

Industry Actors, Think Tanks, and Alcohol Policy in the United Kingdom

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Corporate actors seek to influence alcohol policies through various means, including attempts to shape the evidential content of policy debates. In this case study, we examined how SABMiller engaged the think tank Demos to produce reports on binge drinking, which were heavily promoted among policy-makers at crucial stages in the development of the UK government's 2012 alcohol strategy.

One key report coincided with other SABMiller-funded publications, advocating measures to enhance parenting as an alternative to minimum unit pricing. In this instance, the perceived independence of an influential think tank was used to promote industry interests in tactics similar to those of transnational tobacco corporations.

This approach is in keeping with other alcohol industry efforts to marginalize the peer-reviewed literature. (*Am J Public Health*. 2014;104:1363–1369. doi:10.2105/AJPH.2013.301858)

ON JULY 17, 2013 THE UK

government announced that it would not progress plans to introduce a minimum unit pricing (MUP) for alcohol, which had been set out in its alcohol strategy in March 2012.¹ This decision had been widely predicted² and

followed only days after the announcement that the introduction of plain packaging for tobacco products would be delayed indefinitely. Trends in key indicators of alcohol problems have been rising steeply in Britain, whereas they have been declining elsewhere in Western Europe.^{3,4}

The world's leading alcohol scientists recommend increasing the price of alcohol, through MUP or other means, as a policy measure,⁵ but many sectors of the alcohol industry strongly oppose it.^{6–8} The decision to halt implementation of MUP, as with the delay in implementing plain packaging for tobacco products, brought accusations that the government had been unduly influenced by industry actors, including David Cameron's election strategist Lynton Crosby, whose consultancy works on behalf of the tobacco and alcohol industries.⁹

Following the MUP announcement, prominent individuals and organizations from the public health community withdrew from the government's flagship Responsibility Deal Alcohol Network, citing excessive industry influence on policy as the reason for their decision.¹⁰ Previous studies demonstrate that tobacco and alcohol industry actors exert corporate influence through multiple channels, including funding other bodies to conduct research on their behalf.^{7,11}

Like the tobacco industry, the global alcohol industry has

become increasingly concentrated among a small number of large multinational producers, which are among the world's largest and most profitable corporations.¹² SABMiller is one of the world's largest brewers, producing or marketing more than 200 beer brands in 75 countries.¹² As such, its policy-influencing activities may be similar to those of other large alcohol industry corporations.⁷ Headquartered in London, SABMiller strongly opposed plans to introduce MUP in Scotland, questioning the evidence base for its effectiveness and declaring ideological opposition to state intervention in the market.¹³ In opposing MUP, their submission to the Scottish government's consultation on MUP in 2008 claimed that evidence consistently demonstrated the impact of parenting on whether children begin drinking, although none was presented or referenced.¹³

We have presented a case study of SABMiller's funding of research conducted by the think tank Demos and its attempt to use this research to influence policy debates at crucial stages in the development and implementation of the UK government's alcohol strategy. Demos describes itself as "Britain's leading cross-party think tank . . . dedicated to bringing politics closer to the people."¹⁴

We analyzed the reports produced along with press releases

and related material published on the Demos Web site. We monitored further policy-influencing activities related to the reports through regular examination of the Demos Web site, social media outputs, and other publications relating to the project from 2011 to 2012. In addition, we attended 2 launch events for the published reports in an observational capacity and conducted a semistructured interview with a Demos employee involved in the SABMiller-funded work.

ALCOHOL INDUSTRY, SCIENCE, AND POLICY INFLUENCE

Attempts to influence the political and regulatory environment in which businesses operate are essential components of corporate strategy.¹⁵ The tobacco industry's methods of influencing scientific research and policy have been extensively documented.¹¹ The few studies of the alcohol industry show that it has employed similar tactics at the national, regional, and global levels.^{16–20}

These include the misrepresentation of scientific evidence, the sponsorship of independent research-funding organizations, support of university-based scientists, publication of scientific documents and support of scientific journals, and efforts to influence public perceptions of research and alcohol policies.^{7,21–23} Funding



research allows industry actors to influence the evidential content of policy debates while enhancing their credentials as socially responsible actors.

THINK TANKS AND POLICY INFLUENCE

Miller and Harkins²⁴ have suggested that alcohol industry actors have used think tanks to conduct research on their behalf. Recent controversies demonstrate that sponsoring influential think tanks continues to be an important component of transnational tobacco corporations' political strategy in the United Kingdom.²⁵ At least 1 of these, the Adam Smith Institute, has also worked on alcohol.²⁶ Think tanks present themselves as independent organizations that conduct research, develop ideas, and market policy proposals with the aim of influencing government.²⁷ They are distinct from social aspects and public relations organizations that the alcohol industry has developed as a key means of influencing policy.^{21,28}

Although think tanks' standing in policy debates often depends on their perceived independence,²⁷ they must secure revenue to stay in existence and industry actors are potentially important sources of funding. Using think tanks allows corporations to draw on their apparent credibility and neutrality, while distancing industry from the research they fund and the recommendations they generate.²⁴

UNDER THE INFLUENCE

As the UK government was developing its alcohol strategy in late

2010, SABMiller commissioned Demos to conduct research on its behalf on the social aspects of binge drinking among those aged 18 to 25 years (Demos employee interview, July 25, 2011). It was made clear from the outset that SABMiller was interested in the influence of parenting on alcohol consumption (Demos employee interview, July 25, 2011).

A report, *Under the Influence*, was published on September 15, 2011.²⁹ The title is identical to that Hastings et al. used for their report on alcohol marketing, which the British Medical Association published in 2009.³⁰ The first part of the report consisted of a literature review on binge drinking conducted by Demos staff that was published initially as an interim report in March 2011.³¹ The second part comprised epidemiological analyses of a UK birth cohort study conducted by a PhD student in an unrelated area at a prestigious British university. The press release for the report was released August 28, 2011, some 2 weeks before the publication of the report, and received significant media attention. However, the unavailability of the report at this time precluded any detailed

analysis of the claims made in the publicity materials. The report was further publicized at a launch event held in the Houses of Parliament on January 24, 2012 (Table 1).

The literature review omitted the World Health Organization-sponsored peer-reviewed summary of the alcohol policy evidence base⁵ and accessed instead industry-funded publications, including a 2009 Centre for Economics and Business Research report on MUP commissioned by SABMiller, alongside other outputs by the Wine and Spirit Trade Association⁷ and 2 alcohol industry social aspects and public relations organizations: the International Centre for Alcohol Policies¹⁹ and Drinkaware.²⁸

Under the Influence frames the preparatory work commissioned and undertaken by the UK government on MUP as unsupported "assertions," thus ignoring the underlying evidence base on the effectiveness of price-based interventions. This claim is juxtaposed with a citation of the Centre for Economics and Business Research "study" emphasizing that heavier drinkers were less responsive to price changes and that MUP would have little impact on them. The report reproduces numerous

other anti-MUP arguments made by alcohol industry actors: the limited impact on underage drinkers because of parental supply, the disproportionate impact on the poor, the uncertain impacts on other outcomes of interest, and the complexities of drinking behavior. Like industry actors elsewhere,⁷ the report judges that the evidence on MUP is "not conclusive."^{7(p29)} The UK government subsequently made a commitment to introduce MUP in its alcohol strategy published in March 2012 and announced a consultation on the level at which it would be set.¹

Demos organized fringe events in partnership with SABMiller to promote the report at all 3 main political party conferences in autumn 2012. The details of each event, including the main speakers, are summarized in Table 2. These events also presented an additional SABMiller-funded report on alcohol pricing by the consultancy firm London Economics, subsequently published in December 2012.³² The key message of the latter report is that heavier drinkers are less responsive to price than are lighter drinkers. This focus detracts attention from the fact that despite the lower

TABLE 1—Parliamentary Launch Events for Demos Reports on Alcohol Policy: United Kingdom, 2012

	<i>Under the Influence</i>	<i>Feeling the Effects</i>
Date	January 24, 2012	December 11, 2012
Venue	Committee Room 19, Houses of Commons	Committee Room 18, Houses of Commons
Chair	Fiona Bruce, MP (Conservative)	David Goodhart, Demos
Speakers	Jamie Bartlett, Demos Christine Thompson, SABMiller	Jonathan Birdwell, Demos Andrew Griffiths, MP (Conservative) Simon Antrobas, chief executive Addaction Mary Glover, author of <i>Drugs, Alcohol and Parenting: A Workbook for Parents</i>

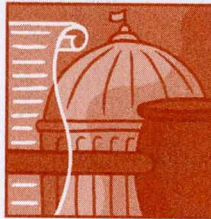


TABLE 2—Party Conference Fringe Events: United Kingdom, 2012

	Liberal Democrat	Labour	Conservative
Date	September 25, 2012	October 1, 2012	October 9, 2012
Venue	Hilton Metropole, Brighton	Premier Inn, Manchester	Jurys Inn, Birmingham
Speakers	John Pugh, MP, cochair Liberal Democrat Parliamentary Policy Committee on Health and Social Care Jonathan Birdwell, head of the Citizens Project, Demos Patrice Muller, senior partner, London Economics Emma Vandore, associate, Demos	Diane Abbott, MP, shadow minister for Public Health Jonathan Birdwell, head of the Citizens Project, Demos Patrice Muller, senior partner, London Economics Simon Antrobas, chief executive, Addaction Clare Gerada, chair, Royal College of General Practitioners	Fiona Bruce, MP, All-Party Parliamentary Group on Alcohol Misuse Jonathan Birdwell, head of the Citizens Project, Demos Patrice Muller, senior partner, London Economics Emma Vandore, associate, Demos Laura Donnelly, health correspondent, <i>The Daily Telegraph</i>

marginal responsiveness to price changes among heavier drinkers, it is heavy consumers who will be most affected by increases in price because of their higher overall consumption.³³

FEELING THE EFFECTS

The Houses of Parliament launched a second report by SABMiller and Demos, *Feeling the Effects*, on December 11, 2012. In addition to the reports by Demos and London Economics, SABMiller funded the Centre for Economics and Business Research to produce a further report on MUP, also published in December 2012.³⁴ Three SABMiller-commissioned reports from 3 different “independent” sources were thus published in this same month, at a key moment in the UK government’s policy deliberations.

Feeling the Effects was written by different Demos staff members from those who wrote *Under the Influence*, along with the same PhD student who had coauthored the previous report. It presents further analyses of the same birth cohort data set, along with a qualitative study of 50 families affected by problem drinking.³⁵

There is no information provided about informed consent of participants or ethical review of this study. Although other agencies were involved, the treatment charity Addaction facilitated the fieldwork for this study and their partnership was credited on the cover. Addaction has received sustained funding from Heineken to support its activities since 2005, and it features prominently in the brewer’s corporate social responsibility campaigns.³⁶

There is little explicit content on MUP in the report, although a quotation from an unknown source appears prominently on the cover suggesting: “Effective parenting is the best way to call time on Britain’s binge drinking.”³⁵ The introduction notes that the UK government plans to introduce MUP and briefly refers to arguments by proponents and critics of the policy, citing a newspaper report and the 2012 London Economics report for each of these. The press release, however, frames interventions on parenting styles as a direct alternative to MUP.

It claims on the basis of its “two year programme of research” that MUP will have little impact on problematic and heavy drinkers

and that a focus on parenting would be more effective than would MUP in tackling alcohol-related harm. Elsewhere it goes even further, claiming, “Focusing on parenting could be the most effective way of reducing hazardous drinking levels in the UK”²⁷ (see the box on page e4). These claims are not within the scope of the report’s accessed data, and the conclusions reached cannot be inferred from the research presented. Indeed, it is not possible to identify any rigorous evidence in the international research literature to support these contentions.⁵

Feeling the Effects makes repeated references to the activities of Drinkaware—the alcohol industry social aspects and public relations organization²⁸ that undertakes a public information function on behalf of the UK government—and its potential future role (see the box on page e4). The report suggests,

There is clearly a significant role for the alcohol industry, which has a motivation to target those misusing alcohol to minimize the harms caused by alcohol.^{35(p16)}

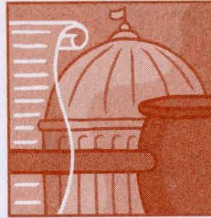
It concludes, “Reducing parental alcohol misuse must be a priority

for policymakers and those in the alcohol industry.”^{35(p55)}

It is noteworthy that Drinkaware also commissioned research into the effects of parental alcohol consumption on children,³⁸ which mirrors the findings of *Feeling the Effects* and, like the 3 SABMiller commissioned reports, was published in December 2012. SABMiller claims on its Web site that it was “the first company to sponsor Drinkaware.”³⁹

Under the Influence and *Feeling the Effects* were among the first materials to be placed in the “knowledge bank” on Drinkaware’s Web site. A SABMiller-sponsored event on local responses to alcohol-related harm was held at the 2013 Labour Party conference.⁴⁰ Advertised speakers at the event included Elaine Hindal, the chief executive of Drinkaware.

Both launch events for the reports in parliament were widely publicized through the Demos Web site and through social media. In addition, the *Feeling the Effects* event was publicized on the SABMiller Web site via a blog post by Christine Thompson, UK government relations manager,



Key Extracts From the Demos Reports

Extracts From the Demos Press Release for *Feeling the Effects*

On the basis of a 2-year program of research into the causes and culture of hazardous drinking, researchers conclude that the government's planned policy of minimum pricing will have minimal impact on consumption by problematic and heavy drinkers.

Instead, new research from Demos suggests that a policy focus on parenting style and drinking habits in front of children would be more effective than is minimum pricing in creating a responsible drinking culture.

Because of the impact of parenting style on children—and the impact of parental alcohol consumption on parenting style—Demos argues that helping parents to be better, more effective parents—especially those with alcohol problems—may be the best approach to reduce levels of hazardous drinking in the United Kingdom.

Jonathan Birdwell, author of the report and head of the Citizens Program at Demos said: "The Prime Minister has said that Britain's binge drinking culture needs to be 'attacked from every angle' but the policy proposals tend to be limited to technocratic solutions like minimum pricing. Our research suggests that focusing on parenting could be the most effective way of reducing hazardous drinking levels in the UK, especially in the long-term."³⁷

Extracts From *Feeling the Effects* on Drinkaware

"Drinkaware's advice to parents is the correct approach and should be continued. However, leading companies in the alcohol industry should do more to coordinate and spearhead information awareness campaigns aimed at parents. They could do this through a national level campaign and targeted local area campaigns in the UK or at the European level through the EU Alcohol and Health Forum [another industry body]. At a strategic level, in devising these campaigns and effective messages, advertising companies that have worked on behaviour change campaigns—including the Drinkaware campaign—should be brought in as stakeholders and consultants, alongside the government's Behaviour Change Unit."^{35(p58)}

who had delivered a presentation at the launch of *Under the Influence*. In contrast to the Demos press release, this blog post did not include any discussion of MUP.⁴¹ Senior figures from other industry groups such as Drinkaware and its parent body, the Portman Group, attended the launch events.²⁸ The financial support of SABMiller was acknowledged in both *Under the Influence* and *Feeling the Effects* and in the notes to editors of the accompanying press releases (although not in their summary of *Under the Influence* on the Demos Web site).

Neither of the 2 SABMiller-funded reports by Demos nor any part of either has been published in a peer-reviewed journal. We encourage readers to examine directly the limitations of the epidemiological analyses in both reports and of the qualitative study presented in the second report.

SOBERING UP

In November 2013, Demos published a further report on alcohol, funded by the Association of Convenience Stores, a retail sector trade association.⁴² The report repeatedly claims that the UK government rejected MUP because of a lack of supporting evidence. In keeping with the industry-favored approach, it calls for industry self-regulation and partnership between the retail sector and a range of service providers and education and information campaigns.

The report cites the other SABMiller-funded outputs as evidence of the importance of parenting. Cross-referencing demonstrates how industry-funded reports become mutually reinforcing, leading to the formation of a methodologically flawed and highly biased but internally consistent parallel literature to the

international peer-reviewed scientific literature.^{19,43}

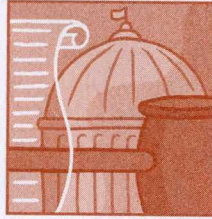
INFLUENCING THE POLICY PROCESS

The decision of one of the world's leading alcohol producers to fund "research" undertaken by a think tank is similar to wider alcohol and tobacco industry tactics to influence the evidential content of policy debates.²¹⁻²³ Apart from the work of Miller and Harkins,²⁴ the use of this particular tactic has not been highlighted in the scientific literature in relation to the alcohol industry. From the outset the parameters of the SABMiller and Demos project were circumscribed, focusing on issues in keeping with the policy preferences and business interests of the funder.

Published reports neglected policy interventions that the international evidence base suggests

are the most likely to be effective in reducing alcohol consumption and harm.⁵ Notwithstanding the limitations of these reports, their relevance to ongoing policy debates was explicitly and forcefully articulated in ways designed to influence thinking about, and decision-making on, MUP. They were launched at the heart of government and promoted at the conferences of the 3 largest United Kingdom-wide political parties.

SABMiller's engagement of Demos and other research organizations is reminiscent of transnational tobacco corporations' use of front organizations.⁴⁴ Other tactics used here—including the targeting of junior researchers and prestigious universities and the apparent attempt to marginalize the peer-reviewed scientific literature by creating a parallel literature—have previously been used by the alcohol industry elsewhere.^{19,21,23} Although there is



evidence of coordination between tobacco and alcohol industry activities in previous decades.⁴⁵ SABMiller is more closely connected to the tobacco industry than are other alcohol producers.^{46,47}

Philip Morris controlled the then Miller Brewing Company for 30 years and still retains a significant shareholding in SABMiller.⁴⁷ Internal company documents reveal that they supported the establishment of International Centre for Alcohol Policies as a global actor principally concerned with managing efforts at regulation.¹⁹ It is also noteworthy that the Centre for Economics and Business Research has also produced a report funded by Phillip Morris on the allegedly negative economic consequences of plain packaging of tobacco products.⁴⁸ More recently, SABMiller has been exposed as the author of the alcohol policies of 4 sub-Saharan African countries.⁴⁹

It is not possible to know now whether this makes SABMiller atypical of alcohol industry actors in their approach to the use of evidence to influence policy. However, concerns about corporate subversion of science are not restricted to the tobacco and alcohol industries; funding effects are a well-established source of bias for both pharmaceutical⁵⁰ and nutrition research.⁵¹ It is thus necessary to study the activities of corporations in this area carefully, across sectors of the industry, across industries, and at the domestic and international levels. This need has been recognized as requiring forms of knowledge generation that transcend traditional academic disciplines with novel,

theoretically informed research designs and methodologies.^{20,23}

The Association of Convenience Stores' funding of the report suggests that the work conducted on behalf of SABMiller was not an isolated case for Demos. Rather, it points to a wider acceptance of alcohol industry actors as a legitimate source of research funding for this organization. If thinks tanks such as Demos are to contribute to the evidence base on public policies, they must manage better the tensions inherent in commercial sponsorship of their activities. Both reports include the statement that for Demos "our unique approach challenges the traditional 'ivory tower' model of policymaking by giving a voice to people and communities."

This makes Demos vulnerable to corporations seeking to undermine policy-relevant scientific evidence that does not suit their business interests, especially in areas such as alcohol, where Demos does not possess the internal expertise to undertake this type of research. Because of its own professed ideals of bridging the gap between political leaders and ordinary voters in key contemporary political debates, this episode provides much for Demos to consider.¹⁴

As early as March 2013 media reports began to emerge that the government had abandoned plans to implement MUP, some 4 months before the policy change was formally announced.² The absence of transparency in UK alcohol policymaking means that it is not possible to assess how far the activities we have detailed, or additional influencing activities by other industry actors, have been

responsible for the UK government's decision to abandon MUP. Other activities included the Why Should Responsible Drinkers Pay More campaign (and the associated Web site) coordinated by the Wine and Spirit Trade Association⁵² and supported by leading UK supermarkets along with producer organizations such as SABMiller.

The formal announcement of the decision to halt plans for MUP implementation accessed a lack of evidence that MUP would achieve desired reductions in alcohol harms and spurious alcohol industry concerns about the effects of MUP on moderate consumers:

We do not yet have enough concrete evidence that its introduction would be effective in reducing harms associated with problem drinking—this is a crucial point—without penalising people who drink responsibly.⁵³

The public health community widely criticized and industry actors welcomed the decision to stop MUP.⁵⁴ The timing and justification for the decision are particularly noteworthy because the explicit aim of the preceding consultation was to canvass views on the level at which the minimum price per unit should be set, not to establish whether MUP should be implemented at all.¹ The UK government's alcohol strategy has described the available evidence as follows:

There is strong and consistent evidence that an increase in the price of alcohol reduces the demand for alcohol which in turn can lead to a reduction in harm, including for those who regularly drink heavily and young drinkers under 18.¹

Despite industry claims to the contrary, the accumulating

evidence base in support of MUP was more substantial when the policy was halted than when the initial decision to implement it was first announced.^{55,56} Because of the circumstances in which the decision on MUP was made, the perception exists that the UK government has subordinated concerns about public health to powerful vested interests. Members of the main party within the UK government have forcefully articulated this view.⁵⁷

We encourage the research community to investigate these issues further. In addition, there is a particular responsibility for health policymakers to facilitate such investigations to ascertain whether, and to what extent, large, powerful corporations are subverting evidence-based public health. Easily accessible publication of documents, including records of meetings with industry actors and full declaration of conflicts of interests for all policy-relevant actors, could be the first step toward achieving this. ■

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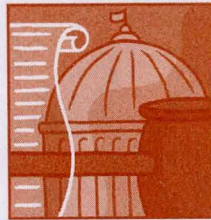
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Contributors

B. Hawkins produced the first draft of this article. J. McCambridge was on the steering committee for the *Under the Influence* report and developed the idea for the study after the revelation



of industry funding. Both authors contributed to the design of the study, the analysis of relevant documents, and the drafting of the article. Both authors approved the final draft for publication.

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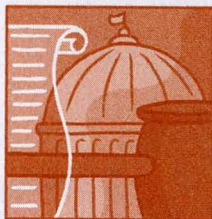
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Human Participant Protection

The London School of Hygiene and Tropical Medicine approved the study from which the interview used in this article is drawn.

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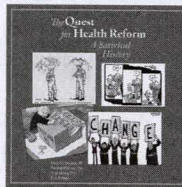
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