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Framing the alcohol policy debate: industry actors and the regulation of the UK beverage alcohol market

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This article explores alcohol industry attempts to frame the debate about pricing and promotions policy in the United Kingdom. Framing theory, it is argued, offers us important insights into the dynamics of the policymaking process as a contest between competing conceptualizations of both problems and solutions. Drawing on a documentary analysis and a series of interviews with policymakers, public health advocates and alcohol industry actors, it argues that industry actors framed the policy debate in ways which were consistent with their underlying commercial interests. A clear challenge was posed to the industry by the shift towards whole-population interventions favored by the Scottish government. This led to a reassertion of the industry frame in which alcohol-related harm is limited to a small minority of the population and which advocates targeted interventions.

Keywords: alcohol policy; alcohol industry; framing; minimum pricing; UK

1. Introduction

This article aims to contribute to our understanding of the role played by alcohol industry actors in the making of UK alcohol policy. It builds on a growing literature on the role of corporate actors in the realm of public policy (Farnsworth 2004, Farnsworth and Holden 2006, Holden and Lee 2009). At the same time, it addresses the apparent gap in this literature, which has paid relatively little attention to the activities of the beverage alcohol industry (for exceptions see Miller and Harkins 2010, Bond *et al.* 2010). There are a number of ways in which industry actors are able to influence the policy process, including the direct lobbying of government officials and policymakers; the formation of trade associations and pressure groups; and the funding of political campaigns (Hawkins and Holden 2013). Previous research on the tobacco industry using internal industry documents has also highlighted how corporate actors have deliberately sought to influence public and policymaker perceptions of the harm caused by their products, including by influencing the terms of the scientific debate (Bero 2003, Hurt *et al.* 2009). Internal documents reveal that co-ownership of alcohol and tobacco corporations (e.g. Phillip Morris and Miller) has resulted in significant knowledge transfer between industries, with corporations in each sector often employing similar public affairs strategies (Bond *et al.* 2010, Hawkins and Holden 2013).

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In addition to their lobbying activity, alcohol industry actors seek to influence broader societal discourses about the effects of alcohol on society and the policies designed to regulate this. Miller and Harkins (2010) argue that communicative strategies, which aim to dominate the ‘information environment’, are central to industry actors’ attempts to influence regulation and avoid measures inconsistent with their search for profit. They found evidence that the alcohol and food industries use the media and a variety of ‘scientific’ and civil society front organizations to shape relevant policy debates.

The current article examines the attempts by alcohol industry actors to shape alcohol policy debates in the United Kingdom in ways amenable to their underlying corporate interests. To this end, it draws on the concept of framing, highlighting how issues can be conceptualized and represented in different ways by political actors in a strategic attempt to further their interests. The specific framing of an issue is of great importance in policy debates as it opens up certain policy responses whilst precluding others. It may create an imperative for political action or act as a buffer against this. Consequently, the competition to define the terms of the debate is a vital component of the policy process.

The article focuses on the issue of the pricing and promotion of alcoholic beverages, which is at the heart of current policy debates throughout the United Kingdom. Legislation introduced by the Scottish Government in 2009 included proposals to introduce a minimum unit pricing for alcohol (MUP).¹ Although the clauses on MUP were removed during the passage of the Alcohol etc. (Scotland) Act through parliament in 2010, the Scottish Government introduced further legislation to bring in MUP following the 2011 Scottish elections which is due to come into force in 2013. Following developments in Scotland, the coalition government’s Alcohol Strategy set out similar plans to introduce MUP in England (HM Government 2012). Price-based interventions have also come onto the agenda in Wales and Northern Ireland (Northern Ireland Assembly 2010).

The article draws on both an analysis of the submissions made by alcohol industry actors to the Scottish Government’s consultation on *Changing Scotland’s Relationship with Alcohol* (Scottish Government 2008) and 35 qualitative interviews with industry actors, non-governmental organizations (NGOs), civil servants, parliamentarians and former ministers involved in the policy debates in both Edinburgh and London. We make extensive use of interview material, as this often provided the clearest and most nuanced summary of actors’ policy positions. However, the interview responses mirror the framing of the pricing issue evident in written submissions.

Whilst the industry was divided in its response to price-based interventions, a dominant, vociferous anti-minimum-pricing frame emerged from certain sectors of the industry. Those opposed to price-based interventions argue that alcohol-related harm is restricted to a small minority of problem drinkers towards whom policy interventions must be targeted. Consequently, they reject measures such as minimum pricing, which they consider would unfairly impact upon the majority of moderate drinkers. Furthermore, they attempt to problematize the relationship between price, consumption and harm, claiming that minimum pricing is a ‘blunt instrument’ unsuited to tackling a complex social issue such as alcohol-related harm. Instead, they advocate education initiatives aimed at changing individual behavior and the culture around alcohol. At the heart of this framing there appears to be a fundamental contradiction between their references to a problematic minority of drinkers and the need for widespread cultural change.

2. Framing and policy

This article starts from the assumption that the events and practices which constitute the social world are open to a multitude of competing interpretations and meanings (Gusfield 1981, Fischer 2003, Hajer and Laws 2006). The indeterminacy of the social world, and the contestable nature of our understanding of that world, mean that policy actors may have widely differing (and sometimes incommensurable) understandings of a given issue (Rein and Schön 1994).

The argument developed below draws on the concept of framing and its importance in shaping policy debates. Frames provide an ordering logic that renders issues comprehensible (Schön and Rein 1996, Triandafyllidou and Fotiou 1998, Hajer and Laws 2006, Daviter 2007, Scheufele and Tewksbury 2007). In Snow and Benford's (1992, p. 137) words, a frame functions as 'an interpretive schemata that signifies and condenses the "world out there"'. The specific framing of an issue influences whether it is identified as a political problem and thus enters onto the political agenda. Once on the agenda, the framing of that issue opens the way to certain policy responses, while precluding others; it identifies legitimate participants in policy debates and shapes coalitions of interests (Schattschneider 1960). For example, the depiction of excessive alcohol consumption as a public order issue leads towards a different type of policy intervention (involving different agencies and different measures of success), than if it were framed as a public health issue or a broader social problem. For this reason, policy actors have an interest in framing debates in ways that are amenable to their interests and objectives (Snow and Benford 1992, Schön and Rein 1996).

Efforts by policy actors to frame issues are political acts which attempt to dictate the terms of a policy debate (Weiss 1989, Béland 2009). The task of the policy analyst is to try to understand how, under what conditions, and through which processes specific frames emerge and are maintained. Identifying the predominant framing of an issue renders policy debates comprehensible and deepens our understanding of the processes through which specific policies emerge.

Framing theory has been applied to a number of fields in the social sciences as diverse as psychology (Druckman 2001), behavioral economics (Tversky and Kahneman 1987), media and communications studies (Semetko and Valkenburg 2000), public opinion research (Sniderman and Theriault 2004),² and the study of social movements (Steinberg 1998, Benford and Snow 2000). In the field of policy studies, Rein and Schön (1994) set out a constructivist account of policy framing and its significance for the resolution of protracted policy controversies. Frames, they contend, are 'underlying structures of belief, perception and appreciation' on which distinct policy positions depend (Rein and Schön 1994, p. 23). Policy frames construct a particular view of social reality and are underpinned by a set of broader institutional and meta-cultural frames. Whilst meta-cultural frames help to shape how particular individuals or groups perceive their interests, political actors can be highly instrumental, framing issues in ways that furthers their specific interests.

Political controversies emerge where mutually incompatible policy frames compete to define a given issue and to dictate the policy responses to it. In other words, political contestation is a struggle between competing frames to define the terms of a policy debate (Edelman 1988). Rein and Schön (1994) focus on policy debates amongst decision-makers, and the possibility of resolving protracted policy controversies through a process of 'frame reflection'. However, framing approaches can be applied to the way in which policy actors located outside the institutions of government attempt to establish their particular framing as the predominant mode of thinking and speaking about an issue. Schön and Rein

(1996, p. 89) introduce the terms ‘rhetorical frames’ and ‘action frames’ to distinguish between the framing of issues in policy debates by policy advocates (or ‘frame sponsors’) and the ‘pattern of action undertaken by policy practitioners’ involved in the design and implementation of policies.

Rhetorical frames are closely related to Deborah Stone’s (1989) concept of ‘causal stories’. Stone (1989, p. 282) focuses on the narratives constructed by political actors attempting to frame political problems, attribute responsibility for them and advocate particular solutions:

Problem definition is a process of image making, where the images have to do fundamentally with attributing cause, blame and responsibility. Conditions, difficulties, or issues thus do not have inherent properties that make them more or less likely to be seen as problems or to be expanded. Rather, political actors *deliberately portray* them in ways calculated to gain support for their side. And political actors, in turn, do not simply accept causal models that are given from science or popular culture or any other source. They compose stories that describe harms and difficulties, attribute them to actions of other individuals or organizations, and thereby claim the right to invoke government power to stop the harm.

Equally, it could be argued, policy actors seeking to avoid government regulation will seek to play down the significance of an issue to keep it off the agenda. They may invoke principles of liberty or individual responsibility to steer governments towards less interventionist forms of regulation which are in keeping with their interests.

Useful insights can be drawn from the field of social movements research into the processes through which policy actors seek to frame a political issue. Benford and Snow (2000, Snow and Benford 1988) offer an analysis of what they term ‘collective action frames’ and identify three ‘core framing tasks’ which are crucial to the emergence and mobilization of social movements. Whilst *diagnostic framing* seeks to define the problem at stake, *prognostic framing* offers a putative solution to the problem thus identified. The third task, of particular relevance to social movements research, is *motivational framing*, which seeks to enlist support for the cause and move people to act to affect social change. The insights offered by social movements theory, we argue, are applicable to an analysis of policy actors, such as corporations, seeking to engage in the policy process. Their framing of the issue defines the problem, offers solutions and seeks to enlist support for this position amongst decision-makers and the general public. Whilst they may not wish to motivate people to move to the barricades, they nonetheless look to garner support for their position which will create pressure to drive through measures they favor, and resist those they do not. This article focuses on the ‘rhetorical frames’ deployed in the current debates about alcohol policy in the United Kingdom by frame sponsors from the alcohol industry.

Framing theory has much in common with other interpretative or critical approaches to policy analysis which focus on the construction of social reality and the symbolic use of language within policy debates (Taylor 1971, Edelman 1977, 1988, Gusfield 1981, Lakoff 2004, see also Glynos and Howarth 2007). Frames, for example, can be seen as analogous with the concept of discourse (Laclau and Mouffe 1985, Fairclough 1992, Howarth 2000). Framing refers to the processes through which actors attempt to impose order upon an ambiguous social world open to a multiplicity of interpretations (Hajer and Laws 2006, p. 254).

We employ the concept of frames as opposed to discourses for two main reasons. Firstly, as we will emphasize below, the debate about MUP in Scotland was described by policy actors themselves in terms of framing and reframing the terms of the debate. Public health activists underlined the importance of reframing policy debates in terms amenable

to a radically different policy agenda from that previously pursued. As such, we deploy the terminology (and the underlying concepts) in which the MUP debate was conducted by participants. As Hajer and Laws (2006, p. 256) comment, the concept of frames captures ‘the dynamics of policy making’ that makes sense to practitioners’ themselves. Secondly, framing theory captures the strategic and purposive nature of policy actors’ interventions in policy debates and provides a conceptual framework for its analysis (Loizides 2009, Desrosiers 2012). It enables us to analyze frames as ‘weapons of advocacy’ (Weiss 1989).

3. Methodology

This article adopts the ‘naming and framing’ approach to frame analysis set out by Schön and Rein (1996) to map the different positions adopted within the alcohol industry on the minimum-pricing debate, to identify the industry actors advocating these positions and to examine the role they played in the development and implementation of policy. The project included both qualitative interviews and documentary analysis of the submissions made to the consultation on the Scottish Government’s (2008) Green Paper *Changing Scotland’s Relationship with Alcohol*. The consultation submissions were supplemented by documents collected from the websites of organizations engaged in the debates. The documents were analyzed and coded manually by the current authors. We sought to identify the positions which different actors adopted on the issues at hand, the terms in which their arguments were couched and the evidence they cited for their positions. The documentary analysis yielded evidence of a number of recurrent themes in the industry discourse and evidence of some cleavages emerging between the different sectors of the industry. The claims about the nature of the alcohol problem and the role of government and other actors in addressing this were used to inform the remainder of the study.

Semi-structured interviews investigated both the positions adopted by policy actors and the political strategies in which they engaged. Whilst the use of interviews to examine the framing of policy debates is not without precedent (see Hajer and Laws 2006, p. 261, Fischlein *et al.* 2010), their employment marks a departure from the more established approach to frame analysis which focuses principally on public documents. The focus in the framing literature on claims making within the public domain reflects the importance of rhetorical framing in influencing the broader societal debates and the impact this has on policy debates. The current article shares this concern with the role of rhetorical frames in structuring the discursive context in which the policy process takes place. However, there is a sound rationale for supplementing the available documents with an analysis of interviews conducted with key policy actors.

Interviews allowed us to examine in greater depth the policy positions advanced in the documents analyzed and to probe the public positions adopted by respondents. We attempted to understand the internal logic of these positions and the underlying assumptions on which they are based; to identify contradictions and inconsistencies within their framing and to understand how the positions they adopted served their strategic interests. We asked industry respondents not only what their positions were on key policy issues, but also how they attempted to communicate these messages to policymakers and the wider public. In addition, interviews allowed us to question the role of the media and broader societal debates in the overall political strategy of policy advocates. Industry actors enjoy significant access to policymakers and are able to present their framing of the policy process to these decision-makers in person as well as through written submissions. Interviews, therefore, offer us a further insight into the way in which these actors articulate their views in face to face meetings.

A total of 35 interviews were conducted with policymakers (civil servants, Members of Parliament (MPs), Members of the Scottish Parliament (MSPs), former ministers), public health advocates and representatives of relevant NGOs and alcohol industry actors in Edinburgh and London between May 2010 and November 2011. A preliminary ‘stakeholder’ analysis based upon a review of relevant literature, the analysis of consultation documents and company websites, and our own knowledge of the alcohol industry and policy processes were used to identify initial respondents and a snowballing technique was employed to identify further respondents in each interview conducted. Interviewees were offered anonymity for themselves and for their organizations to encourage participation and frank discussion. Whilst we were unable to conduct interviews with every organization involved in these debates, the respondents included representatives from all sectors of the alcohol industry.

Interviews were transcribed and analyzed by the authors using Nvivo data analysis software. The data analysis was an iterative process involving a gradual refinement of our themes and codes during successive readings of the texts. From an initial reading of the interview transcripts, key themes and arguments were identified. These were then compared with those which emerged from the policy documents analyzed. Significant overlap was identified and a set of core themes were used to code the interview transcripts during the second reading. The use of Nvivo for this purpose allowed us to examine different dimensions of the frames presented by respondents, to identify connections and overlaps between the framing of issues by different sets of actors and to identify cleavages and coalitions between actors advancing specific framings of the issue (see Holden *et al.* 2012). Our study was not limited to industry frames, although this is the focus of the current article. Wherever possible we have attempted to distinguish between the positions of different companies and different sectors of the industry. However, given the sensitive nature of the issues discussed it has been essential to anonymize the identities of most respondents and, in some cases, the organizations they work for. Quotes attributed directly to organizations are drawn from their responses to the Scottish Government consultation.

4. Framing and UK alcohol policy

It has been argued that alcohol policy under the previous Labour government closely mirrored the preferences of alcohol industry actors (Room 2004, Anderson 2007). The *Alcohol Harm Reduction Strategy for England (AHRSE)* (Cabinet Office 2004) and the subsequent *Safe Sensible Social: The Next Steps in the National Alcohol Strategy (SSS)* (Department of Health (DoH) 2007) focus on targeted interventions, industry self-regulation and public information programs, affording industry actors a prominent role as partners in the policy process (see Hawkins *et al.* 2012). A similar framing of the issue was also evident in Scottish policy documents prior to 2007 (see Scottish Executive 2002). This approach to alcohol policy depends on a specific, highly contested framing of the alcohol problem facing the United Kingdom, the role of government and the involvement of industry actors in the policy process. It privileges economic considerations and the promotion of the nighttime economy over public health, emphasizing free markets, light-touch regulation and individual responsibility. As such, it reflected the broader ideological and political disposition of the government (Baggott 2010). The ‘responsibility deals’ at the center of the coalition government’s health policy reflect a similar framing of the alcohol policy issue by the current administration (DoH 2011).

In Scotland, public health advocates identified a change in the framing of the alcohol debate as a prerequisite for bringing price-based interventions onto the policy agenda and

for securing support for these measures amongst both policymakers and the general public. This entailed a shift from defining alcohol-related problems as residing primarily at the individual and sub-population levels – an approach favored by the industry – to understanding them at the population level. At the same time, it required the issue to be reframed as a public health rather than a public order issue. As a representative from *Alcohol Focus Scotland* commented:

What we had to do was change the frame of alcohol policy. That's quite important because . . . if you look at the alcohol policy documents, certainly from the Westminster Government, but even from the Scottish Government as recently as 2001, you'll see that alcohol is identified as a problem, but the way that it's framed in the policy documents is very much . . . in terms of the industry . . . I think the industry is mentioned probably in the first sentence of the ministerial foreword and the frame of the problem is about most people drink alcohol responsibly and it's really just this tiny minority that don't, where we have to concentrate our efforts. Now, if that's your frame then the policy solutions you come up with are going to be education and stuff like that. So a key advocacy task for us was to change the frame of the alcohol problem and to actually get politicians and the general public and the media thinking about [whole] population approaches to alcohol policy.

Partly as a result of efforts by public health activists to reframe the debate on alcohol policy, the newly elected Scottish Government began to focus on the endemic and deep-seated nature of alcohol-related harm following the 2007 elections (see Scottish Government 2009). The legislation it proposed recognized that a step change was needed in tackling the problem and included a range of interventions to limit the availability and affordability of alcohol, of which MUP was a part. The change in emphasis was symbolized by the shift in responsibility for the Alcohol etc. (Scotland) Bill from the Justice Ministry to the Ministry for Health and Wellbeing. This represented a clear departure from the assumptions underpinning alcohol policy in Scotland under the previous government, and led price-based interventions to enter the political agenda in other parts of the United Kingdom (see HM Government 2010, 2012, Northern Ireland Assembly 2010).

The alcohol industry's response to this change in policy orientation varied between sectors. As we have argued elsewhere, the alcohol industry is divided on many issues of policy, including the regulation of price (Holden *et al.* 2012). This reflects the differing commercial interests of specific parts of the industry and their varying perceptions of the effects of certain policies. It would be misleading, therefore, to argue that there is a single, unified industry framing of the debates around pricing policy; some industry actors were sympathetic to price-based interventions. However, there is a significant and highly vocal sector of the industry – centered round the main wine and spirit producers, certain off-trade³ retailers and some brewers – which is vehemently opposed to any government regulation of price.

Industry actors opposed to price-based interventions sought to reassert their framing of the issue through a sustained media and lobbying campaign, including the use of public affairs agencies which were tasked with publicizing these actors' framing of the alcohol problem and the appropriate policy responses. There was, however, a far less concerted effort by those industry actors who support price-based interventions to make the case in its favor. In part, this can be explained by a general reticence expressed by industry respondents towards any form of government regulation and a fear that support for minimum pricing may open the door to other, less desirable forms of regulation in the longer term. In addition, because of the broad constituency of their membership, organizations such as the Wine and Spirit Trade Association (WSTA) and the British Beer and Pub Association

(BBPA), which were potential conduits for the message of those prepared to accept price interventions, did not articulate these views. Despite some internal disagreements, both these associations ultimately came out in opposition to minimum pricing (see Holden *et al.* 2012). The result of this was the emergence of a dominant anti-minimum-pricing frame within the industry, with dissenting views relegated to the margins of the debate. The following sections examine the content of the anti-minimum-pricing frame in greater detail.

5. Framing the alcohol problem

Our analysis indicates that industry actors attempted to minimize perceptions of the scale of the alcohol problem faced by the United Kingdom and to highlight instead the positive effects of alcohol on society, the economy and on the lives of the individuals who enjoy their products. Blame for perceptions of the current negative effects of alcohol on British society is placed at the feet of an unsympathetic and sensationalist media – which does not reflect the fact that the vast majority of people consume alcohol responsibly and in moderation – and politicians who exaggerate the problem to further their own agendas.

Actors from all sectors of the industry claim that alcohol makes a positive contribution to British society. While not denying that there are also negative consequences associated with excessive alcohol consumption, industry actors were keen to stress that alcohol is a legal product enjoyed safely and in moderation by most people. Some were also keen to highlight the social benefits of alcohol and some also drew attention to the potential health benefits of moderate alcohol consumption. There was a sense, however, that the good news stories about alcohol are consigned to the margins of the debate.

Industry actors also highlighted the contribution made by the alcohol industry to the British economy, highlighting the financial contribution made by tax revenue generated by the industry (e.g. from duty and value added tax (VAT)) levied on alcohol, the number of people employed within the alcohol industry and its role in sustaining the industrial and agricultural infrastructure. The Scotch Whisky Association (SWA 2008, p. 5) highlight, for example, that their members ‘provide employment to some 40,000 people across Scotland often in less economically advantaged urban areas or in remote rural communities where limited alternative job opportunities exist’.

All companies presented themselves as socially responsible actors and were at pains to stress their commitment to tackling alcohol-related harm. Virtually every response to the Scottish Government’s consultation began by welcoming the government’s determination to tackle Scotland’s alcohol problem and reaffirmed the organization in question’s commitment to tackling alcohol-related harms. Many highlighted specific measures they had taken or programs they had endorsed to this end. Tesco’s (2008, p. 2) assertions on this issue are indicative of the industry a whole:

As a company, we take exceptionally seriously our responsibilities regarding the retailing of alcohol. We already have robust policies in place to ensure that our staff sell alcohol legally. Indeed, our policies go considerably beyond the letter of the law.

A representative from the National Association of Cider Makers (NACM) went so far as to claim that promoting overconsumption was counterproductive for the wellbeing of the industry:

no one produces products or sells products on the basis of we actually want people to drink lots of alcohol; that's not how anybody is – the retailer, the producer – I don't think there's anyone who actually sets out to deliberately go past the point of saying 'do you know what kids are drinking; don't care my bottom line is what I'm concerned about.'

Others, meanwhile, argued that the industry is driven as much by a sense of civic duty or pride in their industry as with commercial interests. As a representative of the Portman Group⁴ commented in relation to the corporate social responsibility (CSR) activities of its members:

There is a commercial interest to a lot of this, but I don't believe it is all so cynical as to be wholly driven by commercial interest. I think that there is, on the part of some of the people involved, there is a genuinely held social responsibility view that this would be the right thing to do for society. [A representative of a large brewer] said in one of our council meetings not so long ago – we were talking about what we should be doing as an organization – and he said, 'Well look, I don't want my children growing up to be ashamed of what I do.' And so I think he has got a genuine desire to reduce alcohol misuse.

In addition, industry actors contended that the scale of alcohol-related harm in the United Kingdom is exaggerated. Virtually all the consultation responses framed the alcohol problem in terms of a small minority of the population using alcohol excessively and irresponsibly. The idea of a 'sensible majority' at the heart of the industry discourse has obvious implications for the policy agenda. Framing the issue in this way leads logically to the conclusion that government policy ought to be targeted at that minority rather than at the entire population. Some organizations cited statistics that the overall levels of consumption had peaked in 2004 and had subsequently been declining. W.M. Morrison (2008, p. 5), for example, comments that:

the discussion paper does not include reference to the decline in alcohol consumption in recent years. Data from the HMRC demonstrates that across the UK alcohol consumption declined 2% in 2005 and 3.3% in 2006. A further decline is expected this year after a small increase in 2007.⁵

This was taken as evidence that the trend towards greater consumption had begun to correct itself naturally and that levels of alcohol consumption are cyclical, fluctuating over time independently of government intervention.

A further argument made by industry actors was that certain parts of the United Kingdom, with high levels of alcohol-related harm, give a false impression of the situation in the country as a whole. Problems, they contend, are concentrated in certain areas, such as Glasgow and the north-east of England, which suffer high levels of socio-economic deprivation and unemployment and which are considered to be outliers on a number of social indicators. As the WSTA (2008, p. 6) states:

The regional Health & Wellbeing Profiles 2008 provide graphic illustrations of the level of variation in the scale of problems associated with alcohol misuse in different parts of Scotland. 28% of all alcohol related hospital admissions in Scotland are in Glasgow whilst 9 out of 14 Health Boards have a lower than Scottish average level. Similarly Glasgow accounts for 36% of all alcohol related deaths, whilst 11 out of 14 Health Boards are below the Scotland average.⁶

If these areas were removed from the equation, the overall levels of alcohol consumption and alcohol-related harm in the United Kingdom would appear far less serious. It is noteworthy that this line of argument seems to explain alcohol-related harm in terms of broader socio-economic factors, affecting entire sections of the population. This would seem to be at odds with attempts to frame the alcohol problem as being restricted to a small, problematic minority. As will be argued below, it would also seem to contradict the call to individual accountability which is at the heart of industry discourses.

Whilst there were reservations expressed by industry actors about the scale of the alcohol problem, it should be highlighted that no organization denied that there are alcohol-related issues facing the United Kingdom. The common message was that the problems which arose were restricted to a minority of drinkers, whilst perceptions of the scale of the problem did not accord with this reality. Producers from different sectors were keen to pass the blame for the problems associated with alcohol onto other sectors of the industry (Holden *et al* 2012). In the following section we will examine how the framing of the alcohol problem by industry actors translates into a series of policy positions on how to tackle the problem, and the role of the industry in this process.

6. Partnership versus legislation

Most industry actors were skeptical about the need for additional legislation to regulate the sale and promotion of alcohol. The industry's claim that it is in their interests to market alcohol responsibly implies there is a shared agenda between regulators, producers and retailers which obviates the need for further legislative interventions. The underlying logic of the industry position is that they are key stakeholders in the fight against alcohol-related harm and that effective regulation needs to be based around a partnership approach in which all interested parties are able to contribute to non-legislative interventions. Diageo's (2008, p. 3) consultation responses summarize the logic of this position:

As a responsible company, Diageo believes that at a minimum industry and government should work together to root out all irresponsible promotions, whether in shops, supermarkets, clubs, bars or pubs. Going further, we believe that industry can play an important role in changing consumer attitudes to alcohol by working in partnership with government and civil society, because partnership has the greatest chance of success in changing Scottish consumers' relationship with alcohol. So we invite the Scottish Government to facilitate such a partnership, to ensure that alcohol can play the positive role in Scottish society that the Government says it desires.

Throughout the consultation responses and interviews there were repeated references to examples of apparently effective partnership-based approaches to tackling alcohol-related harm such as Community Alcohol Partnerships and industry led schemes including Best Bar None, Purple Flag and Think 21.

It was argued also that legislation is often incapable of tackling alcohol-related harm and may even be counterproductive. There may be unforeseen consequences of new laws, such as increases in the black market trade in alcohol. Furthermore, legislation could undermine well-functioning voluntary codes. Instead of new laws, what was needed was better enforcement of existing laws, such as those relating to the under-age sale of alcohol. Some respondents argued that legislation is seen as an easy option by many in government who were more concerned with being seen to be acting than with tackling the problem in the most effective way. Others went so far as to claim that it was the industry rather than government which was genuinely committed to reducing alcohol-related harm, lamenting

what they saw as missed opportunities to tackle alcohol misuse by governments unwilling to engage effectively with stakeholders.

The partnership approach, it is argued, allows the alcohol industry to work side by side with government and other stakeholders to reduce alcohol-related harm. However, the need to achieve compromise means that policy measures are often reduced to the lowest common denominator on which all parties agree. Whilst certain things can be achieved through this approach, other policies – on which there is no room for agreement – must be set aside. This means that issues which are not in the interests of the industry can be delayed or moved off of the agenda altogether. It could be argued, therefore, that the partnership approach is inherently ‘conservative’, favoring the status quo and limiting progress towards potentially more effective policy interventions.

Where legislation could not be avoided through self-regulation, industry actors sought to be involved in the policymaking process at every possible stage. This was couched in terms of partnership or stakeholder consultation. The view was articulated from all sections of the industry that good legislation required all parties to be involved in the policymaking process. Without a sufficient consultation process involving all stakeholders, it was argued, ineffective or counter-productive legislation would emerge which would set back attempts to tackle alcohol-related harm. As one trade association representative commented:

I think consultation is absolutely key to this. So let's take alcohol disorder zones, something that the last government introduced. No-one has ever used it. What local authority would want to be called an alcohol disorder zone? . . . So, a daft piece of legislation; legislate in haste, repent at leisure is clear. They didn't consult properly; they've come out with something that nobody's going to use. So the clear message, as far as I'm concerned, is: consult widely and listen to what people say in response to consultation. Because if you don't, you can get yourself into an absolute muddle and we have.

It is important to note that there was a high degree of support for this view amongst civil servants and former ministers who saw at first hand the value of stakeholder involvement in highlighting the potentially unforeseen consequences of certain measures (see Hawkins and Holden 2013).

7. Pricing

Whilst many producer and retailer organizations were strongly and vociferously opposed to interventions on price, representatives of the on-trade as well as some supermarkets and brewers were prepared to consider MUP or tax-based pricing measures. Nevertheless, support for price-based interventions amongst those organizations was tentative and often amounted to little more than a willingness to examine the possibility of their introduction. Those who opposed the introduction of MUP, however, marshaled a series of arguments against its introduction.

As was argued above, the industry frames the issue of alcohol-related harm in terms of a small, yet visible, minority of problematic drinkers. Consequently, policy interventions should be targeted at those misusing alcohol, not towards the majority who enjoy it in moderation. As the SWA (2008, p. 3) states, ‘the vast majority of Scots drink responsibly. It is simply not fair – and potentially counterproductive – to bring in policies which punish all drinkers for the misconduct of the few’. What is needed instead ‘are targeted policies designed to tackle the minority with alcohol problems’.

This emphasis on targeted interventions is at the core of the anti-minimum-pricing frame because it is consistent with companies’ commercial interests. Targeted measures

allow retailers and producers to continue marketing alcohol and driving sales amongst the ‘sensible majority’. Whole-population approaches, meanwhile, are rejected because they are designed to restrict the aggregate levels of alcohol consumption across the entire population.

The specific arguments presented against MUP were that it would be ineffective in tackling alcohol-related harm, could have unintended consequences and would unfairly impact upon moderate drinkers and those on low incomes. Some questioned whether it would be illegal under European Union (EU) competition and single market regulations. Almost all the consultation responses raised about the robustness of academic studies cited in support of minimum pricing, particularly the economic modeling undertaken by the University of Sheffield (Booth *et al* 2008). Companies repeatedly stressed their commitment to evidence-based policy. Diageo (2008), for example, devote an entire section of their consultation response to set out their commitment to evidence-based policy and its implications for the MUP debate. This went hand in hand with the argument that the burden of proof for the effectiveness of MUP lay with the government. It was argued that the government should not introduce any new measure unless it was able to provide overwhelming evidence of its effectiveness in advance. This would seem an unreasonably high hurdle for new policy initiatives to have to overcome and would make it virtually impossible to alter current policy.

Industry respondents often drew comparisons with other countries to support their claims about the ineffectiveness of price-based interventions. It was argued that alcohol prices are already high in the United Kingdom in comparison with other countries in continental Europe that have lower levels of aggregate consumption and harm. For example, the WSTA (2008, p. 3) comments, there is ‘no clear link between the price of alcohol, consumptions and misuse. In Europe, many of the countries with the lowest tax rates have the lowest consumption’. In the absence of a comparable system of MUP, commentators looked at the high-tax regimes in place in Scandinavia to draw lessons about the potential effectiveness of the proposed measures in Scotland. As one trade association representative argued:

We’ve seen how pricing mechanisms have played out in Nordic countries, and it hasn’t dealt with the problems. Yeah, national government consumption statistics may have dropped, but if you go out on the streets of Stockholm on a Friday and Saturday night, you know that alcohol issues is still as rife as ever, it’s just moved into the underground marketplace. And we see those same solutions likely to happen here.

However, it appears that industry actors were highly instrumental in their use of overseas examples. Whilst the passages cited above demonstrate the willingness of industry respondents to cite evidence from other countries which supported their position, they were equally prepared to question the applicability of those cases which contradicted their position. In their submissions to the Scottish Government, evidence from both Scandinavia (Diageo 2008, p. 12) and other English speaking countries such as the United States (SWA 2008, p. 8) was discounted on the grounds that it was impossible to draw conclusions about the Scottish case from countries with such vastly different histories and cultures.

For some organizations MUP represented an unacceptable, and potentially damaging, intervention in the functioning of the market, which could prevent competition and harm consumers. It appeared to be a point of principle for these organizations that government had no right to intervene in this way (see Pernod Ricard 2008, SAB Miller 2008). This point is summarized well by a representative of a national chain of supermarkets:

you could argue that we should be in favor of a minimum unit pricing because potentially we're going to make more money; but we fundamentally disagree with it because, you know, we think, on behalf of our customers, we should have the freedom to set our own prices. And that it shouldn't be set such that it is totally fixed throughout the market in contrast to maybe a floor price like duty and VAT. The reason we say that is if it's minimum unit pricing, . . . what we think that does is it completely removes competition from the market, and therefore if you're the largest retailer you've got a guaranteed market share three times bigger than us – that's, you know, three times the sales of us at a price which we can't do anything to vary to compete.

Respondents squarely opposed to the idea of MUP, were more open to the idea of a ban on the sale of alcohol below the level of duty and VAT which, unlike MUP, would have little overall effect on the cost of products currently on the market.

Interestingly, there appeared to be a shift in the position of many actors on the issue of pricing as the debate around MUP intensified. Some actors, who were initially opposed to any interference in their ability to set prices, began to countenance the possibility of some movement on this. As a representative of a leading chain of supermarkets explains:

You know some would argue that that's a dangerous public policy to mention; that if we want to have freedom to set our prices, we should have freedom to set below duty and VAT. Well we thought long and hard about that, and I think that no, actually, that isn't right, our customers would expect, that if tax is being levied, if the government thinks that alcohol is a product worthy of a specific tax known as duty, and that has duty and the Value Added Tax, we shouldn't sell below that It therefore sets that threshold and gives the government the confidence that if they raise it, it will be passed on.

8. Changing culture, changing behavior

The arguments marshaled in opposition to price-based intervention center on the idea that price is a blunt instrument, unable to tackle a complex social issue like alcohol-related harm. Instead, it is argued that there needs to be a change in the culture surrounding alcohol and the way it is consumed if there is to be a significant reduction in harm. The root cause of the UK's alcohol problem is seen to be a culture in which public drunkenness is tolerated and indulged and in which anti-social behavior has become normalized. As SAB Miller (2008, p. 2) comments:

Societal tolerance (or intolerance) of those who drink irresponsibly or illegally appears to be a greater determinant of the extent to which a country will experience alcohol harm than the price of alcohol.

The importance of culture change was a recurrent theme throughout the consultation responses. The goals for the government, it was argued, should be to 'denormalize' excessive consumptions and delegitimize anti-social behavior associated with this. Such a change in drinking culture, it was argued, required a change in the perception of alcohol as a product.

There was skepticism articulated by industry actors that legislation can succeed in bringing about the shift in attitudes and behavior which the industry seeks. What was needed instead was a call to individual accountability and for people to take responsibility for their actions. The correct role for government is to understand what motivates individuals to drink in hazardous and anti-social ways and to develop policies which encourage individuals to change their behavior. As the SWA (2008, p. 3) argues:

We are disappointed that the consultation focuses heavily on ever greater restrictions that would penalise responsible producers and consumers. Insufficient attention is given to enforcement of existing laws and to the promotion of personal responsibility by individual drinkers. Understanding the reasons people drink inappropriately and to excess, and their acceptance of anti-social behaviour, needs to be fully understood if Scotland is to reduce alcohol related harm.

The focus on individual responsibility went hand in hand with almost universal calls for more education and information for consumers, which would allow them to make informed choices about their lifestyles. There was frustration expressed by respondents that the focus of the debate on alcohol policy had shifted from education to other issues such as MUP which, it was argued, failed to target the underlying aim of culture change:

I think the medical lobby are really only interested in the minimum pricing rules, alternative taxation, bans on advertising and sponsorship, and that's about it; there's no focus given to education. And if you want to change the culture of a country which has been drinking to these patterns for hundreds of years, then if you don't start educating generations you will never get there.

The Drinkaware Trust⁷ and the public information programs it runs about safe alcohol use and the dangers of excessive consumption were highlighted by industry actors as examples of the type of public information campaigns they claimed were effective in changing people's attitudes and behavior. In addition, it was felt that the government and the education system could do more to promote sensible drinking and explain the consequences of misuse.

The overall message which emerged from the industry is that the root of the UK's alcohol problem is to be found in societal attitudes towards alcohol and to the behavior of those consuming it. The solution to the problem is culture change and a call for greater personal accountability, facilitated by education and public information campaigns. However, there appears to be a fundamental contradiction at the heart of this framing. The suggestion that alcohol misuse is a cultural issue, which requires a shift in societal-level norms, seems to run counter to the industry framing of the alcohol problem in terms of a small minority of problematic drinkers at whom policies must be targeted. If the problem is one of widespread acceptance of public drunkenness, and the solution is culture change, it would suggest that the problem extends beyond a small minority to a far wider section of the population. Similarly, whilst the focus on cultural change appears to situate the problem of alcohol-related harm at the societal level, the solutions advocated by industry respondents tend to focus on measures designed to change individual behavior. Insofar as the focus on culture change has a population-level rather than individual focus, it has the virtue for the industry of diffusing responsibility for change among a variety of stakeholders and of depending on gradual change over time, rather than measures designed to reduce aggregate alcohol consumption in the short to medium term.

9. Conclusion

This article highlights the importance of framing theory in understanding current debates around alcohol policy in the United Kingdom and examines the strategic framing of the issue of minimum pricing by alcohol industry actors. Framing theory offers a lens through which to understand the process of political contestation between actors with differing agendas and priorities. The current study draws on approaches to framing developed in

the field of policy studies and from related disciplines such as social movements research. These offer a conceptual framework through which we are able to better understand the dynamics of current alcohol policy debates. We emphasise the importance of rhetorical frames as ‘weapons of advocacy’ for policy actors seeking to influence the content and direction of policy. In particular, we demonstrate the relevance of these approaches to the study of corporations as political actors engaging in the policy process. This represents a contribution to both the literature on framing and that on corporate political strategy (see Hillman and Hitt 1999). All policies depend on a specific framing of the issue at stake, which paves the way for certain interventions and precludes others. Attempts to shift the terrain on which political debate is conducted, and the terms in which it is couched, are thus important ways in which actors seek to influence the policy process and to garner support for their positions amongst both decision-makers and the general public.

The significance of policy framing in the present context was confirmed by key actors in the debates themselves. They underlined the importance of framing within the development of the alcohol policy debate and identified attempts to frame the issue as a key objective of actors on both sides of the argument. Public health campaigners seeking a reorientation of policy towards whole population solution saw reframing the issue of alcohol-related harm as the first step in this process. Meanwhile, industry actors opposed to price-based interventions sought to assert their framing of the issue through engagement with the media and policymakers.

As well as its theoretical and empirical contributions, the present article is methodologically innovative, employing semi-structured interviews to analyze the rhetorical frames developed by policy actors and the way they are used strategically. Interviews allow us to probe and question the framing of a policy debate and to tease out the nuances of actors’ positions. As such, they deepen our understanding of the predominant framing of a policy debate without diminishing the focus on the public nature of rhetorical framing, evident in the documents analyzed. Furthermore, whilst we have focused extensively on interview responses in this article, as the references to documentary sources demonstrate, these are consistent with the messages industry actors advanced publicly via consultation responses.

Under the previous Labour-led administrations in Scotland and at Westminster, the underlying assumptions on which alcohol policies were based closely mirrored the policy preferences of industry actors. The shift towards a whole-population approach by the Scottish Government after 2007 – including interventions on the pricing and promotion of alcohol – represented a sea change in the UK alcohol debate and price-based measures have now entered on to the agenda at Westminster and in devolved administrations elsewhere in the United Kingdom. Attempts to raise the price of alcohol and reduce aggregate levels of consumption presented a clear challenge to the commercial interests of certain industry actors. Spirits producers, some brewers and the majority of the off-trade retail sector were strongly opposed to any form of price-based measure. Their response was to attempt to reassert their framing of the issue and to promote policies which were consistent with their business models.

They framed the alcohol problem facing the United Kingdom as one of a small minority of harmful and hazardous drinkers. Against this problematic minority, they argued, the vast majority of the population enjoys alcohol responsibly. The corollary of this framing is that policy interventions must be targeted at the problematic minority rather than the population at large. Whole-population solutions such as minimum pricing, they contend, are both unfair and ineffective in addressing the underlying issue and could even prove to be counterproductive. What is required instead is a partnership-based approach in which stakeholders, including the alcohol industry, are involved in the formation and execution of

harm reduction policies. They advocate education initiatives aimed at changing the culture around alcohol. However, there is a tension at the heart of the anti-MUP discourse between attempts to frame the problem of alcohol-related harm as being limited to a small minority of problematic drinkers, whilst at the same time claiming it is the result of broader socio-economic and cultural factors. Similarly, calls for a widespread change in cultural attitudes towards alcohol do not sit well with the emphasis placed on individual responsibility and targeted policy interventions by those opposed to price-based interventions.

The anti-minimum-pricing frame examined here was not the only one advanced by industry actors on the pricing debate. Industry actors articulated a range of overlapping, yet distinct, positions on the issue. To varying degrees, representatives of the on-trade, certain brewing organizations and even some supermarkets declared themselves willing to accept, or at least the investigate the possibility of, MUP or some kind of tax-based intervention on price. The debates around pricing policy should, therefore, not be seen in terms of a simple dichotomy between public health activists on the one hand and a uniform, monolithic, alcohol industry on the other. Nevertheless, the voices of those amenable to price-based interventions tended to lack the commitment, intensity and ubiquity of those who argued against minimum pricing, who expended significant resources in their attempt to reframe the debate through engagement with the media and political lobbying (Holden and Hawkins 2012, Hawkins and Holden 2013). The framing of the issue by these actors thus became the dominant industry approach to the issue, with considerable impact on broader public debates.

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Notes

1. MUP introduces a minimum price at which a unit of alcohol can be sold and is designed to lift the price of the cheapest products on the market. The proposed level of £0.45 in Scotland would have meant a 75cl bottle of vodka, containing 30 units of alcohol, could not be sold for less than £13.50, considerably above the level at which it is currently possible to buy many brands.
2. For an overview see Chong and Druckman (2007).
3. The term 'off-trade' refers to those retailers – such as supermarkets, off-licences and convenience stores – who sell alcohol for consumptions away from the premises on which it is sold.

The term ‘on-trade’, by contrast, refers to venues such as bars, pubs and nightclubs where alcohol is sold for consumption on the premises in which it is sold.

4. The Portman Group is an organization run and funded by eight leading alcohol producers, which speaks on behalf of its members on the social aspects of alcohol. In addition it runs a self-regulatory system on the responsible marketing of alcoholic beverages. For more details see <http://www.portmangroup.org.uk>
5. See also WSTA (2008, p. 8) and The Portman Group (2008, p. 7).
6. The same argument, referring to the same data source is used by the SWA (2008, p. 6) and Diageo (2008, p. 11).
7. The Drinkaware Trust is an industry-funded body which provides public information on alcohol consumption through a number of different channels including media advertising and their website. The board of governors contains an equal number of representatives from the alcohol industry and NGO sectors as well as an independent chairman (see <http://www.drinkaware.co.uk> for further information).

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