



Supporting independence from
alcohol industry influence.

**A toolkit for building organisations & communities
free from alcohol industry influence.**



Irish Community Action
on Alcohol Network
Supported by Alcohol Forum





“The alcohol industry has no role in the formulation of alcohol policies, which must be protected from distortion by commercial or vested interests”

**Dr Margaret Chan,
Former Director General of the WHO**



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The Toolkit

The i-mark Initiative has been developed by the Irish Community Action on Alcohol Network (ICAAN), in direct response to growing concern across communities about the growing influence of the alcohol industry in the areas of partnership, policy and school-based education. ICAAN are part of a growing global movement working to reduce the influence of the alcohol industry on our lives and the lives of our children.

This resource has been developed to empower and support organisations to build understanding of and independence from the influence of the alcohol industry on our communities. The document outlines the inherent conflict of interest between the motives of the alcohol industry and our health and wellbeing. It also provides a useful check list with questions for organisations to work through when and if they may be considering using industry funded educational resources or accepting funding from the alcohol industry.

Also included are forms for organisations interested in adopting the **i-mark** to sign up. All organisations that sign up will have their name displayed on Alcohol Forum Ireland's website. The alcohol industry is highly profitable and fast moving, with significant resources to constantly develop new tactics and strategies. The Irish Community Action on Alcohol Network (ICAAN) commits to reviewing and updating the **i-mark** toolkit on an annual basis to incorporate any changes necessary to respond to new developments.





This resource aims to support:



education about the conflict of interest for charities, community, voluntary and statutory organisations in collaborating with the alcohol industry



clarity about straightforward action steps organisations can take to reduce the influence of the alcohol industry on our children and communities



alliance building, enabling organisations to connect with others and work together to reduce alcohol harm

For the **i-mark** to have its greatest effect, it is recommended that your organisation sign up, join the movement and use the logo as appropriate in your organisation's work. You may also want to print the **i-mark** logo, making it visible to staff and those you work with.

Thank you for joining this movement to reduce alcohol industry influence on our children, our communities and our lives. We hope you'll spread the word!

Key Definition

Who & What is ‘The Alcohol Industry?’

“Alcohol industry” means manufacturers of alcoholic beverages, wholesale distributors, major retailers and importers that deal solely and exclusively in alcohol beverages or whose primary income comes from trade in alcohol beverages. It includes alcohol industry funded Social Aspect Public Relation Organisations (SAPROs) and charities.

The World Health Organisation has defined the alcohol industry as follows:

“The term “alcohol industry” includes business associations or other non-State actors representing or funded largely by any of the afore-mentioned entities, as well as alcohol industry lobbyists and commercial interests in the alcohol beverage trade other than above when the interaction with WHO can be linked to their interests in alcohol beverage trade. Other non-State actors who receive funding from the alcohol industry (including funding for research) or have considerable links to the above-mentioned entities should be reviewed on an ad hoc basis in order to determine whether they should also be viewed as “alcohol industry”.

- (WHO 2019)



Background



In ICAAN, we are dedicated to finding common strategies and policy positions for reducing the harm that alcohol causes in Ireland; to individuals, to families and to communities. We are committed to working in collaboration and solidarity with others for a safer and healthier future for everyone who lives on this island. We are calling organisations across a range of sectors; including the charity, community, voluntary, statutory and education sectors to adopt the **i-mark**. What that means is that we are asking organisations to commit to analysing and understanding the inherent conflict of interest between our health and well-being and the motives of the alcohol industry, its funded charities, corporate social responsibility activities and its interest groups. In signing this pledge, organisations and individuals act to stop misleading marketing and alcohol industry funded 'awareness', 'education' and 'prevention' activities which serve to replace, detract from, undermine and / or confuse sound scientific evidence. In signing this pledge, you will be joining with others to raise awareness of significant conflict of interests and to protect people living in Ireland from misleading information funded and promoted by the alcohol industry.

The influence of the alcohol industry and its interest groups has increased in recent years, including at the local level. The **i-mark** and the supporting information have been produced by the Irish Community Action on Alcohol Network to outline the efforts of the alcohol industry in trying to influence alcohol policy and actions for their own commercial purposes, and to discuss the potential implications for local partners.

Summary of Evidence

Across the globe, the alcohol industry is increasingly attempting to enter into partnerships with Governments, health services, education providers and NGO's as part of their global corporate social responsibility (CSR) strategy. The I-Mark provides us with one tool for resisting this agenda and making that resistance visible.

The industries CSR approach presents the alcohol industry as good corporate citizens, drawing attention away their primary goal of increasing global alcohol consumption. Evidence suggests that these strategies facilitate access to government, co-opt nongovernmental organizations to corporate agendas, build trust among the public, and promote untested, voluntary solutions over binding regulation and other effective measures. There has been a growing trend among the large alcohol corporations to attempt, to “frame” or influence the interpretation of scientific information about the dangers of alcohol, using tactics developed decades ago by the tobacco industry (Babor et al., 2013)¹. There is now a body of independent research which highlights, analyses and documents the overall strategy and the tactics used.

In following pages is a brief summary outlining some of the key areas of concern.

1. Babor T, Brown K, Jernigan D, Mbona Tumwesigye N, Hastings G, Laranjeira R, et al. Statement of concern—the international public health community responds to the global alcohol producers’ attempts to implement the WHO strategy on the harmful use of alcohol. Global Alcohol Policy Alliance, 2013. www.globalgapa.org/pdfs/who-statement-of-concern080213.pdf

- **Influencing Policy** - Evidence shows that the global alcohol industry is working to influence policy at the international, national and local levels in ways designed to favour their business interests at the expense of public health and well-being. Data from the lobbying register here in Ireland indicates that drinks industry lobbyists met Government ministers, senior officials and Oireachtas members 361 times in 2018, the year the Public Health Alcohol Act was debated by Government.
- **Misinformation & Confusion Regarding Cancer Risk** - The alcohol industry is a significant source of misinformation and confusion regarding alcohol's cancer risk. A review of information from 27 Industry funded organisations globally, found that the majority were misleading the public about the cancer risks relating to alcohol (Petticrew et al, 2018)². It is important to note that alcohol is classified as a Group 1 carcinogen by the WHO -IARC (2012) and drinking alcohol increases the risk of 7 different types of cancer
- **Misinformation & Confusion Regarding Risk During Pregnancy** - The alcohol industry is a significant source of misinformation and confusion about the risks of alcohol consumption during pregnancy. A review of alcohol industry funded websites in 2019, concluded that alcohol industry-funded websites omit and misrepresent the evidence on key risks of alcohol consumption during pregnancy. This may “nudge” women toward continuing to drink during pregnancy and the public should be made widely aware of the risks of obtaining health information from alcohol industry-funded sources³.

2. Petticrew M, Maani Hessari N, Knai C, et al. How alcohol industry organisations mislead the public about alcohol and cancer. *Drug Alcohol Rev* 2018;37:293–303.

3. Lim AWY, van Schalkwyk MCI, Maani Hessari N, Petticrew MP. Pregnancy, Fertility, Breastfeeding, and Alcohol Consumption: An Analysis of Framing and Completeness of Information Disseminated by Alcohol Industry-Funded Organizations. *J Stud Alcohol Drugs*. 2019 Sep;80(5):524-533. doi: 10.15288/jsad.2019.80.524. PMID: 31603753; PMCID: PMC6811724.

- Ineffective ‘Responsible Drinking’ Campaigns** - ‘Responsible drinking’ ‘drink smart’ and ‘drink responsibly’ messages and campaigns are a key focus of the industry’s Corporate Social Responsibility strategy (used, for example by AB InBev, Diageo, Heineken, Carlsberg). These unscientific and ambiguous terms fail to define lower-risk drinking and are not supported by scientific research. A recent systematic review of eight studies evaluating the effectiveness of responsible drinking messages found minimal support, with the authors unable to draw conclusions with regard to effectiveness or effect size (Moss & Albery, 2018)⁴. Additional evidence demonstrates that responsible drinking campaigns produce a positive image of the industry among adolescents and young adults (Smith et al., 2006)⁵. Here in Ireland the ‘drink responsibly’ message is embedded in alcohol ads and therefore has a strong association with the positive images used in marketing campaigns.
- Schools Based Education** - Research and analysis of schools-based education programmes and materials point to the fact that a common thread across programmes is a strong focus on ‘personal responsibility’ and ‘personal choices’, neglecting the impact of wider environmental factors including advertising and availability which play a much stronger role in influencing youth alcohol consumption. Public health experts strongly recommend that individuals, schools and organisations do not use educational or other materials from alcohol industry funded sources (Jackson & Dickson, 2020)⁶.

4. Moss AC, Albery IP. (2018) The science of absent evidence: is there such thing as an effective responsible drinking message? *Alcohol Alcoholism* 53: 26–30.

5. Smith SW1, Atkin CK, Roznowski J.(2006) Are “drink responsibly” alcohol campaigns strategically ambiguous? *Health Commun.* 2006;20(1):1-11. PMID: 16813484 DOI: 10.1207/s1

6. Jackson N, Dixon R(2020) The practice of the alcohol industry as health educator: a critique *NZMJ* 1515.indd (website-files.com)

- **Partnerships** - Partnerships are used to gain political and public support and credibility for ineffective policy measures, whilst undermining support and misrepresenting evidence on effective regulatory interventions. Partnerships are invariably used by the alcohol industry to re-frame the problem as one caused by a minority of individuals abusing a lawful product which provides pleasure and benefit to many moderate drinkers, rather than a population-wide issue involving a harmful product produced, marketed and sold by organisations seeking to maximise profits for shareholders. Those with responsibility for and interest in promoting health and / or reducing the levels of alcohol harm should be aware of the motives of the alcohol industry in seeking partnerships and collaborations and should work to ensure public health goals and objectives are protected.
- Interventions proposed by the alcohol industry are generally weak, are rarely evidence-based and unlikely to reduce harmful alcohol use⁷.
- A key component of alcohol industry strategy is to promote partnership working in order to influence health policy. Research in this area has highlighted the potential for public health/industry partnerships to serve as part of a larger stakeholder marketing strategy⁸.

7. Babor T and Robaina K. (2013). *Public Health, Academic Medicine, and the Alcohol Industry's Corporate Social Responsibility Activities*. *American Journal of Public Health*, Vol. 103. No. 2.

8. McCambridge J, Hawkins B, Holden C. (2013) *Industry use of evidence to influence alcohol policy: A case study of submissions to the 2008 Scottish Government Consultation*. *PLOS Medicine*;10(4): e1001431. doi:10.1371/journal.pmed.1001431.

McCambridge, J., Sheldon, T. A., Madden, M. T., & Barbor, T. (2019). *Advancing public health policy making through research on the political strategies of alcohol industry actors*. *Journal of public health*.

Babor, TF, Robaina, K, Noel, J. (2018) *The Role of the Alcohol Industry in Policy Interventions for Alcohol-Impaired Driving*. Appendix C in: *National Academies of Sciences, Engineering and Medicine. Getting to zero alcohol-impaired driving fatalities. A comprehensive approach to a persistent problem*. Washington, DC. National Academies Press, pp. C1-C37

Pantani D, Peltzer R, Cremonte M, Robaina K, Babor T, Pinsky I. (2017) *The marketing potential of corporate social responsibility activities: the case of the alcohol industry in Latin America and the Caribbean*. *Addiction* 112: S1,74–80. DOI: 10.1111/add.13616

Advice & Guidance

Advice from the experts

Guidance was provided by over 500 public health professionals, alcohol scientists and NGOs from 60 different countries to the WHO in February 2013. Amongst other things it recommended avoiding funding from industry sources for prevention, research and information dissemination activities. The most effective way to reduce alcohol related deaths and other harms relating to alcohol is to reduce consumption, and, therefore, the sale of alcohol, something which is not in the alcohol industry's commercial interest.

HSE Policy on Non-Collaboration with the Alcohol Industry (2021)

Here in Ireland, the HSE has shown leadership on this issue and has developed a policy on non-collaboration with the alcohol industry which applies to HSE staff, services and HSE funded organisations. The policy on non-collaboration with the Alcohol Industry the clearly advises that HSE staff and funded organisations: 'Do not engage, directly or indirectly, in any initiatives or funding arrangements with the alcohol industry. This includes campaigns, programmes or initiatives that are funded, or co-funded, directly or indirectly, by Alcohol manufacturers and distributors or their Social Aspect Public Relations Organisations (SAPROS)'.

Guidance for Charities, Community & Voluntary Organisations

ICAAN believes that organisations should understand the context and long-term strategy of the alcohol industry when making decisions on whether or not to work with alcohol and retail companies, their trade organisations, funded charities or Social Aspect Public Relations Organisations.

We recognise that there are occasions when partners will need to interact with the industry and its representative groups. We believe this is appropriate where it relates to the implementation of policy that has been independently developed by experts based on evidence. Community organisations working to reduce alcohol harm may have work areas which involve those who sell alcohol (pubs, clubs, off licenses, retailers) and this may be an appropriate area of work at the local level. We also recognise that local government officers and Gardai, particularly those responsible for the application of alcohol licensing laws, will be required to engage with representatives of the industry in order to fulfil their work responsibilities. However, if those relationships stray outside the bounds of the application of laws and regulations, it would be beneficial for organisations (statutory and voluntary) to consider the questions in the next section of the toolkit.

When approached by the industry or one of its representative organisations, we recommend that organisations ask some important questions, outlined in the following section. These are designed to support organisations to analyse and avoid conflicts of interest and to make informed decisions. The alcohol industry is made up of a variety of constituent parts. At times public health and their partners may find themselves on the same side of a policy argument as parts of the industry. However, that is unlikely to develop into a long term, strategic partnership.

Where any organisation, club or charity is concerned that a potential partnership, collaboration or funding opportunity may be in conflict with your **i-mark** commitments we recommend that you contact ICAAN directly for advice. If your organisation is funded by the HSE and you are concerned that it may be a breach of the HSE policy, we recommend you contact the HSE Alcohol Programme directly for advice.

Ask Yourself...

Questions to ask if thinking of collaborating with the alcohol industry on a project or intervention with the public or others

If you are considering working with a license holder, an alcohol company or alcohol industry funded organisation on a project or intervention designed to reach out to the public or other key groups, you should ask yourself:

- ② What is the objective of this organisation in offering their support?
- ② Does the project involve alcohol industry representatives leading on public health matters?
- ② Does it involve using alcohol industry materials or materials funded by them, or developed by them?
- ② Does the project focus solely on a targeted minority as opposed to the wider population?
- ② Is the project likely to be used to present the industry in a positive light?
- ② Will the project deflect from independent, non-industry associated evidence-based interventions?
- ② Does your industry collaborator use similar interventions as an excuse not to support or to deflect attention from more effective population-level interventions?
- ② Can you be sure your new partners will not misrepresent the joint work you are doing? Do you have control of the publicity surrounding it? Will they agree to an independent academic evaluation that is not financed by them and is completely independent of all industry involvement?
- ② Are you giving credibility to an organisation that is undermining the overall evidence base in relation to alcohol? Have you checked what they are publicly saying about interventions such as minimum unit price (MUP), restrictions on availability and promotion?

- ② If this is a global company, do you know what standards they are applying outside of Ireland and particularly in the developing world?
- ② Should you be providing access to policy formers and decision makers to companies and their funded organisations when they have a legal responsibility to increase profits and therefore alcohol consumption?
- ② Will the initiatives that are funded include brand names, company names of slogans (eg Drink responsibly) that could serve as a form of marketing?"

Questions to ask if considering sharing a public platform

The alcohol industry is a highly complex and well-funded sector and making informed decisions about engaging or not can be very challenging. Evidence shows certain parts of the industry may say that they support action on alcohol harms in one setting, while at the same time undermining or arguing against interventions that evidence shows to work. This is particularly the case with regard to Minimum Unit Pricing and restrictions on alcohol advertising. If you are thinking of inviting the industry or associated body to a health or an alcohol-related event, ask yourself:

- ② Am I giving the alcohol industry or an associated body access to policy and decision makers and is that appropriate?
- ② Will their presence undermine the independent evidence base? Here, we would advise that you check what their organisation is saying publicly elsewhere about effective public health measures to reduce alcohol harm (for example, restrictions on price, availability and / or marketing)
- ② Is it possible that they could use the platform to establish credibility that their actions elsewhere don't deserve? Do their actions and the actions of their brands match the words they are likely to use on the platform?
- ② Will it provide an opportunity to hold them to account?

Questions to ask if considering collaborating on or using education programmes funded, part funded or developed by the alcohol industry.

It is strongly recommended that individuals and organisations do not use educational or other materials from alcohol industry funded sources. Public health experts identify this as one of a number of ‘no-go’ areas. If you or your organisation are approached by the alcohol industry, or any of its funded or representative organisations, promoting use of any programmes or materials, ask yourself:

- ② Has the content of the material been developed, reviewed and approved by independent experts in public health and community safety?
By independent we mean experts who are not paid by or have partnered with alcohol industry bodies
- ② Does it paint an unrealistically positive picture of the role alcohol plays in Ireland?
- ② Is it clear on the range of long and short-term harms caused by alcohol at a population level? Or is it just focused on individual behaviour?
- ② Does it minimise the problem, blaming a small minority of misbehaving individuals while not recognising that large proportions of the population are drinking at levels of increasing and higher risk?
- ② Does it attribute the causes of alcohol harms to individuals but not to industry activities (for example, marketing, pricing, widespread availability)?
- ② Has it been independently tested on the target audience to evaluate its effectiveness?

Collaboration

What should be considered ‘no-go’ areas in terms of collaboration?

There are some areas that should be ‘no-go’ areas for the alcohol industry and where the advice, the evidence and the conflict of interest are clear. This includes industry support for or provision of education-based programmes for children and young people; or the use of alcohol industry developed or alcohol industry funded materials in any educational setting. Other areas where organisations should avoid collaboration include sponsorship of sporting, cultural and other activity that is likely to expose children to positive images of alcohol; and direct sponsorship of alcohol or other drug treatment activities. While the Public Health Alcohol Act provides an enhanced regulatory framework in Ireland on alcohol advertising and sports sponsorship, it is important that organisations make informed decisions about their engagement with the alcohol industry.

Call To Government

Call To Government To Identify Alternative Funding Streams

Strong evidence highlights the fact that the alcohol industry is following the Tobacco Industry Playbook in the way that it seeks to compromise the independence of civil society organisations. Because of their role in the marketing and sale of a psychoactive and harmful substance worldwide, the Alcohol Industry is not an appropriate partner in health activities. Reputational damage can result to an organization by partnering with the alcohol industry and it is important that government and other key stakeholders find ways of funding community, health and social supports and services independent of alcohol industry sources.

As part of the work of the **i-mark**, ICAAN calls on government to explore how to provide alternative funding for those groups and organisations in the community sector who currently accept alcohol industry funding. It is important that in adopting policies that distance organisations from the profits of the alcohol industry, that Government recognises this work is in line with their commitments to the Sustainable Development Goals and the WHO Global Alcohol Action Plan. Political leadership is needed to tackle the devastating impact of alcohol on society and exploring alternative sources of funding for organisations currently accepting funding could have a positive impact in the fight against alcohol harm.

Sources of Information

We would strongly recommend that partners DO NOT use materials or direct people to websites associated with, funded by, or partly funded by the alcohol industry. A number of published studies have indicated that industry associated materials have misrepresented the evidence on key risks of alcohol consumption during pregnancy and the alcohol-related risk of cancer on their websites and in their educational materials.

Here in Ireland, the HSE Ask About Alcohol campaign and website provides a trusted source of information on alcohol and alcohol related harm;



Big Alcohol Exposed!

The alcohol industry is highly complex and making informed decisions about engaging or not can be challenging for organisations.

If your organisation is interested in finding out more about the unethical business practice interests of global alcohol corporations, the Big Alcohol Exposed project can be a really useful resource. Big Alcohol Exposed is a global initiative to monitor, document, and reveal the unethical business practices of the alcohol industry. It is an invaluable resource for groups and organisations in supporting them to gain an insight to and understanding of the unethical business practice of global alcohol corporations.

Find out more at:

- **Web:** www.bigalcohol.exposed
- **Twitter:** @BigAexposed
- **Facebook:** BigAlcoholExp

Acknowledgements

The Irish Community Action on Alcohol Network is part of a growing global movement committed to reducing the impact of alcohol industry activities on our health and wellbeing. Thanks are due to our UK colleagues in **Balance North-East** whose work on 'Engaging with the Alcohol Industry' inspired us on this journey. Thanks also to **Professor Tom Babor** and to **Professor Mark Pettircew** for sharing their significant expertise and for reviewing earlier drafts of this document. Thanks to our friends in **Movendi** for their work on the Big Alcohol Exposed Initiative. Alcohol harm is a global issue, we are much stronger working together. Finally, thanks as always to **Alcohol Forum Ireland** for their ongoing support on **ICAAN**.



Complete and return to:
i-mark / Alcohol Forum Ireland,
Unit B9,
Enterprise Fund Business Centre,
Ballyraine, Letterkenny ,
Co Donegal, F92 CX47.

Membership Form

Join The Movement

Name of Organisation:

Key Contact Person:

Email Address:

Phone Contact:

We

(Name of Organisation)

have discussed this i-mark at Board level and have agreed that our organisation commit to this pledge to reduce alcohol industry influence on our children and our communities.

We the undersigned pledge to:

1. Review any partnership or funding proposals against the questions outlined in the I-Mark toolkit
2. Never accept funding from, or enter into partnerships with, the alcohol industry, its subsidiary companies, trade organisations, its funded charities or social aspect public relations organisations (SAPRO's)
3. Never use or promote alcohol industry funded materials or programmes in either educational or out of school settings with young people in Ireland and commit to investigating how any materials and / or programmes are funded
4. Scrutinise, challenge and raise awareness of the tactics of the alcohol industry in undermining public health in Ireland and beyond

Signed:
(Chairperson)

Date: / /

alcoholforum.org/i-mark

