

FRC Food Policy Discussion Paper

‘To discuss business’: food and drink industry lobbying in the UK



**Food Research
Collaboration**

an initiative of

**Centre for
Food Policy**

Shaping an effective food system

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June 2022

Series Editor:
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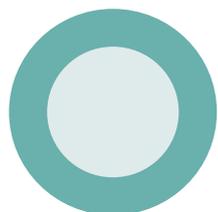


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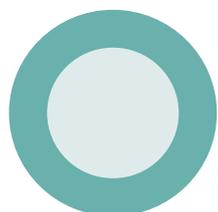
Interactions between business and policy-makers are an important public concern. The purpose of this Discussion Paper is to provide illustrative findings on recently declared meetings between food and drink businesses and UK policy-makers, and to suggest ways that food and drink lobbying could be improved to enhance transparency and trust in lobbying, in business and in policy-making.



Introduction

The food and drink industry is a major economic sector in the UK. The sector's trade association the Food and Drink Federation estimates that the industry encompasses 11,675 businesses and employs 468,000 people, with a total turnover in 2021 of £112 billion¹. How this industry interacts with British policy-makers and seeks political influence is therefore a matter of public interest.

In this Discussion Paper, we examine the interactions of businesses with three major UK government departments, identify weaknesses in the current disclosure process, and compare UK procedures with the more stringent disclosure requirements in two other English-speaking countries, Ireland and Canada, which tend to produce more specific and transparent data.



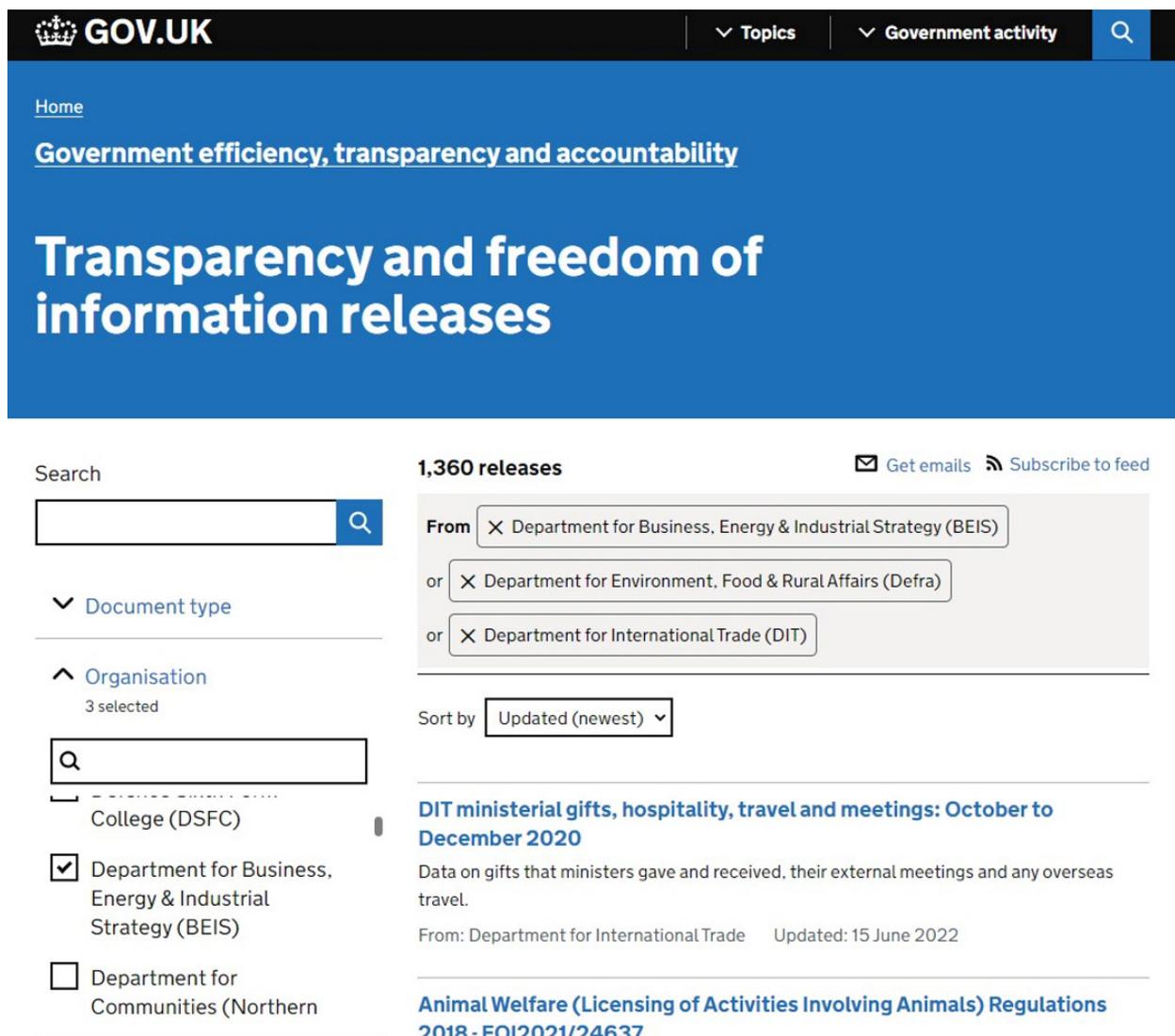
What we have done

We have highlighted [in our past research](#) that lobbying is an integral part of the democratic process, allowing interested parties to present data and arguments to policy-makers and thus helping politicians to make good public decisions. However, as the anticorruption non-governmental organisation Transparency International UK has noted, decisions made by ministers, legislators and civil servants “often bestow private benefits” and “a large proportion of lobbying exists to further a special interest or private gain by influencing these decisions”². This is not surprising: as Professor Marion Nestle of New York University has clearly stated “the job of food lobbyists is to make sure that the government does nothing to impede

clients from selling more of their products and does as much as possible to create a supportive sales environment”³. So corporate lobbying, though legitimate, can distort public decision-making, and therefore requires public scrutiny.

Governments recognise this, and put in place various mechanisms to keep the public aware of lobbying activities. In European Union institutions, for example, special interest groups can only participate in meetings with EU policy-makers if they are registered in the EU transparency register⁴. In the UK, data about government officials and ministers' meetings, hospitality, gifts and overseas travel is released to the official government website gov.uk by each governmental department on a

Image 1: Screenshot showing online process for retrieving data from UK government Efficiency, Transparency and Accountability websiteⁱ



quarterly basis⁵. It nevertheless can be difficult to find out exactly who meets whom and why they are meeting, as this data is centrally collated under the aegis of 'government efficiency, transparency and accountability'⁶, and members of the public need to retrieve the specific data relating to 'gifts, hospitality, travel and meetings' among thousands of freedom of information releases (Image 1).

The Food Research Collaboration has examined some of the interactions between the food industry and British political officials by analysing the publicly available data about meetings held by government and business representatives. We specifically identified meetings between food

industry representatives and policy-makers at three departments that are highly relevant to the food system, the Department for Business, Energy and Industrial Strategy (BEIS); the Department for Environment, Food and Rural Affairs (DEFRA); and the Department for International Trade (DIT), focusing on meetings that took place between January 2020 and September 2021. We supplemented this analysis by consulting Transparency International [UK's Open Access database](#).

Box 1 presents some illustrative findings from our research.

ⁱ <https://www.gov.uk/search/transparency-and-freedom-of-information-releases?parent=%2Fgovernment%2Fgovernment-efficiency-transparency-and-accountability&topic=f3f4b5d3-49c4-487b-bd5b-be75f11ec8c5>

Box 1: Illustrative findings of meetings between government ministers and business representatives, January 2020 to September 2021.

Retailers

- **Tesco** participated in at least 25 meetings or discussions with senior policy-makers. These included seven meetings with **Paul Scully**, the Minister for Small Business, Consumers and Labour Markets; six meetings with **George Eustice**, the Environment Secretary; four meetings with **Greg Hands**, the Minister of State for Trade Policy; five meetings with the Business Secretary **Kwasi Kwarteng**; and two meetings with the International Trade Secretary **Liz Truss**.
- **Asda** similarly took part in over twenty meetings, which included nine meetings on Covid-19 with **Paul Scully**; six meetings with **George Eustice**, including a discussion on “*concerns relating to supply chains and CO₂ shortages*”; and a discussion on “*increasing domestic consumption of United Kingdom seafood*” with **Victoria Prentis**, the Parliamentary Under Secretary of State at the Department for Environment and Rural Affairs.
- The leading pub retailer and brewer **Greene King** took part in at least 23 meetings. The majority of these meetings were with other hospitality operators. However, Greene King appears to also have secured an introductory call with **Kwasi Kwarteng**, as well as with **Paul Scully**, to discuss the Government’s response to Covid-19.

Farming sector

- The **National Farmers’ Union** had over 50 meetings with ministers. These included regular meetings of the so-called ‘Food 4’ (the NFU along with the Food and Drink Federation, the trade association representing the interests of food and drink manufacturers; UK Hospitality, the trade association representing the interests of hospitality businesses; and the British Retail Consortium, the trade association representing the interests of retail businesses) to discuss the impact of Covid-19 and Brexit. The National Farmers’ Union is particularly successful at securing high-level meetings: over the space of nine months, the NFU met with **George Eustice** seven times, and with **Liz Truss** five times.
- Regional affiliates of the NFU also met with senior politicians. Representatives of **NFU Scotland** and **NFU Cymru** met with **Greg Hands** on at least seven occasions to discuss “*the benefits of (free trade agreements) for the food and drink sector*”, and in particular the UK-Australia free trade agreement.

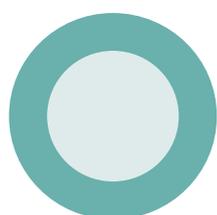
Big food brands

- **Unilever** secured 10 meetings with senior policy-makers across the three studied departments. These included meetings “*to discuss business*” with **Kwasi Kwarteng**, with the Secretary of State for Business, Energy and Industrial Strategy, **Alok Sharma**, and “*to discuss the UK investment environment*” with **Lord Grimstone**, the Minister for Investment.
- The world’s largest food and beverage company **Nestle** took part in nine meetings with ministers, including **George Eustice**, **Greg Hands**, **Victoria Prentis** and **Lord Grimstone**.

- **Mondelez** had less high-level access than one might anticipate for a leading multinational corporation. In the first nine months of 2021, the snacks company met once with **Kwasi Kwarteng**; once with **Greg Hands**; and once with the Minister for Energy, Clean Growth and Climate Change, **Anne-Marie Trevelyan**.
- In contrast, the multinational beverage company **Diageo** held 24 meetings with Government officials in the three studied departments. These included six meetings with **Greg Hands**; five meetings with the Minister for International Trade, **Ranil Jayawardena**; and four meetings with **Liz Truss**.
- **Coca Cola** secured five meetings with three ministers. These included discussions on “*the UK future investment landscape*” with Lord Grimstone, and on “*economic recovery*” with **Paul Scully**. Coca Cola also met with **Greg Hands** on three occasions, including as part of the Brexit Business Taskforce on Agri-Food.

Farming input manufacturers

- **CF Fertilisers**, the UK’s leading manufacturer of agricultural fertilisers, held six meetings with four ministers. These included discussions on “*energy intensive industries and the transition to Net Zero*” with **Lord Grimstone**; on “*decarbonisation costs*” and on “*Net Zero*” with the Minister for Business, Energy and Corporate Responsibility, **Lord Callanan**; a discussion on energy with **Kwasi Kwarteng**; and two discussions on decarbonisation and the Energy White Paper with **Anne-Marie Trevelyan**.



What we discovered

Given the economic weight of food and drink businesses, it is unsurprising that food and drink manufacturers, the hospitality sector and food retailers meet frequently with political decision makers. However, we quickly noticed that the meeting details indicate that food industry lobbying in the UK is only semi-transparent.

3.1 Only meetings are listed, but other relevant interactions can go beneath the radar

Only in-person meetings with policy-makers are listed in the transparency disclosures. While listing these meetings is useful, it does not provide a complete or entirely accurate overview of how the food industry may try to exert influence on

policy. For instance, there are no listings of phone calls, emails or messages between lobbyists and policy-makers or their staffers. While these sorts of exchanges have been made public in the past (for instance, evidence to the 2011-12 Leveson Inquiry into the culture, practice and ethics of the press included [copies of emails](#) and [copies of text messages](#) between lobbyists, ministers and ministerial advisers), this seems to be the exception rather than the rule.

Moreover, the available data only encompasses officially declared ‘meetings’. Although the register also comprehensively lists hospitality enjoyed by officials, there is no indication of what political issues may have been discussed between

companies and policy-makers during breakfasts, lunches, dinners, receptions and events.

We know, for instance, that the Environment Secretary George Eustice attended a breakfast hosted by the rural lobby group Countryside Land Alliance in July 2021, and attended a dinner hosted by the trade association Northern Ireland Food and Drink in September 2021⁷. We do not know, however, what policy issues may have been discussed at these events, or whether any business or policy changes occurred as a result of discussions at these events.

3.2 Lack of consistency in who discloses what

It appears that the rules over which policy-makers are expected to disclose details of their meetings with lobbyists differs across departments. Whilst all secretaries of state and ministers are obliged to disclose who they meet with, requirements for civil servants and Special Advisers seem to be less stringent. For the civil service, only the meetings of a department's highest-ranking official, the Permanent Secretary, are listed. As a result, meetings between food businesses and other high-ranking civil servants who may have a significant impact on policy (such as Directors General, Directors, Deputy Directors and Chief Scientific Advisers) are not available for public scrutiny.

There also appears to be very little data about meetings held by Special Advisers, the political appointees hired to support ministers and to give party political advice. While Special Advisers at the Department for Business, Energy & Industrial Strategy and at the Department for International Trade are required to list their meetings with business stakeholders, it appears that Special Advisers at the Department for Environment, Food and Rural Affairs are only required to report their meetings with 'senior media figures'⁸.

3.3 Descriptions of a meeting's purpose are too broad

There does not seem to be a requirement to disclose detailed information of the meetings

and the discussions that take place. The 'purpose of meeting' is often very broad and leads to descriptions of meetings that merely state the obvious.

For example,

- In January 2021 Defra's Parliamentary Secretary of State Victoria Prentis met with lobbyists from the Food and Drink Federation, UKHospitality, the British Retail Consortium, and the National Farmers' Union "*to discuss current issues*", and in February 2021 met with members of the UK Seafood Exports Working Group "*to discuss seafood export issues*".
- In February, May and June 2021, the then International Trade Secretary Liz Truss met with lobbyists from the National Farmers' Union four times "*to discuss trade and agriculture*", and in August 2021 met with members of the National Pig Association "*to discuss pork exports and market access issues*".
- Descriptions of meetings between corporate representatives and the Business Secretary Kwasi Kwarteng are particularly broad, veering on the meaningless. In January 2021, the Business Secretary had conversations with UK Hospitality, the British Beer and Pub Association, Marks & Spencer's and Tesco described as "*Introductory call as new Secretary of State*", and held meetings in April and in June with representatives from Sainsbury's, Deliveroo and Starbucks "*to discuss business*".

3.4 The expected political outcomes of meetings between lobbyists and policy-makers could be disclosed

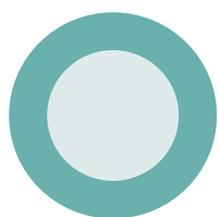
A major question arising from analysing meeting data is what the long-term purpose of meetings between industry and policy-makers is. In addition to descriptions of meeting content being too broad, it appears that there are no specific rules on how to describe the expected or desired outcomes of lobbyist meetings.

The problem with the current practices is that they disclose what policy-makers and business representatives anticipate will be discussed, rather than on what was *actually* discussed. Descriptions of a meeting's 'purpose' can be very broad – on April 27, 2021, Victoria Prentis met with representatives from Warburtons, Arla Foods, Kraft Heinz, Unilever, Nestle, Premier Foods, McCain, Pladis, Associated British Foods, Pepsi, Pernod Ricard and Diageo “to discuss the food and drink sector” – yielding no information on what specific political issues were discussed and, more importantly, which outcomes were sought by business stakeholders.

Some descriptions are more detailed. For instance, on June 18, 2021, Anne-Marie Trevelyan met with representatives from Diageo, Olam, Unilever and Guinness Breweries “to discuss adaptation and

resilience for COP26”. The most useful transparency declarations are those where the purpose of the meeting is specific and explicitly mentions which policy or legislation was under discussion. For example, on January 18, 2021, George Eustice met with the President of the National Farmers' Union and a more comprehensive declaration was provided: “to discuss trade, farming schemes, and the gene editing consultation”.

Our analysis finds that there are few clearly defined rules governing the disclosure of lobbyist meetings. Transparency can be general or specific, seemingly at the participants' discretion. This has the potential to be enhanced, and there are lessons that might be learned and applied from other countries in this regard.



What transparency practices could the UK learn from other countries?

In contrast to the UK, lobbying disclosure practices in some other countries are a lot more stringent and high-level, providing a clearer picture of lobbyists' longer-term interests. Disclosure practices in Ireland and in Canada, for example, clearly indicate that UK data about lobbying by the food industry has the potential to be more transparent. In both countries, lobbyists declare not simply the purpose of a discussion with a policy-maker, but also well-defined policy areas and specific outcomes.

Ireland's Register of Lobbying provides a detailed overview of an organisation's lobbying, including the specific policy under discussion; the intended result of the lobbying activity; the name of the person primarily responsible for lobbying policy-

makers; the forms of lobbying involved; and the names of the public officials who were lobbied. Table 1 details the specific lobbying activities of the agricultural interest group the Irish Farmers' Association in spring/summer of 2021.

Similarly, in Canada lobbying is deemed to occur when an organisation “communicate(s) directly (in writing, orally) or indirectly...with a federal public office holder” about “legislative proposals, bills, resolutions, regulations, policies or programs” and any lobbyist activity must be reported in the national Registry of Lobbyists⁹. Table 2 details the specific policies that are of interest to the trade association Food and Beverage Canada, and Table 3 details which policy-makers it lobbied in April 2021.

Table 1: Lobbying in spring/summer 2021 by the Irish Farmers' Association declared in Ireland's Register of Lobbying¹⁰

Lobbying Organisation
The Irish Farmers' Association - IFA
Date published
18 Sep, 2021
Relevant Matter
Public policy or programme
Public Policy Area
Food
Period
1 May, 2021 to 31 Aug, 2021
Specific Details
National Food Systems Summit Dialogue
Intended results
<ul style="list-style-type: none">- Engagement with the UN Food Systems Summit- Support Ireland's sustainable food systems journey, and contribute to delivering a Food Systems Summit that is people-centred and solutions-focused.- Supporting the delivery of an ambitious UN Food Systems Summit.- Important opportunity for all stakeholders, from producers to consumers, to take an active role in shaping the future sustainability of Ireland's food system.- Inform participants about Ireland's food system, build understanding of the complex and interlinked challenges we face as members of the food system, and help us identify opportunities to create a common pathway towards a more environmentally, socially and economically sustainable food system for Ireland by 2030.
Name of person primarily responsible for lobbying on this activity
Tim Cullinan - IFA President
Lobbying activity
Meeting (1)
Informal communication (2-5)
Designated public officials lobbied
Sinead McPhillips - Assistant Secretary (Department of Agriculture, Food and the Marine)
Charlie McConalogue - Minister (Department of Agriculture, Food and the Marine)
Christopher O'Sullivan - TD (Dáil Éireann, the Oireachtas)

Table 2: Lobbying registration information of Food and Beverage Canada declared to the Office of the Commissioner of Lobbying of Canada¹¹

In-house Organization name:

Food and Beverage Canada / Aliment et boissons Canada

Responsible Officer Name:

Kathleen Sullivan, Chief Executive Officer

Registration version:

Version 9 of 15 (2021-03-23 to 2021-06-14)

Legislative Proposal, Bill or Resolution

- Budget: Measures in annual federal budget to support food and beverage processing, including implementation of Agri-food Economic Strategy Table Report.
- International Trade: The provisions of the text of the USMCA as they relate to agriculture and agri-food, including tariff schedules, Tariff Rate Quotas, regulatory cooperation and measures related to non-tariff barriers.

Policies or Program

- COVID-19: Support to address costs related to COVID-19 management through CEWS and/or tax credit.
- Confirming interpretation of OIC's under the Quarantine Act that apply to travel into Canada during COVID-19
- Facilitating the entry into Canada of technicians required to maintain critical infrastructure
- Grocery Code of Conduct: Asking that the federal government lead the development of a Code of Conduct related to relationships in Canada's food supply chain.
- Industry: The adoption of innovation in the food and beverage sector in the context of the Strategic Innovation Fund.
- Labour: Enhancements to the Temporary Foreign Workers program and pathways to permanency for food and beverage processing labour.
- Science and Technology: ISED policies and programs to promote innovation and technology adoption in the food and beverage processing sector

Policies or Program, Regulation

- Agriculture: Policies related to the food and beverage processing sector including: funding for industry research and development, implementation of Safe Foods for Canadians Regulations.
- Health: Policies and regulations related to food and beverage products including the federal government's Health Eating Strategy, Front of Pack labelling regulations, Marketing to Children regulations, modifications to the Food Guide, modifications the Food and Drugs Regulations.
- Regulatory Modernization: Regulations and Policies to modernize Canada's approach to regulating.

Communication Techniques

- Written communication
- Oral communication

Table 3: Lobbying in April 2021 by Food and Beverage Canada declared to the Office of the Commissioner of Lobbying¹²

Designated Public Office Holders who participated in the communication:

Tom Rosser, Assistant Deputy Minister | Agriculture and Agri-Food Canada (AAFC)

Subject Matter of the communication:

Health, Labour, Industry

Communication date:

2021-04-06

Designated Public Office Holders who participated in the communication:

Abed Harb, Senior Advisor Minister`s Office | Agriculture and Agri-Food Canada (AAFC)

Subject Matter of the communication:

Health, Labour, Industry

Communication date:

2021-04-06

Designated Public Office Holders who participated in the communication:

Jordan Matte, Parliamentary Assistant to Erin O`Toole | House of Commons

Subject Matter of the communication:

Budget, Health, Labour, Industry

Communication date:

2021-04-13

Designated Public Office Holders who participated in the communication:

Jeremy Gauthier, Director of Policy | Agriculture and Agri-Food Canada (AAFC)

Subject Matter of the communication:

Health, Labour

Communication date:

2021-04-20

Designated Public Office Holders who participated in the communication:

Francis Drouin, Member of Parliament | House of Commons

Vincent Desmarais-Adam, Member's Assistant | House of Commons

Subject Matter of the communication:

Health, Labour

Communication date:

2021-04-21

Designated Public Office Holders who participated in the communication:

Jordan Matte, Parliamentary Assistant to Erin O`Toole | House of Commons

Subject Matter of the communication:

Health, Labour

Communication date:

2021-04-21

Designated Public Office Holders who participated in the communication:

Salma Zahid, Member of the House of Commons | House of Commons

Subject Matter of the communication:

Health, Immigration, Labour

Communication date:

2021-04-23

Designated Public Office Holders who participated in the communication:

Yves Perron, Member of Parliament | House of Commons

Simon-Pierre Savard-Tremblay, Member of Parliament | House of Commons

Francois Robert, Parliamentary Assistant to Yves Perron | House of Commons

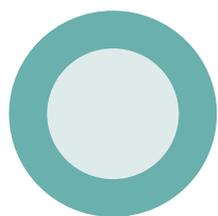
Amélie Gamache, Parliamentary Assistant to Simon-Pierre Savard-Tremblay | House of Commons

Subject Matter of the communication:

Immigration, Labour, Industry

Communication date:

2021-04-30



Conclusion: potential measures to improve transparency of food industry lobbying in the UK

Given the importance of the food and drink sector in the UK, which is reflected in the number of interactions between industry representatives and policy-makers, the semi-transparent nature of food industry lobbying in the UK is a cause for concern. Three potential measures could be enacted that would improve the transparency of interactions between policy-makers and the UK food industry.

5.1 Widen disclosure to encompass lobbying 'grey areas' as well as formal meetings

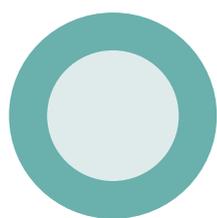
Although some information about formal meetings between policy-makers and industry representatives is available to the public, other relevant interactions such as discussions during receptions, dinners, conferences and other industry events are not routinely disclosed in detail. Professor Marion Nestle has previously noted that *"A great deal of lobbying takes place in unreportable grey areas of social transaction, such as dinner parties, receptions, meetings, golf games, birthday parties, and weddings"*¹³. Policy discussions that take place in these 'grey areas' should also be disclosed as a matter of routine.

5.2 Widen disclosure to ensure that meetings with non-ministerial policy-makers are recorded

While the occurrences of formal meetings between ministers and food businesses are made available to the public, trust would be enhanced if more details were disclosed. It would be particularly useful for academics and civil society if meetings and correspondence between food businesses and senior civil servants and special advisers could also be disclosed.

5.3 Provide detailed descriptions of lobbying to enhance transparency and trust

Transparency and trust would also be improved if policy-makers, civil servants, special advisers and food and drink industry actors were to provide more detailed descriptions of their interactions, as well as declaring the specific policies and political outcomes that were discussed. While some ministers do declare the political purpose of their meetings with food industry representatives in some detail, there is no obligation to do so. Modelling the UK's disclosure practices along Irish or Canadian lines could enhance transparency and trust in the lobbying process.



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The [Food Research Collaboration](#) is an initiative of the [Centre for Food Policy](#), facilitating joint working between academics and civil society organisations to improve the UK food system, and making academic knowledge available wherever it may be useful.

We are grateful to the [Esmée Fairbairn Foundation](#) for funding our work.



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ISBN: 978-1-903957-71-4

Please cite as: So, A. 2022. *'To discuss business': food and drink industry lobbying in the UK*. Food Research Collaboration Discussion Paper.

