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Short Report

Maintaining Integrity in Alcohol Research in Ireland: A Commentary

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Abstract

Ireland is currently leading the way in alcohol control in Europe. Recent initiatives include both the introduction of curbs on alcohol advertising and minimum unit pricing (MUP), as well as the forthcoming implementation of legislation that will require combined text and graphic alcohol warning labels on alcohol packaging. In this context it is vital to maintain research integrity in relation to alcohol control initiatives in order to develop a robust evidence base. The alcohol industry has an established track record of interference in alcohol control research and policy. This commentary explores weaknesses in the integrity of the current alcohol research infrastructure in Ireland, with a particular focus on the country's leading health research funder, the Health Research Board (HRB). Specific recommendations are made to remediate the deficits identified and develop more robust research systems.

Key Words: *Research Integrity, Research Ethics, Alcohol Industry, Ireland, Health Research Board (HRB), Corporate Social Responsibility (CSR), National Institute on Alcohol Abuse and Alcoholism (NIAAA), Health Policy, Safeguards, Mach 15, International Center for Alcohol Policies (ICAP)*



Introduction

Ireland has become the first country within the European Union to pass legislation (the Public Health [Alcohol] Act, 2018) that will require alcohol warning labels (1). This legislation has recently been enacted and will come into operation in 2026. Despite its many deficits, the Act remains a significant tool for Public Health action in Ireland (2-4). The successful introduction of this Act, despite heavy alcohol industry lobbying (5), has catapulted Ireland into a position as world leader in alcohol control, similar to its former role in tobacco control (6). Needless to say this intervention will be watched by both alcohol control advocates and the alcohol industry globally to assess its impact and associated ramifications. This immediately raises an important question; how can the integrity of independent and trusted research on the topic of alcohol control in Ireland be achieved or maintained?

The Alcohol Industry

Alcohol remains an important commercial determinant of health (CDoH) (7). In order to assess the need for a specific focus on research integrity in relation to alcohol it is crucial to understand the size and influence of ‘Big Alcohol’ (8,9). The OECD suggest that in the year 2019 the global alcohol industry was worth US\$ 1.7 trillion (10). As Babor & Robaina note *‘the alcohol industry is a powerful multi-national business complex that includes not only the producers of beer, wine and distilled spirits, but also a large network of distributors, wholesalers and related industries, such as hotels, restaurants, bars and advertisers’* (11).

Obviously when dealing with a global industry of these proportions it cannot be approached naïvely. In efforts to maintain its profits and markets, the alcohol industry is not passive. McCambridge et al. observe that it is *‘highly strategic, rhetorically sophisticated and well organized in influencing national policymaking’* (12). The alcohol industry is engaged in extensive surveillance and monitoring of ongoing research, and there is clear evidence of harassment by industry for unfavorable findings (13).

The Machinations of ‘Big Alcohol’

The alcohol industry has been identified as both using data strategically to advance their interests (14), and to obscure Public Health messages (8). However, these are only few of the industry’s arguably reprehensible activities. Table One details the findings of a recent scoping review of reviews which examines how the machinations of Big Alcohol restrict government regulation of their activities. Although the activities in Section B are of most importance (Shaping the evidence-base; Infiltrate the public health scientific community; Hiding industry role in research), Sections A and C are also relevant in the context of maintaining research integrity.

Table 1: Alcohol Industry Strategies to Expand Corporate Autonomy (15)

A) Influencing Government Policy Making and Implementation

- Lobbying;
- Revolving door;
- Policy capture;
- Intimidation, incentives & bribery;
- Developing/ promoting alternative solutions;



- Influencing voters and the general public.

- B) Challenging Unfavourable Science**
 - Shaping the evidence-base;
 - Infiltrate the public health scientific community;
 - Hiding industry role in research.

- C) Creating a Positive Image**
 - Corporate social responsibility;
 - Offering voluntary self-regulation;
 - Issue framing;
 - Targeted marketing.

- D) Manipulating Markets**
 - Illicit trade and smuggling.

- E) Mounting Legal Challenges**
 - Litigation

Alcohol industry involvement specifically in relation to alcohol research has been noted in seven distinct areas: 1) Sponsorship of research funding organizations; 2) Direct financing of university-based scientists and centers; 3) Studies conducted through contract research organizations; 4) Research conducted by trade organizations and social aspects/ public relations organizations (SAPROs); 5) Efforts to influence public perceptions of research, research findings and alcohol policies; 6) Publication of scientific documents and support of scientific journals; 7) Sponsorship of scientific conferences and presentations at conferences (16,17). It is obvious that the alcohol industry both manipulates and uses science as a political weapon. It is an unfortunate reality that there are many examples of the alcohol industry funding research (18).

The result of such research are conflicts of interest in health research, and often biased research findings that favor commercial interests at the expense of population and patient health. The alcohol industry constantly strives to shape the research, policy and public agenda and to dictate the questions being asked and debated. However, in terms of examining the machinations of ‘Big Alcohol’ alcohol control advocates are fortunate enough to be able to look for guidance from what may be termed the ‘Big Tobacco Playbook’ (see Table Two).

Table 2: The Policy Manipulation Game Plan (19)

- 1) Fund research that supports the interest group position;
- 2) Publish research that supports the interest group position;
- 3) Suppress research that does not support the interest group position;
- 4) Criticise research that does not support the interest group position;
- 5) Disseminate interest group data or interpretation of risk in the lay press; and



6) Disseminate interest group data or interpretation of risk directly to policy makers.

Specifically this ‘game plan’ is based on the denial of problems, the misrepresentation of data, and the manufacturing of doubt around research findings (20-22). Maani et al. have noted that it is ‘*exceptionally easy to spread erroneous or pseudoscientific information*’ (20). The industry also works to promote self-regulation rather than government intervention. Industry tactics focus on moving blame from the industry to the more narrow target of personal responsibility, and alcohol addiction, rather than negatives associated more broadly with alcohol consumption. The sector also routinely seeks to delay the implementation of controls, as well as watering down alcohol control policies and recommendations. A notable aspect of alcohol industry machinations is the use of social aspects organizations to promote industry public relations interests over the long term (23).

The alcohol industry, like the tobacco industry before it, are actively engaged in using Corporate Social Responsibility (CSR) as a form of camouflage to give the ‘*illusion of righteousness*’ (24). The manipulation of CSR activities in support of the alcohol industry has been a focus for many years (11,24). The issue of CSR is important in the context of research integrity as the alcohol industry can use ostensible CSR research funding as camouflage to influence research. Research has demonstrated that under the guise of CSR the alcohol industry seeks to achieve three main aims. Firstly, CSR can be used to frame issues and problems and guide policy discussions, as well shifting blame from manufacturers to consumers (25). Secondly, CSR initiatives may be used to promote voluntary initiatives in order to prevent or delay governmental regulation. Finally, CSR may simply be used as indirect band marketing (24). CSR activities, for example those conducted by alcohol industry funded SAPROs in schools are a particular issue of concern (26,27). However, such programs have been successfully resisted in some areas, including in Ireland (28).

The NIAAA’s MACH 15 Trial

It is instructive at this point to briefly explore examples of alcohol industry manipulation and funding of research and policy. The most infamous example internationally is the Moderate Alcohol and Cardiovascular Health (MACH) Trial, sometimes referred to as the MACH 15 trial (29), as participants were to evaluate the impact of one alcoholic drink containing 15g of alcohol per day. What makes this study particularly alarming is that it involved the National Institute on Alcohol Abuse and Alcoholism (NIAAA), part of the prestigious National Institutes of Health (NIH) in the US, and is the largest funding agency for alcohol research globally (30,31):

The most shocking detail in the story: The researchers behind the study reportedly persuaded alcohol industry executives to fund them by arguing the trial “represents a unique opportunity to show that moderate alcohol consumption is safe and lowers risk of common diseases”- before they had even enrolled their first patient. The study “is not public health research – it’s marketing” (32)

The MACH 15 Trial had funding of \$100 million. \$33 million was to be provided by the NIAAA, while the remaining funding \$67 million was to be provided by alcohol industry groups ABInBev, Heineken, DIAGEO, Pernod Ricard, and Carlsberg. The extensive links between the investigators in this project and the alcohol industry have been revealed in depth (30-36).



The International Center for Alcohol Policies (ICAP)

Examples of how Big Alcohol attempts to influence research and the research agenda can also be seen in activities such as publications produced by the International Center for Alcohol Policies (ICAP). The Washington D.C. based ICAP is funded by the alcohol industry and its focus is evident in its tagline: ‘*Analysis, Balance, Partnership*’. The activities of ICAP have been noted as being particularly contentious (13), with its Alcohol in Society book series have been described as a ‘*key resource globally for alcohol industry political strategies*’ (37). Texts produced by ICAP include leading titles such as *Alcohol and Pleasure: A Health Perspective* (38), *Corporate Social Responsibility & Alcohol: The Need and Potential for Partnership* (39), and *Reasonable Risk: Alcohol in Perspective* (40).

Ireland: UCD, the MRCI & the HRB

Ireland is not exempt from the machinations of the alcohol industry on health research. Even a cursory examination of the literature identifies some problematic instances of this. These will be detailed as exemplars of this phenomenon. Babor provides a clear example of this:

In 2006, Diageo Ireland, part of Diageo plc, the world’s largest producer and distributor of alcoholic beverages gave €1.5 million to the University College Dublin’s Geary Institute... The grant provides salary for several faculty, graduate students and support staff engaged in a 3-year study of health risk behavior in relation to hazardous drinking among young adults in Ireland (41)

An additional Irish example of alcohol industry involvement in research may be seen in the reports of the Medical Research Council of Ireland. Examination of past issues indicate ongoing funding for almost 30 years from 1947 to 1975 by this Messrs. Arthur Guinness Son & Co. Ltd. alongside the Irish Tobacco Manufacturers Advisory Committee (42). The Medical Research Council of Ireland subsequently merged with the Medico-Social Research Board to form the Health Research Board (HRB) in 1986. The HRB is a leading funder of health and health services research in Ireland, and as such it is opportune to explore how robust its mechanisms are in relation to potential subversion by Big Alcohol.

The HRB has a Policy on researchers funded by the tobacco industry (43). This policy states that ‘*the HRB is unwilling to fund applications from individuals applying for, holding, or employed under a research grant from the tobacco industry*’ (43). However, it is notable that no such equivalent policy exists in relation to the alcohol industry. This is an unfortunate lacuna in its internal policies. The reasons given for having a specific policy on researchers funded by the tobacco industry are given in Table Three.

Table 3: HRB Policy on researchers funded by the tobacco industry (43)*

<p>Their key argument was that tobacco is uniquely dangerous in the scale of harm it causes, and that this harm is caused when tobacco is used exactly as intended by its manufacturers.</p>



Additional arguments were put forward as follows.

- Tobacco use is always dangerous, and it has no safe level of manner of use...
- The scale of risk is far greater than in other health-damaging behaviour, and one in two lifetime smokers will die from their habit...
- Its use usually starts in childhood, when awareness of health risks is lower...
- It is highly addictive, so it is very difficult to quit...
- It causes harm to non-users as well as to users...
- There is a long delay before the damage becomes apparent, so self-deception is easy...
- World-wide it is set to become the single greatest killer, overtaking lower respiratory infections by 2020...

Apart from harm to health, there is now a **large body of evidence of the uniquely dishonest behaviour of the industry**, including:

- suppressing research findings on the harmful effects of tobacco...
- seeking to distort research evidence... and
- trying to recruit scientists to present one-sided views on the risks of smoking

*Bold highlighting of certain text is from the original policy

In terms of maintaining research integrity is clear that an equivalent policy in relation to the alcohol industry is urgently required. Although this would be an important step forward it is undoubtedly insufficient on its own. It is important to note that a key figure in the establishment of the MACH 15 study was what has been described as a *‘revolving-door individual’* referring to people that rotate from working in the research or policy field to industry, and/ or vice-versa (35). Babor notes the importance of blocking such revolving doors, and as such we must ask if the HRB should block funding to someone who has ever been funded by the alcohol industry (36)?

Robust and transparent systems are essential to protect the integrity of research and to resist the influence of the alcohol industry. Given what happened at the National Institutes of Health NIAAA in relation to the MACH 15 trial it is obvious that there is a need to expand the remit of the lobbying register or introduce a similar system specifically for Governmental research funding organizations. Ireland has legislation, the Regulation of Lobbying Act, 2015, which requires elected politicians and senior civil servants to record meetings with industry and lobbyists (44,45). However, there are three major public research funding organizations in Ireland not currently covered by this legislation. These are the Health Research Board (HRB), Science Foundation Ireland (SFI), and the Irish Research Council (IRC). An extension in the lobbying register legislation to cover these agencies should make industry attempts to influence and control research more transparent.

In order to safeguard research integrity in face of potential solicitation by the alcohol industry it is also important that all employees of organizations such as the HRB, IRC and SFI need to make Declarations of Interest (DoI) to order to ensure transparency and independence. Such declarations should not be once-off event, but an annual process. This is the process that has been adopted by Ireland’s new formed National Research Ethics Committees (NRECs) (46).



Disclosure of Interest Forms & Practices

In terms of independence from industry influence over research it can be instructive to examine the Disclosure of Interests (DOI) forms used by academic journals. In the medical field a standard one is that developed by the International Committee of Medical Journal Editors (ICMJE) (47). The ICMJE's form which aims to facilitate the '*Disclosure of Financial and Non-Financial Relationships and Activities, and Conflicts of Interest*' is better than many used by a range of journals. It is important in the context of this examination as it has been adopted for use by many journals, including the Irish Journal of Medical Science (IJMS) (48). The ICMJE Disclosure Form specifically addresses 13 different domains ranging from stock options to support for attending meetings and/or travel. However, a more critical reading of the ICMJE form reveals that it fails to address key issues, including for example payments, gifts and funding being made to spouses, partners or family members. Payments to family members rather than directly to individuals have been noted relation to corruption in other fields in Ireland (49,50).

One very positive development towards maintaining transparency in relation to declarations of interest is the recent launch of the i-MARK. This logo is used to explicitly communicate that the organization displaying it does not accept any alcohol industry funding (51).

The WHO have recently published guidance on this topic. Their document contains eight key messages (52). As can be seen from Table Four, point six explicitly addresses the issue of insufficiency in current CoI practices.

Table 4: WHO Key Messages on Addressing & Managing Conflicts of Interest in Alcohol Control Policies (52)

- 1) There are irreconcilable differences between public health and economic interests.
- 2) Industries producing and selling unhealthy commodities have defeated, delayed or weakened the design, implementation and evaluation of public policies worldwide.
- 3) Evidence shows that protecting policy development from conflicts of interest is essential to decrease the burden of disease.
- 4) There is no robust evidence that corporate social responsibility reduces alcohol consumption.
- 5) International frameworks and coalitions help in managing conflicts of interest and advance alcohol control policies.
- 6) The current research practices to disclose conflicts of interest are insufficient to ensure transparency and unbiased science
- 7) Adopting procedures to identify and limit interactions with the alcohol industry prevents interferences and ensure transparency during the development of public health policies
- 8) Civil society can improve the recognition of and anticipate the industry practices.

Safeguarding Publications

Another avenue in which the HRB could promote research integrity in relation to the alcohol industry relates to publications. However misguided a metric, it must be acknowledged that publications and citations are increasingly important in academic careers (53-62). Articles that are



open access are routinely cited at a considerably higher rate than those behind a publisher's paywall (63). Generous alcohol industry funding may come with ample funds to cover open access publishing costs for journal articles, which in turn help generate citations and support research careers. However, without such publishing supports researchers may find their work more marginal and their career prospects more tenuous. The HRB currently operates a publishing platform called HRB Open Research (64). This open access publishing platform is currently restricted to current and former recipients of HRB funding who can publish on it for free. This effectively creates a privileged pool of researchers that are less likely to be ensnared by alcohol industry funding. However, many researchers have not received HRB funding and therefore have no such privileged access to this established publishing platform. In order to support research integrity the HRB should expand the remit of HRB Open Research to include publications relating to alcohol and other commercial determinants of health, such as tobacco, fast food, and gambling.

Partnership Arrangements

Guidance for researchers in relation to interactions with the alcohol industry has been described as '*necessary, but limited*' and that further discussion and debate is required (13). It must be acknowledged that various frameworks for guidance in relation to interactions with the alcohol industry have been put forward. One typology suggested by Stenius & Babor defines these as: partnership arrangements; policy statements on conflicts of interest; ethical analyses; and blanket prohibitions (17).

The model adopted potentially has significant impacts on integrity in the research process. For example the most infamous example of partnership arrangements in relation to alcohol control are the Dublin Principles developed in Dublin on 26-28 May 1997 at the invitation of the National College of Industrial Relations (NCIR) and the International Center for Alcohol Policies (ICAP) (65). Given the involvement of the highly suspect ICAP, it is perhaps no surprise that this approach suggests that '*alcohol policies should reflect a combination of government regulation, industry self-regulation, and individual responsibility*' (65).

Ethics Training

Ethics training on issues relating to interactions with the alcohol industry are undoubtedly essential. However, it is important that this training is not restricted to postgraduate students. Instead, it should encompass not only higher education, but secondary school education as well. Ireland has a significant opportunity to introduce secondary pupils to such training via transition year. Most secondary schools in Ireland offer a less academic year between lower level (NQF level 4) exams usually taken at about age 15/16, and more advanced exams (NQF level 5) usually taken at about age 17/18 (66). This year is largely project based and could easily incorporate an introduction to such training.

Training in relation to the alcohol industry should also focus on clear warnings. It is vital that both new and established researchers are routinely reminded that working with the alcohol industry both normalizes alcohol consumption and confers legitimacy upon the industry, as well as providing status and prestige through links to higher education. Additionally, they must be made aware that in working with the alcohol industry they face reputational risk, as does their employer. One overarching message that must be disseminated to researchers in the field of alcohol control



is to 'Be Alert & Be Wary'. Researchers need to anticipate alcohol industry tactical initiatives to subvert both their research findings and their independence.

Most importantly, it is clear that industry involvement in alcohol policy is patently untenable because the its for-profit model is entirely based on over-consumption. As Boniface notes the purchaser to profit ratio of the alcohol industry hints at the Pareto Principle (67). The Pareto Principle is sometimes simply referred to as the 80: 20 Rule. In this instance it refers to the reality that 81% of alcohol off-trade revenue is generated by 25% of the population drinking above guideline levels (68). It is important to note that alcohol is a proven carcinogen and there is no safe level of consumption (69). The reality is clear, there must be no involvement of the alcohol industry in public health and alcohol control research.

Safeguarding Funding

It is naïve to deny the potential allure of alcohol industry funding. In university systems in which publications and research revenue raising metrics are crucial in hiring, retention, tenure and progression processes alternative sources of funding may be crucial in maintaining research independence. Maintaining research integrity in the face of the machinations of Big Alcohol would be aided by firmly decoupling academic researchers from potential industry funding. One way to help ensure this is to provide centralized alcohol excise tax-based funding to support alcohol control research devoid of industry influence. This funding for research could be similar to that Proposed under the Social Impact Fund for the Gambling Regulatory Authority of Ireland (GRAI) (68). It would be vital in such a development that neither the alcohol industry nor their client SAPROs are in any way involved in the allocation of such funding. Funding for specific research examining alcohol industry involvement in practices to influence policy (70), as well as their camouflaging CSR activities such as greenwashing, gender-washing, and so forth should also be prioritized.

Robust Peer Review

Finally, robust peer review systems are vital to a robust research process. In order to help achieve research unbiased by the impacts of commerce peer review systems need to be both robust and rewarded. The proliferation of journals in recent years and increased competitiveness in the academic job market mean that it is increasingly difficult to secure peer-reviewers (71). Two obvious solutions are either to pay reviewers for their time and expertise, something most of the commercial publishers could easily do given their significant profit margins. Alternatively, more weight and recognition could be given to such activities in employment and promotion processes. Sites such as Publons and ORCID are now recording such peer review activity, although as yet little weight appears to be given to such activities by universities (72,73).

Conclusion

The machinations of Big Alcohol must not be under-estimated. The alcohol industry has a proven track record of the strategic manipulation of research and policy processes. Partnership with the alcohol industry is not a viable option. Alcohol is an addictive, toxic, psychotropic, carcinogenic, mutagen. The alcohol industry is based on a for-profit model, which relies on over-excessive consumption by a substantial minority. Robust systems are required to maintain the integrity of research. It is clear that the research infrastructure in Ireland is currently not well positioned to resist the influence of the alcohol industry. Significant developments are required in the fields of:



policies in relation to funding those who have connections with the alcohol industry; sources of funding; conflict of interest and declaration of interest processes; ethics training; and peer review. Without improvements across all of these domains alcohol research in Ireland remains highly vulnerable to industry interference and manipulation.

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