TO: World Health Organization  
FROM: Sister Patricia Marshall  
         Director, SBS Social Justice Office  
         Sisters of the Blessed Sacrament  
         1663 Bristol Pike  
         Bensalem, PA 19020-8502  
         215-244-9900, Extension 321  
ABOUT: FRAMEWORK CONVENTION ON TOBACCO CONTROL  

**Introduction:** The Sisters of the Blessed Sacrament were founded in 1891 by Katharine Drexel to work with American Indians and Blacks. One hundred years later they also began work with Haitians, and today their mandate includes striving toward unity and community among all peoples. Katharine Drexel is about to be canonized by the Roman Catholic Church (October 1). She is especially noted for her educational work with Black youth in Louisiana, and various inner cities and Indian reservations in the United States, as well as work toward interracial harmony and justice in American society. Her legacy continues today through the religious congregation that she founded.

Work toward social justice, while carried out in a variety of ways, focuses partly on addressing corporations in which the Congregation holds stock. Although our own investments are relatively small, we regularly join our efforts toward social responsibility by corporations with those of the many members of the Interfaith Center on Corporate Responsibility—religious investors—whose combined portfolios are valued at around $100 billion.

We understand that the Framework Convention on Tobacco Control is entering a phase in which comments are invited. Because of our interest in economic justice, international health, and the connection between them and the people we serve, we offer our comments below.

**COMMENTS**

We urge governments to support the following elements, necessary for an effective tobacco control treaty:

1. Eliminate tobacco advertising and promotion that appeals to children and young people
2. Keep the tobacco transnationals out of public health policy—including by requiring disclosure of lobbying activities and political contributions and prohibiting tobacco industry interference in public health matters
3. Include strict timelines for compliance by the tobacco transnationals with independent enforcement

**RATIONALE**

- **Individual governments and the World Health Organization are targeted** by, and often overpowered by, lobbyists for the tobacco transnationals when considering regulations to protect public health from the tobacco industry. Limits on the political influence of the tobacco transnationals are even more urgent given the outrageous and unethical conduct exposed in the recently released report by the WHO.

- **Promises by Philip Morris’s CEO** Geoffrey Bible in June, 1998 to “align [its] US and international tobacco marketing so [the company] cannot be accused of marketing tobacco to children” **have not been kept**. Only a treaty can ensure independent enforcement and global standards to protect children in all countries from the predatory practices of the tobacco transnationals.

- The treaty process should **ensure full participation by NGOs**, but the **tobacco corporations have disqualified themselves** from a role in public health policy. NGOs can help our governments in building support for the treaty, providing information and technical expertise, suggesting key points to address in the treaty, and monitoring the tobacco industry. The relative successes of other international codes and conventions, such as the Landmine Treaty, and the conventions on Ozone and Climate Change, are strongly connected to the degree of NGO participation and industry interference.

- There are precedents for imposing **obligations on transnational corporations**, as well as restricting marketing and promotion in the interest of public health. The Bamako Convention, the International Law of the Sea, and the International Code of Marketing of Breastmilk Substitutes all include provisions affecting the behavior and practices of transnational corporations.

- The **Framework Convention on Tobacco Control** should also:
  - Prioritize **public health over trade** issues
  - Not preempt governments from adopting even **stricter measures**
  - Include **consumer protections**
  - Provide **economic conversion assistance** to developing countries where the majority of the world’s tobacco is currently grown

**CONCLUSION**

The Sisters of the Blessed Sacrament, in the course of their work with poor and minority youth in inner cities and on Indian reservations in the United States, have often witnessed blatant tobacco advertising and promotion that appeals to children and young people, in spite of corporate protestations to the contrary. We believe that tobacco transnationals do not belong in the formation of public health policy any more than foxes belong guarding the hen house. It is time for an effective tobacco control treaty,
independently enforced and with strict timelines for compliance by the industry. It is time to bring this culture of death to a halt.

Given our own observations, and all the points raised above, we raise our voice for an international convention on tobacco control, a convention strong enough to reign in the egregious behavior of tobacco companies worldwide.