FSS to help it operate more effectively in the rural region.¹⁹

Thanks to BATSA-financing and the alleged co-opting of LEA officers, FSS built an impressive capability to operate in remote areas. It seems to have effectively fulfilled the role of border agencies in the battle against tobacco smuggling, except it served a multinational corporation with vested commercial interests in its competitors' activities, and which itself has questions to ask over its complicity in smuggling.²⁰

TISA's regulatory capture: BAT and TISA's tentacles

In October 2021, the South African press reported that SARS had received gifts from BAT/TISA,²¹ a trade organization that represented the large tobacco companies, which had been formally wound down in 2020.²² Historically BAT was by far the largest funder of TISA,²³ which could have served as a trojan horse for state capture. Gifts included hammer mills used to destroy cigarettes.²⁴ For nearly a decade, TISA had been offering them across the South African Customs Areas region for use.²⁵

SARS, like so many other agencies in the Southern Africa region, has many questions to answer going back a decade. In 2011, at the same time the Revenue Authority was investigating the tobacco industry via Project Honey Badger, the organization was also holding regular meetings with TISA due to its collaboration in a SARS/TISA Joint Tactical

Group (JTG). According to TISA, this "resulted in considerable strengthening of relationships and knowledge between TISA and government officials" with formal monthly meetings, and TISA "regularly and constructively engaged" with "various senior SARS officials across all relevant functions of SARS, which "will certainly bear positive results in the near future."²⁶ Indeed, TISA even boasted that the Minister of Finance had "made reference to the progress made by the Joint Tactical Group (JTG)" in his February 2011 budget speech.²⁷

TISA's tentacles stretched elsewhere. It sat on a Forum with the SAPS and Directorate for Priority Crime Investigation (DPCI) also commonly known as the Hawks, chaired by a so-called "national cigarette champion," which in 2013 was Provincial Head of the Hawks.²⁸ TISA also sat on "Provincial Cluster Groups" with SAPS, SARS, as well as the Defence Intelligence Division of the South African National Defence Force (SANDF), and National Prosecuting Authority (NPA).²⁹

FSS also undertook training for South African officials. For example, in its 2010 annual report, TISA noted: "Training for customs and law enforcement agencies was conducted by FSS on behalf of TISA. More than 1,100 officials attended the training sessions during 2010."³⁰

Another undated FSS PowerPoint added that some 400 traffic officers, customs officers and police officers were being trained. "20 Police station[s] identified, will be contacting the station commanders to see if we can provide them with training."³¹

TISA's alleged capture of so many agencies in South Africa meant that the Department of Health was an outlier, which the trade organization appeared keen to capture, too: In one document, TISA said it had "been working closely with various authorities such as SARS, SAPS, SANDF, NPA and

other Law Enforcement Agencies to help combat the illicit trade in cigarettes and bring guilty parties to book. It is time the Health Ministry joins these efforts if it is to achieve its health objectives.”³² At TISA’s 2013 conference, the tobacco organization “pleaded” with governments for an “integrated approach” but warned that “Health Ministries can no longer stay outside.”³³

Article 5.3 of the FCTC outlines how health must be protected from the vested interests of the tobacco industry, something TISA appears to have been actively trying to undermine not only in South Africa, but across the region.

Violating Article 5.3 across the Southern African region

According to TISA, the industry body represented the “legal tobacco sector in SA” but its “mandate” also extended “into the SACU [Southern African Customs Union] and SADC [Southern Africa Development Community].”³⁴

TISA routinely met relevant authorities in Botswana, Namibia, Angola, Malawi, Mozambique, Swaziland, Zambia and Zimbabwe to “achieve synergy in the SACU/SADC region” and to “streamline activities” and “align legislation.” To this end, TISA also set up formal structures across borders with a so-called “Combined Border Force” between TISA and Swaziland/Mozambique; Namibia/Angola; Botswana; Lesotho and Zambia. Notable to the list of countries with no such agreement was Zimbabwe.³⁵

Such was the apparent capture of the region that TISA signed memorandums of understanding (MOUs) with the Mozambique Revenue Authority, the Lesotho Revenue Authority, the Botswana Revenue Service, the Swaziland Revenue Authority, the Namibia Ministry of Finance and in 2013 was working on MOUs with the Mozambique Police, Botswana Police and Zambia Customs.³⁶

In Namibia, documents show that FSS was meeting the Namibian Commissioner of Police and Customs, along with TISA, to talk about communication lines and an MOU. Intelligence and information were shared between all parties, according to the documents. In addition, the documents show how the tobacco industry was able to train officials regarding the new Tobacco Control Act. “TISA is offering to facilitate training workshops re illicit tobacco products and legislation, and specifically referred to the new Tobacco products Control Act which was signed and accepted by Parliament.” In response, the Namibian Customs agreed to the training.³⁷

The level of alleged capture of the police is evident with discussions between FSS and the police outlining “that the project team should meet on a monthly basis to discuss progress and agree on the following month’s actions/investigation.”³⁸

The level of oversight from FSS is outlined in reports, such as this one from Northern Namibia: “I briefed the officers during breakfast (I thought that breakfast would be a good way to sort of get the officers motivated for the job at hand, make them more prone to helping me now and in future. Some sort of PRO stunt, if you like.). I explained to them exactly how I wanted to do the operation, and how I thought we should approach it. Once I was satisfied that they understood exactly what I wanted.”³⁹

The Botswana government was later forced to cancel its MOU with TISA, upon pressure from the Ministry of Health and the Anti-Tobacco Network for violating Article 5.3 of the FCTC and Article 4.2 of the Protocol to Eliminate Illicit Trade in Tobacco Products on industry interference.⁴⁰

The industry response was predictable in trying to undermine the importance of the FCTC and the fact it is a legally binding treaty. In a February 2013 letter to the Botswana Unified Revenue Service

Commissioner-General, TISA Chairman and CEO Francois van der Merwe wrote: “The Guidelines to Article 5.3 are therefore merely guidelines and recommendations with the intention to assist Parties,” further complaining: “It is unfortunate that Article 5.3 is often cited as a reason for governments to block any engagement with the bona fide tobacco industry or any attempts to allow industry positions to be heard on issues related to health policy making on tobacco control measures.”⁴¹

Van der Merwe later noted that TISA had signed “Memorandums of Understandings with all the other BLNS countries, as well as Mozambique” and enjoyed “a formal and very good working relationship with the South African Revenue Service (SARS),” boasting that TISA had been awarded a World Customs Organization Certificate of Merit for “rendering exceptional service to the International Customs community.”

This of course clashes with research showing how ineffective and opaque MOUs with the tobacco industry on illicit trade have been,⁴² and the fact that SARS was not formally part of the Illicit Tobacco Task Team. In light of the evidence presented by STOP, the BBC, the BIJ and the OCCRP since September 2021, the claim that BAT and TISA had rendered “exceptional service to the International Customs community” is deeply questionable.

In 2019, an academic article concluded that “MOUs are non-transparent partnerships between government agencies and TTCs, violating FCTC Article 5.3 and the Protocol. MOUs are not legally binding so do not create an accountability system or penalties for non-compliance, rendering them ineffective at controlling illicit trade.” The paper stated that governments should reject transnational tobacco company “partnerships through MOUs and instead ratify and implement the FCTC and the Protocol to effectively address illicit trade in tobacco products.”⁴³

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TISA's Annual Conferences: Where TISA Rubbed Shoulders with Law Enforcement

Law enforcement from across the continent and beyond flocked to TISA's annual conference, which was held in Cape Town every year.

2007: An Anti-Illicit Trade Conference hosted by TISA featured "Service providers to TISA and TISA members, South African Revenue Authority, South African Police Service, National Prosecuting Authority (Scorpions)" with a barbeque later hosted by TISA. Discussions on Day 2 included: "Overview of Tobacco Bill and other tobacco related issues hosted by British American Tobacco South Africa (BATSA), Signature House, Stellenbosch."⁴⁴

2011: Participants included the International Tax and Investment Center, the World Customs Organization, SARS Customs Trade Operations, Interpol, the U.S. Department of Justice (DOJ), the U.K.'s HM Customs & Revenue, the Digital Coding and Tracking Association, the Uganda Revenue Agency, the Kenyan Police, South Sudan Customs, DPCI, from FSS, the National Prosecuting Authority (NPA), and personnel from BAT Globe House in London.⁴⁵

2012: The list of participants to the TISA AIT Engagement Conference included representatives from FSS, Tralac (Trade Law Centre for Southern Africa), SACU (Southern Africa Customs Union), SARS, U.K. Trade and Investment (UKTI), EU, Interpol, WCO, UNODC, RILO (Regional Intelligence Liaison Offices), DPCI SAPS Directorate of Priority Crimes (DPCI), also known as the "Hawks," SARS, SANDF (South African National Defence Force), SA NPA (South African National Prosecuting Authority), as well as representatives from Botswana, Namibia, Lesotho, Swaziland, Mozambique, Zambia, Angola, and Senegal, again with senior personnel from Globe House present.⁴⁶

2013: At the TISA conference the Ugandan Revenue Authority listed BAT's competitor brands being smuggled and lauded the "sharing

of intelligence with private sector."⁴⁷ The Mauritian Customs Department and Mauritius Revenue Authority outlined the memorandum of understanding with BAT.⁴⁸ Also present was a Fiscal Crime Liaison Officer in South Africa for the U.K. HMRC.⁴⁹ Also speaking was a BATSA employee seconded to TISA and part-time member of the Illicit Tobacco Task Team,⁵⁰ who included the logos of organizations they were cooperating with including SARS, Hawks, Interpol, the EU, SADC, and SADC and ZIMRA.⁵¹

2014: TISA's conference this year was facilitated by a senior government minister, despite the fact that SARS was at the time "engaged in a dispute with one of the members of TISA with respect to a tax assessment of R800,000,000.00."⁵² The member was BAT. At TISA's annual conference in November in Cape Town that year, HMRC again turned up, lauding its partnership with the tobacco industry.⁵³ Also present were representatives from COMESA (Common Market for Eastern and Southern Africa),⁵⁴ the Smoke Unit at the Fraud Unit from the Serious Organised Crime Department and Europol, who outlined the areas where the Agency engaged with the tobacco manufacturers.⁵⁵ Also present was the Kenya Revenue Authority,⁵⁶ Namibian Customs,⁵⁷ the Ugandan Revenue Authority⁵⁸ and Zimbabwean government.⁵⁹

Also speaking was the Head of the Illicit Tobacco Task Team.⁶⁰ A month after the conference, the triple agent 5332 emailed her handler from the State Security Agency, who sat on the Illicit Task Force. She emailed: "I warned you about the conference in November... Being in bed with private companies is not going to end well for Government Departments," she warned. "I am not going to be tarnished by your relationship with BAT."⁶¹

Interpol

There certainly seems to be questions about the complicity of other international agencies with the tobacco industry, such as Interpol. As one document noted that FSS recommended “that we should promote MOU’s with the Police in each of the countries where we operate. A possibility is to request facilitation via Interpol in each country as illicit cigarettes has been listed as a concern at SARPCCO [Southern African Regional Police Chiefs Cooperation Organisation].”⁶²

FSS also joined Interpol operations alongside its LEA partners and directed the surveillance and disruption efforts. Codenamed Operation Meerkat, the joint operation in 2012 conducted by Customs, SAPS, SARS, Interpol and FSS targeted the illegal cigarette and alcohol trade. An internal FSS email noted: “FSS has been fortunate enough to be part of this operation and we will join the daily operations from a consultancy perspective.” FSS was deeply embedded in the operation, even facilitating a briefing for Interpol and the other LEA partners.⁶³

FSS engaged with Interpol on other operations too and benefited from information sharing usually preserved exclusively for law enforcement agencies and Interpol state partners, for example obtaining profiles of companies of interest in Hong Kong with a hand in the tobacco trade.⁶⁴

Conclusion

Regulatory agencies in the Southern Africa region, as well as international bodies such as Interpol, should not cooperate with the tobacco industry. To do so is a clear violation of Article 5.3 of the FCTC.

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About STOP (Stopping Tobacco Organizations and Products)

STOP is a global tobacco industry watchdog whose mission is to expose the tobacco industry strategies and tactics that undermine public health. STOP is funded by Bloomberg Philanthropies and comprised of a partnership among the Tobacco Control Research Group (TCRG) at the University of Bath, The Global Center for Good Governance in Tobacco Control (GGTC), the International Union Against Tuberculosis and Lung Disease (The Union) and Vital Strategies. For more information, visit exposetobacco.org.