**Engaging with the Alcohol Industry: What You Need To Know**

*“The [WHO] Global Strategy …. restricts the actions of “economic operators” in alcohol production and trade to their core roles as developers, producers, distributors, marketers and sellers of alcoholic beverages …. The development of alcohol policies is the sole prerogative of national authorities. In the view of WHO, the alcohol industry has no role in the formulation of alcohol policies, which must be protected from distortion by commercial or vested interests.”* Dr Margaret Chan, Director General, WHO, 2 April 2013

**Introduction**

The influence of the alcohol industry and its interest groups – such as Drinkaware, the Portman Group, the Wine and Spirits Trade Association and the British Beer and Pub Association – has increased in recent years. This was made apparent by the Government’s Responsibility Deal and has been underlined in a recent report in the British Medical Journal (*‘Under the Influence’*) which highlighted the level of contact between senior politicians and civil servants on the one hand and industry representatives on the other. Increasingly, this influence is being seen at the local level with packages of support being offered for training, education and partnership initiatives with minimal evidence of effectiveness, while local plans to introduce measures such as Early Morning Restriction Orders and Late Night Levys are routinely opposed.

This briefing document has been produced by Balance, the North East Alcohol Office, to outline the efforts of the alcohol industry in trying to influence alcohol policy and actions and to discuss the potential implications for local organisations in terms of their own relationships with alcohol industry organisations and companies.

**Summary**

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| * Evidence continues to build showing that the global alcohol industry is working to influence policy at the international, national and local levels in ways designed to favour their business interests at the expense of public health and well-being * Interventions proposed by the alcohol industry are generally weak, are rarely evidence-based and unlikely to reduce harmful alcohol use * A key component of alcohol industry strategy is to promote partnership working in order to control the policy agenda * Partnerships are used to gain political and public support and credibility for ineffective policy measures, whilst undermining support and misrepresenting evidence on effective regulatory interventions * Partnerships are invariably used by the alcohol industry to re-frame the problem as one caused by a minority of individuals abusing a lawful product which provides pleasure and benefit to many moderate drinkers, rather than a population-wide issue involving a harmful product produced, marketed and sold by organisations seeking to maximise profits for their shareholders * Those with a responsibility for and interest in reducing the levels of alcohol harm should be aware of the motivations of the alcohol industry in seeking partnership approaches and should work to ensure public health goals and objectives are protected |

**Advice from the experts**

The following guidance was provided by over 500 public health professionals, alcohol scientists and NGOs from 60 different countries in a Statement of Concern submitted to the WHO in February 2013[[1]](#endnote-1):

* Avoid funding from industry sources for prevention, research and information dissemination activities. Refrain from any form of association with industry education programmes
* Insist on industry support for evidence-based policies, and cessation of anti-scientific lobbying activities
* Insist on rigorous adherence to Conflict of Interest principles
* Support independent research in developing countries on non-commercial alcohol and alcohol marketing
* Make all information and details relating to funding and/or partnership work transparent and available for public scrutiny

**Alcohol Industry Strategy to Influence Alcohol Policy**

*“Global initiatives promoted by the alcohol industry are overwhelmingly derived from approaches of unknown or minimal effectiveness or approaches shown to be ineffective through systematic scientific research. Moreover, the industry initiatives only rarely include practices that the WHO and the public health community consider to have good evidence of effectiveness, and few have been evaluated in the low and middle income countries where they are now being disseminated.”*

From ‘Public Health, Academic Medicine, and the Alcohol Industry’s Corporate Social Responsibility Activities’, 2013[[2]](#endnote-2)

To avoid regulation, the global alcohol industry has developed a comprehensive strategy to influence alcohol policies and manage the policy-making environment in ways that best protect its business interests. Analysis of industry policy-making activity has identified the following key components:

* **Attributing alcohol problems to an irresponsible minority**

Focusing attention on the drinker and not the substance. Problems are attributed to a minority who drink ‘irresponsibly’ and are contrasted with the majority of ‘moderate’ drinkers. Framing the issue in this way allows the industry to argue for policy solutions which focus on education and ‘responsible drinking’ campaigns rather than the evidence-based measures which regulate the drinking environment through controls on price, availability and marketing.

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| **North East Fact:** almost 40%[[3]](#endnote-3) of people in the region admit to drinking above the recommended guidelines. Evidence tells us that people under-estimate how much they drink so the real figure is likely to be much higher |

* **Promoting the least effective policy interventions and industry self-regulation**

Promoting interventions with the weakest evidence base for reducing alcohol harm as an alternative to regulatory measures. These include self-regulation for alcohol marketing, voluntary codes of alcohol retail practice, and information and education approaches

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| **Fact:** The alcohol funded body The Portman Group champions self-regulation. Since it was founded in 1989 alcohol related deaths in England have increased by 36%[[4]](#endnote-4) while alcohol related hospital admissions have increased by over 140%[[5]](#endnote-5) |

* **Distorting and misrepresenting evidence on effective alcohol policies**

Using media statements, consultation responses and public hearings to distort or misrepresent evidence in support of the most effective policy interventions including price controls and restrictions on availability and marketing

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| **Fact:** The industry has consistently undermined and misrepresented the evidence supporting a minimum unit price for alcohol in spite of the fact that independent evidence from Canada has shown that a 10% increase in minimum price results in a fall of 32% in wholly attributable alcohol deaths[[6]](#endnote-6) |

* **Promoting partnership working**

Promoting partnership working and developing relationships with policy-makers and practitioners provides the industry with access, influence and credibility. Engaging with public health and other public interest bodies enables the industry to ‘capture’ the policy agenda, as the initiatives adopted by partnership approaches are likely to involve measures with the weakest evidence

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| **Fact:** The Government’s Responsibility Deal? has resulted in alcohol policy which is not based on the most effective interventions, such a minimum unit price |

**Alcohol Industry Efforts to Influence UK Policy**

**Influencing Westminster**

The alcohol industry’s ability to influence Government decisions came into sharp focus with the decision to drop minimum unit price from the national alcohol strategy.

The Prime Minister personally committed to introducing the measure in the launch of the draft strategy in March 2012. In the foreword to the strategy Mr Cameron said: “ …the responsibility of being in government isn’t always about doing the popular thing. It’s about doing the right thing. “[[7]](#endnote-7)

Elements of the alcohol industry clearly saw this as a challenge and in subsequent months did everything possible to undermine confidence in the independent supporting evidence. For example, the Wine and Spirits Trade Association’s policy states:

“There is no real world evidence that minimum unit pricing would be effective in addressing alcohol misuse, as it has never been tried on a national basis anywhere in the world. It would penalise all consumers, especially families on low incomes and pensioners, rather than targeting problem drinkers”[[8]](#endnote-8)

Evidence produced by independent researchers with no commercial axe to grind makes it clear that MUP is a measure targeted at heavy drinkers and young people which has minimal impact on people drinking within the recommended limits and which wouldn’t affect pub prices. Indeed, real world evidence in British Columbia in Canada has shown that an increase of 10 per cent in minimum price results in wholly attributable alcohol deaths falling by 32 per cent.

This approach has often been combined with promoting less effective options. For example, Sheffield University has demonstrated that a ban on below cost sales would reduce consumption by only 0.04%[[9]](#endnote-9). It would only result in 14 fewer deaths in year 10 of the measure compared with 960 lives saved with a 50p minimum unit price[[10]](#endnote-10). There would be 900 fewer crimes with a below cost ban, yet the figure for a 50p MUP is over 50,000. Yet this is the measure that bodies such as the British Beer and Pub Association have chosen to champion.

Nevertheless, it is a strategy which has worked, according to the British Medical Journal (BMJ) report *“Under the Influence”[[11]](#endnote-11)*, which outlines the links between Government – and the Department of Health in particular – and the alcohol industry. It focuses on the period around the national alcohol strategy consultation and argues that alcohol industry representations were instrumental in encouraging the Government to drop its commitment to MUP.

Key points from the report include:

* Freedom of Information (FOI) requests have found evidence of *“dozens of meetings between industry representatives and the Department of Health alone, in some of which alcohol companies were encouraged to argue the case for alternatives to minimum pricing even after the policy had apparently been set in stone.”*
* A quote from pro-MUP Conservative MP Sarah Wollaston stating that *“every avenue I went down to try to get a meeting before the decision was announced was closed off, or I had a meeting and it would be cancelled the next day.”*
* Three days before the announcement that MUP was dead George Osborne was one of 100 MPs and members of the House of Lords who mingled with guests from the industry. He was awarded the title of ‘Beer Drinker of the Year’ by the All Party Parliamentary Group on Beer for scrapping the beer duty escalator.
* The British Beer and Pub Association is quoted as saying it is difficult to calculate how many meetings they have had with members of the government or senior civil servants in the last year as they have *“daily contacts with officials and frequent meetings with ministers and their advisors across a range of government departments.”*
* A Treasury Minister had a number of meetings with the industry during the consultation and the Treasury has delayed responding to requests for minutes of these meetings, while a further seven meetings were held with Treasury officials between March and July 2013, when the announcement to abandon MUP was made.
* Six days after the consultation ended Anna Soubry, then Parliamentary Undersecretary of State for Public Health, met with seven representatives of the industry.
* In addition, Soubry and Home Secretary Theresa May, hosted a meeting with alcohol industry representatives on 3 July, three weeks before the U-turn on MUP, the purpose of which was to *“discuss voluntary action the industry could take…”* A total of 18 organisations were represented, including the major supermarkets and the industry funded Portman Group

**Challenging Scotland**

Scotland is leading the world in evidence-based alcohol policy. The Scottish Parliament has approved the introduction of a MUP. The only thing standing in the way is the alcohol industry, led in this case by the Scottish Whisky Association. The Government has already won one legal challenge but, taking lessons from their colleagues in tobacco, the Scottish Whisky Association decided to appeal.

A recent study has highlighted that as long ago as 2008 the industry, in responding to the Scottish Government’s consultation on *Changing Scotland’s Relationship with Alcohol[[12]](#endnote-12)*, were misrepresenting strong evidence, promoting weak evidence, making unsubstantiated claims about the adverse effects of policy proposals and promoting un-evidenced alternatives.

**Influence at the local level**

Colleagues at the local level, especially those responsible for working within the licensing act, are constantly facing the challenges set by the alcohol industry. It is clear that national and global alcohol companies and trade bodies have little regard for ‘localism’ and the damage that alcohol can do to communities in the North East.

Take the case of Early Morning Restriction Orders (EMROs) and Late Night Levys, two powers introduced by the current government designed to give local councils and alcohol partnerships more control over the role that alcohol plays in their communities. Almost immediately the Association of Licensed Multiple Retailers announced that they were setting up a fighting fund to ensure these measures were not put in place. Attempts to introduce EMROs have attracted widespread opposition from national bodies representing the alcohol industry and to date nowhere has been successful in implementing the measure.

On a more routine basis, the alcohol industry and their retail partners ignore the desires of local communities. For example, it seems that the major supermarket groups will appeal decisions to refuse licensing applications as a matter of routine, as has happened recently in one North East city. In so doing they are happy to ignore the problems of nearby street drinking or the fact that they have another shop selling alcohol a few hundred yards away.

**Guidance for Local Alcohol Partnerships**

Balance believes that partners should understand the context and long-term strategy of the alcohol industry when making decisions on whether or not to work with alcohol and retail companies and their trade organisations.

We recognise that there are occasions when partners will need to interact with the industry and its representative groups. We believe this is entirely appropriate where it relates to the implementation of policy that has been independently developed by experts based on evidence.

When approached by the industry or one of its representative organisations, Balance would encourage partners to ask some searching questions.

**Project or intervention with the public or others**

If you are considering working in partnership with an alcohol company or representative group on a project or intervention designed to reach out to the public or other key groups, you should ask yourself:

* What is the objective of this organisation in offering their support?
* Is the project likely to be used to present the industry in a positive light?
* Will the project deflect from evidence-based interventions?
* Does your industry partner use similar interventions as an excuse not to support population-level interventions?
* Can you be sure your new partners will not misrepresent the joint work you are doing? Do you have control of the publicity surrounding it? Will they agree to an independent evaluation that is not financed by them?
* Are you giving credibility to an organisation that is undermining the evidence base? Have you checked what they are publicly saying about interventions such as minimum unit price, restrictions in availability and promotion?
* If this is a global company, do I know what standards they are applying outside the UK and particularly in the developing world?
* Should I be providing access to policy formers and decision makers to companies and their funded organisations when they have a legal responsibility to increase profits and therefore alcohol consumption?

**Sharing a public platform**

If you are thinking of inviting the industry or associated body to an alcohol-related event, ask yourself:

* Am I giving them access to policy and decision makers and is that appropriate?
* Will their presence undermine the independent evidence base? Check what their organisation is saying publicly elsewhere
* Are they using the platform to establish credibility that their actions elsewhere don’t deserve? Do their actions and the actions of their brands match the words they are likely to use on the platform?
* Will it provide an opportunity to hold them to account?

**Using industry developed programmes or materials**

If you are considering using programmes or materials developed by the industry, ask yourself:

* Has the content of the material been developed by or reviewed and approved by independent experts in public health and community safety?
* Does it paint an unrealistically positive picture of the role alcohol plays in society?
* Is it clear on the range of harms caused by alcohol?
* Does it minimise the problem, blaming a small minority of misbehaving individuals while not recognising that large proportions of the population are drinking at levels of increasing and higher risk?
* Would they be prepared to take their branding off the material and, if not, are they more interested in the positive publicity they will receive rather than the impact the material or programme will have?
* Has it been tested on the target audience to evaluate its effectiveness?

The alcohol industry is made up of a variety of constituent parts. At the tactical level, it may be useful to work with some members of the industry on a limited and time limited basis. For example, it makes sense to work with local publicans in calling for the introduction of a minimum unit price. However, that level of tactical support is unlikely to develop into a long term, strategic partnership. We also recognise that local government officers, particularly those responsible for the application of the licensing laws, will be required to engage with representatives in order to fulfil their work responsibilities. However, if those relationships stray outside the bounds of the application of laws and regulations, it would still be appropriate to ask some of the questions outlined above.

There are some areas that should be ‘no-go’ areas for the industry. This includes industry support for education-based programmes for children and young people; sponsorship of sporting, cultural and other activity that is likely to expose children to positive images of alcohol; and direct sponsorship of treatment activity.

**References**

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