SPECIAL COMMENTARY

THE DUBLIN PRINCIPLES OF COOPERATION AMONG THE BEVERAGE ALCOHOL INDUSTRY, GOVERNMENTS, SCIENTIFIC RESEARCHERS, AND THE PUBLIC HEALTH COMMUNITY

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Abstract — A 3-day Meeting held in Dublin, Ireland on 26-28 May 1997 was organized by the National College of Industrial Relations of Ireland and the US-based International Center for Alcohol Policies. During this Meeting, the 24 participants representing the beverage alcohol industry, governmental organizations and the scientific and public health communities discussed cooperation among all those concerned with alcohol consumption and its effects. These discussions led to the formulation of the 'Dublin Principles of Cooperation'. This special article describes these Principles and comments on them.

INTRODUCTION

Recognizing the importance of encouraging understanding of both the benefits and the risks of alcohol beverage consumption, the Dublin Principles of Cooperation among the Beverage Alcohol Industry, Governments, Scientific Researchers, and the Public Health Community were designed to provide guidance for mutually acceptable means of cooperation, based on ethical principles, among all those concerned with alcohol consumption and its effects. They were adopted at a three-day meeting in Dublin on 26-28 May 1997, organized by the National College of Industrial Relations and the International Center for Alcohol Policies. The former is a university-level institution whose programmes are accredited by the Irish National Council for Educational Awards, and the latter is a non-profit organization based in Washington, DC, USA, and funded by 11 major international drinks companies.

All those concerned with beverage alcohol accept the fact that alcohol misuse is associated with a variety of health, social, and safety risks to the individual drinker, to others, and to society as a whole. These Principles seek to identify the appropriate roles of the major actors in combatting misuse and minimizing those risks. They also implicitly recognize the freedom of individuals to drink alcohol in a responsible manner or to abstain from drinking, based on their own moral and cultural norms, as well as their right to make such choices.

The Principles do not attempt to bridge the gap between those who seek to reduce alcohol-related problems through reducing overall consumption, on the one hand, and, on the other hand, those who see moderate, responsible drinking as not only compatible with, but even capable of contributing to, good physical and mental health. Nor do the Principles attempt to address every issue which may be of interest to the beverage alcohol industry or the public health community, such as protecting the environment, eliminating corruption, ensuring an adequate level of government funding for health care, or mitigating any inappropriate political influence that may be exerted on government by special interests.

The Principles do, however, attempt to identify the common ground which exists among those who produce and sell alcohol, those who regulate

*The author prepared the initial drafts of the Principles and participated in the Meeting. It should, however, be emphasized that his Commentary is solely his own responsibility and does not necessarily reflect the views of other participants.

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Table 1. List of participants at the Dublin Meeting

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
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<td>Joseph Asare</td>
<td>Accra Psychiatric Hospital, Ghana</td>
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<td>Bernard Le Bourhis</td>
<td>Institut de Recherches Scientifiques sur les Boissons, France</td>
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<td>Michael Crutcher</td>
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<td>Ivan Diamond</td>
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<td>David Ichel</td>
<td>Simpson Thacher &amp; Bartlett, USA</td>
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<td>Paul Lemmens</td>
<td>University of Maastricht, The Netherlands</td>
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<td>Jorge Litvak</td>
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<td>Desmond O’Byrne</td>
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<td>Joyce O’Connor</td>
<td>National College of Industrial Relations, Ireland</td>
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<td>Gaye Pedlow</td>
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<td>Khee Liang Phoa</td>
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<td>Martin Plant</td>
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<td>Flavio Poldrigo</td>
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Affiliations are given here only for information purposes.

and tax its use, those who scientifically study its effects, and those who are primarily concerned with preventing or treating alcohol misuse.

Prior to the May 1997 Meeting in Dublin at which the Principles were adopted, drafts of the Principles were sent for comment to a wide range of persons and organizations interested in alcohol-related issues and the conduct of scientific research. As noted in the brief introduction to the Principles themselves, the 24 experts who participated in the Dublin Meeting (see Table 1) acted in their individual capacities in revising and eventually approving the Principles. At the same time, however, the participants were broadly representative of the major sectors concerned with alcohol-related issues. It is hoped that the strong consensus reached on the text will be followed by its subsequent acceptance by individual companies, trade associations, relevant professional societies, academic institutions, and public health advocates, as a basis for future cooperative action.

Participants in the Meeting felt that it was premature to adopt specific recommendations for follow-up activities or to monitor implementation of the Dublin Principles. However, it was agreed that the National College of Industrial Relations would serve as a focal point for any such future work and that the College would serve as a clearing-house for information related to the Principles. The hope also was expressed that the process of consultation through which the Principles were adopted might serve as a model for the broader involvement of non-governmental actors in health promotion generally. Such involvement was one of the goals of the World Health Organization’s Fourth International Conference on Health Promotion, ‘New Players for a New Era: Leading Health Promotion into the 21st Century’, which was held in Jakarta in July 1997.

PREAMBLE: THE ETHICS OF COOPERATION

The common good of society requires all its members to assume their fair share of social responsibility. In areas related to alcohol
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consumption, individuals and the societies in which they live need to be able to make informed choices. In order to further public knowledge about alcohol and prevent its misuse, governments, the beverage alcohol industry, scientific researchers, and the public health community have a common responsibility to work together as indicated in these Principles.

Commentary

This brief Preamble places the Principles of Cooperation in the broader context of social and ethical responsibility, which is relevant to public and private entities, including governments, intergovernmental organizations, and business. Although there are some advocates who wish to isolate the beverage alcohol industry from any participation in research, policy formulation, or promotional public health activities, such a position runs counter to the weight of contemporary moral, philosophical, business and political opinion. The Principles reflect this trend, which calls for greater involvement by business in social issues, not less.

Recognition of such principles of corporate social responsibility may be found in, e.g. the Beer Institute Advertising and Marketing Code (‘[B]rewers are responsible corporate citizens, sensitive to the problems of the society in which they exist.’) and the IDV Code of Business Conduct (‘Successful businesses are those which respect and re-invest in the societies from which they draw.’). Among non-alcohol-related companies, references to social responsibility may be found in documents as diverse as the well-known credo of Johnson and Johnson (‘We are responsible to the communities in which we live and work and to the world community as well’) and codes of conduct adopted by, e.g. BankAmerica, Wells Fargo Bank, Citicorp, Hewlett-Packard, the New Zealand Computer Society, the American Chemical Society, Nortel, and Lockheed Martin.

I. ALCOHOL AND SOCIETY: COOPERATION AMONG INDUSTRY, GOVERNMENTS, THE COMMUNITY, AND PUBLIC HEALTH ADVOCATES

Commentary

Precedents for many of the principles in this section may be found in existing codes of conduct or marketing practices developed by beverage alcohol trade associations and individual companies. Of course, the Principles are tailored so that they respond to the specific context of alcohol production, sale, use, and regulation.

The Jakarta Declaration on Health Promotion into the 21st Century, adopted by the Fourth WHO Conference on Health Promotion in July 1997, states ‘There is a clear need to break through traditional boundaries within government sectors, between government and non-government organizations, and between the public and private sector. Co-operation is essential . . . Health promotion requires partnerships for health and social development between the different sectors at all levels of governance and society . . . Partnerships offer mutual benefit for health through the sharing of expertise, skills, and resources. Each partnership must be transparent and accountable and be based on agreed ethical principles, mutual understanding and respect.

A. Governments, non-governmental organizations, public health professionals, and members of the beverage alcohol industry should base their policies and positions concerning alcohol-related issues upon the fullest possible understanding of available scientific evidence.

Commentary

This paragraph emphasizes that all sectors involved in alcohol have a responsibility to base their policies on scientific fact, not preconceived ideas or moral bias; it is complementary to the call for accurate information set out in Principle I.F.

B. Consistent with the cultural context in which they occur, alcohol policies should reflect a combination of government regulation, industry self-regulation, and individual responsibility.

Commentary

Given the complex nature of alcohol use and its regulation, it is clear that meaningful alcohol policies must involve all of the primary actors. Every government regulates alcohol consumption in some respect, from taxation to restrictions on sale to the criminalization of certain conduct related to excessive drinking. Industry self-regulation also is common, particularly in the area of advertising, but also in defining production and
quality standards. Whatever the legal constraints imposed by government, however, many of the most important decisions about drinking alcohol must be made in a particular social context by the individual consumer or abstainer. This Principle recognizes the role of all of these factors, but it does not exclude the participation of others, such as the public health community.

The paragraph also implicitly recognizes that alcohol use is governed by cultural norms as well as by government regulation, and policies adopted by society at large will naturally conform to widely followed cultural practices. Even in the context of workers' safety, for example, the International Labour Organization has recognized in its 'Code of Practice Concerning Management of Alcohol-and Drug-related Issues in the Workplace' that restrictions on alcohol 'may vary significantly depending on the nature of the work and the national, cultural and social environment'. Of course, many countries are multi-cultural, and alcohol policies should reflect cultural diversity where it exists, rather than a narrow majoritarian view of culture which automatically imposes majority values on those who might not share them.

C. Consumption of alcohol is associated with a variety of beneficial and adverse health and social consequences, both to the individual and to society. Governments, intergovernmental organizations, the public health community, and members of the beverage alcohol industry, individually and in cooperation with others, should take appropriate measures to combat irresponsible drinking and inducements to such drinking. These measures could include research, education, and support of programmes addressing alcohol-related problems.

Commentary

There is no doubt that some individuals are unable to drink any amount of alcohol responsibly. It seems equally clear that very low levels of drinking (for example, one drink per day) have no negative effects for most people and may even have some positive impact on health. Beyond that, there is a great deal of disagreement over what constitutes 'responsible' drinking, both in terms of the amount of alcohol consumed and pattern of consumption.

None the less, recognition that there are risks associated with the misuse of alcohol beverages is beyond argument and has been explicitly accepted in many existing industry codes, e.g., the DISCUS Code of Good Practice, Dutch Code for Alcoholic Beverages, and the IDV Code of Ethical Marketing Practice. Programmes designed to minimize these risks have been adopted by WHO and a wide number of government and quasi-government bodies, as well as the public health community.

This Principle calls upon all those concerned with producing, promoting, selling, regulating, or conducting research on alcohol to take whatever measures might be appropriate to help reduce the misuse of alcohol. Such measures will evidently vary depending on the sector involved, but among the programmes which might be supported would be those dealing with, for example, drunk driving, underage drinking, binge drinking, the relationship between excessive drinking and violence, alcoholism, or the potentially negative effects of alcohol on unborn children. The Principle underscores the fact that the ethical obligation to combat alcohol misuse includes both individual and cooperative or collective actions.

D. Only the legal and responsible consumption of alcohol should be promoted by the beverage alcohol industry and others involved in the production, sale, regulation, and consumption of alcohol.

Commentary

Some individuals and groups might disagree with the notion that drinking could ever be 'responsible' or moral, and this provision does not require scientists, governments, or anyone else to 'promote' alcohol consumption. However, the Principle does seek to ensure that any promotional efforts advocate only legal, responsible drinking. The reference to 'legal' consumption ensures that due account will be taken of differing local laws.

E. Government and industry both have a responsibility to ensure strict control of product safety.

Commentary

This Principle is consistent with the practice of the drinks industry generally, although it does not appear frequently in company codes of conduct. It is partially derived from the 'strategies for alcohol
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action' contained in the European Charter on Alcohol, which was adopted in 1995 at a conference organized by the European Office of WHO, although it omits the latter’s reference to illicit production of alcohol.

F. To enable individuals to make informed choices about drinking, all those who provide the public with information about the health and societal impact of alcohol should present such information in an accurate and balanced manner.

Commentary

This Principle also reflects a provision in the European Charter on Alcohol, which calls for ‘valid’ and ‘impartial’ information and education to be provided, ‘starting early in life, on the consequences of alcohol consumption on health, the family and society’. However, it was felt that reference to ‘accurate and balanced’ information was more realistic than the Charter’s call for ‘impartial’ education. This Principle supports the provision of accurate information as to the possible beneficial effects (in both social and health terms) associated with moderate drinking, as well as the dissemination of information on the negative health and societal impacts of drinking.

This Principle is restricted to information ‘about the health and societal impact of alcohol’, and it is not intended to preclude advertising or marketing that seeks to promote a particular product or class of products. No information presented to the public should be designed to mislead its intended audience.

1. Advertising of beverage alcohol products should be subject to reasonable regulation, and/or industry self-regulation, and should not promote excessive or irresponsible drinking.

Commentary

This Principle recognizes the fact that virtually every country regulates advertising to some degree (if only by prohibiting misleading or fraudulent advertisements) and that advertising beverages which contain alcohol is likely to be subject to more stringent restrictions than those imposed on many other products. Numerous advertising codes have been adopted by industry groups and governments, all of which implicitly or explicitly condemn promotion of excessive or irresponsible drinking.

Given the wide range of social and economic contexts in which advertising is practised, the Dublin Principles do not address advertising issues in detail. Nonetheless, this Principle underscores that both industry and government have an obligation to ensure that advertising is responsible; it complements Principle I.D.

2. Educational programmes should play an important role in providing accurate information about drinking and the risks associated with drinking.

Commentary

Reference to educational activities addressing alcohol abuse may be found in many corporate codes, and the provision of educational information by the public health community and by members of the beverage alcohol industry about the risks of misusing alcohol seems to be common practice.

II. ALCOHOL RESEARCH: COOPERATION AMONG INDUSTRY, GOVERNMENTS, AND THE SCIENTIFIC AND ACADEMIC COMMUNITIES

Commentary

The Principles in this section are drawn primarily from existing codes of conduct and guidelines outside the beverage alcohol industry, which should ipso facto be applicable to alcohol-related scientific research. Indeed, much of the criticism of industry-sponsored research is more properly understood as criticism of bias which the recipients allegedly allow to creep into their methods or their choice of research, rather than as criticism of industry funding per se. Thus, those primarily responsible for preventing inappropriate linkages from developing between industry and science are scientists and academic institutions themselves.

The basic position of most academic institutions with respect to privately funded research would be similar to that set forth in, for example, the Harvard Faculty of Medicine’s Faculty Policies on Integrity in Science. In its statement, the school welcomes industry-sponsored research agreements, ‘which stimulate its investigators, promote
technological transfer, and provide valuable support. At the same time, it recognizes the need to avoid arrangements that might compromise, or seem to compromise, its intellectual principles and purposes and the freedom of inquiry that members of the Faculty enjoy.'

This section can only set out the most basic tenets of scientific integrity, which normally will be supplemented by more specific norms of conduct applicable to the particular researcher.

A. To increase knowledge about alcohol in all its aspects, the academic and scientific communities should be free to work together with the beverage alcohol industry, governments, and non-governmental organizations.

Commentary
Industry funding of alcohol (and other) research has been strongly criticized in some quarters in recent years. The underlying premises of the criticism seem to be either that industry money is inherently tainted and/or that it illegitimately shifts the research agenda of scientists to topics in which industry is interested, rather than topics which are directly oriented to public health issues. Of course, the same criticism could be directed against ‘anti-alcohol’ organizations and even governments, which may set their research agendas based on their own biases, popular opinion, or political expediency, rather than solely on the scientific merits of a particular project or area of investigation.

The position that industry should never fund research runs counter to current efforts by the WHO and others to view health promotion as a broad goal which needs to encompass all of the relevant actors (including private industry as well as governments, scientists, and public health professionals) in educational and other efforts. For example, the Plan of Action for Nutrition, adopted by WHO and FAO at an international conference in 1992, calls upon governments, academic institutions, and industry to ‘support the development of fundamental and applied research directed towards the improving [of] the scientific and technological knowledge base against which food, nutrition and health problems can be analysed and solved’. This Principle therefore adopts the view that scientific and academic researchers should not be restricted in working with other sectors, be they public or private.

B. The beverage alcohol industry, governments, and non-governmental organizations should support independent scientific research which contributes to a better understanding of the use, misuse, effects, and properties of alcohol and the relationships among alcohol, health and society.

Commentary
The suggested language clarifies that industry funding of research is not only legitimate but that it is desirable. It also reinforces the obligation of governments and non-governmental organizations to provide adequate support for research on alcohol’s effects on public health and society. Although the provision does not seek to impose a legal obligation to provide a specific level of support, the general commitment to support alcohol research is consistent with the concept of social responsibility set forth in the Preamble.

To put the debate over the propriety of accepting alcohol industry research funding in perspective, the relatively low level of industry-supported alcohol research should be noted. For example, the Alcohol Beverage Medical Research Foundation (the major US-based industry funder of scientific research) contributed approximately $2 million to alcohol research in 1995; the US-government-funded National Institute on Alcohol Abuse and Alcoholism spent nearly $200 million in 1996, the great majority of which was devoted to research. Of course, some advocates contend that taxes on alcohol already fund government research indirectly, so that much of the money for scientific research in effect is derived from alcohol producers and consumers.

C. The academic and scientific communities should adhere to the highest professional, scientific, and ethical standards in conducting and reporting on alcohol research, whatever the source of funding for such research.

Commentary
This statement reinforces the position that primary responsibility for the appropriate conduct of scientific research on alcohol rests with researchers rather than industry or other funders. It
is fundamental to the scientific process that results be evaluated by others, preferably through publication in peer-reviewed journals. The source of funding should have no impact on the conduct of research, although it may, in varying degrees, influence the scope of research. Of course, funders should not attempt to impose unreasonable conditions on the research that they support, as suggested by the immediately following provisions.

D. All those concerned in a research undertaking, including funders, should avoid arrangements that might compromise the intellectual integrity and freedom of inquiry fundamental to scientific research and academic institutions.

Commentary

This language is drawn from the Harvard University Faculty of Medicine’s Statement on Research Sponsored by Industry and represents the basic concern of academic institutions (and, presumably, other researchers) that industry-sponsored research should not affect the independence or undermine the scientific standards of the institution or individual researcher. This relatively broad provision would apply to conflicts of interest, inappropriate restrictions on research methodology or reporting of results, and similar potential problems. Of course, the same standards apply to government-sponsored research, as well.

1. When seeking support, scientific researchers should disclose any personal, economic, or financial interest that might directly and significantly affect the design, conduct, analysis, interpretation, or reporting of any research project.

Commentary

Openness and transparency should be hallmarks of scientific research, and full financial disclosure must be at the heart of any scheme designed to prevent conflicts of interest. This Principle focuses on the initial stage of the research process, when it is essential that potential conflicts of interest be disclosed to prospective funding sources.

The particular language in this paragraph (‘directly and significantly affect the design, conduct, or reporting of any research project’) is drawn from the US National Science Foundation’s 1995 rules on investigator financial disclosure and the US Public Health Service’s rules on conflicts of interest. Most corporate codes of conduct also contain provisions designed to avoid conflicts of interest, but the NSF and PHS formulations have the advantage of focusing specifically on the conduct of research. It might be noted that disclosure should be made of relevant personal or financial interest when seeking funding from any source, as conflicts of interest may affect research funded by governments, intergovernmental organizations, or interest groups, as well as research funded by industry.

2. Scientific researchers should acknowledge the source(s) of funding of their research activities in any report of such research.

Commentary

The requirement of acknowledging funding sources in any report or publication follows naturally on the general need for openness and transparency in research. As noted by one of the industry’s most persistent critics on this issue, ‘A policy which requires all authors to declare source of funding [industry, government, and others] and potential conflict of interest in no way impugns the integrity of authors, but readers have a right to know who pays the player.’. Editorial, ‘Playing fair: science, ethics and scientific journals’ [Addiction 90, 4 (1995)]. This approach is echoed in a review of the same topic by Plant et al., on ‘Ethics, Funding and Alcohol Research’ [Alcohol and Alcoholism 31, 24 (1996)]. The reference to ‘any report’ is intended to include oral presentations or any other way in which the results of research are reported to others.

E. Researchers should be free to disseminate and publish the results of their work. In order to protect proprietary information or trade secrets that do not have public health implications, dissemination and publication may be subjected to reasonable and ethical restrictions agreed in advance.

Commentary

Freedom of dissemination and publication of research results are fundamental characteristics of academic research institutions. A typical statement
of academic policy is that found in the Investigators' Handbook of the University of California, San Francisco, which is devoted to medicine and the health sciences:

The freedom to publish (or otherwise rapidly disseminate research results) is an inviolate principle of academia that is incorporated into University policy. The compromise of this principle is not acceptable. However, because of the nature of private enterprise and the risks underwritten by for-profit sponsors of research, contracts often contain language which allows a time-limited review period during which the sponsor may delay publication in order, for example, to decide whether to file a patent application . . . This period may be negotiable, but lengthy or unreasonable delays which have the effect of sequestering information are not acceptable.

Despite such lofty statements, recent reports have revealed troubling examples of censorship imposed by both industry and government. For example, the Journal of the American Medical Association recently published a report of work related to thyroid drugs only years after it was completed, because of opposition from the sponsoring company; see Drummond Rennie 'Thyroid Storm' [Journal of the American Medical Association 277, 16 April (1997)]. Another report suggests that, while withholding of research results is not widespread, industry-supported researchers are more likely than others to withhold or delay publication of their work: see Blumenthal et al. 'Participation of Life-Science Faculty in Research Relationships with Industry' [New England Journal of Medicine 335, 1734 (1996)].

Similarly, the US National Institutes of Health reportedly refused in 1972 to allow publication of a paper which showed that men who drank moderate amounts of alcohol had a lower risk of coronary heart disease than those who did not drink; see Seltzer 'Conflicts of Interest' and 'Political Science' [Journal of Clinical Epidemiology 50, 627 (1997)]. Dr Seltzer concluded that 'conflicts of interest and pressures on investigators need not arise exclusively from commercial organizations. A non-profit governmental agency that funds research can also suppress some of its findings, and can alter definitions and analyses to make results that originally contradict a governmental policy emerge as supportive. What should be epidemiologic science may then become political science'.

This Principle would not interfere with the hiring of any person by industry, government or an intergovernmental organization to provide expert advice, whether confidentially or publicly. Dissemination of materials developed during such consultancies may be limited by contract or otherwise, and publication would be governed by other Principles requiring disclosure of financial interests, funding sources, and possible conflicts of interest. However, this exception to the normal practice of publication or dissemination should not apply if the results of the research have significant public health implications, in which case the researcher might have an ethical obligation to disclose certain information in spite of contractual obligations requiring confidentiality.