



Food and beverage product reformulation as a corporate political strategy



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ABSTRACT

Product reformulation—the process of altering a food or beverage product's recipe or composition to improve the product's health profile—is a prominent response to the obesity and noncommunicable disease epidemics in the U.S. To date, reformulation in the U.S. has been largely voluntary and initiated by actors within the food and beverage industry. Similar voluntary efforts by the tobacco and alcohol industry have been considered to be a mechanism of corporate political strategy to shape public health policies and decisions to suit commercial needs.

We propose a taxonomy of food and beverage industry corporate political strategies that builds on the existing literature. We then analyzed the industry's responses to a 2014 U.S. government consultation on product reformulation, run as part of the process to define the 2015 Dietary Guidelines for Americans. We qualitatively coded the industry's responses for predominant narratives and framings around reformulation using a purposely-designed coding framework, and compared the results to the taxonomy.

The food and beverage industry in the United States used a highly similar narrative around voluntary product reformulation in their consultation responses: that reformulation is “part of the solution” to obesity and NCDs, even though their products or industry are not large contributors to the problem, and that progress has been made despite reformulation posing significant technical challenges. This narrative and the frames used in the submissions illustrate the four categories of the taxonomy: participation in the policy process, influencing the framing of the nutrition policy debate, creating partnerships, and influencing the interpretation of evidence. These strategic uses of reformulation align with previous research on food and beverage corporate political strategy.

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1. Introduction

The food and beverage industry regularly changes or reformulates its products' recipes or composition, for example to improve taste or decrease costs. However, reformulations intending to improve the health profile of food and beverage products have recently gained prominence as a public health approach (Combris et al., 2011; World Health Organization, 2004). Health-specific reformulations typically aim to reduce salt, sugar and fat in highly processed foods and sugary drinks, well-established as drivers of the obesity and noncommunicable disease (NCD) epidemics (Monteiro, 2009). Health-focused reformulation of food and beverages (herein referred to as reformulation) is increasingly considered a nutrition policy intervention or initiative in and of

itself, but has also been conducted in response to other nutrition policies such as food labeling—as was demonstrated by the industry-wide reformulations following mandatory *trans*-fat labeling in the United States (U.S.) (Otite et al., 2013).

A variety of food and beverage reformulation initiatives are currently underway in the U.S.: quasi-regulatory public-private partnerships with government institutions, co-regulatory mechanisms in partnership with non-profit or non-governmental organizations, voluntary corporate pledges initiated by alliances of food and beverage companies, and codes of conduct or commitments at individual food and beverage companies, some of whom are also participating in collective corporate reformulation pledges/alliances (Alliance for a Healthier Generation, n.d.; Mars Inc., n.d.; McDonald's, n.d.; Partnership for a Healthier America, n.d.; Slining et al., 2013; The Hershey Company, n.d.; The NYC Health Department, n.d.). Reformulation has also been a priority of First Lady Michelle Obama's obesity prevention campaign, Let's Move, and she is the honorary chair of the reformulation focused

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Partnership for a Healthier America (Let's Move, n.d.; Partnership for a Healthier America, n.d.; The White House – Office of the First Lady, 2010). Most recently, in June 2016, the Food and Drug Administration issued proposed guidance on a set of voluntary salt reduction targets (U.S. Food and Drug Administration, 2016). Taken together, these initiatives illustrate food and beverage reformulation's prominent position on the industry and health policy agendas in the U.S.

All of the above reformulation initiatives in the U.S. are voluntary, and the majority are self-regulated. Literature on corporate political strategy – the variety of ways corporations seek to influence policy decisions and the regulatory environment (Hillman and Hitt, 1999) – has identified such voluntary initiatives as a mechanism used by industries facing political and social pressure to preempt or avoid restrictive or mandatory regulations on their activities (Hauffer, 2001; Saloojee and Dagli, 2000). The food and beverage industry has increasingly been under such pressures as obesity and NCDs continue to rise and governments adopt policies and issue policy recommendations which would impact the food and beverage industry's business (Ng and Dunford, 2013; Sacks et al., 2013; The PLoS Medicine Editors, 2012). For example, taxation and other fiscal measures feature in numerous nutrition policy documents, including the World Health Organization's 2013 NCD Action Plan, which, if implemented, would be considerably more intrusive on the industry's business than a voluntary program such as product reformulation (World Health Organization, 2013).

This paper is part of a larger research project exploring the political aspects of product reformulation from multiple viewpoints, in order to inform the broader debate about effective solutions and policies to address obesity and NCDs in the U.S. This paper in particular aims to provide insights into food and beverage product reformulation and its relationship to industry political strategy around obesity and NCD policies. It examines the narratives and frames contained within food and beverage industry responses to a U.S. government consultation on reformulation and compares them against a taxonomy of food and beverage industry political strategies collated for this research.

2. Methods

Nutrition policy is a value-laden, political process, and subject to inherent tensions between stakeholders' beliefs, motives and desired policy outcomes (Nestle, 2002; Weible et al., 2012). In order to identify the political strategies and tensions within voluntary product reformulation, we conducted an analysis of frames and narratives.

A frame is a way of “select[ing] some aspects of a perceived reality in order to make them more salient...” so that a problem, and therefore its solution, are defined in a certain way (Entman, 1993). The way an issue is framed dictates whether or not the issue comes onto the public policy agenda, and how to respond to that issue once it is on the agenda (Dorfman et al., 2005; Mah et al., 2014). Importantly, frames can “construct policy decisions even before a decision per se has been made...” (Mah et al., 2014) – therefore frames used by the food and beverage industry may be strategic in attempting to shape future nutrition policy decisions in a particular direction.

A study of narratives is one of many approaches commonly applied to identify and analyze stakeholder positions and their effect on the policy process. Narratives provide a structural arch – a story, or plot line – to political debate, and the building of narratives is a key component of political strategy (Atkinson, 2000; Stone, 2012). In particular, narratives are able to “frame who benefits and who sustains costs in the policy conflict” (McBeth et al., 2007). In the case of nutrition policy, the food and beverage

industry may be using narratives in order to shape on-going discussions about how to address the obesity and NCD epidemic toward policy options in which they are the constituent who benefits.

Frames and narratives are closely interrelated but distinct concepts. They both imbue texts and discourse with underlying values and convey broader implications and meanings to policy debate. Frames, as used in this research, are more specifically concerned with how a problem, and its solutions, are defined in order to shape policy processes. While narratives may contain frames within them, or even help to define the frames themselves, they refer more specifically to the story being told within the text or discourse. When this paper refers to a narrative, it is referring to the overarching line of argumentation or storyline of the food and beverage industry submissions.

2.1. Taxonomy of food and beverage industry corporate political strategies

To create a taxonomy of food and beverage industry corporate political strategies, we first reviewed the work on such strategies by Brownell and Warner (2009), Miller and Harkins (2010) and Goldman et al., (2014). We then searched Scopus and Medline for additional papers, using the search string: ([food OR beverage industry] AND (strategy OR policy OR politics OR voluntary OR regulation OR regulate)). If the title or abstract indicated the paper was specifically about the food and beverage industry, we read the full text (n = 36) and extracted any political strategies identified within. We then grouped the strategies into categories, and cross-checked the categories identified against those discussed by Brownell and Warner (2009) as well as those identified in two prominent books in this field (Freudenberg, 2014; Nestle, 2002). The resulting categories in the taxonomy were: influencing the framing of the debate, influencing the evidence, providing funding and participating in partnerships, and participating in the policy process (Fig. 1). This taxonomy of industry tactics is intended to be an evolving tool through which to interpret food and beverage industry political strategies. Furthermore, it is noted that a number of the strategies identified within the taxonomy and within this paper could be categorized under multiple taxonomy categories. For example, the use of voluntary pledges and codes can be seen as participating in the policy process, as well as framing the nutrition policy debate away from mandatory regulations, among others.

The frames identified in this taxonomy and in this research were also informed by the literature reviewed on food and beverage industry corporate political strategy. In particular, these include the frame that the industry is ‘part of the solution’ to obesity and NCDs and the individual responsibility/consumer choice frame frequently employed by industry (Dorfman and Wallack, 2007; Kwan, 2009; Nixon et al., 2015). However, two of the frames identified in this paper – focusing on ‘positive’ nutrients in products and emphasizing the cost/effort of reformulation – were unique to and generated from this research.

This taxonomy was originally generated from a literature search in 2014, when this research commenced. In the time since that literature search, further academic work has been completed on the corporate political strategies of the food and beverage industry. In particular, Mialon et al. (2015) published a framework for monitoring the corporate political activity of the food and beverage industry. The categories and strategies contained within the framework proposed by Mialon et al. (2015) are largely overlapping with that of the taxonomy proposed here; however, the taxonomy presented here contains fewer categories of strategies.

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