

This is a repository copy of *Corporate political activity of the dairy industry in France: an analysis of publicly available information*.

White Rose Research Online URL for this paper:

<https://eprints.whiterose.ac.uk/119253/>

Version: Published Version

Article:

Mialon, Melissa Amina Madeleine orcid.org/0000-0002-9883-6441 and Mialon, Jonathan (2017) Corporate political activity of the dairy industry in France: an analysis of publicly available information. *Public Health Nutrition*. pp. 1-8. ISSN 1368-9800

<https://doi.org/10.1017/S1368980017001197>

Reuse

Items deposited in White Rose Research Online are protected by copyright, with all rights reserved unless indicated otherwise. They may be downloaded and/or printed for private study, or other acts as permitted by national copyright laws. The publisher or other rights holders may allow further reproduction and re-use of the full text version. This is indicated by the licence information on the White Rose Research Online record for the item.

Takedown

If you consider content in White Rose Research Online to be in breach of UK law, please notify us by emailing eprints@whiterose.ac.uk including the URL of the record and the reason for the withdrawal request.

**PUBLIC
HEALTH NUTRITION**



**CAMBRIDGE
UNIVERSITY PRESS**

**Corporate political activity of the dairy industry in France:
an analysis of publicly available information**

Journal:	<i>Public Health Nutrition</i>
Manuscript ID	PHN-RES-2017-0004.R2
Manuscript Type:	Research Article
Keywords:	Corporate political activity, food industry, public policy
Subject Category:	10. Public policies

SCHOLARONE™
Manuscripts

1 **Abstract**

2 Objective: In this study, we used a structured approach, based on publicly-available information, to
3 identify the corporate political activity (CPA) strategies of three major actors in the dairy industry
4 in France.

5 Design: We collected publicly available information from the industry, government and other
6 sources, over a six-month period, from March to August 2015. Data collection and analysis were
7 informed by an existing framework for classifying the CPA of the food industry.

8 Setting and subjects: In our study, we included three major actors in the dairy industry in France:
9 Danone, Lactalis and the 'Centre National Interprofessionnel de l'Economie Laitière' (CNIEL), a
10 trade association.

11 Results: During the period of data collection, the dairy industry employed CPA practices on
12 numerous occasions by using three strategies: the 'information and messaging', the 'constituency
13 building' and the 'policy substitution' strategies. The most common practice was the shaping of
14 evidence in ways that suited the industry. The industry also sought involvement in the community,
15 established relationships with public health professionals, academics and the government.

16 Conclusions: This study shows that the dairy industry used several CPA practices, even during
17 periods when there was no specific policy debate on the role of dairy products in dietary guidelines.
18 The information provided in our paper could inform public health advocates and policy makers and
19 help them **ensure that** commercial interests of industry do not impede public health policies and
20 programmes.

21 **Keywords**

22 Corporate political activity; food industry; public policy

23 Introduction

24 The dairy industry is an important economic actor in France, with over €27 billion in profits in 2013
25 ⁽¹⁾. Dairy products have a special role in the diet of the population, with some products, such as
26 milk, as one of the nine key food categories in the French ‘Programme National Nutrition Santé’
27 (the French dietary and health guidelines), while some other products, particularly those high in fat,
28 such as sour cream and butter, are considered as less healthy **by** the guidelines ⁽²⁾.

29 Globally, there is an increased recognition that the economic power of the food industry often
30 translates into political influence ^(3, 4). ‘Corporate Political Activity’ is a term used in the business
31 literature to refer to the strategies used by the industry to influence policy process and public
32 opinion in ways favourable to the firm ⁽⁵⁾. In public health, the CPA has been widely studied for the
33 tobacco industry, where public health advocates had access to internal documents after litigation
34 against the industry in the late 1990s ^(6, 7, 8). These documents revealed that a broad range of CPA
35 practices were used, over many decades, by the tobacco industry to influence public health policies
36 and programmes ^(6, 9). A review conducted in 2015 by Mialon *et al* showed that the food industry
37 uses similar CPA strategies, **which are classified in a framework presented in** Table 1: the
38 information and messaging strategy; the financial incentives strategy; the constituency building
39 strategy; the legal strategies; the policy substitution strategy; the opposition fragmentation and
40 destabilisation strategy ⁽¹⁰⁾. All of these strategies are used by companies to increase or protect their
41 profits but could have a negative influence on the development of public health policies and
42 programmes to address diet- and public health-related issues ^(10, 11).

43 <Insert Table 1>

44 In recent years, the influence of the French dairy industry on public opinion and on public health
45 policies and programmes has been investigated by journalists ^(12, 13). They noted, for example, that
46 this industry shaped the evidence base on diet- and public health-related issues and established
47 relationships with policy makers ^(12, 13).

48 This political influence may compromise the development of effective public health policies and
49 programmes, including dietary guidelines. However, to understand the extent to which the dairy
50 industry uses CPA strategies, and in the absence of internal documents, public health advocates and
51 researchers mostly rely on information available in the public domain. Mialon *et al* proposed a
52 structured approach, based on publicly available information only, to monitor the CPA of the food
53 industry at the country level ⁽¹⁰⁾.

54 In this study, we used the methods developed by Mialon *et al* to monitor the CPA of three major
55 actors in the dairy industry in France for a period of six months ⁽¹⁰⁾. We report the results of this
56 study in this paper.

57 **Methods**

58 We conducted a structured identification and monitoring of the CPA of major dairy industry actors
59 in France over a six-month period, as part of a broader project to monitor other sectors of the food
60 industry in France. We collected publicly available information, using an approach that was based
61 on previous approaches to identify and monitor the CPA of the tobacco and other industries ⁽¹⁰⁾.

62 This approach consisted of five steps: selection of food industry actors; identification of sources of
63 information; ongoing data collection; data analysis using the framework **presented in Table 1**, in an
64 iterative process; reporting of results for policy action.

65 **Selection of industry actors was based on recommendations made by MM *et al* ⁽¹⁰⁾**. Due to time
66 constraints, and after consultation with experts, we decided to include three industry actors in our
67 study. We monitored the CPA of two major actors in the ‘packaged products, dairy’ category in
68 France, based on the Euromonitor classification of companies ⁽¹⁴⁾. The selection was based on their
69 market shares: in 2014, the Groupe Lactalis (referred to as ‘Lactalis’ in this paper) and the Groupe
70 Danone (referred to as ‘Danone’ in this paper) owned 17.1 and 8.0 % of that market respectively. In
71 addition, we included the ‘Centre National Interprofessionnel de l'Economie Laitière’ (CNIEL, the
72 National Inter-professional Centre for the Dairy Economy) in our study ⁽¹⁵⁾. In France, the CNIEL is

73 a major trade association for the dairy industry and has ‘two principal objectives: foster the
74 relationships between producers and processors in the dairy food chain and promote the image of
75 milk and dairy products’ ⁽¹⁶⁾.

76 Different sources of information were included: the industry’s own materials, including its websites
77 and Twitter accounts; government materials, such as registers of lobbyists or websites of agencies
78 in charge of health-related issues; and other materials, including the websites of universities and
79 professional organisations ⁽¹⁰⁾. Google News and media releases from the selected sample of actors
80 were also analysed. For annual or occasional events and publications, including conferences or
81 companies’ annual reports, we included the most recent data available (up to two years
82 retrospectively). Data collection covered the period March-August 2015. It is important to note that
83 during this period, there was no specific debate on the role of dairy products in the dietary
84 guidelines. Details about specific sources of information are provided in S1. All documents
85 retrieved were in French and collected and analysed by a native French-speaker.

86 JM conducted the data collection and qualitative analysis. Choice of themes was based on an
87 existing framework for categorising the CPA strategies of the food industry ⁽¹⁰⁾. Categorisation of
88 data (100%) was reviewed by the second author, MM, and mutual agreement was reached (but not
89 quantified) for the final categorisation of CPA practices. All data collected is available in French in
90 S2.

91 In this paper, we present illustrative examples (each allocated with an ‘A’ code from S2), translated
92 from French to English, of CPA practices employed in France by three major actors in the dairy
93 industry during the period of data collection. We use the broad term ‘dairy industry’ to refer to the
94 three industry actors included in our study.

95 We took a critical social science approach, where the actions of food industry were considered as a
96 potential determinant of health. Critical social science seeks to reduce illusion and in this case, the
97 illusion that the dairy industry is only an economic actor, while it also engages in political activities.

98 Critical social science also seeks to identify avoidable suffering. In this case, the potential suffering
99 comes from the fact that commercial interests of the dairy industry may impede public health
100 policies and programmes, thus having a negative impact on the health of the population ⁽¹⁷⁾.

101 Results

102 During the period of data collection, evidence shows that the dairy industry used three of the six
103 CPA strategies identified in the literature, with 170 examples collected over a six-month period.
104 Table 2 presents a summary of the examples we found for each of the CPA practices.

105 <Insert Table 2>

106 In France, the dairy industry made extensive use of the ‘information and messaging strategy’ in
107 particular, and there was evidence that it also used the ‘constituency building’ and ‘policy
108 substitution’ strategies to a lesser extent. We found no evidence, from the data we collected in the
109 public domain, of the ‘financial’, ‘legal’ and ‘opposition and fragmentation’ strategies. The absence
110 of information on the ‘financial incentives’ strategy could be explained by the fact that French laws
111 prohibit political parties from receiving individual donations that exceed €7,500 ⁽¹⁸⁾.

112 Information and messaging

113 In France, during the period of data collection, the dairy industry mostly used the ‘information and
114 messaging’ strategy. 129 of the 170 examples we collected were classified within that strategy.

115 *Stressing the economic importance of the industry*

116 First, the economic importance of the dairy industry was highlighted on several occasions by the
117 CNIEL: it emphasised the number of jobs it generated, particularly in remote regions, and stressed
118 the fact that this industry was a driving force in the French economy [A76-81].

119 *Framing the debate on diet- and public health-related issues*

120 The dairy industry also promoted messages on diet-related issues. Even if they might be accurate,
121 the fact that the industry only promoted certain messages indicates framing in ways favourable to its
122 products. For example, despite working with food products, the industry focused the attention on

123 physical activity programmes, a practice that has been used by other companies, in other countries,
124 to shift the blame away from the industry products in the global burden of NCDs ^(19, 20). These
125 messages included:

126 'To support teachers during the academic year, the Danone Institute France, in collaboration with
127 the Union Sportive de l'Enseignement du Premier degré (USEP – Sport Alliance for Primary
128 Schools), developed the kit "Let's move".' [A20]

129 'No food, in itself, is responsible for the obesity epidemic, neither milk, nor any other food.
130 (...) It is when energy expenditure (physical activity...) is below intake (diet) that we may gain
131 weight, it is a question of balance.' [A82]

132 *Shaping the evidence base on diet-and public health-related issues*

133 In this study, we found that one of the major practices of the dairy industry was to shape the
134 evidence on diet-related issues. 115 of the 170 examples collected during this study refer to that
135 practice. It did so using different mechanisms. One of them was to establish and run scientific
136 organisations. Through these organisations, the industry publicised the beneficial health effects
137 associated with the consumption of dairy products. For example, the 'Danone Institute provide[s],
138 for free, "Nutrition Objective" to almost 21,000 health professionals. (...). Written by diet and
139 nutrition specialists, Nutrition Objective proposes original, up-to-date and practical scientific
140 knowledge' [A12]. And, 'for the Danone Institute France, supporting research has always been a
141 priority. Since its beginning, the Institute has awarded research prizes to young researchers. Thus, in
142 20 years, the Institute has supported more than 75 researchers.' [A17]. Another example was the
143 CERIN, 'a research and nutrition information centre and the health department of the dairy
144 industry', whose 'mission is to deliver comprehensive and validated nutritional information about
145 milk and dairy products, but also about the general themes of nutrition and health, nutritional needs
146 of sub-groups of the population, and the prevention of pathologies through nutrition, to health and
147 public health professionals, but also to journalists' [A164]. A third example was OCHA, which 'is
148 the observatory of eating habits for the dairy industry – it is a resource and research centre shared
149 with the scientific community around the approach, using human and social sciences, of diet, food
150 systems and relations man/animal' [A162]. We noted that the link with the dairy industry was not
151 always made clear on the organisations' websites. For example, there were mentions of the

152 industry's affiliation with the CERIN on the different websites we searched, and the OCHA's
153 description on its website header was "the CNIEL observatory of eating habits" [A162]. However,
154 one would have needed to know what the CERIN or CNIEL were, in order to make a connection
155 with the dairy industry.

156 The dairy industry also promoted industry-sponsored educational materials for health professionals,
157 such as TV shows [A155]. The CERIN also supplied educational materials on its website:

158 'The CERIN leaflets are summary materials for the general public and patients relaying
159 recommendations and dietary advice. (...) The basics (leaflets, basic sheets and posters) could be
160 ordered for free. (...)The synthetic and informative posters are intended for the waiting rooms of
161 health professionals. They could also be used to support food education sessions.' [A161]

162 The industry did not systematically provide references to scientific studies [A10, A21, A 23-4, A66-
163 8, A70-1 and several examples through A86-169]. In addition, there were examples where the dairy
164 industry provided and used evidence that had links to/or that was funded by the industry itself
165 [A127, A129-30, A157, and A159]. On several occasions, the dairy industry presented unpublished
166 and non-peer reviewed evidence when discussing the health benefits associated with the
167 consumption of dairy products [A93, A95-8, A123, A131]. This is a practice that has been
168 described in the literature for the tobacco industry⁽²¹⁾.

169 In addition, it promoted the health benefits of specific, single nutrients, and, because these were
170 present in some dairy products, implied that these products were good for health, but did not
171 provide scientific references to support those claims. For example, there were messages claiming
172 that:

173 'For health professionals, cheese is primarily a source of calcium and protein. They recognise that
174 it has a role in the prevention of denutrition and osteoporosis. Yoghurt is acclaimed for easing
175 digestion. As for milk, it is all good! It is a complete food; it provides calcium but also protein,
176 vitamins and trace elements.' [A139]

177 'Is butter good for health? Butter is often criticised for being rich in saturated fatty acids, and for
178 increasing cholesterol. In fact, butter is made up of a large variety of different fatty acids: saturated
179 (including the short-chain saturated, good for health) but also unsaturated (poly and mono-
180 unsaturated). In practice, all types of fats have a nutritional value. The important thing is to vary
181 them (...). Butter is also very rich in vitamin A, beneficial for vision and growth: 20 to 25 g of
182 butter a day could cover approximately 30 % of the daily intake in vitamin A.' [A153]

183 Another CPA practice of the dairy industry was to actively participate in most of the major diet- and
184 public health-related scientific events in France. For example, there were several partners from the
185 food industry at the ‘Entretiens de Nutrition de l’Institut Pasteur de Lille’ (Annual national nutrition
186 talks), including some actors from the dairy industry, such as Danone and the CERIN [A8, A89].
187 The dairy industry was also involved to the ‘Journées Francophones de Nutrition’ (Annual nutrition
188 conference for Francophones): the CERIN was an official partner and ran a symposium, while
189 Danone organised its ‘20^{ème} Rencontres Scientifiques de Nutrition’ (20th scientific meeting on
190 nutrition) on the health effects of food contaminants, in parallel with the conference [A14, A87-8].
191 There was also evidence that the ‘53^{ème} journées d’études de l’Association Française des Diététiciens
192 Nutritionnistes’ (Annual conference of the Dieticians and Nutritionists Association of France) was
193 organised in partnership with the three dairy industry actors included in our study [A29, A72,
194 A165]. In addition, Danone provided donations to the ‘Fonds Français pour l’Alimentation et la
195 Santé’ or FFA (French funds for diet and health), an “unprecedented and unifying structure whose
196 mission is the study and enhancement of diet as a source of pleasure and health” [A27]. In 2015, the
197 FFA supported research and community programmes, received funds from food companies and
198 trade associations and was administered by an equal mix of stakeholders from the
199 research/academic sector and from industry [A27] ⁽²²⁾.
200 The dairy industry also provided educational material to children, some of which may be considered
201 as ‘advergaming’ (for simultaneous ‘advertising’ and ‘gaming’) ^(23,24), with the intention to actively
202 promote the benefits of consuming dairy products to that population:

203 ‘The website www.power-cows.fr was developed by the CNIEL to inform adolescents in
204 secondary school (...) about the benefits of consuming the 3 to 4 dairy products a day that are
205 recommended by the Plan National Nutrition Santé [French dietary and health guidelines].’
206 [A110]

207 ‘The CNIEL proposes a free notebook for the holidays available on tablets and smartphones, to
208 allow children ages 6 to 11 years old to discover how milk is produced, how it is processed and
209 what are the nutritional benefits of dairy products. A fun way to educate young people about the
210 dairy sector.’ [A142]

211 ‘Les Jeunes Agriculteurs du Grand OUEST [The young farmers of the Midwest] have been
212 offering activities for several years in the primary schools of the region, through a partnership with
213 the Inspection Académique de la Sarthe [Department of Education in the Sarthe region] and the

214 CNIEL. (...) The objective of the JA was not to replace dieticians or doctors, but to be able to give
215 an answer to all these sensitive questions.' [A138]

216 **Constituency building**

217 We also found evidence that the dairy industry used the 'constituency building' strategy, where it
218 tried to establish relationships with different stakeholders. For example, Danone conducted research
219 in partnership with public research institutes in France (INRA, Agro Paris Tech) and abroad (the
220 University of Southampton) [A43]. Danone also sought involvement in the community, through
221 programmes focusing on nutrition, water, sanitation and hygiene, and was a partner of the French
222 Red Cross and of the French branch of the Ronald Mc Donald Foundation [A30-2, A39-41].
223 During the period of data collection, Danone (in partnership with the food company Mars) launched
224 the 'Livelihood fund' for small farmers, an event which was publicised in several newspapers [A33-
225 8].

226 In addition, the dairy industry established relationships with the French government. For example,
227 the 'Conseil National de l'Alimentation' [French National Food Council] is described, on its
228 website, as an institution "under the auspices of the Ministry of Agriculture, Ministry of Health and
229 Ministry in charge of consumer affairs. (...) This council is consulted about the definition of public
230 food policy and provides its expertise on related questions" [A169]. One of its members was
231 affiliated with the CNIEL [A169].

232 There were other links between the dairy industry and the government:

233 'Le Programme Alimentation et Insertion (PAI) [Programme food and **employability**] is an
234 approach (...) that offers training about food balance and social bonding. (...) Launched in
235 September 2003 by Dominique Versini, then-Secretary of State for the fight against precariousness
236 and exclusion, it embodies a partnership commitment in the field of food and nutritional aid,
237 bringing together the government, food banks and several sponsors represented by the ANIA [a
238 trade association], including the Foundation Nestle France and the CNIEL.' [A168]

239 'For almost thirty years, the dairy industry has built close relationships with the Ministry of
240 Education, through actions targeting teaching staff, management staff and students. The objective:
241 introducing dairy products to children and adolescents.' [A90, also cited in A174]

242 Evidence also showed that several ANSES experts (the 'French Agency for Food, Environmental
243 and Occupational Health & Safety'), in particular those working in the 'human nutrition'
244 committee, had close links with the dairy industry: some provided their expertise to the industry

245 scientific organisations, some conducted research in which the industry was involved and others had
246 personal or financial ties with the industry [A45-55, A75, A86, A171-3]. Data showed that an
247 ANSES expert working for the ‘human nutrition’ committee, as well as two senators and a member
248 of parliament, owned shares in Danone in 2015 [A61-4]. It is crucial to note that French laws
249 prohibit public servants, including ANSES experts, to work on matters for which they have a
250 personal, even if indirect, conflict of interest⁽²⁵⁾. The ANSES has internal procedures to ensure the
251 implementation of the law within the agency⁽²⁶⁾.

252 **Policy substitution**

253 Finally, we found evidence, although limited, that the dairy industry used the ‘policy substitution’
254 strategy. For example, **some of Danone’s companies, under the auspices of the Ministry of Health,**
255 **voluntarily committed to improving the nutritional content of their products [A60].**

256 **Discussion**

257 In this study, we found evidence, from the public domain, that the dairy industry was using several
258 CPA strategies in France in 2015, with a total of 170 examples collected over a six-month period.
259 The three industry actors included in our study extensively employed the ‘information and
260 messaging’ strategy, with a total of 129 examples of our 170 examples found in that category. The
261 shaping of evidence in ways that suited the industry was the most common practice within this
262 category, with 115 examples for this practice alone. For example, the dairy industry set up health
263 organisations through which it publicised the beneficial health effects associated with the
264 consumption of dairy products. The dairy industry also promoted industry-sponsored educational
265 materials for health professionals, information that was either unpublished, or not peer-reviewed, or
266 funded by the industry, and participated in major diet- and public health-related scientific events in
267 France. The industry also **used the ‘constituency building’ strategy**, and sought involvement in the
268 community, through partnerships with different charities, and established relationships with public
269 health professionals, academics and the government, such as the ANSES and the Ministry of
270 Education. In addition, we found evidence, although limited, that the dairy industry was using the

271 'policy substitution' strategy. This study shows that the dairy industry used several CPA practices,
272 even during periods when there was no specific policy debate on the role of dairy products in the
273 dietary guidelines. We found no evidence of the 'financial incentives', 'legal' and 'opposition and
274 fragmentation' strategies.

275 This study was the first, to our knowledge, to study the CPA of the food industry in France. It was
276 the first study that focused on the CPA of the dairy industry. It used methods that have been
277 previously successful in exploring the CPA of other major industry actors in other countries where
278 researchers did not have access to internal documents. The framework by Mialon *et al* seemed
279 comprehensive and we were able to include all our data under framework categories⁽¹⁰⁾. This work
280 could contribute to INFORMAS, the International Network for Food and Obesity / non-
281 communicable diseases Research, Monitoring and Action Support⁽²⁷⁾. This network monitors
282 different aspects of food environments in different countries, including the CPA of the food
283 industry. This study, if replicated in other countries, could contribute to comparisons of industry
284 practices among, across, and over time, for different sectors of the food industry, and to
285 comparisons of dairy industry practices (and to the food industry more generally) with practices of
286 other industries, nationally and globally.

287 For example, recent studies showed that the food industry made extensive use of CPA strategies in
288 Australia and in Fiji, two countries of the Western Pacific region^(19, 20, 28). The results of this study,
289 although not focused on the same sector of the food industry, are very similar. In Australia, Fiji and
290 France, the actors stressed their economic importance on numerous occasions^(19, 20, 28). In all
291 countries, they also promoted physical activity, in an attempt to frame the debate on diet- and public
292 health-related issues^(19, 20, 28). In Australia and France, the actors included in the studies shaped the
293 evidence on diet- and public health- related issues, for example by citing evidence that was funded
294 by the industry and by using non-peer reviewed and unpublished evidence^(19, 28). The industry
295 actors tried to establish relationships with health organisations or experts in both of these countries
296^(19, 28). In Australia, Fiji and France, the industry actors provided educational materials to children,

297 sought involvement in the community, established relationships with policy makers and used, to
298 some extent, the ‘policy substitution’ strategy^(19, 20, 28). However, as with previous studies, there
299 was no evidence (or limited evidence for Australia), in the public domain, that the industry actors
300 employed the ‘legal’ and the ‘opposition and fragmentation’ strategies^(19, 20). In that sense, these
301 results show that the CPA of the dairy industry is no different from the CPA of other sectors of the
302 food industry, and the CPA of industry actors in France is also comparable to the CPA of other
303 industry actors around the globe.

304 This study has a number of limitations. First, we selected a limited number of primary sources in
305 our study, as described by Mialon *et al*⁽¹⁰⁾. Our search was, therefore, not exhaustive. It is crucial to
306 note that an absence of evidence, or limited evidence, of CPA practices does not mean that the
307 industry is not using them. One explanation could be that we missed this information. Another
308 explanation might be that the industry is using CPA strategies without disclosing it in the public
309 domain, which is more problematic. This could also be explained by the fact there are safeguards in
310 place to ensure that the industry does not influence public health policies and programmes, such as
311 laws prohibiting donations to political parties, but these results warrant further investigation.

312 Research conducted in other countries showed that interviews with key informants might reveal
313 additional and critical details about the CPA^(20, 28). For example, informal connections and meetings
314 between industry actors and government officials might not be recorded in the public domain, yet
315 they could be very influential. Therefore, we recognise that relying uniquely on data available in the
316 public domain might not be sufficient to identify all CPA strategies. In addition, we focused on
317 specific industry actors for this study, and their actions may not represent the actions of other actors
318 in their sector or in the food industry more broadly. Similarly, we conducted our research in 2015
319 and further investigation is needed to understand how the use of CPA strategies by this industry
320 varies over time. Finally, the industry actors included in our study are part of some other groups or
321 organisations, listed in S3, but, due to time constraints, we did not collect data for these groups.

322 Some have questioned the scientific evidence for recommending the consumption of several dairy
323 products a day, as is the case in France (3 to 4 products), and classifying it as a separate category in
324 the dietary guidelines ^(12, 13, 29). In light of the results provided in this paper, and the CPA strategies
325 of the dairy industry in France, particularly their shaping of evidence, more research is needed to
326 understand if these practices had, and continue to have, an influence on the development of the
327 French dietary guidelines and similar policies and programmes. The results from this study could
328 raise awareness of potential dairy industry interference with public health policies and programmes,
329 including its involvement in some activities that may **have** otherwise been seen as beneficial, such
330 as its focus on physical activity, its sponsorship of scientific organisations and its support **for** the
331 community. **This study also raises questions about the appropriate role of the dairy industry in**
332 **interactions with public health professionals and government, and the potential conflicts of interest**
333 **that make such interactions problematic for public health policy making.** The information provided
334 in this study could be used by public health advocates and the public to increase the transparency
335 and accountability of the dairy industry, and other sectors of the food industry, more generally. This
336 study could be replicated for longer periods of time, **with** other industry actors and other industries
337 in France and abroad. This could help to identify the extent of the involvement of the food industry
338 in public health policies and programmes in France and ensure that commercial interests of industry
339 do not impede public health policies and programmes.

340 **References**

- 341 1. Les produits laitiers (2013) Economie laitiere en France. [http://www.produits-laitiers.com/l-](http://www.produits-laitiers.com/l-economie-laitiere-en-france/)
342 [economie-laitiere-en-france/](http://www.produits-laitiers.com/l-economie-laitiere-en-france/) (accessed December 2016)
- 343 2. Institut national de prévention et d'éducation pour la santé (2016) Alimentation / Déterminants de
344 l'état nutritionnel / Les produits laitiers à tous les âges de la vie.
345 [http://www.mangerbouger.fr/pro/sante/alimentation-19/determinants-de-l-etat-nutritionnel/les-](http://www.mangerbouger.fr/pro/sante/alimentation-19/determinants-de-l-etat-nutritionnel/les-produits-laitiers-a-tous-les-ages-de-la-vie.html)
346 [produits-laitiers-a-tous-les-ages-de-la-vie.html](http://www.mangerbouger.fr/pro/sante/alimentation-19/determinants-de-l-etat-nutritionnel/les-produits-laitiers-a-tous-les-ages-de-la-vie.html) (accessed December 2016)
- 347 3. World Health Organization (2013) Opening address at the 8th Global Conference on Health
348 Promotion Helsinki, Finland - Dr Margaret Chan Director-General of the World Health
349 Organization. Helsinki: World Health Organization.
- 350 4. Moodie R, Stuckler D, Monteiro C *et al.* (2013) Profits and pandemics: prevention of harmful
351 effects of tobacco, alcohol, and ultra-processed food and drink industries [Series]. *The Lancet* **381**,
352 670-679.
- 353 5. Hillman AJ, Keim GD, Schuler D (2004) Corporate political activity: A review and research
354 agenda. *Journal of Management* **30**, 837-857.
- 355 6. Saloojee Y, Dagli E (2000) Tobacco industry tactics for resisting public policy on health. *Bulletin*
356 *of the World Health Organization* **78**, 902-910.
- 357 7. Bero L (2003) Implications of the tobacco industry documents for public health and policy.
358 *Annual Review of Public Health* **24**, 267-288.
- 359 8. University of California San Francisco (2013) Legacy Tobacco Documents Library.
360 <http://legacy.library.ucsf.edu/> (accessed 1 December 2013)
- 361 9. World Health Organization (2008) *Tobacco industry interference with tobacco control*. Geneva:
362 World Health Organization.
- 363 10. Mialon M, Swinburn B, Sacks G (2015) A proposed approach to systematically identify and
364 monitor the corporate political activity of the food industry with respect to public health using
365 publicly available information. *Obesity Reviews* **16**, 519-530.
- 366 11. Lawton T, McGuire S, Rajwani T (2013) Corporate Political Activity: A Literature Review and
367 Research Agenda. *International Journal of Management Reviews* **15**, 86-105.
- 368 12. Souccar T (2008) *Lait, mensonges et propagande*. 2nd ed. Vergèze: T. Souccar.
- 369 13. Richez-Lerouge V (2016) *La vache qui pleure ! retour au lait naturel, une question de santé*.
370 Paris: Nouveau monde éditions.
- 371 14. Euromonitor International (2013) Euromonitor Passeport.
372 <http://www.portal.euromonitor.com/Portal/> (accessed November 2016)
- 373 15. Sacks G, Swinburn B, Kraak V *et al.* (2013) A proposed approach to monitor private-sector
374 policies and practices related to food environments, obesity and non-communicable disease
375 prevention. *Obesity Reviews* **14**, 38-48.
- 376 16. Centre National Interprofessionnel de l'Economie Laitière (2016) Le CNIEL, Maison du lait.
377 <http://www.maison-du-lait.com/les-organisations/cniel> (accessed August 2016)
- 378 17. Sayer A (2009) Who's Afraid of Critical Social Science? *Current Sociology* **57**, 767-786.
- 379 18. LegiFrance (2013) Loi n° 88-227 du 11 mars 1988 relative à la transparence financière de la vie
380 politique: Article 11-4.
381 [https://www.legifrance.gouv.fr/affichTexteArticle.do?idArticle=LEGIARTI000006355325&cidTexte=](https://www.legifrance.gouv.fr/affichTexteArticle.do?idArticle=LEGIARTI000006355325&cidTexte=JORFTEXT000000321646)
382 [JORFTEXT000000321646](https://www.legifrance.gouv.fr/affichTexteArticle.do?idArticle=LEGIARTI000006355325&cidTexte=JORFTEXT000000321646) (accessed December 2016)

- 383 19. Mialon M, Swinburn B, Allender S *et al.* (2016) Systematic examination of publicly-available
384 information reveals the diverse and extensive corporate political activity of the food industry in
385 Australia. *BMC Public Health* **16**, 1-13.
- 386 20. Mialon M, Swinburn B, Wate J *et al.* (2016) Analysis of the corporate political activity of major
387 food industry actors in Fiji. *Globalization and Health* **12**, 1-14.
- 388 21. Ulucanlar S, Fooks GJ, Hatchard JL *et al.* (2014) Representation and Misrepresentation of
389 Scientific Evidence in Contemporary Tobacco Regulation: A Review of Tobacco Industry
390 Submissions to the UK Government Consultation on Standardised Packaging. *PLOS Medicine* **11**,
391 e1001629.
- 392 22. Fonds Francais pour l'Alimentation et la Sante (2015) *Rapport d'activites - Annee 2015*.
- 393 23. Simon M (2006) *Appetite for profit : how the food industry undermines our health and how to*
394 *fight back*. New York: Nation Books.
- 395 24. Brownell KD, Warne KE (2009) The Perils of Ignoring History: Big Tobacco Played Dirty and
396 Millions Died. How Similar Is Big Food? *The Milbank Quarterly* **87**, 259–294.
- 397 25. LegiFrance (2013) Code Penal Article 432-12.
398 <https://www.legifrance.gouv.fr/affichCodeArticle.do?cidTexte=LEGITEXT000006070719&idArticle=LEGIARTI000006418521&dateTexte=&categorieLien=cid> (accessed December 2016)
399
- 400 26. ANSES (2010) Code de déontologie de l'expertise de l'Agence nationale de sécurité sanitaire
401 de l'alimentation, de l'environnement et du travail, vol. 1. Paris: ANSES.
- 402 27. Swinburn B, Sacks G, Vandevijvere S *et al.* (2013) INFORMAS (International Network for
403 Food and Obesity/non-communicable diseases Research, Monitoring and Action Support):
404 overview and key principles. *Obesity Reviews* **14**, 1-12.
- 405 28. Mialon M, Allender S, Swinburn B *et al.* (2017) 'Maximising shareholder value': a detailed
406 insight into the corporate political activity of the Australian food industry. *Australian and New*
407 *Zealand journal of Public Health* **In press**.
- 408 29. Nestle M (2002) *Food politics : how the food industry influences nutrition and health,*
409 *California studies in food and culture*. Berkeley ; London: University of California Press.
- 410

411 Table 1: Description of CPA strategies and related practices of the food industry, from Mialon *et al*⁽¹⁰⁾

CPA strategies	Description and related practices
Information and messaging	The information strategy includes practices through which the industry disseminates information that is likely to be beneficial to its activities in order to influence public health-related policies and outcomes in ways that are in their favour. This strategy includes: lobbying policy makers; stressing the economic importance of the industry; promoting de-regulation; framing the debate on diet- and public health-related issues; and shaping the evidence base on diet and public health-related issues.
Financial incentives	Through the financial incentives strategy, the industry provides funds, gifts and other incentives to politicians, political parties and other decision makers.
Constituency building	The aim of the constituency building strategy is to gain the favour of public opinion as well as other key stakeholders, such as the media and the public health community. This strategy includes: establishing relationships with key opinion leaders and health organisations; seeking involvement in the community; establishing relationships with policymakers; and establishing relationships with the media.
Legal strategies	In this strategy, the industry uses legal action (or the threat thereof) against public policies or opponents. The industry may also attempt to influence the development of trade and investment agreements in their favour.
Policy substitution	When threatened by regulation, the industry proposes alternatives, such as voluntary initiatives or self-regulation.
Opposition fragmentation and destabilisation	The opposition fragmentation and destabilisation strategy refers to practices employed by the industry to fragment and destabilise groups or individuals that have criticised or are likely to oppose a company's products or practices or policies that may adversely impact on the company.

412 Table 2: Summary of CPA examples identified for the selected industry actors in France

Strategy	Practice	Danone	Lactalis	CNIEL	Total (examples)	
Information and messaging	Lobbying	0	0	0	0	129
	Stress the economic importance of the industry	1	1	6	8	
	Promote de-regulation	0	0	0	0	
	Frame the debate on diet- and public health-related issues	2	0	4	6	
	Shape the evidence base on diet and public health-related issues	26	7	82	115	
Financial incentives	Financial incentives	0	0	0	0	0
Constituency building	Establish relationships with key opinion leaders and health organisations	3	2	2	7	38
	Seek involvement in the community	12	0	1	13	
	Establish relationships with policymakers	13	1	4	18	
	Establish relationships with the media	0	0	0	0	
Legal strategies	Use legal action (or the threat of) against public policies or opponents	0	0	0	0	0
	Influence the development of trade and investment agreements	0	0	0	0	
Policy substitution	Policy substitution	3	0	0	3	3
Opposition fragmentation and destabilisation	Opposition fragmentation and destabilisation	0	0	0	0	0
Total number of CPA practices identified		60	11	99	170	170

413