

Big Food's Big Black Box



How corporations attempt to shape global politics outside of public view

Fact File - 2023



Introduction

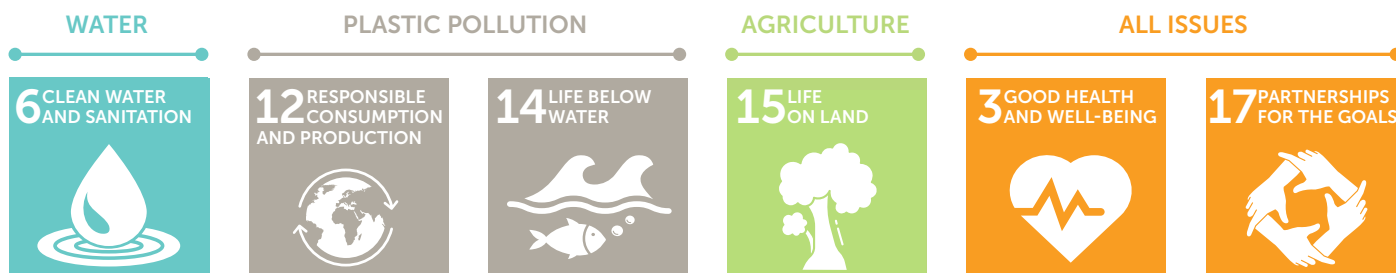
Big Food's Big Black Box examines how some global food and beverage corporations use the [United Nations Sustainable Development Goals](#) (SDGs) to position themselves as a solution to intersectional crises they are often accused of exacerbating. The report finds that while three of the largest, most well-recognized, and politically-influential corporations (Coca-Cola, PepsiCo, and McDonald's) go to great lengths to trumpet their work around the SDGs, they make it very difficult for investors and the public to understand and track what they are spending, on what, where, when, and with what impacts on frontline communities. Further, the report finds these corporations make a wide range of inconsistent and unverifiable, yet ambitious claims about what they are doing to achieve SDGs—all while they are continually questioned for their ongoing business practices related to the very same SDGs.

Not only does this spending and the activities funded by corporations—as well as the opacity thereabouts—pose a range of potential risks to investors, it is a means of obscuring the global harm these corporations perpetrate, supplanting the need for binding policies to address these harms with voluntary commitments. It is also a means of purchasing political access and license to operate. The findings of this report reinforce a growing demand from investors for corporations to not only globalize political disclosure, but also to make these disclosures inclusive of all political activities.¹ Findings also make the case for corporations to fully come clean on how their self-proclaimed impacts on SDGs are tracked, achieved, and calculated.

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In addition, the report prompts deeper scrutiny of the “multistakeholder” model of governance—where voluntary, unverifiable, opaque, and self-reported actions by Big Food take the place of binding, measurable, transparent, and democratic safeguards to uphold health, well-being, and the sovereignty of peoples. Such models that leverage the U.N.'s SDG mandate are being embraced by corporations accused of doing some of the greatest disservice to the mission of the SDGs.² Therefore, this year being the 10th anniversary of the U.N.'s initiating development of the SDGs³ offers a critical opportunity for scrutiny into this matter.

The data and findings in this report cover initiatives related to a sampling of SDGs focused on the issue areas of water, plastic pollution, and agriculture. In some cases, SDGs relate to multiple issue areas.



**The research was undertaken in February and March 2023 from publicly accessible information. The icons are meant to be representative of SDGs but are not official U.N. SDG iconography.*



PLASTIC BOTTLES AND WRAPPERS COVER THE SAND AT KUTA BEACH IN BALI, INDONESIA

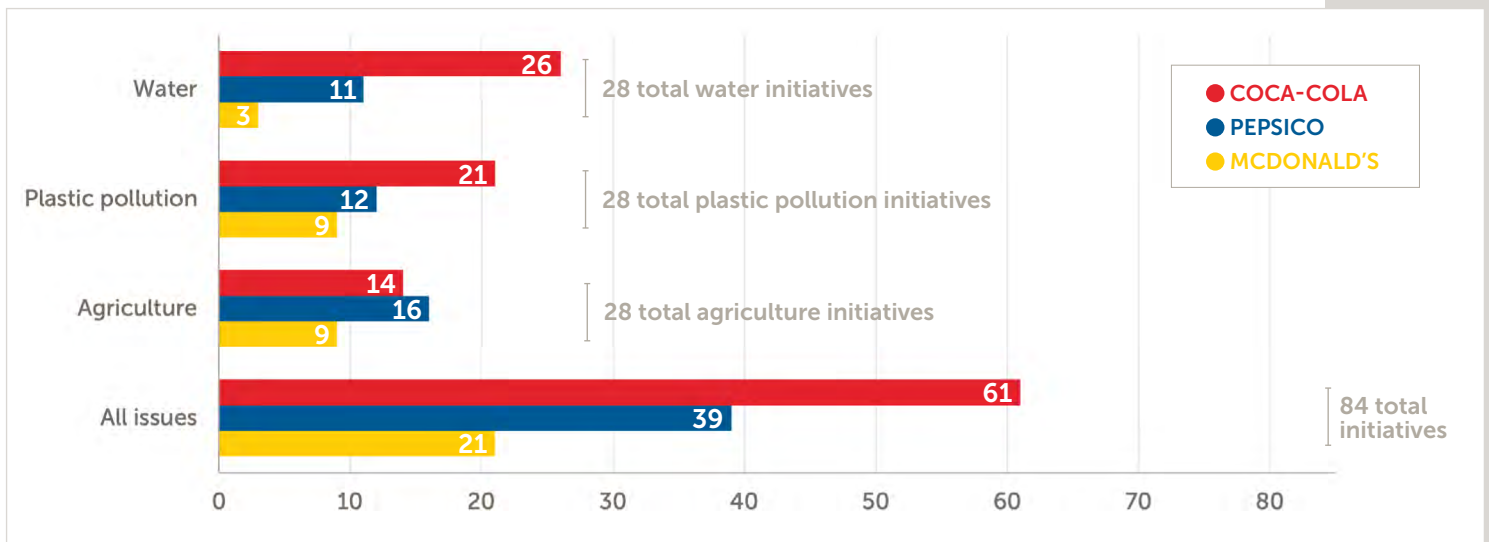
Coca-Cola and PepsiCo have ranked among the world's top plastic polluters throughout the past five years, according to a report by the Plastic Pollution Coalition.

PHOTO CREDIT: MAXIM BLINKOV, SHUTTERSTOCK.

Key Findings

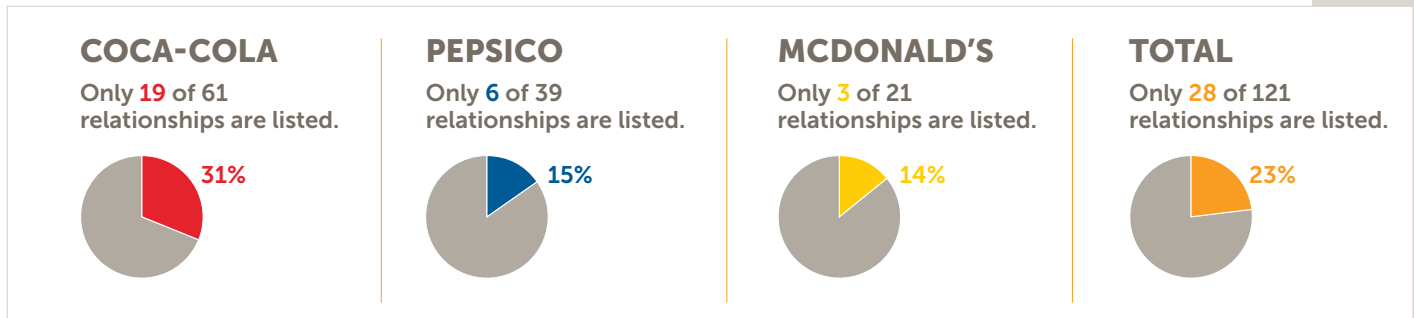
Corporate partnerships across water, plastic waste, and agriculture-related SDGs.

In analyzing political activities around the SDGs addressing water, plastic pollution, and agriculture related to Coca-Cola, PepsiCo, and McDonald's, we found at least 84 initiatives that these corporations have been or are involved in.



Program information available on the U.N. Partnership Platform (now called U.N. SDG Actions Platform)

Investors and the public can access only a fraction of—and by no means comprehensive or updated information around—these initiatives through the [U.N. Partnership Platform](#) (now known as the U.N. SDG Actions Platform) as of March 2023. The pie charts below provide an accounting of how many (or how few) initiatives disclose information on impact and progress to the public through this platform.



This is all to say, **these corporations are engaged with an expansive web of initiatives** involving a range of non-governmental organizations (NGOs), philanthropies, other industry actors, and governments—seemingly intended to:

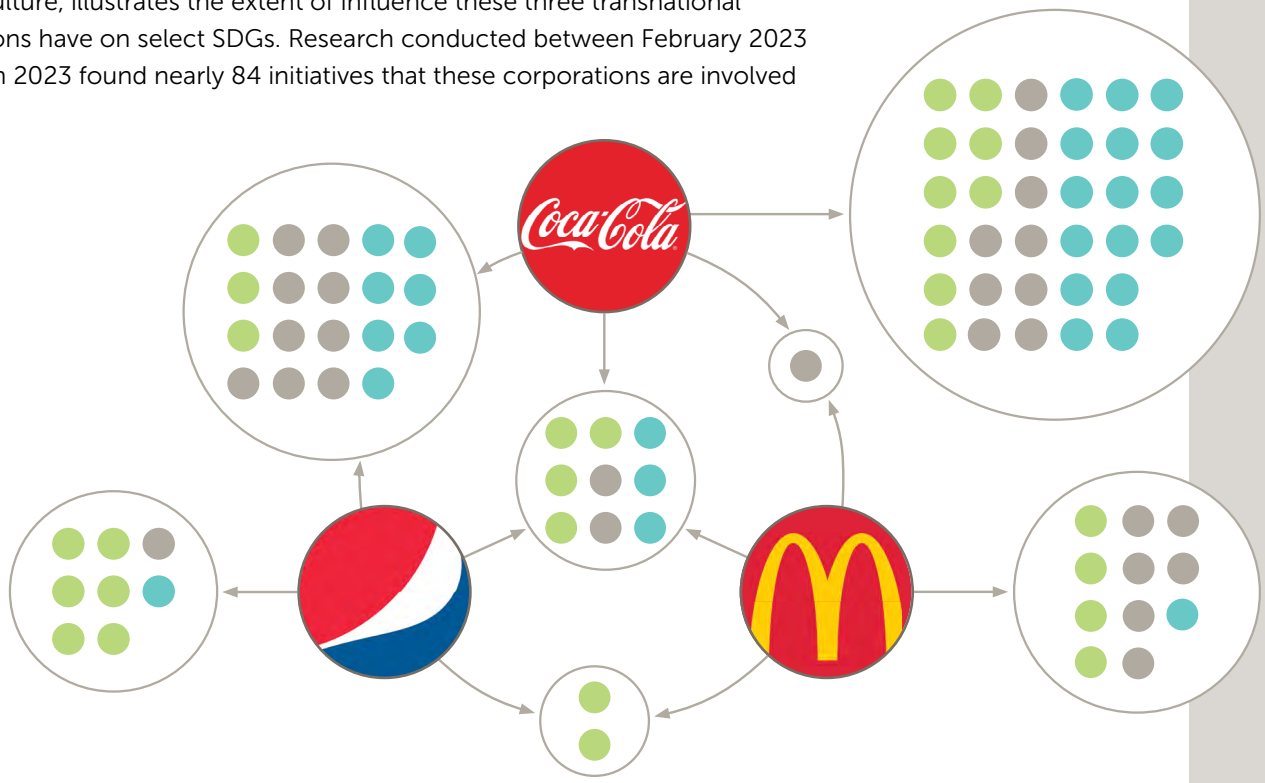
- Illustrate how they are advancing and championing SDGs through “self-regulation” and “multistakeholderism.”
- Position themselves as a solution to the crises their business practices have been accused of exacerbating.
- Build political power to advance industry-friendly policies in place of binding accountability mechanisms.

What’s more, this expansive engagement is happening as each corporation makes explicit to their shareholders that their political spending is “minimal” outside of the United States. Paradoxically, these corporations simultaneously boast about their Corporate Social Responsibility (CSR) reports and environmental, social, and governance (ESG) strategies, which are often focused on countries where these corporations seldom disclose any political spending or activity.^{4 5 6} But, research has shown time and again that these CSR and ESG initiatives can be some of the most salient forms of corporate political activity that corporations adopt,⁷ as they are “primarily a public relations strategy designed to achieve “innocence by association” as corporations align themselves with good causes to burnish their public image and protect their core business.”⁸

As “...the business of business is business... [And] CSR can only represent a piecemeal system of remediation at best, a cynical manipulation of the political agenda at worst,” the report aims to demystify some of these initiatives for what they seem to really be: a form of corporate political activity.⁹

Web of corporate influence across the SDGs: Related to water, plastic pollution, and agriculture

The visual below, followed by a full list of initiatives across water, plastic pollution, and agriculture, illustrates the extent of influence these three transnational corporations have on select SDGs. Research conducted between February 2023 and March 2023 found nearly 84 initiatives that these corporations are involved with.



SDG PROGRAMS RELEVANT TO:

- WATER
- PLASTIC POLLUTION
- AGRICULTURE

Meanwhile, the food industry's business practices contribute to...

EXTRACTING WATER from drought-prone areas



Clogging our oceans with PLASTIC MATERIALS



Perpetuating UNSUSTAINABLE FARMING practices

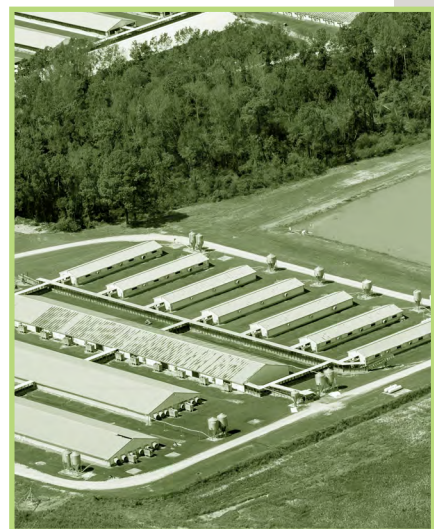


PHOTO CREDITS: JO-ANNE MCARTHUR, UNSPLASH (LEFT) | NICK FEWINGS, UNSPLASH (MIDDLE) | MD. HASANUZZAMAN HIMEL, UNSPLASH (RIGHT).

SDG programs related to water access, plastic pollution, and agriculture

CORPORATE INFLUENCE: ● COCA-COLA ● PEPSICO ● MCDONALD'S

WATER

- 2030 Water Resources Group ● ● ●
- Agua para el Planeta with The Nature Conservancy ●
- Alliance for Water Stewardship ● ●
- Allies for Water in Latin America ●
- CARE ●
- Coca-Cola/USAID Water and Development Alliance ●
- Conservation International ● ● ●
- Global Water Challenge ●
- Global Water Partnership Mediterranean ●
- Intermunicipal Consortium of Piracicaba: Capivari and Jundiá River Basins ●
- Latin America Water Funds Partnership ●
- Long-term Project Arnasay: The First Green Village of Kazakhstan ●
- MCA-CVII Infrastructure Grant Facility's Social Access Fund ●
- Rainforest Alliance ●
- Replenish Africa Initiative ●
- StepByWater ●
- The Global Compact ● ● ●
- The Global Environment and Technology Foundation ●
- The Nature Conservancy ● ●
- WASH4WORK by CEO Water Mandate ● ●
- Water & Sanitation for the Urban Poor ●
- Water For People ●
- Water Management Commitment: CEO Water Mandate ● ●
- Water Resilience Coalition ●
- Water Stewardship Goals: The Global Impact ●
- WaterAid ● ●
- World Resource Institute ● ●
- World Wildlife Fund ● ●

PLASTIC POLLUTION

- Australian Packaging Covenant and Sustainable Packaging Coalition ●
- Benioff Ocean Initiative at the University of California-Santa Barbara ●
- Bioplastic Feedstock Alliance ●
- Business Coalition for a Global Plastics Treaty ● ●
- Closed Loop Ocean Funding Mechanism ● ●
- Ellen MacArthur Foundation New Plastics Economy Advisory Board ● ●
- Every Bottle Back by American Beverage Association ● ●
- Foodservice Packaging Institutes ●
- Ghana's National Plastic Action Partnership ●
- Guide for Plastics Recyclability with the Association of Plastic Recyclers ●
- Latin American Recyclers Network ●
- Material Recovery for the Future ●
- Ocean Conservancy's International Coastal Cleanup ● ● ●
- Packaging and Recycling Alliance for Indonesia Sustainable Environment ●
- Plastics Recovery Group ●
- Reciclar Pelo Brasil ●
- Refrigerants, Naturally! ● ●
- Renewable Energy for FEMSA ●
- The Consumer Goods Forum Plastic Waste Coalition of Action ●
- The NextGen Consortium ● ● ●
- The Ocean Cleanup Project ● ●
- The Recycling Partnership ● ●
- The Sustainable Development Goals Business Index ● ●
- Trash Free Seas Alliance ● ●
- UNEP Montreal Protocol Ozon Action Programme ●
- World Economic Forum Global Plastic Action Partnership ● ●
- World Wildlife Fund's ReSource ● ●
- World Without Waste ● ●

AGRICULTURE

- AgMission by Foundation for Food & Agriculture Research ● ●
- Agriba Sustentable Program ●
- Bonsucro ● ●
- Canadian Hemp Farmers Alliance ●
- Consumer Goods Forum ● ● ●
- Cool Farm Alliance ●
- Field to Market: The Alliance for Sustainable Agriculture ● ● ●
- Fruit Circular Economy ●
- Fruto Resiliente in Brazil ●
- Green Roundtable on Sustainable Beef ●
- Holistic Palm Program and Agrovida in Mexico ● ● ●
- International Center for Tropical Agriculture ●
- Linking Environment and Farming in the UK ● ●
- Meetha Sona Unnati in India ●
- One Planet Business for Biodiversity of WBCSD ●
- Organic Farming in the GAP Region: A Success Story of Ilgin Village ●
- Rimba Collective ●
- Roundtable on Sustainable Palm Oil ● ● ●
- SAI-Sustainable Dairy Partnership ● ●
- She Feeds the World with CARE ●
- Simplifyber and Partners ●
- Sustainable Commodities Assistance Network ●
- TechnoServe ●
- The Nature Conservancy ●
- The Sustainable Market Initiative Agribusiness Task Force ● ●
- The Target 75 Initiative ●
- United Nations Framework Convention on Climate Change ●
- World Business Council for Sustainable Development, Climate Smart Agriculture ● ●

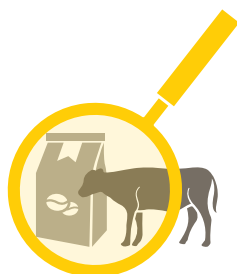
Other major findings and takeaways from the analysis of publicly available information of these corporations and the initiatives are as follows:

1 **Supposedly big spends to support SDGs, yet disclosures lacking.**

While these corporations boast extensively about the significant resources they funnel to what appear to be politically-motivated initiatives, each largely fails to readily disclose these supposedly generous expenditures to investors. For example, of PepsiCo's many plastic pollution-related efforts, we could find no details about how much and in what manner its money was spent. The Ocean Conservancy's 35-year-running International Coastal Cleanup was but one prominent instance where Coca-Cola and PepsiCo both appear to have been involved, but for which little can be discerned in terms of how their contributions are tangibly reducing the massive plastic footprint of each. At the same time, both corporations have been accused of increasing their use of virgin or non-recycled plastic.^{10 11}

2 **Science backing claims of progress on SDGs is evasive at best, absent at worst.**

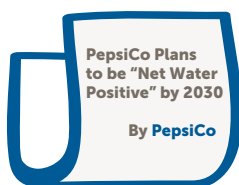
Despite the glowing numbers and achievements these corporations report in advancing SDGs, disclosure of how these numbers were calculated, the methodology of data collection, the scope and limitations of the process, and the scientific rigor underscoring the validity and reliability of data remain vastly unclear, unverifiable, or difficult to access for the public and investors.



In its 2021 self-reporting, **MCDONALD'S** claimed to have "achieved 98 to 100 percent responsible sourcing" on "priority products – beef, soy for chicken feed, coffee, palm oil, fish and fiber."¹² In this reporting, wherever data verification is mentioned, "verified sustainable sources" or "self-verification" are offered as substantiation.¹³ Making the veracity of its claims even harder to square, McDonald's just honored a supplier that has been considered a "dominant" influence in the creation of a dead zone in the Gulf of Mexico the size of New Jersey¹⁴ its "Global Supplier of the Year."¹⁵

3 **Inconsistent self-reporting a constant across the SDG-areas surveyed.**

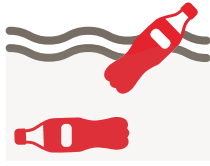
When reporting results from different initiatives, these corporations offered inconsistent and unverifiable progress reports in the best cases, with little to no reports in most cases.



PEPSICO and its foundation claim to have spent more than \$55 million and helped more than 68 million people gain access to safe water over nearly 15 years, with the intention of raising that number by the combined populations of Bolivia, Greece, and Jordan by 2030.^{16 17} These large numbers are offered entirely absent of reliable corroboration and seemingly different from its 2025 aspiration of 25 million people made elsewhere on the corporation's website.¹⁸

4 Lack of accountability to people and the planet.

And these self-acclaimed impact figures—celebrated during shareholder meetings and in ESG reports to investors—largely fail to account for the far-more-significant human and planetary harms these corporations have been called responsible for.



As **COCA-COLA** increased its plastic use¹⁹—while advancing efforts that seemed to undermine bottle bills²⁰ and also emerging as the world’s top plastic polluter for five years running²¹—the company non-ironically claimed “addressing climate change and eliminating plastic waste are two of our highest priority ESG issues.”²²

5 Framing legal compliance as corporate goodwill.

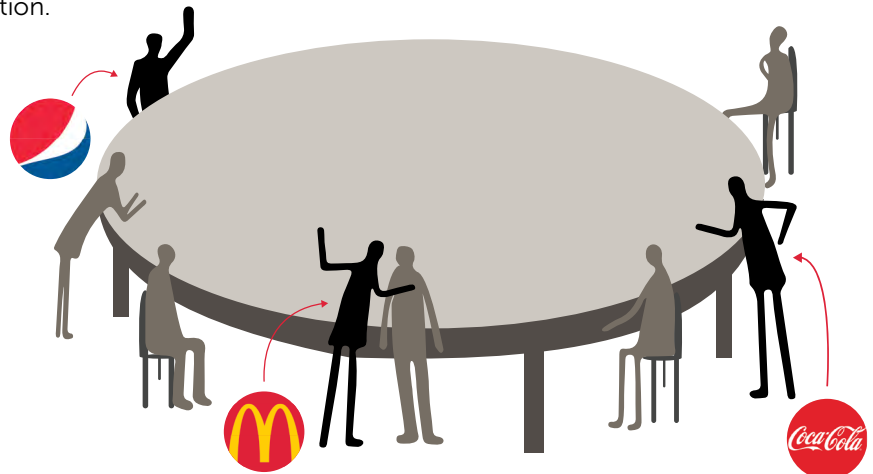
Much of the progress these corporations claim to have achieved in service of the U.N. SDGs is thanks to new legal requirements. What is more, these are legal requirements the food industry has generally opposed across issue areas.



As governments in regions like the EU and Asia are implementing regulations on single-use plastic and other plastic products, **COCA-COLA**, **PEPSICO**, and **MCDONALD’S** are often advertising their waste reduction as part of their commitment to the environment, while in fact policy evolution in these regions is beginning to require corporations to make these changes.

Importance of findings

A great deal is at stake if global corporations are allowed to subvert binding, transparent, effective, and democratically accountable public policy with its opposite. When initiatives such as those analyzed here are used to buy political access, shape political discourse, and afford undeserved political goodwill toward some of the world’s largest polluters, it jeopardizes the fundamental aspirations of the SDGs and the 2030 time horizon for their realization.



For instance...



The health of more than two billion people is at stake. More than a quarter of the global population today is malnourished.²³



About the same number of people struggle to access safe drinking water.²⁴



Plastic and other fossil fuel pollution is contributing to a sixth mass species extinction.²⁵

As the status quo persists, no doubt the SDGs are far beyond their expected realization by 2030 in many countries.

CORPORATE CONTRIBUTION TO GLOBAL CRISES

Unlike the professed success in addressing such global challenges, these corporations' alleged role in exacerbating them is often disturbingly clear.

- McDonald's has been found to have greenhouse gas emissions larger than that of several European countries.²⁶
- Coca-Cola has been found to be the largest plastic polluter in the world year after year.²⁷
- Both Coca-Cola and PepsiCo have an inordinate global water footprint,^{28 29} with a history of being questioned for operating in and extracting water from drought-prone areas at the expense of local communities.^{30 31}
- PepsiCo generates annual revenues exceeding the GDPs of nearly 130 countries,^{32 33} thanks in large part to sales of a host of unhealthy offerings from its soda to its ultra-processed snack lines.

And these are but a few indicative examples of the way these corporations seem to be attempting to obfuscate discourse and polish their public image through their SDG-related initiatives.



CHILDREN MARCH IN BAKU, AZERBAIJAN AS A PART OF GLOBAL CLIMATE WEEK WITH SIGNS REPRESENTING EACH GOAL.

The SDGs address the many intersecting crises—from water access to gender inequity—that threaten and impact people and the planet.

PHOTO CREDIT: ADIL CELEBIYEV, SHUTTERSTOCK.

SDGS “AN IDEAL FRAMEWORK FOR CORPORATE SOCIAL RESPONSIBILITY”

Researchers note the SDGs are ideal for the purposes of CSR because they are widely known, globally recognized, and enjoy the credibility that comes with being associated with the U.N.³⁴ Given as much, it is no wonder the SDGs have been seized upon to advance a host of CSR campaigns. As studies have found, such campaigns generally spend more to trumpet corporate social and environmental commitments than to actually address the industry’s social and environmental harms...to live up to such commitments.³⁵

This is particularly visible in the well-heeled CSR operations of Coca-Cola, PepsiCo, and McDonald’s. McDonald’s, in fact, pioneered the art of CSR for what a former CEO called “very selfish reasons” that were “probably ninety-nine percent commercial.”³⁶

RISKS POSED TO INVESTORS, PUBLIC

Keeping full dimensions and extent of political spending (whether lobbying, electioneering, or under the guise of charity,³⁷ research,³⁸ or CSR³⁹) around SDGs from investors and the public is fraught with risk.

Leading asset management firm Vanguard has cautioned that “poor governance of CPA [Corporate Political Activities], coupled with misalignment to a company’s stated strategy or a lack of transparency about the activity, can manifest into financial, legal, and reputational risks that can affect long-term value for shareholders.”⁴⁰ Further, a coalition of investors representing over \$USD 2 trillion in assets, the Interfaith Center on Corporate Responsibility, has noted, “corporate political spending has a destabilizing effect on the broader economic and cultural environment, inhibiting the long-term sustainability of business...”⁴¹

And 2022 polling finds a significant majority of investors (68 percent) are likely to avoid stocks or funds altogether associated with corporations that contradict their values.⁴² So when stated values turn out to be misaligned with a corporation’s CPAs, it not only betrays the trust of current investors, but also influences the investment decisions of those who might otherwise be inclined to invest. Common sense would dictate, if potential risks are not being fully disclosed, it is not with investors’ or the public’s interest in mind.

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But one example of this is critical media coverage of Coca-Cola and PepsiCo’s efforts to block public health laws in two of the largest soda markets in the world, Mexico and India.^{43 44} Not only are such CPA values misaligned, it reveals the extent to which these corporations will go to prevent the inevitable. Countries are increasingly motivated to safeguard their populations from a corporate-driven health and environmental crises,^{45 46 47} perhaps ultimately by holding Big Food and Beverage liable for the harms their products continue to cause.⁴⁸

What you cannot measure by way of CPAs, you cannot manage. And what you cannot manage, you can’t mitigate the risks surrounding. Unfortunately, these corporations currently insist investors and the public take on faith that their internal codes of conduct, albeit inadequate, are being adhered to globally.^{49 50 51}

Savvy investors are increasingly asking for more in terms of both verifiable values alignment and disclosure,⁵² thanks in no small part to the fact that these corporations, in particular, have proven untrustworthy time and again.

- In recent years, **Coca-Cola has been outed for bankrolling groups seemingly intent on diffusing or derailing public discourse and policy on diet-related disease.**^{53 54} The corporation even issued a mea culpa and “vowed to improve transparency” in the Wall Street Journal in the aftermath.^{55 56}
- **PepsiCo, for its part, has continued to source palm oil from corporations accused of being responsible for violating Indigenous and traditional peoples’ rights despite its claiming to have cut ties.**⁵⁷ The corporation has sought to mitigate the risks stemming from the allegations of its contribution to deforestation, greenhouse gas emissions, and labor abuse by supporting a global nonprofit organization and a certification scheme called the Roundtable on Sustainable Palm Oil (RSPO) that campaigners have called “neither responsible nor sustainable.”⁵⁸
- **And McDonald’s has been forced to very publicly acknowledge the central role it has played in blocking increases to the minimum wage at the local, state, and national level in the U.S.**⁵⁹ This while maintaining its membership in the trade group primarily responsible for lobbying against minimum wage increases.⁶⁰

Impetus for and approach to research

From this inquiry we were interested in better understanding the extent, nature, and reporting of these corporations’ engagement in varied SDG-related initiatives. We did this with the intent of providing a strategy for better scrutinizing the food industry’s broader political activity around the SDGs. We looked at publicly accessible information on these initiatives, including Coca-Cola, PepsiCo, and McDonald’s reports (ESG and others) published between 2018 and 2022.

We also triangulated the findings of the relationships via data available on the U.N. SDG Partnership Platform (now known as the U.N. SDG Actions Platform) and the Global Atlas of Environmental Justice (EJAtlas). The research for the report was conducted in February and March of 2023. Inquiry was focused on three SDG-related thematic areas: water, plastic pollution, and agriculture. These areas were chosen because of significant milestones in global governance this year that are being influenced by the SDG-related political activity of the food industry, namely: the first global water conference in fifty years;⁶¹ the follow-up to the highly controversial U.N. Food Systems Summit;^{62 63} and the negotiation of a first-ever global plastics treaty.^{64 65}



BILLBOARD IN POZNAN, POLAND DISPLAYING ALL 17 SDGS.

This research uncovered a wide range of inconsistent and unverifiable claims from corporations around their actions and plans for achieving the goals.

PHOTO CREDIT: ZBIGNIEW JANKOWSKI, SHUTTERSTOCK.



MEMBER STATES OF THE UNITED NATIONS ADOPTED THE 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT AS A "BLUEPRINT FOR PEACE AND PROSPERITY."
PHOTO CREDIT: SHUTTERSTOCK.

Recommendations

As the world continues its long recovery from the impacts of the COVID-19 pandemic—while grappling with the manifold crises the pandemic and global corporations have exacerbated—Coca-Cola, PepsiCo, and McDonald’s have all reaffirmed, in their own ways,^{66 67} their commitments to the SDGs and to “emerge from the crisis stronger in terms of business fundamentals, sustainability results, and stakeholder engagement.”⁶⁸ The findings of *Big Food’s Big Black Box* suggest these corporations do the following to realize as much:

Globalize political disclosures. Though, for more than a decade, Coca-Cola has pledged to “move beyond required disclosures” and give investors information in a way that is easy to follow,⁶⁹ it continues to offer limited information to investors on its global political spending. What it does offer is largely limited to geographies where some limited political disclosures are required by law. Given Coca-Cola and PepsiCo operate in nearly 200 countries^{70 71} and McDonald’s in nearly 120⁷² with 40-60 percent of their revenues coming from international markets, current disclosures provide an incomplete view of these corporations’ CPAs, not to mention the impacts they have on people’s health, livelihoods, and the environment.^{73 74 75}

Ensure disclosures are comprehensive. As the near absence of publicly and readily available third-party audited disclosures around these corporations’ spending on U.N. SDG-related initiatives suggests, Coca-Cola, PepsiCo, and McDonald’s should become better at ensuring these disclosures are publicly accessible. Given the mounting evidence of the political intent and efficacy of CSR, corporate philanthropy, and research funding, corporate disclosures need to extend well beyond electioneering and direct lobbying and become comprehensive of all corporate activities that may influence policy and politics. This includes information and reporting on progress toward corporate promises on social and environmental impact.

Address values misalignment. The CPAs of all three corporations have in recent years raised investor concern about the say-do gap that exists for each. This has compelled each to evaluate and/or temporarily suspend political spending, largely in response to events like the U.S. Capitol riot.⁷⁶ The U.S. Supreme Court ruling on reproductive rights⁷⁷ and police killings like of George Floyd and Breonna Taylor⁷⁸ have also increased scrutiny around CPAs. Media around these events brings into focus the pervasive, misaligned, and corrosive role of corporate money in politics suggesting global corporations like those analyzed could most easily avoid misalignment by permanently suspending all political spending or at the very least adopting a framework that ensures so-called “congruency audits,” and making all these data public and verified by third parties.

Ensure veracity of progress reports. As the report finds, these corporations make a range of inconsistent and unverifiable claims about what they are doing to advance SDGs and ESG issues they are otherwise accused of undermining. For investors and the public to trust the veracity of these claims, they should clearly define and disclose the science utilized in ensuring impact and make third-party audits public to benefit the public.⁷⁹

Shareholder resolutions before Coca-Cola, PepsiCo, McDonald’s, and a growing number of global corporations across industries echo these recommendations. Their adoption would constitute an important first step in both opening Big Food’s Big Black Box and ensuring the CPAs therein are neither values misaligned nor undermine the very SDGs they purport to uplift.

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