



Good governance in public health policy:

Managing interactions with alcohol industry stakeholders

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SPECTRUM

SHAPING PUBLIC HEALTH POLICIES
TO REDUCE INEQUALITIES AND HARM

BACKGROUND

Increasing attention has been given to the role corporations play in shaping public health policy, with the commercial determinants of health a rapidly evolving field of study.¹ The World Health Organization (WHO) states:

“Overwhelming evidence indicates that companies producing and selling unhealthy commodities have defeated, delayed or weakened the design, implementation and evaluation of public policies worldwide”.²

A clear conflict of interest exists between the economic objectives of these companies and public health goals that seek to reduce consumption of harmful products. This conflict of interest between the alcohol industry and public health is clearly demonstrated by research estimates that, if all drinkers in England reduced their alcohol consumption to within the recommended low-risk guidelines, alcohol sales revenue could decline by 38%.³

Activities of the alcohol industry have been identified as a major barrier to public policy progress in reducing alcohol harm. International evidence demonstrates alcohol industry actors are highly strategic, rhetorically sophisticated, and well organised in influencing national policymaking to further their commercial interests.⁴

Whilst the UK government has adopted detailed measures to protect public policy from tobacco industry interference,⁵ no current guidance exists to inform the management and prevention of conflict of interest in interactions with alcohol industry actors. Previous Public Health England (PHE) [‘Principles for engaging with industry stakeholders’](#) acknowledged that unhealthy commodity industries, including alcohol, can use both subtle and “aggressive tactics to disrupt and undermine positive actions from public health policy and initiatives”.⁶ PHE developed recommendations to ensure that where public health agencies engage with these stakeholders, they should do so cautiously and within a well-defined framework that protects the public’s interest and health. Following the transition to the Office of Health Improvement and Disparities, it is unclear whether these principles are being applied, with alcohol industry bodies currently occupying prominent roles in health policy.

Scope and Purpose

This document provides guidance for identifying, managing and protecting against conflicts of interest associated with alcohol industry involvement in public health policy. The principles outlined here have been developed through collaboration with alcohol policy and public health experts across the UK, and informed by international best practice in approaches to managing interactions with unhealthy commodity industries.^{7,8,9} They are intended to enhance governance by providing a guide to inform the consideration and management of any interactions with industry actors. While this guidance is primarily intended to inform interactions within public health policy, the principles and practices outlined could usefully inform engagement with industry in linked policy areas and enable the development of a whole-of-government approach to interacting with alcohol industry stakeholders.

These principles are designed to inform the approach of the incoming UK government to addressing alcohol harm, and may also be useful to devolved administrations, local governments and health agencies, and to support policy actors working on other risk factors where commercial conflicts of interest exist. The ultimate aim is to support decisionmakers to pursue policies which can protect health, promote equity and advance policy coherence with wider social and economic goals.

Definitions

Term	Definition
Alcohol industry	<p>Manufacturers of alcoholic beverages, wholesale distributors, major retailers and importers that deal solely and exclusively in alcoholic beverages or whose primary income comes from trade in alcohol beverages, as well as business associations or other non-State actors representing any of the afore-mentioned entities.¹⁰</p> <p>Other non-State actors who are engaged in the sale of alcohol, receive funding from the alcohol industry (including funding for research) or have intrinsic links to the above-mentioned entities should be reviewed on a case by case basis in order to determine whether they should also be viewed as 'alcohol industry'.</p>
Conflicts of Interest	<p>For the purposes of this document a conflict of interest refers to when a primary interest in promoting public health may be reasonably perceived to be unduly influenced by another interest (e.g. commercial gain). Conflicts of interest can be present at the individual, institutional, and structural levels.¹¹</p>

Guiding principles

The following principles are intended to guide all decisions relating to managing interactions with alcohol industry representatives. They are designed to mitigate risks linked to conflicts of interest which may threaten the success of public health policies designed to reduce alcohol harm.

1 Acknowledge the essential conflict of interest between alcohol industry economic objectives and public health goals, in accordance with WHO recommendations.

- The [WHO Global Alcohol Action Plan 2022-2030](#) acknowledges “the inherent contradiction between the interests of alcohol producers and public health” and states “the development of public policies to reduce harmful use of alcohol should be protected, in accordance with national laws, from commercial and other vested interests that can interfere with and undermine public health objectives”.¹²
- Extensive evidence exists to demonstrate alcohol industry interference and undue influence on health policy, hindering progress to reduce alcohol harm in the UK and internationally.¹³

2 Establish good governance processes that promote transparency and protect health-focused policymaking from alcohol industry interference.

- Given the inherent conflict of interest outlined above, clear and robust processes must be established to minimise the risk of alcohol industry interference or obstruction of health policy objectives.
- Transparency and accountability should be at the heart of good governance processes, and full details of all interactions with alcohol industry representatives should be a matter of public record.
- Effective governance processes will also help to protect against reputational risk for governments and/or health agencies, and promote integrity and credibility.

3 Minimise interactions with industry and restrict those that occur to information exchange to support policy implementation.

- Former WHO Director General Dr Margaret Chan stated in 2013 that, “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”.¹⁴
- The UK has endorsed the WHO Global Alcohol Action Plan, which calls on alcohol industry bodies to focus on the implementation of measures that can contribute to reducing the harmful use of alcohol, which are stringently within their core roles as developers, producers, distributors, marketers, and sellers of alcoholic beverages.
- Any interactions with alcohol industry bodies to support the pursuit of public health goals should therefore be limited to consultation and information exchange about implementation of policies. Alcohol industry bodies should not be involved in developing public health policies, or funding or conducting education and health promotion activities.

4 Reject partnerships with alcohol industry bodies.

- Public Health England’s principles for engaging with industry stakeholders stated that engagement with the alcohol industry will not lead to or imply partnership, collaboration, or any other similar type of engagement that could give the impression of a formal relationship. This is because there is a danger such engagements “would put at risk the integrity, credibility and independence” of PHE’s work.¹⁵
- Interactions with alcohol industry bodies should not entail any formal collaboration and should not be perceived to endorse corporate social responsibility and other stakeholder marketing initiatives.

Putting the principles into practice

The following guidance on the conduct of meetings between government officials and/or health agencies and alcohol industry representatives will help to operationalise the principles for good governance outlined above and promote transparency and accountability.

- ✓ The purpose, objectives, and scope of the meeting and how it will contribute to public health objectives should be determined in advance by the government/health agency.
- ✓ The government/health agency should be informed in advance of the names, positions, and affiliations of each participant of the meeting representing the alcohol industry.
- ✓ The government/health agency should be solely responsible for (a) developing the meeting agenda/programme, (b) inviting participants and (c) preparing the meeting report or other outcome document.
- ✓ Prior to all meetings, it should be made clear to alcohol industry representatives, preferably in writing, that the meeting does not imply collaboration or partnership between the government/health agency and the alcohol industry, and that no partnership, collaboration, or similar relationship may be implied in any representation or publications by the industry.
- ✓ Meetings between the government/health agency staff and the alcohol industry should in no case take place at alcohol industry premises, or entities that are considered not at arm's length from the alcohol industry (lobbyists or similar entities) and with the presence of the Legal Counsel as appropriate.
- ✓ At least two government/health agency staff members should be present at any meetings with the alcohol industry.
- ✓ There should be no jointly-signed documents, written commitments, contracts, or memoranda of understanding on the circumstances or outcomes of the meeting between government/health agency and the alcohol industry, as this implies a relationship.
- ✓ Minutes of all meetings between government/health agency staff and the alcohol industry should be made publicly available.

Acknowledgements

The following alcohol policy and public health experts contributed to the development of this report:

- Dr Katherine Severi, Chief Executive, Institute of Alcohol Studies.
- Professor Jeff Collin, Global Health Policy, University of Edinburgh.
- Alison Douglas, Chief Executive, Alcohol Focus Scotland.
- Clive Henn, former Head of Alcohol and Gambling Evidence and Delivery, Office for Health Improvement and Disparities.
- Crispin Acton, IAS Advisor and former Department of Health official.
- Elinor Jayne, Director of Scottish Health Action on Alcohol Problems.
- Jem Roberts, Senior External Affairs Manager, Institute of Alcohol Studies.
- Malcolm Clark, Senior Prevention Policy Manager, Cancer Research UK.
- Professor Niamh Fitzgerald, Institute for Social Marketing & Health, University of Stirling.
- Dr Peter Rice, Chair, Institute of Alcohol Studies.
- Dr Richard Piper, Chief Executive, Alcohol Change UK.
- Dr Sheila Gilheany, Chief Executive, Alcohol Action Ireland.
- Susan Taylor, Head of Alcohol Policy, Fresh and Balance.

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