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'Water dripping on stone'? Industry lobbying and UK alcohol policy

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Despite a growing literature on corporations as political actors, relatively little is known about how alcohol industry actors attempt to influence public policy. In the context of contemporary debates about the minimum pricing of alcoholic beverages, and drawing on semi-structured interviews with a range of key informants, this article investigates the means by which alcohol industry actors gain access to policy makers and the strategies used to influence policy. It finds that the strategies of alcohol industry actors are focused on long-term relationship building with policy makers, involving the provision and interpretation of information and the promotion of various forms of self-regulation.

Key words: alcohol policy • corporate actors • corporate power • industry lobbying

Introduction

Despite a growing literature on corporations as political actors (Hillman and Hitt, 1999; Farnsworth and Holden, 2006), and the now extensive literature on the lobbying strategies of tobacco industry actors (Holden and Lee, 2009; Hurt et al, 2009), relatively little is known about the alcohol industry. Recent studies have examined the political activity of alcohol industry actors in Australia and the United States (Giesbrecht, 2000; Munro, 2004; Bond et al, 2010), but few studies have focused on alcohol industry lobbying in the British context (for an exception, see Miller and Harkins, 2010). The issue of industry influence on policy is particularly pertinent given the high levels of alcohol-related harm evident in the United Kingdom (UK) (Leon and McCambridge, 2006a, 2006b) and the extensive public debate about the most effective policy responses (Hawkins et al, 2012).

There is widespread concern among public health activists that the alcohol industry has been afforded too prominent a position by government in policy debates (Baggott,

2006, 2010; Anderson, 2007). Consequently, it is argued, the policies pursued by government over the last decade have served the commercial interests of industry at the expense of the public's health (Room, 2004). This article focuses on the lobbying activities of the UK alcohol industry and the role it plays in the alcohol policy process. It aims to deepen our understanding of the political strategy of the UK alcohol industry and its influence on alcohol policy. More specifically, it investigates the points of access for industry actors in the policy process and the mechanisms and strategies through which they engage government.

The role of corporate actors in the policy process has received attention from scholars of political science and business studies (Lindblom, 1977; Hillman and Hitt, 1999; Farnsworth and Holden, 2006). Political scientists have emphasised the structurally privileged position enjoyed by business (Lindblom, 1977), given the apparent dependence of governments on the employment and tax revenue generated by businesses, and their role in mobilising resources within the economy (Dahl and Lindblom, 1992). The ability of some businesses to relocate overseas creates an incentive for governments to pursue business-friendly policies (Farnsworth, 2004). Others have highlighted that firms' ability to provide expert knowledge on a specific policy issue facilitates their access to key decision makers (Hansen, 1991; Hillman and Hitt, 1999). Bouwen (2002) employs the term 'access goods' to describe the informational resources possessed by businesses, and desired by government, which guarantee corporate actors access to policy makers.

In the field of management studies, scholars have focused on corporate political strategy. This literature emphasises the impact of government policy on businesses (Hillman, 2003) and the strategic importance to corporations of ensuring a favourable regulatory environment (Epstein, 1969; Baron, 1995). Hillman and Hitt (1999) argue that corporations are faced with three main decisions in formulating their political strategies. They must decide:

1. whether to adopt a transactional (issue-by-issue) approach or a long-term (relationship-building) approach;
2. whether to act individually or collectively (eg through trade associations);
3. which strategies to use to achieve their objectives.

Businesses employ three main strategies: informational, financial and constituency building (Hillman and Hitt, 1999). The first seeks to influence policy by providing decision makers with pertinent information or specific technical expertise. Businesses conduct their own research, lobby policy makers, respond to consultations and appear as expert witnesses. Financial strategies rely on inducements such as campaign contributions to influence decisions makers' positions. However, it is possible to define financial strategies more broadly to include the delivery of public goods. Thus, the ability of corporations to deliver specific policy outcomes – for example through a system of self-regulation – may be considered a form of financial incentive to ministers and civil servants with limited resources. Finally, constituency-building strategies aim to build support for particular policy interventions among the broader public, who in turn express these views to government.

Hillman and Hitt's typology provides a useful analytical lens through which to examine the political activities of alcohol industry actors. This article focuses on specific aspects of their framework. Alcohol corporations' decisions to act individually

or collectively and their constituency building efforts through media and public relations campaigns are discussed elsewhere (Holden and Hawkins, 2012; Holden et al, 2012). Here, we argue that alcohol industry actors pursue a long-term, relationship-building approach to corporate political strategy and analyse how they execute this strategy. A long-term, relationship-building strategy requires extensive access to policy makers. Consequently, we focus our analysis on the points of access available to industry actors in the policy process – the specific policy actors they seek to contact – and the mechanisms through which these actors are engaged. We then examine the specific strategies employed by industry actors to develop their relationship with policy makers and to establish themselves as key partners in the policy process.

While we make reference to *the* alcohol industry in this article, it should be highlighted that the industry is not monolithic, but composed of a variety of actors with differing agendas and priorities (Holden et al, 2012). Despite the differences in policy position, there is a high degree of similarity between the tactics employed by actors in different sectors. As such, we identify specific actors only where there is a discernable difference in approach from other sectors of the industry. When doing so it is not always possible to identify individuals, or even their organisations, as we are bound by strict confidentiality agreements.

Methods

This article draws on a series of semi-structured interviews timed to coincide with policy debates in the UK over the pricing and promotion of alcohol. We conducted 35 interviews between June and November 2010 with respondents from all sections of the UK alcohol industry, former government ministers, Members of Parliament (MPs) and Members of the Scottish Parliament (MSPs), civil servants and public health advocates. Respondents were selected based on a combination of purposive and snowball sampling, following an initial stakeholder analysis. Our study draws both on a cross-section of the UK alcohol industry and on other respondents familiar with industry actors' roles in the policy process. Response rates varied between different types of actor. Table 1 provides a breakdown of the respondents and the response rates of those contacted. The response rate from government actors was low (15%) and it is difficult to know to what extent this reflected a reluctance to speak on these issues or whether it was simply the result of over-full diaries. On the other hand, the

Table 1: Breakdown of interview respondents by sector

Sector	Interviews conducted	Did not respond	Declined interview	Total
Producer companies	5	2	4	11
On-trade operators	2	2	0	4
Off-trade retailers	2	2	1	5
Industry trade associations	13	0	0	13
Government	7	29	12	48
Public health	6	0	1	7
Total	35	35	18	88

response rate from trade associations was particularly high (100%) compared to other types of industry actor (40–50%). This is unsurprising given the general preference of industry actors to speak through collective bodies (Holden et al, 2012), but may have affected the type or quality of the information obtained. Perhaps also unsurprisingly, the response rate from public health actors was high (86%).

Notwithstanding the qualitative nature of this study, where response rates or absolute numbers interviewed were low, it is particularly difficult to know the extent to which the views and experiences conveyed were representative of the wider set of actors. However, while not all those contacted agreed to participate in the study, we were able to speak to respondents from government, including both elected representatives and civil servants, who were in a position to have an in-depth understanding of the role of industry actors. We also obtained responses from all sections of the industry, including producers of wines, beers, spirits and cider; on-trade and off-trade retailers; and respondents from trade associations representing all these sectors. While the particular interests, marketing strategies and policy preferences of industry actors differed to some extent (Holden et al, 2012), there was a high degree of consistency among responses concerning the nature of the policy process and strategies for influencing it, indicating a degree of ‘saturation’. Furthermore, respondents from trade associations were very candid, presenting participation in the policy process as a routine activity, although we cannot know what information may have been withheld. Triangulation of responses from different sets of actors permitted a nuanced picture of industry participation in the policy process to be constructed.

Interviews were semi-structured and conducted by the first author. The interview schedule devised drew on the existing academic literature on alcohol policy and the role of corporate actors in the policy process. In addition, it was informed by an analysis of publicly available documents produced by alcohol industry actors and public health advocates on current issues in the UK. Interviews covered both substantive policy issues (ie, pricing and promotion policy) and the processes through which policy is made.

Interview responses were then transcribed and analysed using NVivo software. To improve the reliability of the analysis, recordings of the interviews were listened to by both authors prior to the detailed analysis in order to identify the key themes and ‘nodes’ used to code the interviews. The interview transcripts were triangulated against the documents analysed to build up a detailed picture of the processes through which alcohol industry actors engage government and attempt to influence policy.

Access to policy makers

Alcohol industry actors seek to involve themselves at every stage of the policy process from initial consultations, through the deliberative and legislative phases to the final implementation of new measures. Representatives from some of the largest and most prominent producer and retailer organisations occupy a particularly privileged position, being invited to so-called ‘pre-consultation discussions’. Industry actors seek access to the entire range of political actors involved in policy making: civil servants, MPs, regional and local government actors, special advisers and ministers, including those at the very highest level of government.

Officials, ministers and MPs

Civil servants are at the heart of the policy process with responsibility for drafting proposed legislation and for its implementation and enforcement. As such, much of the industry's lobbying activity is focused on officials within relevant ministries such as the Department of Health, the Home Office and the Treasury. Respondents agreed that their first point of call on a given issue would be to the relevant officials in the ministry in question and they felt they enjoyed a high level of access to officials:

'You can pick up the phone to them, you can talk to them, it's not a problem of access. It's just a case of ... you have something to say, you have something to contribute, they'll listen.'

In addition to the political importance of the civil service in its own right, officials acted as gatekeepers to ministers. As the representative of a national trade association commented:

'So, you know, the civil servants are going in there and saying, this lot are a good bunch and you should work with them, and help them and see what they're saying.'

Ministerial contact was highly valued by respondents, but performed a different function to civil servant contacts within companies' overall lobbying strategies. While civil servants are responsible for the detailed legislative proposals brought forward, the overall political direction is set by ministers. Industry actors displayed a sophisticated appreciation of this process. As a representative from a national trade association explained:

'It's a ... subtly different activity because at the ministerial level you are selling them how your idea ties into their political objectives. And at a civil service level you're doing more than that because you're also saying "and this is how this specific element of it delivers that broader aspect".... At a ministerial level you will be saying, "if you are serious about tackling alcohol-related crime and disorder, if you don't tackle the off-trade you will not reduce the headline figures".... You then would start to talk to the civil servants to say "if you want to reregulate the off-trade then a ban on below cost selling is more effective than the minimum pricing". And that message then goes up to the minister, and then you're talking to the minister again about "ok, now what we want is a ban on below cost selling", and then you're back down to the civil servants to say "if you want a ban on below cost selling, this is how you deliver it". So ... it works in tandem and it's a sales job in both cases, but it's a sales job at a different level.'

Contact with ministers, while less frequent than with officials, is still common for the largest companies and trade associations. For example, the representative of a national trade association claimed that they would probably meet the public health minister three or four times a year and may organise lunch meetings where key member companies could discuss specific issues at "a behind closed doors session with the

minister”. While not all companies or trade bodies would enjoy quite this level of access, they nevertheless meet ministers on at least an annual basis as part of a cycle of meetings on a specific issue with a range of different stakeholders.

In addition to direct contact with ministers, some respondents highlighted the value of speaking to ministers’ special advisers. Access to these advisers was seen as a parallel route into government, which could be pursued alongside direct overtures to the minister. As a representative of a national trade association commented:

‘[T]o talk to an influential special adviser is as nearly as good as talking to the minister. And it, you know, and unless you’re trying to get a sort of trophy meeting, as I describe it, with the minister, actually a conversation with the special adviser is as good. And they thank you for it; because the special adviser gets a bit of kudos and insight, and the minister’s time is not taken up.’

Many industry actors also sought to engage backbench MPs and used connections to local MPs who have a brewery or a bottling plant in their constituency as a means of securing a meeting or encouraging them to take up an issue. Some commentators were keen to downplay the significance of this, arguing that it is the role of MPs to represent the interests of companies in their constituency. Andrew Griffiths MP, who has a number of breweries in his Burton-on-Trent constituency, argued that alcohol industry actors are treated no differently from other businesses in his constituency, whose interests he would represent. Once MPs had been convinced to pursue a specific issue it was hoped that they would be able to win additional support for their cause among fellow parliamentarians and perhaps even ministers. Thus, a sympathetic MP with a constituency link to a particular company or sector of the industry could be an effective means of getting the industry’s message out to legislators, or in bringing issues onto the political agenda.

The Opposition

According to respondents, industry actors also seek to lobby opposition groups within Parliament. For example, those wishing to oppose measures put forward by the government may attempt to use opposition MPs to do so. There is considerable evidence that this was the tactic employed by industry actors opposed to the introduction of Minimum Unit Pricing (MUP) in Scotland (Holden and Hawkins, 2012). At Westminster too, governments may be forced to drop certain policy options in the face of vehement opposition from MPs.

Opposition parties present a particular lobbying opportunity for corporations. The lack of resources they possess to scrutinise government policy and conduct their own research on key issues, creates a void that industry actors are able to fill by providing data and human resources. As the representative of one trade association told us:

‘If you’re the small business spokesman, or even the ... Shadow Home Secretary, you’ve only got three or four people who work for you to provide you with briefings on a whole raft of topics, and you also are looking for ways in which to oppose the current government because that’s your job. So, actually, when you can find people out there who can help you to provide information for a

supposition, then you have that close working relationship ... or closer working relationship I should say.'

In the case of UK alcohol policy, the lead-up to the General Election of May 2010 created a set of circumstances in which it was possible for industry actors to foster ties with the Conservative opposition, which was widely predicted to win an overall majority. The Conservatives regard themselves as the party of business, with an ideological proclivity towards market-based solutions to policy issues. Allied to this, the challenging fiscal situation that the UK faced and the reformist tendencies of the prospective Secretary of State for Health, Andrew Lansley, meant that the election presented an almost unique opportunity for corporate actors to influence the incoming government's health policy.

Prior to the election, industry actors moved to ensure that their interests were represented in the prospective government's policies. Their involvement in policy development was actively encouraged by the Conservatives themselves. The Public Health Commission (PHC), set up by Lansley when Shadow Health Secretary, and populated by a range of corporate actors, was a key mechanism through which the party developed its public health policy. The PHC demonstrates both the reliance of opposition parties on outside resources in their policy development, and the effectiveness of this as a platform for industry actors such as Diageo and the Wine and Spirit Trade Association (WSTA) to articulate their interests directly to the prospective government. Their involvement in the PHC has proven highly successful with the current government's 'Responsibility Deals' exemplifying the partnership-based approach to regulation that the industry advocates (DH, 2011).

Mechanisms of access

This section examines the different channels through which industry actors engage key policy actors. Contacts were established between industry actors, MPs, officials and ministers through what were described by respondents as 'standard lobbying practices'. By this they meant a range of activities, including both written submissions and face-to-face meetings of various types. Written submissions or briefing documents prepared by companies or trade associations often served as a prelude to a meeting. In the words of a representative of a national trade association, they act as a 'calling card', which is the pretext for a meeting with officials or the minister. In addition, industry actors attended lunches or breakfasts with ministers, MPs and/or civil servants and invited politicians to visit company sites.

Contact with officials and ministers took the form of both bilateral meetings and roundtable events involving industry actors and stakeholders from outside the industry, and included representatives from both individual companies and trade associations. During the periods immediately preceding the introduction of new legislation or prior to the annual budget, the frequency of these meetings, particularly with officials, increased. This was seen by respondents as a normal and perfectly legitimate part of the policy process. It reflects the status afforded to industry actors as key stakeholders in the policy process. Public health activists claimed that they are simply not able to obtain the level of access to government granted to industry actors.

The ongoing dialogue between the industry and government was facilitated through personal contacts between the employees of trade associations and companies and

relevant figures in government. One respondent cited the example of the apparently close relationship between the Secretary of State for Health and the head of corporate affairs at Tesco, as evidence of this type of connection. Another respondent, from a producer trade association, explained their own personal and family connections within different branches of government:

‘I’ve got good influences in European Parliament; my children have worked there, my daughter’s in the Cabinet Office, you know. I know these guys, they’re friends of mine; I was a Tory candidate, you know.’

Where personal networks were insufficient, industry actors used outside agencies to pursue their public affairs strategies and to foster contacts with policy makers. These agencies perform a number of different functions:

- providing advice on lobbying strategy and lines of communication;
- providing information about the political process;
- providing insights into the political climate;
- helping to identify key actors and points of contact;
- providing assistance in drafting papers for submission to government;
- media monitoring and response.

Agencies were also used to set up meetings with key decision makers. For example, at the 2010 Liberal Democrat Party conference, an agency retained by a national trade association organised an event to be attended by the agency’s clients:

‘They’ve created a party really; presumably made a contribution to Lib Dem funds, and this minister is going to grace us with his presence. But there will only be about eight or 10 of us talking to him.’

Many industry respondents played down both the extent to which they made use of agencies and their effectiveness, arguing that the alcohol industry is no different from other stakeholders in its use of agencies. Respondents from non-governmental organisations (NGOs) and the public health sector, however, highlighted that they lack the financial resources to employ consultants in the same way as industry actors.

Official consultations

Industry respondents consistently highlighted official consultations as a vital means of communication between business and government. Indeed, the representative of one national producers’ association commented that the sheer volume of alcohol regulation in recent years meant that consultations alone had resulted in a substantial dialogue between government and the alcohol industry, obviating the need to seek out other channels of engagement.

There are opportunities for industry actors to present their views before, during and after the set-piece consultation. Prior to the official consultation, a series of pre-consultation meetings are often held to discuss the parameters of the consultation with key industry stakeholders. The importance of access to policy makers at such an early phase in the policy process cannot be underestimated. The earlier stakeholders

are able to intervene, the more effectively they are able to defend their interests by shaping the parameters of the debate, keeping issues off the agenda and influencing those issues that are discussed.

During the consultation itself, stakeholders participate in 'roundtable' events with officials as well as via written submissions. This provides an additional forum for entering the debate that, while open to all stakeholders, may offer a greater opportunity to some organisations than others to have their voice heard. Those with the greatest resources in terms of time and human capital are able to participate in the full range of events. A lack of resources was a common complaint from NGO respondents frustrated at the difficulties they confronted in articulating their position on policy issues to both government and the public. Industry actors, by contrast, were able to engage with government at every juncture. As the representative of one public health organisation commented, "the agenda is set by people who have got the time and effort to talk the hind leg off a donkey. And we just don't have that level of time and resource".

Industry lobbying does not end with the conclusion of the consultation period. Companies and trade associations often seek follow-up meetings to discuss or clarify their position once their official submissions have been made. It remains unclear whether these meetings are available to all stakeholders who request a meeting. Nevertheless, neither pre- nor post-consultation meetings are an official part of the consultation process and are worthy of greater scrutiny given the opportunity they afford the best-resourced organisations to shape the content and direction of policy.

All Party Groups

All Party Groups (APGs) are cross-party groups of backbench MPs focusing on specific issues. The APGs on beer, cider, wine and spirits and retail are the main groups of relevance to the alcohol industry and there is a significant level of involvement from industry trade associations in the organisation and functioning of these groups. The WSTA, for example, provides the secretariat for the APG that shares its name, while the British Beer and Pub Association provides similar support to the All Party Beer Group (APBG), the largest APG in the previous Parliament and one of the most active.

The purpose of such groups is to create a dialogue between MPs and the communities they represent. The secretary of one APG described his job as being "to help to deliver the audience" for companies. APGs host a range of events, including wine tasting evenings held by the wine and spirits group, breakfasts held by the retail group for new MPs, tours of supermarkets and other ad hoc meetings. For example, members of the APBG meet senior ministers such as the Home Secretary on issues of particular importance within their policy remit. In addition, the APBG and the All Party Cider Group hold annual dinners, which provide additional networking opportunities. As the representative of a leading brewer commented on one such event:

'I'm in this parliamentary group this evening and what we are doing – this is the whole concept actually – we are buying a table, each company, and then we have MPs sitting with us. So there are four from our company and four MPs. So we do have a dialogue around the table. And we told them I was going to attend this and what are our concerns and so on.'

In addition to the events and meetings it hosts, the APBG undertakes studies and publishes reports on issues relating to the brewing industry. These are distributed to MPs and ministers asking for their responses on the areas within their remit. This is indicative of a wider function of the APGs. As well as facilitating direct contact between stakeholders and MPs, the groups act as a conduit between industry actors and the government via the MPs in the group. As a representative of a national trade association explained:

‘[T]he chairman of the All Party Parliamentary Beer Group will bump into the Health Minister and will be able to ... you know. We would put in representations to him as a matter of course so that he is equipped with the kind of messaging that the industry is about so then he has informal conversations in the lobby.’

Industry bodies recognise the effectiveness of this as a channel and aim to provide group members with the resources needed to make their case as effectively as possible. Membership of an APG also appears to lend extra weight to their message.

Some respondents were keen to highlight the fact that APGs are not designed as a platform for influencing parliamentarians, but as a mechanism for generating interest in things such as wine or in demonstrating pride in an industry. Others, meanwhile, argued that the effectiveness of the APGs as a lobbying tool is limited. Both these arguments, however, depend on a narrow definition of lobbying and a restricted understanding of how the impact of this type of activity ought to be measured. Lobbying may take the form of overt requests for action on a given issue, which may lead to a directly attributable outcome. However, much lobbying activity is not designed at achieving specific, short-term goals (ie, the transactional approach identified by Hillman and Hitt, 1999). Its aim instead is to develop long-term relationships with key decision makers and influencers. It maintains the profile of the industry and reinforces the idea that industry actors are key stakeholders in the policy process whose views must be taken into account.

Party conferences

Party conferences were seen by industry respondents as an important forum for networking with politicians at receptions and fringe meetings, some of which are organised or sponsored by industry actors. The importance of conferences is that they present a concentrated audience of MPs, ministers and advisers. They are an opportunity to raise the profile of the industry among decision makers and for organisations to present themselves as key contacts within the industry. Paraphrasing one respondent, it is a chance to get your face known. As with APGs, some respondents were sceptical about the effectiveness of conferences as a lobbying tool. However, this again depends on a narrow, transactional account of the lobbying process, which underplays the effectiveness of long-term relationship building.

Industry strategy

This section places the preceding discussion in the context of the broader lobbying strategy of industry actors. Drawing on Hillman and Hitt’s (1999) typology of corporate political strategy, we examine the way in which industry actors use the

access they are afforded to key decision makers to influence policy. Their strategy is to develop long-term relationships with key decision makers and to pursue a partnership-based approach to policy making. We then focus on the 'informational' and 'financial' strategies employed to develop these relationships.

Relationship building

The various meetings, forums and events that bring industry and government together are part of a broader strategy of relationship building, which positions industry actors as key stakeholders in the policy process. As the representative of a national public health charity put it, public affairs can be likened to "water dripping on stone". The metaphor employed describes not only the constant, ubiquitous nature of alcohol industry lobbying, but also the subtle and often indirect manner of their engagement with government. The representative of a national trade association offers the following advice to his members when meeting politicians:

'Just make yourself thoroughly personable as a knowledgeable, informed and interesting person so that when ... you meet them next ... they'll take your call. And then you go and sell them your widgets.... You meet a minister socially or semi-socially, you want to say enough to make sure that they know that you know what you're talking about. But don't be specific; don't bang their ear about the iniquities of the fourth clause of the 15th chapter of the Bill.'

The sustained contact between the industry and government establishes the norm that industry actors should be part of the policy process. This is evident in the widespread acceptance among politicians, and even some NGO respondents, that industry actors are key partners in delivering policy solutions. It is common practice for civil servants and government ministers to seek engagement with industry in an attempt to gain industry 'buy-in'. As one former public health minister explained in relation to inter-ministerial meetings:

'I think on a quarterly basis we used to get together and basically look at the whole issue around a whole number of alcohol-related concerns. And ... at those meetings often we would have those different sectors of the alcohol industry, health representation, police representation as well....'

Other respondents from outside the industry who had been involved in government consultations, underlined how deeply ingrained the idea of partnership with industry has become:

'These big meetings with the Department of Health that I've been to, they've all had industry representatives. And the Department of Health will tell you, "We have to speak to the industry as much as we speak to you." I say, "Well, hang on, you're Health. You're not Trade & Industry. It's not your job to promote the alcohol industry." No, "It's important that we consult with all stakeholders" and that sort of jargon.'

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The fact that industry actors are afforded a seat at the table does not necessarily mean that their views are taken on board or that they are effective in shaping policy. On certain issues, policy will run counter to their interests. Nevertheless, there appears to be an acceptance on the part of government that they should at least attempt to work in collaboration with industry, and to get industry to buy in to a policy wherever possible. However, while it can be claimed that effective policy making needs to take account of a wide range of perspectives, it is not clear why commercial interests should have equivalent influence to those with particular expertise in health improvement in the making of public health policy.

Information, partnership and delivery

Industry actors cement their position as partners in the policy process through the provision of specific, practical expertise and through their apparent ability to implement policy initiatives on behalf of the government, often in place of mandatory regulation. One form of initiative has been the creation of ‘social aspects organisations’ (SAOs) such as the Portman Group (PG) and Drinkaware. The PG was formed by nine producer organisations to oversee the ‘social aspects’ of the alcohol industry and to promote responsible drinking. With the public information component of its original mandate having passed to Drinkaware, many industry actors claim that the role of the PG is now confined to overseeing and implementing its *Code of Practice on the naming, packaging and promotion of alcoholic drinks* (PG, 1996), a system of self-regulation for producers and marketers of alcoholic drinks. Industry-funded public information campaigns such as Drinkaware’s, and social responsibility initiatives such as *Challenge 25*, which aims to eliminate underage sales through a voluntary age verification scheme run by retailers, are further examples of measures that appear to relieve government of a regulatory burden.

According to a former public health minister, these initiatives are attractive to policy makers with limited resources available to them as they reduce costs and obviate the need for more complex, time-consuming legislative measures that require enforcement mechanisms to be put in place. There was widespread agreement among respondents that initiatives of this kind are of great value to civil servants and ministers faced with limited resources. The representative of one trade association summarised the importance of business as follows:

‘Delivery primarily. They’ve got a problem and they want it delivered so they’ll look to industry to deliver it for them because they don’t have the resource to do it and, for all the legislation they do, they know really the only way it’s going to be affected is through industry primarily.’

Industry-led initiatives afford additional opportunities to access policy makers. The PG, for example, continues to be an important conduit between government and industry. Its views on policy issues are sought by government and were referred to directly in the previous government’s alcohol strategy (Cabinet Office, 2004). It was claimed by some respondents that the PG is independent of the industry actors who founded, govern and fund the organisation. However, there is evidence that it continues to act as an advocate for the industry and promotes a policy agenda in keeping with its members’ underlying commercial interests. A number of industry

respondents, including from the PG itself, highlighted its role in expressing industry views to government. This is in keeping with a number of studies, which argue that, while maintaining the appearance of independence, SAOs act as policy advocates for the corporations that govern them (Anderson, 2003; Munro, 2004).

Similar debates occur about the independence of Drinkaware. The alcohol industry is the sole funder for Drinkaware and has significant representation on its management board. While there is no suggestion from public health advocates that Drinkaware engages in lobbying on behalf of the industry, there is concern that the message it promotes on moderate consumption and individual responsibility is extremely close to the industry position (see Anderson, 2009). Furthermore, its exclusive focus on public information campaigns potentially diverts attention away from other interventions and provides the context in which policy debates occur.

The industry's influence on policy is further reinforced by its apparent economic importance to the country. Its ability to provide employment, tax revenue and policy implementation is of great value to government and helps to ensure a place at the table in policy debates. As the former chairman of the Health Select Committee put it:

“Tesco's to bring in another three and a half thousand jobs” ... no ministers are going to say that, you know, people who can put good news on the street like that doesn't have access to me.'

Or as the representative of a national trade association commented:

'We'll always see the Treasury minister a couple of times a year because alcohol and duty represents £14.3 billion worth of Treasury receipts, so it's only polite to see us.'

Conclusion

Alcohol industry actors enjoy significant access to key policy actors through a range of different channels and forums. They are involved at every stage of the policy process and are seen by government as key stakeholders who must be consulted – and where possible accommodated – in policy debates. They owe this position both to the ubiquity of their contacts with political actors and to the extensive resources at their disposal both as individual organisations and through the trade bodies they fund. The extent of their resources means that they are able to participate in all available forums and can supply concrete policy solutions to governments. At a time when departmental budgets and resources are being squeezed, the ability to outsource regulatory competencies to industry-sponsored agencies such as Drinkaware and the PG are attractive options for ministers. Similarly, they provide information and expertise that supports the work of ministers, officials and MPs.

Hillman and Hitt (1999) identify long-term relationship building as an important strategic approach to government affairs open to corporate actors. They identify informational and financial strategies as important ways in which corporations may develop such relationships. The current article argues that the political strategy of the alcohol industry is based around building long-term relationships with policy makers in which they are seen as partners to government in delivering policy solutions. They provide information and expertise as well as appearing to deliver certain social goods

(eg, self-regulation and the implementation of policy objectives). Perhaps the measure of success of the industry's lobbying strategy is the extent to which their involvement in the policy process is accepted by policy makers themselves. It is an unquestioned assumption that industry actors are stakeholders with a right to be consulted on policy. While some level of consultation between government and industry is desirable, leading to more effective policy, it can be argued that the current level of industry involvement in certain areas has moved beyond the point at which it is beneficial to the wider public interest.

Furthermore, it must be called into question whether corporate actors ought to enjoy the same (or greater) level of influence on the policy-making process as practitioners and experts within a given field. In the area of health policy, in particular, there is a strong evidence base supporting some form of intervention on the minimum price of alcohol (Booth et al, 2008), yet meaningful action in this area has only recently entered onto the UK-wide political agenda (HM Government, 2012). This is due in part at least to the vehement opposition of many industry actors and the ability they have to feed this opposition into government. Recent studies have indicated that involvement of corporate actors as partners in the policy process undermines the willingness of public health officials to pursue measures opposed by corporate actors (Piazza-Gardener and Barry, 2011). Instead, they are more likely to adopt the standards and values of the corporations with whom they are in partnership. The current debates about alcohol pricing provide an opportunity to reassess the relationship between government and industry in this sector and to deepen our understanding of when and how policy makers should engage with corporate actors. This article aims to inform such debates by providing new insights into the current role sought by alcohol industry actors in policy making, their success in gaining access to policy makers and the implications this may have for health policy.

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