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

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## 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 <sup>(1)</sup>. 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 <sup>(2)</sup>.

29 Globally, there is an increased recognition that the economic power of the food industry often  
30 translates into political influence <sup>(3, 4)</sup>. ‘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 <sup>(5)</sup>. 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 <sup>(6, 7, 8)</sup>. 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 <sup>(6, 9)</sup>. 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 <sup>(10)</sup>. 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 <sup>(10, 11)</sup>.

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 <sup>(12, 13)</sup>. 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 <sup>(12, 13)</sup>.

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 <sup>(10)</sup>.

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 <sup>(10)</sup>. 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 <sup>(10)</sup>.

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* <sup>(10)</sup>**. 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 <sup>(14)</sup>. 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 <sup>(15)</sup>. 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’ <sup>(16)</sup>.

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 <sup>(10)</sup>. 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 <sup>(10)</sup>. 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<sup>(17)</sup>.

## 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<sup>(18)</sup>.

### 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 <sup>(19, 20)</sup>. 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<sup>(21)</sup>.

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<sup>ème</sup> Rencontres Scientifiques de Nutrition’ (20<sup>th</sup> 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<sup>ème</sup> 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] <sup>(22)</sup>.  
200 The dairy industry also provided educational material to children, some of which may be considered  
201 as ‘advergaming’ (for simultaneous ‘advertising’ and ‘gaming’) <sup>(23,24)</sup>, with the intention to actively  
202 promote the benefits of consuming dairy products to that population:

203 ‘The website [www.power-cows.fr](http://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<sup>(25)</sup>. The ANSES has internal procedures to ensure the  
251 implementation of the law within the agency<sup>(26)</sup>.

### 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<sup>(10)</sup>. This work  
280 could contribute to INFORMAS, the International Network for Food and Obesity / non-  
281 communicable diseases Research, Monitoring and Action Support<sup>(27)</sup>. 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<sup>(19, 20, 28)</sup>. 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<sup>(19, 20, 28)</sup>. In all  
291 countries, they also promoted physical activity, in an attempt to frame the debate on diet- and public  
292 health-related issues<sup>(19, 20, 28)</sup>. 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<sup>(19, 28)</sup>. The industry  
295 actors tried to establish relationships with health organisations or experts in both of these countries  
296<sup>(19, 28)</sup>. 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 <sup>(19, 20, 28)</sup>. 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 <sup>(19, 20)</sup>. 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* <sup>(10)</sup>. 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 <sup>(20, 28)</sup>. 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<sup>(12, 13, 29)</sup>. 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.

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

CPA strategies	Description and related practices
<b>Information and messaging</b>	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.
<b>Financial incentives</b>	Through the financial incentives strategy, the industry provides funds, gifts and other incentives to politicians, political parties and other decision makers.
<b>Constituency building</b>	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.
<b>Legal strategies</b>	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.
<b>Policy substitution</b>	When threatened by regulation, the industry proposes alternatives, such as voluntary initiatives or self-regulation.
<b>Opposition fragmentation and destabilisation</b>	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

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