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### Under the influence

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1 Title: Under the influence: System-level effects of alcohol industry-funded health information  
2 organisations

3

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13

14 **Keywords**

15 Commercial determinants of health, alcohol, public private partnerships, documentary analysis, policy

16 analysis

17

18

19 ***Unstructured Abstract***

20 There is now an established body of evidence that the alcohol industry seeks to obstruct public  
21 health policies that could affect the availability, affordability, or marketing of alcohol. In  
22 parallel, the alcohol industry is active in funding corporate social responsibility initiatives, with a  
23 particular focus on “responsible drinking” campaigns, often facilitated by national level charities  
24 established and/or funded by the alcohol industry and associated organisations. While evidence  
25 continues to grow regarding biases in the content produced by such health information  
26 organisations, they remain active in partnerships with government health departments on  
27 national health promotion campaigns, and provide a range of health-related information to the  
28 public, community organisations, and schools. In order to understand the implications of such  
29 access for policy-makers, researchers and the public, there is a need to consider the wider,  
30 system-level influences of such organisations, and their place in wider alcohol industry  
31 strategies. In this article we describe evolving evidence of the direct and indirect strategic  
32 effects of such organisations and demonstrate how they serve key roles for the alcohol industry  
33 through their existence, content, partnerships and public profiles. We end by considering the  
34 implications for how we conceptualise charities established or funded (entirely or partly) by  
35 harmful commodity industries, and to what extent current conflicts of interest guidelines are  
36 sufficiently effective.

37

38 Contribution to Health Promotion

- 39 • The alcohol industry is increasingly understood as a conflicted and inappropriate partner  
40 for health promotion
- 41 • In spite of this, national alcohol-industry funded health information charities remain  
42 prominent, and engage in a range of partnerships and health promotion campaigns
- 43 • This article brings together the latest evidence on how such organisations, through their  
44 content and their existence, serve strategic functions for the alcohol industry

45

46

#### 47 *Introduction*

48 The alcohol industry, which has been defined as including the economic actors involved in the  
49 production, distribution and marketing of alcohol, as well as trade associations and related  
50 social aspects organizations (McCambridge et al., 2018), is a harmful product industry. Alcohol  
51 is among the leading causes of preventable death globally, and the leading risk factor for  
52 disability adjusted life years among those aged 25-49 (Collaborators, 2020). Those who drink at  
53 the most harmful levels constitute a disproportionate amount of overall alcohol sales, meaning  
54 the industry is disproportionately dependent on them for revenue (Foster et al., 2006), and  
55 targets its marketing efforts accordingly (Maani Hessari et al., 2019a), The commercial value of  
56 underage drinking to the industry is also significant. In the US in 2016 alone, underage alcohol  
57 consumption was estimated to yield 17.5 billion dollars in revenue, approximately 7.5% of all  
58 revenue earned during that time (Eck et al., 2021). The alcohol industry is increasingly globally  
59 consolidated (Hanefeld et al., 2016), with documentary analyses demonstrating strong parallels  
60 in structure and strategy to the tobacco industry (Hawkins et al., 2018), and in some cases

61 examples of alcohol and tobacco manufacturers advancing mutual interests in collaboration  
62 (Lesch and McCambridge, 2022).

63

64 Taken together, these patterns reflect a fundamental conflict between the need for population-  
65 level approaches to reducing alcohol-related harm, and the business interests of the alcohol  
66 industry. Indeed, there is now an established and growing evidence base of efforts by the  
67 alcohol industry to shape science and policy discourses in ways that undermine effective  
68 regulation and defend or develop their markets, consistent (and in some cases linked with)  
69 similar efforts by other harmful product manufacturers (Madureira Lima and Galea, 2018). This  
70 evidence is increasingly being applied in guidance to policy and media members. According to  
71 the WHO European Framework for Action on Alcohol 2022–2025, member states reported  
72 “significant and sustained opposition by economic operators in trade and production” as key  
73 barrier to the implementation of the most high-impact and cost-effective policies (World Health  
74 Organization Regional Office for Europe, 2022). A recent guide produced by the WHO for  
75 reporters communicating on alcohol issues notes that pressure from commercial operators may  
76 include entities other than producers, such as industry-funded journalism awards, advertising,  
77 industry-owned media outlets, industry-funded think tanks and those with associated conflicts  
78 of interest (World Health Organization, 2023).

79

80 It has been argued by coalitions of scholars and advocates that the alcohol industry in  
81 particular, due to the global burden of alcohol harms, reliance on harmful consumption of its  
82 products for a substantial proportion of sales, its increasingly global consolidation, and growing

83 evidence of parallels in ongoing corporate political activity, requires a greater policy alignment  
84 with approaches to dealing with the threat to public health posed by the tobacco industry  
85 (McCambridge and Morris, 2019), including a possible global Framework Convention for  
86 Alcohol Control (Au Yeung and Lam, 2019). Yet unlike the tobacco industry, the alcohol industry  
87 remains viewed by segments of public health policy, practice and academia as a legitimate  
88 partner in important areas such as the development of national alcohol policy (Bakke and  
89 Endal, 2010), and global health initiatives (Marten and Hawkins, 2018).

90  
91 Analyses of industry activities mainly focus on one area of their activity; e.g. sales, advertising  
92 and marketing, setting (e.g. schools, communities), policy influence, or corporate social  
93 responsibility. It has however been argued that in order to understand the complex  
94 relationships between unhealthy commodity industries, policy-making and government  
95 agencies, there is a similar need to take a systems perspective on commercial influences on  
96 health, including, critically, understanding wider efforts to shape evidence, frame narratives,  
97 and build constituencies through third party organisations (Gilmore et al., 2023). One  
98 mechanism through which such efforts may be perpetuated, and which has been an increasing  
99 focus of scholarship, is industry-funded alcohol health information organisations (IFAIOS)  
100 (Pietracatella and Brady, 2020).

101  
102 The alcohol industry funds a range of such national-level health information organisations,  
103 often registered as charities, that ostensibly seek to educate the public on alcohol-related  
104 harms. Such organisations include for example Drinkaware (UK), Drinkaware Ireland, DrinkWise

105 (Australia), the Foundation for Advancing Alcohol Responsibility (US), and the Association for  
106 Alcohol Responsibility and Education (South Africa). In addition, there are other organisations  
107 that, although not officially formed by the alcohol industry and may receive funds from other  
108 sources, attract industry funding and partnership, signaling that they are of likely strategic  
109 benefit to wider industry agendas. In order to examine the strategic purpose of these types of  
110 organisations and partnerships, there is a need to both independently evaluate the nature of  
111 the materials and campaigns they produce, and more broadly understand the system-level  
112 effects of such organisations, and how they may serve wider industry interests, in part through  
113 their perceived separation or ‘independence’ from the industry in the mind of policy-makers  
114 and the public. In this perspective, we bring together existing evidence to conceptualize the  
115 system-level impacts of IFAIOs for norms, policy and public health.

116

### 117 *The origins of industry-funded alcohol information*

118

119 Alcohol industry funding of third party organisations with an education remit has a long history,  
120 dating back to the 1950s (Anderson, 2003). These early organisations have been described as  
121 serving to manage issues that might be detrimental to business through for example,  
122 influencing alcohol policy, broadening industry influence and legitimacy, recruiting scientists,  
123 organising and hosting conferences and other meetings, and preparing and promoting self-  
124 regulatory approaches to alcohol (Anderson, 2003, Babor, 2009). At times this included  
125 providing information on alcohol harm to the public, but also other activities such as funding  
126 science, lobbying, or proposing policy alternatives. Due to the co-ownership of the Miller

127 Brewing Company (MBC) by Phillip Morris International (PMI), analyses of internal tobacco  
128 industry documents have revealed the extent to which MBC adopted strategies from PMI and  
129 explicitly sought to protect revenue by being “...a supporter of education and research to  
130 combat the problem of alcoholism rather than imposition of additional restrictions on the use of  
131 alcoholic beverages” (McCambridge et al., 2022). In 1996, the MBC vice president of corporate  
132 affairs noted in a presentation to an industry group that “...the number one priority for the  
133 alcohol beverage industry... over the next five years...must be protecting and promoting the  
134 social acceptability of our product. Alcohol education will play a critical role in accomplishing  
135 this task.”(McCambridge et al., 2022).

136

137 In a study tracing the evolution of alcohol industry SAPROs over time, McCambridge and  
138 colleagues note three main phases in the evolution of such groups (McCambridge et al., 2021).  
139 Firstly, from the 1950s onwards, with the involvement of the public relations company Hill and  
140 Knowlton (whose clients have included members of the tobacco, asbestos and fossil fuel  
141 industries), the distilled spirits industry in particular sought to fund research to define  
142 alcoholism, rather than alcohol use, as problematic. From the 1970s onward, they note  
143 increasing organisation of the US alcohol industry across beverage categories though the  
144 formation of the Distilled Spirits Council of the United States (DISCUS), which sought in the 80s  
145 to “clarify public understanding that alcohol abuse rather than use is the source of alcohol  
146 related problems” and that “the liquor industry is actively interested and concerned about the  
147 problems of alcohol abuse”. DISCUS explicitly aimed to “de-sensationalize the various issues  
148 related to alcohol abuse, and to suggest that the problems are manageable through enhanced



149 *personal awareness and responsible behaviour by the target audience.*” The third phase, from  
150 the 1980s onward, was a response to the global existential threat posed by the scientific  
151 evidence on policies that reduce alcohol harm through price, availability, and marketing. In  
152 1986, the DISCUS vice-president produced an analysis showing that scientific consensus on such  
153 policies could “...*gradually wear down individual industry associations and producers in most*  
154 *countries*”, warning that “*if the control of alcohol availability agenda becomes worldwide public*  
155 *policy, there will be no industry as we know it.*” (McCambridge et al., 2021).

156  
157 It is therefore apparent that the potential threat to revenue posed by evidence-based policy is a  
158 driving force for the alcohol industry funding of educational initiatives by third party  
159 organisations, initiatives which in turn serve several key strategic goals. These organisations  
160 help place a greater emphasis on individual rather than industry responsibility for alcohol  
161 harms, and on educational activities that align with their commercial interests (van Schalkwyk  
162 et al., 2022). They help to cast the alcohol industry as a “concerned citizen” and partner of  
163 governments and health agencies, rather than a profit-driven enterprise that obstructs effective  
164 public health policymaking and transparent labelling of its products, and is disproportionately  
165 reliant on revenue from those drinking at higher levels. It is important to note that the  
166 industries’ funding of health information organisations may have distinctive functions beyond  
167 the nature of the specific content produced by such organisations, as their presentation as  
168 charities, perceived as independent from the industry, allows for the industry to build  
169 partnerships and perceptions beyond those the industry could achieve in isolation.

170

171 In spite of this history, their participation in national awareness campaigns, their logos being  
172 signposted on alcohol products, in most alcohol advertising in print and on TV, and in some  
173 high-profile partnerships with public health authorities, the content of industry-funded alcohol  
174 information organisations has historically attracted less attention from researchers compared  
175 to areas such as alcohol marketing. In more recent years, evidence from public health research  
176 shows industry-funded education charities are not neutral education sources, but instead, in  
177 their content as well as their form, serve as an extension of alcohol industry marketing and  
178 political activity. They produce content that echoes industry discourses of ‘misuse’ and  
179 ‘personal responsibility’ (Smith et al., 2006, Maani Hessari and Petticrew, 2018), and convey  
180 misinformation regarding alcohol harms (Peake et al., 2021, Lim et al., 2019, Maani et al.,  
181 2022b, Dumbili et al., 2022). In other words, these alcohol industry-funded organisations do not  
182 only serve a function through their presence as seemingly distinct from industry in the wider  
183 policy environment, but produce content that appears to materially differ from non-industry-  
184 funded charities and government departments, in ways consistent with the strategic objectives  
185 of the alcohol industry. Below we outline some of the key conceptual and empiric arguments  
186 supporting these observations. In doing so, we examine the different but complementary ways  
187 in which the activities and outputs of alcohol-industry funded organisations serves the interests  
188 of their funders from the reproduction of industry-favourable narratives based on personal  
189 responsibility and the normalization of alcohol as a consumer product to the maintenance of  
190 knowledge and policy environments conducive to the business interests of the alcohol industry  
191 and its expansion.

192

193 *Industry-funded alcohol information organisations may help normalise drinking*

194

195 Alcohol industry-funded health information organisations can be conceived as forming part of a  
196 complex system in which both their own initiatives and alcohol marketing are mutually  
197 reinforcing. For example, marketing is known to propagate pro-alcohol social norms, and the  
198 expansion of use in target markets, such as initiating younger drinkers (among whom alcohol  
199 use is declining), or female drinkers (Noel et al., 2020, Jernigan et al., 2017). School-based  
200 education campaigns wholly or in part sponsored by the alcohol industry have been found to  
201 similarly foster pro-drinking social norms through familiarization with alcohol as a product  
202 (including learning how to pour a standard drink) and promoting alcohol consumption as a  
203 normal adult activity that children should learn about and master responsible use of (van  
204 Schalkwyk et al., 2022). It has been argued that the provision of such materials through third  
205 party industry-funded alcohol information organisations provides them with a veneer of  
206 independence and facilitates their penetration into schools, an environment where direct  
207 industry funding or messaging might not otherwise be deemed publicly acceptable.(Connor,  
208 2020) In doing so, pro-alcohol norms and the industry-favoured framing of health as primarily a  
209 question of individual responsibility may be seeded at an early age in ways that complement  
210 alcohol marketing, which itself is frequently viewed by children due to its ubiquitous nature  
211 (Chambers et al., 2018).

212

213 *Industry-funded alcohol information organisations reproduce industry narratives regarding the*  
214 *causes of alcohol harms*

215

216 There is growing evidence that the content of industry-funded alcohol information  
217 organisations differs from that of non-industry funded charities in ways that echo industry  
218 narratives regarding the causes of harms. Compared to non-industry funded charities, they  
219 mislead the public on alcohol and cancer risk (Petticrew et al., 2018b), on alcohol harms in  
220 pregnancy and fetal alcohol syndrome disorder specifically (Lim et al., 2019), and alcohol  
221 consumption and heart disease (Peake et al., 2021). In a randomized controlled trial in which  
222 online panelists were exposed to excerpts from such organisations on alcohol and breast cancer  
223 or factually correct statements from independent health organisations, industry-funded  
224 statements were associated with 58% greater odds of uncertainty about the link between  
225 alcohol and breast cancer (Maani et al., 2022b). “Responsible drinking” posters have also been  
226 found to increase drinking among undergraduate students (Moss et al., 2015). A study of letters  
227 to the editor written on behalf of such industry-funded organisations to academic journals  
228 found that in response to such evidence, they appeared to actively seek to discredit peer-  
229 reviewed research regarding their activities (Bartlett and McCambridge, 2021), consistent with  
230 evidence from the wider commercial determinants literature (Sass, 2008).

231

232 *Reproducing personal responsibility narratives*

233

234 As with other forms of alcohol industry corporate social responsibility (Babor and Robaina,  
235 2013) such organisations prioritise the promotion of individual behaviour change and individual  
236 responsibility (Maani Hessari et al., 2019b), with responsible consumption often defined in

237 what have been termed strategically ambiguous ways (Smith et al., 2006, Maani Hessari and  
238 Petticrew, 2018). Narratives of personal responsibility, which contradict theories and evidence  
239 on the upstream drivers of alcohol consumption, are echoed in industry evidence submissions  
240 in opposition to marketing legislation (Savell et al., 2016), a demonstration of the ways in which  
241 such third-party initiatives are mutually reinforcing of more direct industry efforts to prevent  
242 regulation. A systematic review of alcohol industry CSR initiatives found no evidence that such  
243 initiatives reduce harmful drinking, but good evidence that they were used to influence the  
244 framing of alcohol-related issues in line with alcohol industry interests (Mialon and  
245 McCambridge, 2018). Such narratives of personal responsibility likely have other cumulative  
246 negative effects, such as increasing stigma among vulnerable groups (McCambridge et al.,  
247 2014b) and complementing the strategies adopted by other harmful industries who seek to  
248 shift responsibility onto the public and undermine public understanding of harms and effective  
249 ways to prevent them (Michaels, 2020, Supran and Oreskes, 2021). Such activities also run  
250 counter to WHO alcohol strategy guidance which stipulate the need for member states to build  
251 public support for policy measures that act upon the upstream drivers of alcohol harm (World  
252 Health Organisation, 2010).

253

254 *Forming information environments that reduce risk of regulation*

255

256 Many consumers may not be aware that the organization they are sign-posted to for “the facts”  
257 in alcohol advertisements is often itself funded by the alcohol industry. A survey of Australian  
258 weekly drinkers found that only 37% were aware that DrinkWise was industry-funded,

259 compared to 84.1% who believed it received government funding (Brennan et al., 2017). These  
260 organisations often claim to be independent of the alcohol industry in spite of their funding,  
261 but it is not clear how such independence is achieved, or how independence is defined in this  
262 context. These assertions conflict with a substantial body of evidence on the “funding effect”,  
263 whereby, consciously or unconsciously, results and practices tend to align with the interests of  
264 the funder (Stenius and Babor, 2010). By being sign-posted to such organisations instead of  
265 independent sources of alcohol harm information, consumers are being directed to “safe  
266 spaces” for the industry, as these organisations have been found to not inform consumers  
267 about policy options to prevent alcohol harm (such as those recommended by the World Health  
268 Organisation)(World Health Organisation, 2010), upcoming legislation and the evidence  
269 supporting it, the role of the industry and related conflicts of interest, or information on alcohol  
270 marketing, affordability or availability more generally (Maani Hessari et al., 2019b). In this way,  
271 such organisations can help the industry define the discourse surrounding alcohol problems, its  
272 causes, and possible solutions (Maani et al., 2022a, Pietracatella and Brady, 2020).

273

274

### 275 *Policy substitution*

276 As described above, a key reason that the alcohol industry historically prioritized funding  
277 alcohol education initiatives and charities appears to be to attempt to prevent or delay  
278 population-level measures that might impact on future revenue. These campaigns can help  
279 divert resources and public attention away from evidence-based measures, such as restricting  
280 access and availability. At the same time, they may give the impression that ‘something is being

281 done' to address alcohol harms and that the alcohol industry is part of that solution.(Brown,  
282 2015) Insofar as alcohol industry-funded educational organisations facilitate networking and  
283 partnerships, they may also normalize industry narratives and the industry presence among  
284 policy-makers, researchers and practitioners, thereby helping to shape both policy and research  
285 agendas in industry-favourable ways (Hawkins and McCambridge, 2014, McCambridge et al.,  
286 2014a, Hawkins et al., 2012, Maani et al., 2022a).

287

288 While scholarship on such organisations continues to grow, they remain active in health  
289 promotion activities, and the nature of their origins and strategic purpose is not obvious to  
290 policy-makers or the public. Future research could further seek to engage qualitatively with the  
291 perspectives of non-industry participants in such partnerships, to ascertain their motivations,  
292 perspectives, and reflections, as has been done with researchers who had chosen to work, or  
293 not, with the alcohol industry (Mitchell and McCambridge, 2022). There is growing recognition  
294 that building greater knowledge of the commercial determinants of health requires an  
295 understanding of both relationships between companies and a wide range of facilitative third  
296 party organisations, and understanding the wider systems in which they operate (Gilmore et al.,  
297 2023). This requires an analytical lens that moves beyond examining the individual impact of AI  
298 activities on health, or understanding, to impacts on wider political, educational, or regulatory  
299 environments, and on social norms. Alcohol industry-funded education organisations offer an  
300 example of the value of this wider lens, as they may serve a range of strategic functions.

301

302 Figure 1 describes a conceptual model of the potential wider system effects of such  
303 organisations, including shaping public understanding, displacing more effective policy options  
304 and independent charities, building coalitions, and emphasizing individual responsibility, based  
305 on the framework for commercial determinants by Gilmore and colleagues (Gilmore et al.,  
306 2023). These elements in turn can be viewed as affecting wider political and economic systems,  
307 regulatory approaches, sectoral public policies, and physical and social environments. Beyond  
308 independently assessing the efficacy of individual campaigns or messages produced by such  
309 organisations, relatively little research has assessed these wider effects. This model is intended  
310 to aid researchers in the empirical analysis of how these organisations may serve wider  
311 commercial interests, through for example, inputs to policy consultations, framing of harms and  
312 solutions, and policy substitution. While the current paper focuses on health information  
313 organisations, it is important to note that members of the alcohol industry fund a much wider  
314 range of corporate social responsibility initiatives including treatment and prevention charities  
315 (Lyness and McCambridge, 2014) and community partnerships (Petticrew et al., 2018a) whose  
316 system-level effects merit similar examination.

317

318 Taken together, the body of existing evidence on the history and strategic purpose of alcohol  
319 industry-funded health information organisations suggests that the wider, system-level impacts  
320 of such organisations on policy and health are likely more profound than previously assumed.  
321 Such structural and normative effects could include the (perhaps deliberate/planned)  
322 marginalization of important voices, such as independent alcohol charities and health experts,  
323 who might otherwise be more frequently turned to by the public and policy-makers. It has been



324 argued that the promotion of voluntary industry approaches may form part of policy  
325 substitution strategies to prevent more effective, evidence-based regulation. Through the  
326 funding of organisations that by design are focused primarily on education rather than policy,  
327 and which contain narratives regarding alcohol harms and their solutions that exclude the role  
328 of the industry, there is a risk that directing consumers to those organisations may both serve  
329 to undermine public understanding, and more broadly change how problems and solutions are  
330 framed in ways that undermine public health goals (Maani et al., 2022a).

331

### 332 *Denormalising engagement with alcohol industry-funded organisations*

333

334 Corporate social responsibility activities such as those described above clearly can be used to  
335 serve business goals at the expense of population health, particularly where there is a  
336 fundamental conflict of interest, and the alcohol industry has both a significant conflict of  
337 interest and is very active in this space. In spite of this, such CSR activities have attracted  
338 relatively little regulatory attention, or rigorous independent analysis, compared to alcohol  
339 advertising and marketing for example. Furthermore, in the context of lack of political will or  
340 government funding for health promotion campaigns, the perception that endorsing or  
341 partnering with industry CSR alternatives is “better than nothing” should be challenged, given  
342 the real risk that industry interests rather than public health goals may be served, and the risk  
343 that real public health harms (rising from the active displacement of accurate, independent  
344 health advice) are the result of such partnerships; misinformation about cancers, and drinking  
345 in pregnancy from such alcohol-industry funded organisations does not simply result in a

346 misinformed public: it results in real cases of cancer, and real children with FASD, which to the  
347 industry, remain helpfully unattributable.

348

349 In summary, alcohol industry-funded health information organisations occupy strategically  
350 significant roles for their funders through their charitable status, reach and connections with  
351 policy makers. Evaluations of their output, and how consistent these effects are with the wider  
352 goals of the alcohol industry in seeking to boost consumption and undermine regulation that is  
353 needed to address a major global burden of preventable death and illness, a shift in how such  
354 organisations are engaged with by researchers, policy-makers and wider society appears long  
355 overdue. Such scrutiny of current approaches to engagement is critical to fulfilling core public  
356 health principles of being evidence-based, equitable and committed to first do not harm.

357

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370

### 371 **Conflicts of interest**

372 The authors declare no relevant conflicts of interest.

373

### 374 **Figure 1: A conceptual model of the wider effects of alcohol industry-funded health 375 information organisations**

376

377

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