

Master's Thesis

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Lappeenranta University of Technology
LUT School of Business and Management
Master's Degree Program in International Marketing Management

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**THE SIGNIFICANCE OF ALCOHOL INDUSTRY LOBBYING IN A LEGISLATIVE
PROCESS**

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ABSTRACT

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Title: The significance of lobbying in a legislative process

Faculty: LUT School of Business and Management

Major: International Marketing Management

Year: 2015

Master's Thesis: Lappeenranta University of Technology

130 pages, 9 figures and 3 tables

Examiners: Prof. Olli Kuivalainen

Prof. Liisa-Maija Sainio

Keywords: lobbying, alcohol industry, legislative process, marketing communications, public relations, qualitative study

The aim of this Master's Thesis was to clarify the significance of lobbying in a legislative process, that may contribute to a deeper understanding of the role of alcohol industry in political decision-making. The significance of lobbying was analyzed through the objectives of alcohol industry lobbyists, the strategies they use, and the influence of their lobbying on the legislative process. This qualitative study examined lobbying through a theoretical framework which was formulated based on models of communication process and marketing communications. Data was collected by interviewing representatives of the alcohol industry and public sector. In addition, data was collected from media sources using media analysis, and from policy-documents using process tracing method. The empirical evidence suggested that if the context is favorable for lobbying, a lobbyist is able to influence decision-makers. According to this study, the characteristics of the lobbyists, the ability of the lobbyists to eliminate competing messages, the lobbying coalitions, public opinion, and the media have a significant influence on the success of lobbying.

TIIVISTELMÄ

Tekijä: Mäkelä, Siiri

Tutkielman nimi: The significance of alcohol industry lobbying in a legislative process

Tiedekunta: LUT School of Business and Management

Maisteriohjelma: International Marketing Management

Vuosi: 2015

Pro Gradu -tutkielma: Lappeenrannan teknillinen yliopisto

130 sivua, 9 kuvaa ja 3 taulukkoa

Tarkastajat: Prof. Olli Kuivalainen

Prof. Liisa-Maija Sainio

Hakusanat: lobbaus, alkoholiteollisuus, lainsäädäntöprosessi, viestintä, markkinointi, laadullinen tutkimus

Tutkielman tarkoituksena oli selvittää alkoholiteollisuuden lobbauksen merkitys lainsäädäntöprosessissa. Tutkimalla lobbauksen merkitystä, on mahdollista ymmärtää paremmin alkoholiteollisuuden roolia poliittisessa päätöksenteossa. Merkitystä käsiteltiin lobbauksen tavoitteiden, strategioiden ja vaikuttavuuden kautta. Lobbausta analysoitaessa tutkimuksessa käytettiin tavoitteellisen viestinnän ja markkinointiviestinnän mallien perusteella muodostettua viitekehystä. Aihetta tutkittiin alkoholiteollisuuden kontekstissa Suomessa. Tutkielma on laadullinen tutkimus. Aineisto kerättiin alkoholiteollisuuden ja julkisen sektorin toimijoita haastatteleamalla sekä media-aineistosta ja politiikka-asiakirjoista. Aineistonkeruumenetelmänä käytettiin haastattelun lisäksi media-analyysia ja process tracing menetelmää. Tulokset osoittavat, että lobbauksella on mahdollista vaikuttaa poliittisten päätöstentekijöihin, mikäli konteksti on lobbaukselle suotuisa. Tutkimuksen mukaan lobbauksen tehokkuuteen vaikuttavat merkittävästi lobbaajan ominaisuudet, kyky eliminoida kilpailevien lobbaajien viestejä, lobbaajista muodostuvat koalitiot sekä media ja kansalaismielipide.

ACKNOWLEDGEMENTS

I would like to express my gratitude to the people who supported me to complete my Master's Thesis.

I would like to thank Professor Olli Kuivalainen for his valuable feedback and helpful tips. In addition, I would like to thank Professor Liisa-Maija Sainio for her advice.

I would also like to thank my family and friends for their constant support and encouragement. I feel very privileged to know you all. Thank you!

Helsinki, December 2015

Siiri Mäkelä

"Laws are like sausages. It is better not to see them being made."

John Godfrey Saxe (1816-1887)

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1 INTRODUCTION

1.1 BACKGROUND

Lobbying has become a part of companies' strategic management (Jaatinen 2003, 174). Lobbyists are the most experienced, knowledgeable and strategic professionals operating in the arena of politics (Hall & Deardorff 2006). As marketing communication is increasing and the means of it are extending, it becomes an important subject of research (Kantola & Lounasmeri 2014). The significance of public affairs has increased in recent years in the United States and Western Europe and even in Finland. The communication of social actors has become more professional and careful. In addition, the means of communication have become more diverse. (Kantola & Lounasmeri 2014) Nevertheless lobbying can facilitate better-informed legislation and through that to promote economic productivity and growth. In addition, lobbying can be seen as an instrument aligning management and shareholder interests and thereby enforce the corporate performance. (Mathur, Singh, Thompson & Nejadmalayeri 2013)

Lobbying is a part of democratic processes, and a way for an industry to have its own voice heard. However, certain industries make profit with products that are significant from the perspective of public health. Alcohol industry is one of these industries. As a matter of fact, alcohol industry lobbying is often compared to the lobbying of tobacco industry. In both cases, there is a conflict between industry profits and public health. Hence the attitudes of alcohol industry and the health sector towards the restrictions in alcohol marketing are opposing. Due to its size and power in national and in global level, but most importantly due to its significance in public health, alcohol industry is a business that needs careful examination.

Alcohol researchers and nongovernmental organizations in Finland and in Europe have supported the restriction of alcohol marketing, while alcohol industry has strongly lobbied against them. The struggle between these parties has taken place

in different arenas such as in media space and in working groups. This study will examine the significance of alcohol industry lobbying in a legislative process.

The empirical section of this study examines Finnish alcohol industry lobbying from 2004 until 2015. The timeline of the legislation process addressed in this thesis begins from the year 2004 and continues until the year 2015. The year 2004 is selected as the starting point since remarkable changes were executed in the Finnish alcohol policy that year. During 2004, Estonia became a member of European Union and the restrictions in passenger alcohol import were removed, which had an influence on the situation in Finland. However, the main focus is on the time period from 2010 until 2015. In 2010 a proposition to prohibit the mental image marketing of alcohol beverages was made. Based on the scientific evidence, alcohol marketing influences the consumption of alcohol of youth. Over half of the members of the parliament and several experts supported the proposition. However, it was viewed that there is no need for further restrictions on alcohol marketing and the proposition was rejected.

In the same year it was again suggested to forbid the mental image marketing, which was supported by experts in several working groups. After circulation of a proposal, the suggestion to forbid mental image marketing was changed into the prohibition of outdoor marketing and restriction of social media marketing. The subject has raised a lot of attention in media and social media. Alcohol industry has lobbied actively throughout the process. This study evaluates the objectives alcohol industry lobbyists had during the legislative process. In addition, the strategies and tactics exploited by the industry are examined. Most importantly, this study will contribute to the evaluation of lobbying effectiveness.

Part of the empirical material, including two interviews, of this study was collected as part of a University of Helsinki working group report of alcohol industry lobbying strategies. The report was ordered by Finnish Association for Substance Abuse Prevention (Ehyt ry). This thesis is an independent study and does not have any linkages with the Finnish Association for Substance Abuse Prevention.

1.2 OBJECTIVES AND RESEARCH QUESTIONS

Lobbying has been a subject of research since 1950's. Lobbying is a subject that has raised interest in the field of economic theories, political theories, management theories and in communication theories. However, the most important fields of study in regards to lobbying are communication research and political research. (Jaatinen 1999, 9) Lobbying has traditionally been studied from the perspective of political sciences. Political theories that have analyzed lobbying include for example corporatism, pluralism, conflict theory and constitutionalism. These theories are often based on the divergent interests of different actors in society. Political theories often study the effects of lobbying, while management theories concentrate for example on management systems and crisis management. Lobbying has also been studied from the perspective of mathematics. This perspective has generated several mathematic and economic theories that have focused on lobbying as an exchange of advantages or information between decision-makers and interest groups. However, these theories are hardly utilized by the lobbyist in real life situations. Many of the theories of lobbying tend to ignore the elements of business. (Jokinen 2000; Jaatinen 1999, 5)

Particularly mathematical theories tend to suggest that lobbying is a process of exchange. As a matter of fact, lobbying theories can be categorized as either exchange- or resource dependence theories. Exchange theories propose that lobbying is a series of inter-organizational exchange between private and public actors. On the other hand the resource dependency view suggests that organizations are dependent of external resources, and for that reason engage in lobbying. (e.g. Pappi and Henning 1999, Lewine & White 1961, Blau 1964, Aldrich & Pfeffer 1976) Comparative lobbying is a research trend that focuses on lobbying in more than one country, and also takes into account variables that vary depending on the case (Kanol 2015). Recently comparative lobbying has taken into account the different features in different countries such as cultural differences and institutional features (e.g. Gao 2006; Yadav 2011). In contrast, the present study addresses only one regional case.

According to Lester Milbrath (1960) lobbying is fundamentally a communication process in which a lobbyist needs to find the most effective way of communication. The effectiveness of communication is determined by the elements of the communication process, namely: the sender, message, channel and context (Jaatinen 1999, 745). Milbrath (1960) is one of the classic researches of lobbying studies. Milbrath (1960) defines lobbying as a communication process between a governmental decision-maker and another actor, other than a citizen acting for his/her own interest. In her study, Milbrath (1960) analyzed lobbying with a quantitative survey of Washington lobbyists. It has to be taken into account that the communication model itself does not explain all of the complexities of lobbying and variables in decision making. However, the communication model does include the variables of the lobbying process. The function of the lobbyist is completed when he/she has communicated in the most effective way. (Milbrath 1960)

In this study lobbying is analyzed by means of traditional communication process since lobbying is communication between the lobbying actor and the decision-maker. However in this study lobbying is considered to be both direct and indirect. Communication research usually views lobbying as external communication of or an organization (Jaatinen 1998). In this study both political and management theories are utilized. In contrast to many other theories of lobbying, this study considers lobbying as public relations. The theoretical framework is shaped based on communication and marketing communications theories.

In marketing research lobbying is a part of marketing communications (Kotler 2000). Marketing communications is often illustrated by variations of the traditional model of communication (e.g. Shannon 1948; Hollensen 2004). As such, lobbying can be presented as a communication process. Marketing communications seek to provide information for stakeholders. Public relations, as a part of marketing communications, covers tools that companies utilize in their external communication. Lobbying can be considered as one of these tools. The objective of public relations is to earn public understanding and acceptance. (Hollensen 2004, 557, 561, 570) In the literature of public relations, lobbying is not highlighted but rather is ignored or only

briefly mentioned. However, lobbying is a vital part of public relations since it composes of communication with the decision-makers, whose decisions influence the political operational environment of the company. The reason for the lack of consideration of lobbying in the literature of public relations, could be explained by the fact that lobbying is not often studied in marketing research, but rather in political research. The word “public” in public relations refers to the groups to whom an organization communicates. Here, public can refer to internal groups such as potential customers or external groups such as media. From the lobbying point of view, public relations refers to communication with the decision-makers. The concept of public relations is examined more closely in the chapter 2.2.1.

To the knowledge of the author, there are no existing studies that examine lobbying as a tool for marketing communications. Existing lobbying models often lack the communication point of view. In addition, there is a lack of lobbying research in the field of marketing communication. The present theoretical framework, that has been formed based on the model of communication by objectives and the marketing communication model, is a unique way to examine lobbying. In addition, the case under examination is unique, and has not been analyzed through lobbying as communication process. This study considers both the perspective of the lobbyists and the subject of the lobbying. The empirical section also covers the analysis of media discussion and the legislative process. Multiple data collection methods make the study more reliable.

Many of the studies addressing lobbying agree that lobbying aims at influencing public policy in order to achieve political results that serve the interests of the lobbyists (eg. Jaatinen 1999; Åberg 1989; Mahoney 2007; Klüver 2011). The decision-makers are the subjects of lobbying, since lobbyists want to achieve policy outcomes that correspond to their interests (e.g. Mahoney 2007; Klüver 2011; Milbrath 1963). Organization’s lobbying activities are also justified by the need for information (Jokinen 2000, 205). Hence lobbying can be seen as an activity that carries out information gathering, analysis and transmission (Jaatinen 1999). When it comes to the strategies lobbyists utilize in their communication, there is a consensus among studies that the strategies can be divided into direct and indirect means. Hillman

and Hitt (1999) propose that the elements that classify different strategies can be identified as information, financial incentives and constituency-building. It is topical and important to evaluate whether the Finnish alcohol industry utilizes the identified strategies in its lobbying activities.

The evaluation of the determinants of lobbying effectiveness is complex. Dür and de Bievre (2007) suggest that lobbying success is determined by the context of political institutions and the characteristics of the political issue. Some researchers suggest that the information lobbying actors are the key determinants for the success of the lobbying (eg. Austen-Smith 1993; Taminiau & Wilts 2006). Furthermore, contextual factors have often been suggested as determining factors for the effectiveness of lobbying. More novel findings propose that ad hoc coalitions formed by lobbyists are important factors in regards to lobbying effectiveness. (eg. Klüver 2007; Jaatinen 1999; Nelson & Webb Yackee 2012; Mahoney 2007) According to several studies, lobbying coalitions have a greater impact on policy outcomes than individual groups of lobbyists (e.g. Nelson & Webb Yackee 2012; Mahoney 2007). In addition, the size of the lobbying coalitions correlates with lobbying success (e.g. Klüver 2011; Nelson & Webb Yackee 2012). The concepts of lobbying objectives, strategies, effectiveness and coalitions are examined more closely in chapter three.

Lobbying in the context of alcohol industry has not been studied extensively. Anderson and Baumberg (2005) have studied what the role of alcohol industry is considered to be by the industry itself and the Government officials and non-governmental organizations. The study reveals the conflict of interest between alcohol industry and its stakeholders. Hence alcohol industry lobbying is very important and a topical subject of research. Industry involvement in research activities has also been studied in the context of alcohol industry (e.g. Babor 2008). In the context of alcohol industry lobbying in Finland, there are few master's theses addressing the subject, but there is clearly a demand for broader research (e.g. Tikkanen 2015). Different perceptions of the role of the alcohol industry together with the national health perspective create a conflict of interests in regards to alcohol policy. Concerning the lobbying of alcohol industry, the conflict between public health and industry profit are actual. Hence there is a significant need to evaluate the significance of alcohol

industry lobbying in the legislative process. In addition, the general influence of economic life in politics is undeniably growing, which makes this subject vital to research.

In Finland alcohol industry lobbying is a very topical subject of research since the new restriction of alcohol beverage marketing came into effect in the beginning of 2015. It can be viewed that the process of new regulations in regards to alcohol marketing and sales began in the year 2004, when Estonia became a member of European Union. During the legislation process different policy proposals in regard to alcohol marketing were presented. It is interesting and necessary to examine whether the lobbying of alcohol industry had any effect on the policy outcomes, and what kind of effects it possibly had. Hence it is important to identify the objectives the alcohol industry had together with the communication strategies they used in the lobbying activities.

The purpose of this master's thesis is to closely examine the objectives of lobbyists, the strategies they use, and the influence of their lobbying on the legislative process. The aim is to clarify the significance of alcohol industry lobbying in a legislative process, that may contribute to a deeper understanding of the role of alcohol industry in political decision-making. The significance of lobbying is based on the objectives, strategies and influence of lobbying and thus analyzed through these concepts. The theoretical framework in this study is based on communication theories. Hence this study will analyze lobbying as a part of an organization's marketing communications. This study views lobbying from the perspective of both the lobbyist and the decision-maker.

This study will offer empirical evidence on the objectives, strategies and influence of lobbying. The empirical evidence will provide information about the significance of lobbying in a legislative process in the context of alcohol industry lobbying in Finland. The subject of research is the legislative process and the media discussion in relation to this process. The study focuses on the viewpoints of all the key actors, including the lobbyists, public servants, decision-makers and the lobbying coalitions.

As such, the main research question is formulated as follows:

What is the significance of alcohol industry lobbying in the legislation process?

And the three supporting sub-questions are:

- 1. What kind of objectives do the lobbyists have?**
- 2. What kind of strategies do the lobbyists use?**
- 3. How can the effectiveness of lobbying be evaluated from the perspective of the lobbyist and the decision-maker?**

With respect to the research questions, each data collection method makes a contribution. From the interviews it is possible to identify the perspective of the lobbyist and the decision-maker. Media discussion is analyzed in order to find out the message the lobbyists want to send. By analyzing the message it is possible to clarify the objectives the lobbyists have. In addition, the analysis of the media discussion identifies the lobbyist. By observing the media discussion, it is also possible to examine the noise in the communication process, which in this case refers to the competing messages. In addition, media is one of the channels through which the message is sent. From the perspective of the lobbyist, lobbying through media is a way to influence the public opinion, which may in turn influence the political decision-maker.

By means of legislative process examination it is possible to evaluate the influence of lobbying. The influence can be estimated by analyzing how the sent messages are visible in the outcomes of the legislative process. The statements given during the legislative process also identify the message the lobbyists want to send. Interviews are used to disclose the viewpoints of the sender and the receiver in regards to lobbying objectives, strategies and effectiveness.

1.3 DEFINITIONS OF KEY CONCEPTS

Lobbying is basically based on a traditional model of communication process (Shannon 1948). Lobbying can be seen as a part of external marketing communications located under the concept of public relations (Harris & Lock 1996). Lobbying is traditionally defined through the lobbyist, the message and the subject of lobbying. According to Milbrath (1963, 7-8) lobbying can be defined as promoting communication and conveying messages. According to Milbrath (1963, 7-8) lobbying is targeted at the decision-makers and aims at influencing the decision-maker's decision. Lobbying can also be defined as a process through which a company pursues responding to the threats and opportunities of the political or legal environment (Jaatinen 2003, 174). According to Jaatinen (2003, 18) the target groups of lobbying are political decision-makers, public servants, competing lobbyists, media, citizens, and the own interest groups of the lobbyists. Lobbying has an important role in democratic processes. In addition to the official political institutions, also other interest groups take part in the political processes. These actors include for example employers' organizations, civic organizations, activists, media, citizens, economic life and interest groups. (Herkman 2011, 16) In this thesis the subjects of lobbying are political decision-makers that is the receivers of the messages.

In the subsequent text, the key concepts applied in this study are defined. The key concepts are lobbying, legislation process, alcohol industry, communication, marketing communication, and public relations. Concepts and their relations are presented more closely in the chapters 2 and 3.

Communication: The basic model of communication includes the following elements: sender, receiver, message and channel (Shannon 1948, 380).

Marketing communications & Public relations: Marketing communication process consists of the same components as the communication process. Marketing communication provides information to stakeholders. In this study public relations is seen as a part of marketing communications. Public relations can be defined as the management of relationships that are strategically important (Hutton 1999). Public

relations is part of marketing communications and includes tools to communicate with the interest groups (Hollensen 2004, 557-559).

Lobbying: In this thesis lobbying is part of a company's marketing mix. This thesis defines lobbying from the perspective of lobbyists and the subject of lobbying. In this thesis lobbying is defined as the activity through which the stakeholders can influence society by affecting the operational environment, so that the circumstances would be favorable for them. Hence lobbying is defined as external communication aiming at causing an effect on the receiver. Through lobbying one can pursue, for example, direct financial benefits or the removal of barriers for business. (Jaatinen 2000, 173) In this study, lobbying refers to attempts to influence public policy through political decision-makers, public servants, competing lobbyists, media or citizens. A *lobbyists* is an actor or group of organized actors with common goals that aim at influencing the decision-maker's decision (Jaatinen 1999, 15). Lobbyists can be an individual, an interest group, an organization or a lobbying coalition. Lobbying coalitions are ad hoc informal or formal groups of lobbying actors that lobby on the same side. In this study the lobbyists is the alcohol industry in Finland and its coalitions.

Lobbying can be executed by various means. In this study, the means of lobbying are divided in two groups. The first group includes the means by which lobbyists directly influence the regulators. The second group includes the means by which lobbying is done indirectly, referring to lobbying done through media, social media, public opinion, research, financial incentives, networks and philanthropy. In this study means of lobbying refer to the strategies and tactics lobbyist use. Different strategies of lobbying include variety of tactics. Objectives of the interest groups refers to the effects the interest groups wish to achieve in regards to the legislative process. In this study the effectiveness of lobbying is evaluated by comparing the pursued effects of lobbying with the achieved effects of lobbying and by identifying the factors that influence the effectiveness.

Alcohol industry: In this thesis alcohol industry refers to the companies whose product portfolio includes alcohol beverages and who operate in the Finnish alcohol markets. In this thesis alcohol industry lobbying often refers to the lobbying of the Federation of brewing and soft drinks industry, which is an interest group of Finnish alcohol industry. The analysis of the lobbying of the organizations who support the restrictions on alcohol policies are excluded from this thesis due to the scope of this study.

Legislation process: In Finland the parliament holds the legislative power. The legislative process usually starts with introducing a bill which is followed by preliminary preparation. The laws are prepared in the ministry which possess the jurisdiction on the matter in question. The preliminary process ends with the decision to begin or close the law-drafting. If the decision is to begin the law-drafting, the phase of basic preparation takes places in an organ named by the ministry. This organ usually is a committee or a working group. In this phase the organ consults the interests groups, public servants and experts that are not represented in the organ, which is an important phase from the perspective of law formulation. The following phase is to request written statements from the interest groups. Based on the statements, the contents of the draft of the government's bill is determined. Government's proposals are given to the parliament after the decision of the parliament. The government can reject or approve the proposal with simple majority. (Finlex 2015) In this thesis policymakers or decision-makers refers to the members of the parliament and to the members of the committees or working groups.

1.4 THEORETICAL FRAMEWORK

Lobbying is considered as communication and evaluated through models of communication. In order to form the theoretical framework of this study, models of communication and marketing communication are utilized and completed with the elements of lobbying. The theoretical framework is based on the communication by objectives model of Wiio (1972, 35) and the traditional model of marketing communication. Objectives of the interest groups play a vital part in lobbying and guide the communication process. In the model of Wiio (1972) the effectiveness of lobbying is

evaluated through the comparison of the pursued effects with the achieved effects. This definition of lobbying effectiveness is also applied in this thesis. According to the traditional model of marketing communication, presented for example by Hollensen, (2004, 559) the factors influencing lobbying is the context in which the lobbying is executed, and the noise which diverts attention from the message. The strategies of lobbying are presented in the phase of communication channel based on the categorization of Hillman & Hitt (1999). The communication models of Wiiio (1972) and Hollensen (2004) and the lobbying strategies of Hillman & Hitt (1999) are presented in the following chapters.

In this study the context of the theoretical framework is legislation. In this theoretical framework the sender of the message is the lobbyists and its coalitions. The message can be send through different channels that can be either direct or indirect. Messages that are send through direct channels can be categorized as information or financial incentive strategies depending on the nature of the elementary resource on which the message is based. Messages that are send trough indirect channels target political decision-makers through constituency support. In this framework the receiver of the message is a political decision-maker. The noise disrupts the message and influences the effectiveness of the message. The noise can be either internal or external. This framework assumes that the lobbyists always has some kind of objectives that guide the communication process. The message is considered effective if it causes changes in the receiver's behavior, attitudes, opinions or knowledge. The effectiveness can be evaluated by comparing the pursued effects with the achieved effects. According to this framework the significance of lobbying is formulated in the process where the message reaches the receiver. (Hillman & Hitt, 1999; Wiiio 1972; Hollensen 2004) The theoretical framework of this study is presented in figure 1. In this thesis lobbying is evaluated from the perspective of the lobbyist and the decision-maker that is the sender and the receiver.

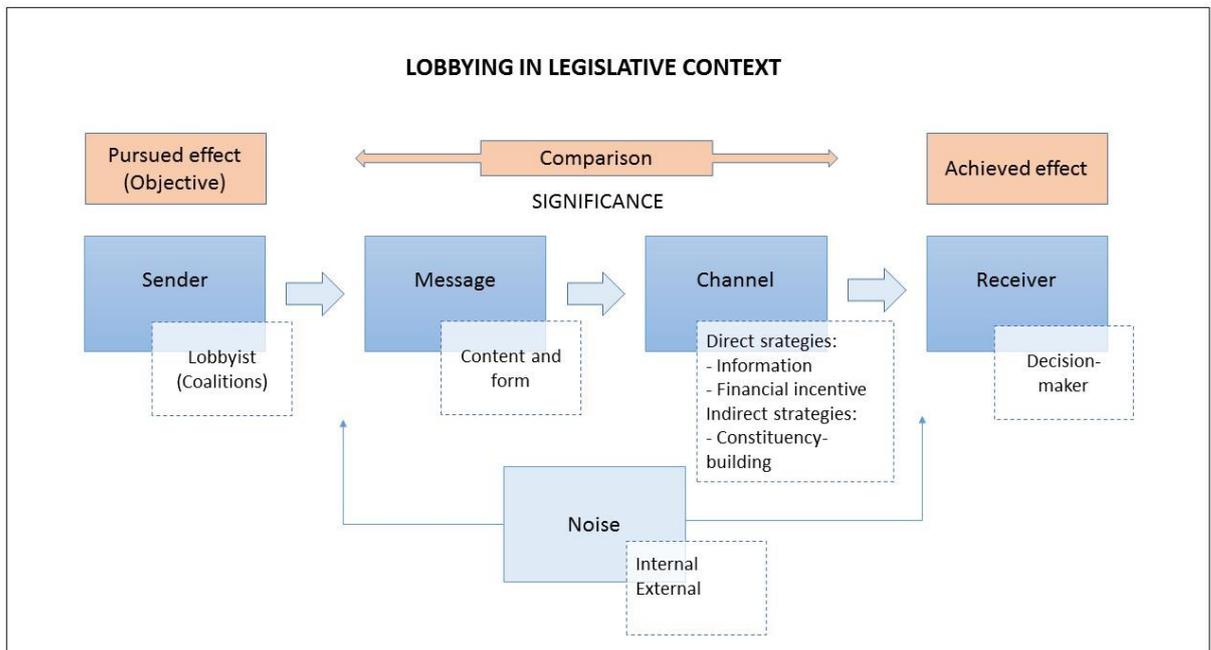


Figure 1. Theoretical framework

1.5 DELIMITATIONS

The model of communication is very general and does not take into account all the complex features of lobbying and does not explain the choices between different strategies (Jaatinen 1999, 82). However, this study does not concentrate on the evaluation or strategy choices, but rather on the general significance of lobbying in the legislative process. The impact of lobbying, and therefore the significance of lobbying, is influenced by the characteristics and resources of the lobbying actors (Dür & de Bievre 2007; Austen-Smith 1993; Fainsod 1940; Dahan 2005). The resources the lobbying actors possess and the coalitions they form cannot be comprehensively observed since some of the information is available only from the interviewees, and their honesty cannot be verified. The same issue apply to the objectives of lobbying too. Furthermore, it is very challenging to evaluate the significance and the effectiveness due to the complexity of the phenomenon. The effectiveness is evaluated through the comparison between the objectives and the achieved effect. The objectives of interest groups may vary due to the changes in the operational environment, which makes the assessment of effectiveness difficult.

This study examines lobbying in a legislative context and more closely in the context of alcohol industry. The context of lobbying is an influential factor in regards to the significance of lobbying (Jaatinen 1999). Therefore the results of this study may not be generalizable to other contexts of lobbying. In addition, the industry examined is peculiar since it is more closely regulated due to the concerns for public health. Nevertheless, the results of this study are valid in the context of alcohol industry lobbying in Finland. The theoretical consideration of lobbying as a marketing communication in a legislative context may be generalizable within the same context. However, industry influence is a subject that needs to be studied in an issue-specific context (Rasmussen 2014). The value of the results is increased by several data collection methods of the empirical section.

The factors that influence the outcome of the lobbying process also include the efforts of the opposing lobbying actors, which in this thesis are referred to as 'noise'. In this study the lobbying efforts of the 'health sector' are not carefully studied due to the scope of this study. However, in this study the noise is still identified.

The present subject of research is politically very sensitive, which sets boundaries to the interviews. It has to be taken into consideration that the interviewees do not necessarily tell the truth. It is very hard to get a comprehensive picture of the subject due to the various different and opposing interests and objectives. This is why several empirical sources are utilized. Interviews as a data collection method are complemented with the analysis of the legislative process and the media discussion. It is difficult to describe the significance of lobbying. Therefore the objectives and strategies of lobbyists are carefully examined and the effectiveness of lobbying is evaluated. In addition, the weakness of interviews as a data collection method is that they are not repeatable. The interviewer may not pose the right questions and the phrasing of the questions may steer the interviewees. In regards to a subject that is politically sensitive, reliable results from interviews are hard to get. The possibility of the lobbyists not willing to express their influence is discussed in the last chapter.

1.6 METHODOLOGY

The theoretical section of this thesis is formulated by collecting and analyzing a vast amount of literature from the fields of marketing management, communication and political sciences. The research field relating to lobbying is examined through academic studies and theories. A multidisciplinary perspective is used in order to theoretically understand lobbying as communication and as a part of marketing communications. To form a comprehensive picture of the significance of lobbying, studies from different fields of science are utilized. The key concepts of this study are communication, marketing communication, public relations, lobbying, coalitions, effectiveness, and objectives are examined by utilizing theoretical studies from the fields of communication, marketing and political sciences in order to create a theoretical basis for understanding the present case. The source material is collected from LUT's databases and from the databases of University of Helsinki. In addition, some printed books and internet sources are utilized.

The research method of the empirical section is qualitative in nature. Qualitative methodology was chosen for this study since the purpose of this study is to explore the significance of lobbying, which consists of the objectives and strategies lobbyists use and the influence lobbying has. The significance of lobbying in a certain context is a very complex subject to evaluate and it consists of multiple factors. Thus it is hard to evaluate the significance of lobbying in quantitative methods. A qualitative method is suitable for this study since qualitative research method examines the subject as comprehensively as possible (Eskola & Suoranta 1998, 120). The qualitative approach of this study may be referred to as a case study. In a case study, detailed information of a single phenomenon is collected. In a case study a phenomenon, occasion or a group of occasions is chosen as the subject of research. Processes are often the subject of interest, and occasions are examined in their own context as an individual case. Typical data collection methods are triangular, namely interviews, research of documents and observation. Commonly the aim of a case study is to provide a description of a phenomenon. (Hirsijärvi, Remes, Sajavaara 2009, 134-135)

In this thesis several data collection methods is used, to which the concept of triangulated data refers. In the studies regarding lobbying, the typical data collection method used is interviewing. The phenomenon examined in this study is complex and politically sensitive. Hence, to form a comprehensive picture it is important to collect data from multiple sources. In addition to interviews the data is collected from different media sources utilizing media analysis and from political documents utilizing process tracing. It has to be taken into account that interviews alone as a data collection method may not provide comprehensive results, since the interviewees do not necessarily tell the truth in regards to a matter that is politically this sensitive. The political sensitivity of the subject is also the reason for multiple perspectives. By identifying the perspectives of both the lobbyist and the decision-maker it is possible to form a more comprehensive picture of the phenomenon. Due to the conflict between industry profits and public health the viewpoints of towards lobbying differ substantially. In addition, the evaluation of lobbying effectiveness is impossible without the perspectives of both the lobbyists and the decision-maker since the lobbyists aims at influencing the decision-maker. Hence it is important to address both the perspective of the lobbyists and the decision-maker.

The data is collected from primary and secondary sources. The interview method of this study is semi-structured theme interview. Semi-structured theme interview was selected as a method for this study because it allows the interviewees to express themselves freely. In the semi-structured interview, the interviewees answer to the set questions in their own words (Metsämuuronen 2006, 115). In this study all the interviewees do not answer to exactly the same questions, but the themes remain the same. In this study the interview data is a small amount of cases which are analyzed as closely as possible. The sufficient amount of data in a qualitative study is based on the amount that is deemed necessary from the perspective of the subject of research. The validity of the data is not based on the quantity but the quality of the data. (Eskola & Suoranta 1998, 60)

1.7 STRUCTURE OF THE THESIS

This study consists of two main parts. Chapters 1-3 form the theoretical part and are based on an extensive literature review concerning communication theories, marketing communications and lobbying. The empirical part is presented in the chapters 4-6. The structure of the thesis is presented in the figure 2.

In the first chapter, the motivation for this thesis is provided by pointing out the research gaps in the existing literature. Here the need for this thesis is further emphasized by presenting the fact that it is very important to consider whether it is possible to influence legislation by means of lobbying in the context where there is a public health perspective and scientific evidence involved.

Chapter 2 examines the theoretical contributions of communication research and marketing communications. Subsequently the concepts of lobbying objectives, strategies, effectiveness and coalitions are examined in the chapter 3. These concepts create a basis for this thesis, and based on these concepts it is possible to answer the research questions from the present theoretical point of view. In the end of this chapter, research related to the context of this study, namely alcohol industry lobbying, is presented.

Chapter 4 provides the rationale for the chosen research methods. In this chapter the methods of empirical data collection are represented and the data collected is described. Chapter 5 presents the findings and empirical results of this study. The last chapter summarizes the results of the research questions stated in this thesis from an empirical and theoretical point of view. In addition the limitations of this study are indicated and the directions for future research are pointed out.

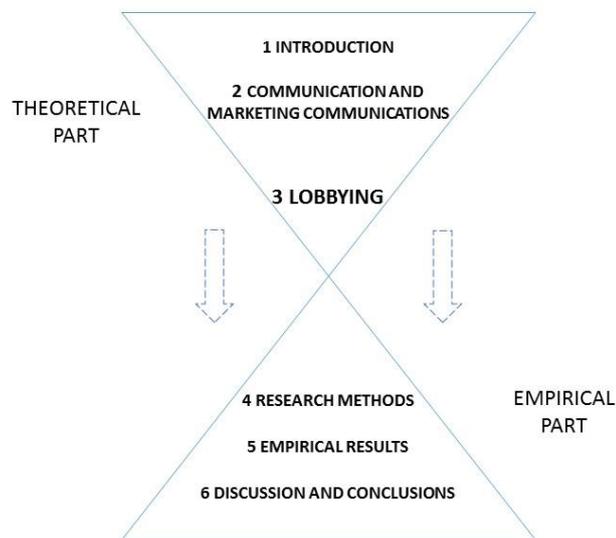


Figure 2. Structure of the thesis

2 COMMUNICATION AND MARKETING COMMUNICATIONS

2.1 COMMUNICATION THEORIES AND PROCESSES

Communication process is a fundamental way to examine communication. The basic elements that create the communication process are sender, receiver, message and channel. In addition, a variety of other factors play a part in the communication process. The traditional communication model is based on the Shannon's (1948, 380) communication process, which has been adapted to answer the features of human communication. Basically the process of communication begins with the sender wanting to send a message to the receiver. For sending the message, a sender needs to possess the ability to communicate. The communication is effected by noise and contextual factors. The contextual factors are related to the communication situation. The noise is either internal or external and has an effect on the communication, transmission and the interpretation of the message. External noise refers to disruption in the channels. Internal noise refers to factors such as opinions

and attitudes of the receiver. Hence the noise transforms the message from its original form. (Wiio 1989, 75-76, 79-80) In this study lobbying is examined from the perspective of communication.

The communication theory of Shannon (1948) is based on information theory. It has to be taken into account that in the statistical information theory, the semantics and the significance of the message do not play a part. Hence Shannon's theory is basically a theory about transferring signals. (Niiniluoto 1988, 30, 13). The model of Shannon represents one-way communication. According to Wiio (1994) communication is the exchange of information between people. Wiio's (1972) communication model addresses the role of communication in regards to achieving the desired influence.

There are many variations of the traditional communication process. Wiio (1972, 35) presents a model of communication by objectives. The model is based on the causation between the elements of communication and the pursued influence. This kind of approach views communication as an objective-directed process. The objectives of communication may be to change behavior, attitudes, opinions or information of the receiver. The message with the pursued effect defines the other elements of communication. According to the model of Wiio (1972, 35) the different factors that have an effect on the communication can be divided into constraints and optional factors. The constraints include timing, noise, target group or audience, sender of the message, competition and resources. These factors are mostly unchangeable. However, these factors should be examined since they have an effect on the optional factors. The optional factors include time-span, channels, and the message content and form. (Wiio, 1972, 35-36) The elements of objective based communication are presented in the figure 3.

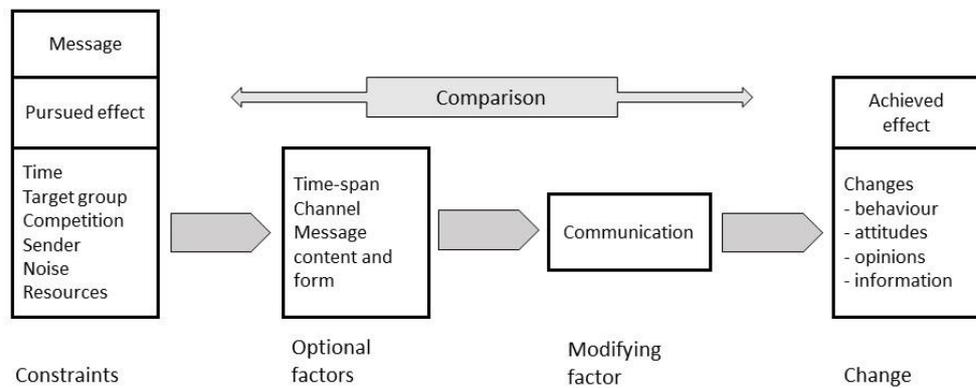


Figure 3. Model of communication by objectives (replicated from Wiio 1972, 35)

There are multiple channels through which the message can be sent. The channels can be direct or indirect. The target audience and the competing messages should be taken into account when selecting the channels. The communication is actualized in regards to the target audience and the channels. The effects of the communication cause the change in the receiver's behavior, attitudes, opinions or information. In order to complete the process, the achieved effects should be compared with the pursued effect. Thus it is possible to observe the effectiveness of communication. (Wiio, 1972, 35-36)

The model of Wiio (1972) has been criticized as excessively general in nature. In addition, the model of communication by objectives has been criticized because it does not fully explain the choices between distinct communication strategies. The categorization of target audience into constraints is problematic since the communicator is not able to select the audience, which makes the model tactical rather than strategic. Strategic communication includes the segmentation and selection of the target group. (Jaatinen 1999, 82) However, in this study the selection process of communication strategies is not examined. In addition, the analysis of the target

group selection by the lobbyist is excluded due to the scope of this study. However, in this study it is assumed that the lobbyist is able to choose the target audience.

Lobbying is basically communication between the lobbyist and the decision-maker. Hence it is justified to examine lobbying through the communication process. However, there is a lack of models of lobbying from a communication perspective (Jaatinen 1999). One of the first well-known studies of lobbying from perspective of communication was carried out by Lester W. Milbrath (1960). Milbrath (1960) addresses lobbying as communication in the survey of Washington lobbyists. According to Milbrath (1960) the lobbying process is basically a communication process in which the lobbyist needs to find out the most effective ways to communicate with the decision-makers. Lobbying is defined as direct and indirect activities that an enterprise or non-governmental organization utilizes in order to influence public policy decision making. Hence lobbying can be defined as “...*an action designed to market any intangible idea aimed at influencing public decision making*”. (Jokinen 2000, 10) Certain objectives always guide lobbying; therefore, the model of communication by objectives is a suitable offset for examining lobbying.

2.2 MARKETING COMMUNICATIONS

Models of marketing communications are typically based on the traditional communication process (e.g. Duncan & Moriarty 1998; Broderick & Pickton 2001; Hollensen 2004). Marketing communications is a term for all the functions that communicate the operations of the organization for all the stakeholders. The competitive advantages of marketing are often associated with the model of 4 p's. The traditional competitive advantages of marketing, including product, price, place and promotion, are often called as marketing mix. The concept of marketing mix was presented by Neil Borden in the 1950's and the concept of 4 p's was later introduced by Edmund Jerome McCarthy in the 1960's. The model is widespread and is based on the short term customer relations, ignoring the long term relationships. In regards to the tra-

ditional view of marketing communications, this lobbying is considered a part of marketing mix, commonly located under the concept of promotion or marketing communications. (Puusa, Reijonen, Juuti & Laukkanen 2013, 101, 115)

The role of marketing communication is to provide information to stakeholders. (Hollensen 2004, 557) Effective marketing communication includes the same components as the traditional communication process of Shannon (1948). Like many others, Hollensen (2004) utilizes the traditional communication process as the basis for his marketing communication process. According to Hollensen (2004), in order to send an effective message, the sender should be aware of the ultimate purpose of the message. In addition, the sender should recognize the audience and should be aware of how the audience will interpret and respond to the message. Moreover, the sender should take the 'noise' into account. Noise refers to rival messages that distract the original message. Due to noise the receiver may not hear the message properly. In addition, the context where the message is sent has a significant influence on the effectiveness. Also factors such as sociocultural differences and regulatory differences influence the communication situation. (Hollensen 2004, 559) The elements of the marketing communication process are presented in the figure 4.

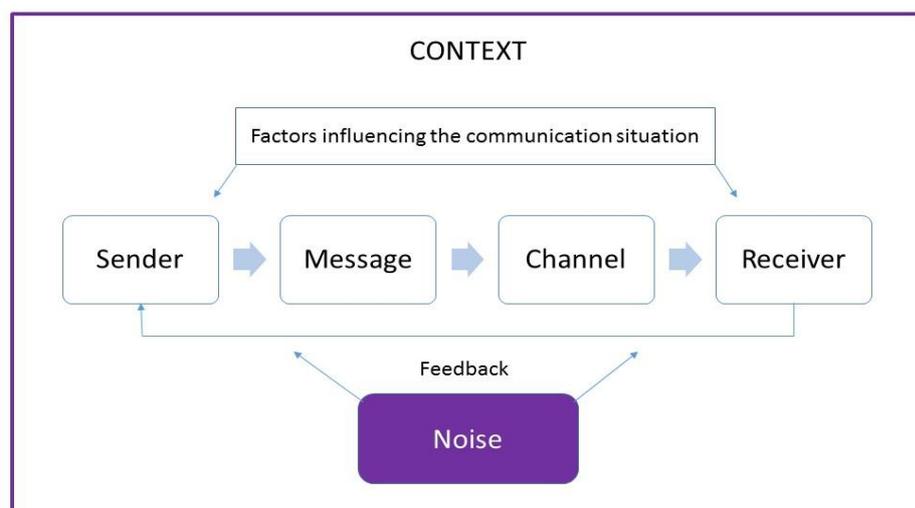


Figure 4. Elements of the marketing communication process (adapted from Hollensen 2004, 559)

Typical communication tools that companies utilize in marketing communications can be divided under the concepts of advertising, public relations, sales promotion, direct marketing and personal selling. The purpose of public relations is to enhance corporate image. Public relations executes functions that seeks to earn public understanding and acceptance. (Hollensen 2004, 561, 570) According to Kotler (1978) the relationships between marketing and public relations can be seen in different ways. Kotler (1978) states that marketing and communication can be seen as separate but equal functions, but also as equal and overlapping functions. They can also dominate each other or be considered as a same function. (Kotler 1978)

2.3 LOBBYING AS A PART OF PUBLIC RELATIONS

In the 90's public relations (PR) was defined as a management function. Based on this definition, the objective of public relations was to achieve and sustain mutually beneficial relationships between the company and the publics who are able to influence the success or failure of the company. (Cutlip, Center & Bloom, 1994, 2) Also Grunig (1993) highlights the mutually beneficial relationship. According to Grunig (1993) public relations is based on the exchange between the organization and the paramount public, hence public relations need to benefit both parties (Grunig 1993). Public relations has also been inspected from the perspective of corporate responsibility (e.g. Wilson 1994). Hutton (1999) suggests the definition of public relationships to be "managing strategic relationships". According to Hutton (1999) public relationships can be used in persuasion, advocacy, education, crusade, providing information and in reputation management.

Many researchers agree that public relations seeks to maintain and reinforce the mutual understanding between the company and the society (Puusa, Reijonen, Juuti & Laukkanen 2013, 118). Within the research there is a mutual conceptualization of public relations aiming to have an effect on the relationship between the organization and the society. Thus public relations is often seen as communication between the organization and the public. Hollensen (2004) addresses public relations as a

form of marketing communications that includes tools that can be utilized to communicate with interest groups. In the case of lobbying marketing communication is mainly external communication, and it is addressed in the present study as such.

Based on the definitions in reviewed literature of public relations, it can be concluded that lobbying and public relations are similar functions in many ways. Lobbying aims at influencing public policy through interest groups. Public relations aims at sustaining good relations with the interest groups that can influence the company. Both functions can be seen as mutually beneficial. However, lobbying has not had a significant foothold in the marketing literature and it often remains in the shadow of public relations. Faithful to this conceptualization, Hollensen (2004, 570) identifies lobbying as one of the tools of public relations. According to Hollensen (2004, 570) lobbying is part of PR with tools such as corporate image, press relations, public relations, sponsorships and events, which are also connected to lobbying. Cutlip, Center and Broom (2006, 6) consider lobbying as a function of public relations together with internal relations, public affairs, investor relations, publicity and advertising. Also according to Haaris & Lock (1996) lobbying is a part of public relations by its extensive definition, and is often seen as a segment of marketing communications.

Lobbying is not often studied from the perspective of marketing communications, and consequently the role of lobbying in relation to marketing and public relations is not very clear in the marketing literature. As mentioned previously, lobbying is often considered as a function of public relations (e.g. Cutlip, Center, Broom 2006; Hollensen 2004). In contradiction to others, Jaatinen (1999) does not consider public relations as a dominant function in relation to lobbying. According to Jaatinen (1999, 44-45), lobbying and public relations can be seen as two different forms of communication which have the same objective to profile, scan and inform the external and internal constituencies of the organization. Jaatinen states (1999, 44-45) that lobbying is basically communication between organizational personnel and governmental and parliamentary decision-makers in addition to the other important stakeholders of the policymaking process. According to Jaatinen (1999, 44-45) public relations can be utilized to support lobbying. Even though lobbying is commonly viewed as a

function of public relations, this thesis considers lobbying in a broader sense. In this thesis lobbying and public relations are seen as equal forms of communication. In the figure 5 the traditional relationship between lobbying and public relations, marketing communications and communications is illustrated.

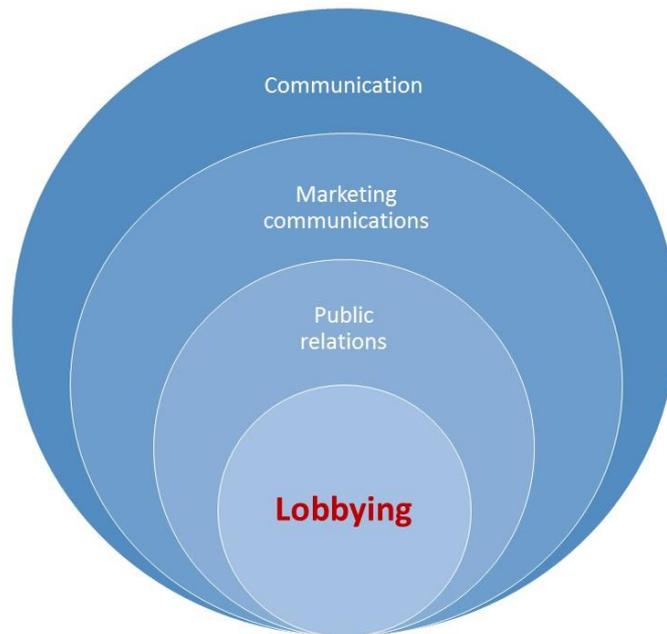


Figure 5. The traditional relationship of communication, marketing communications, public relations and lobbying

3 LOBBYING

3.1 SIGNIFICANCE OF LOBBYING

It can be stated that in the research field of lobbying there are two basic perspectives towards lobbying that compete with each other. One is a transactional interpretation, and the other is a neopluralist perspective. The transaction interpretation claims that the ones lobbying are strong actors that operate at the expense of the weak actors. They are pursuing to secure private goods of entire industries at the expense of the collective interest of the public, or by the biggest firm within an industry operating at the expense of the weaker companies. (e.g. Olson 1982; Stigler 1971; Peltzman 1976) For example, Stigler (1971) states that the power of the state can either harm or help every industry in the society. According to Stigler (1971) every industry with enough political power to utilize the state will, for example, pursue to control the entry of new rivals.

On the other side, there are pluralists and neopluralists who propose that the interest group influence improves democratic society by providing information. According to neopluralists, lobbying is done in situations where corporations need political help in a position where they are in trouble or threatened. (e.g. Truman 1951) Contrary to the neopluralist perspective, the transactional perspective claims that the interest systems are deeply biased in favor of large economic interests that purchase public policies. This is why the interest systems threaten the democratic linkage between public preference and the decisions of elected authority and the function of efficient markets. At the same time, the neopluralist view claims that lobbying contributes to functional democratic governance by adding technical and political specificity to the public's preferences as expressed through elections. Hence neopluralists claim that there is a strong democratic link between the constituents and their representatives. Therefore attempts to bias the policy outcomes in a nondemocratic way are very rare. (Brasher & Lowery 2006)

Lobbying is often addressed from the perspective of political and economic theories. Jokinen (2000) divides theories related to lobbying into political, economic and

mathematical theories. Political theories include, for example, corporatist, conflict and institutionalist theories. Economic and mathematical theories include, for example, informational lobbying, lobbying as a business, and lobbying as a process related theories. Traditionally lobbying has been defined as exchange or persuasion. (e.g. Austen-Smith 1993, Hansen 1991) However, Hall and Deardorff (2006) view lobbying as a form of legislative subsidy. According to them, lobbying can be seen as "...a matching grant of policy information, political intelligence, and legislative labor to the enterprises of strategically selected legislators." According to Hall and Deardorf (2006) the aim of this kind of strategy is to support natural alliances, in order to achieve the objectives that the lobbyists and the politicians share.

Lobbying can also be viewed from the perspective of exchange and resource dependency. Bouwen (2002) studied corporate lobbying in the European Union, but was interested in the logic of access. According to Bouwen (2002), theories regarding lobbying can be seen as exchange theories and as resource dependence theories. Bouwen (2002) claims that many exchange theories of lobbying note that the cooperation of private and public organizations can be seen as a series of inter-organizational exchanges. Organizations involved in the interaction create a cost benefit analysis, based on which they decide with whom to interact with. The exchange relation is considered enduring when both sides can benefit from the interaction. However, the benefits do not need to be equally divided between the parties. (as mentioned by Bouwen 2002; see also Pappi and Henning 1999, Lewine & White 1961, Blau 1964) The resource dependency model, in turn, assumes that it is not possible for an organization to generate all the needed resources themselves. Hence organizations are forced to enter into transactions and relations, in order to gain the necessary resources. The resource dependency theory demands an active role of the organization influencing its operational environment. (Aldrich & Pfeffer 1976) Consequently organizations become interdependent with the other organizations they interact with (Bouwen 2002).

In regards to the European Union decision making processes, private and public actors become interdependent due to the need for resources from each other. The

essential resource that the private actors need is the access to the European institutions, while the institutions need resources that are momentous for their own operations. (Bouwen 2002) Bouwen (2002) presents these momentous resources as 'access goods'. According to Bouwen (2002), the 'access goods' is information that private actors provide to EU institutions. The information provided is important in regards to the EU decision making process. In return for providing information, private actors gain access to EU institutions. The level of access depends on the quality and the vitality of the information for the institutions. (Bouwen 2002) Based on the exchange and resource theories Bouwen (2002) has created a theoretical framework that seeks to understand how business concerns can have an impact on policymaking in a policy area at the European level.

Like mentioned before, the studies addressing lobbying are not often carried out from the perspective of marketing communications. However, the marketing communication literature often mentions lobbying as a part of marketing (e.g. Kotler 2000). Many studies consider lobbying as a way to adapt in a changing business environment. Hence the more traditional view considers lobbying as part of business strategy based on the business environment. (Jokinen 2000, 89) However, Jokinen (2000) examines lobbying as a part of business management.

3.2 LOBBYING OBJECTIVES

The existing literature presents variety of lobbying objectives. Lobbying can be seen as the collection of information from the external operational environment, and as a function aiming at influencing the policymakers. The common factor in regards to all the identified objectives is the aim to influence. Lobbying that influences is achieved through shaping the opinions of the relevant public, and through converting the power hierarchies among the supporters of different opinions. The objective may be to prevent unfavorable legislation or to ensure the passing of desirable legislation. (Jaatinen 1999, 46) According to Jokinen (2000, 205) companies lobby because they need information, and pursue to change the business environment to serve their own interests. Lobbying as organizational communication is information gath-

ering, analyzing the information and transmitting the effects on the internal and external environment. Environmental scanning and influencing the political environment are the most essential parts of lobbying. (Jaatinen 1999, 44-45) Environmental scanning is a system that supports the organization to perceive the essential changes in external and internal environment, so that the organization is able to consider them in its decision making. (Åberg 1989)

Lobbying primarily aims at having an effect on a political decision that has a collective nature (Jaatinen 1999, 66). The objective of lobbying is to influence the public policy, and the main goal of the lobbyist is to influence political decision making. Lobbyists lobby decision-makers in order to achieve policy outcomes that are adequate for them. (Mahoney 2007; Klüver 2011) However, lobbying can include more extensive objectives than just influencing certain legislative processes. It is commonly viewed that interest groups influence policy in two different ways, either by contributing campaigns or through the distribution of special information (Austen-Smith 1993). In contrast to others, Lowery (2007) claims that there is an incorrect assumption in the studies concerning the reasons organization lobby. Lowery (2007) claims that the assumption that the interest organizations lobby because they want to influence public policy is wrong. According to Lowery (2007) the real reason behind lobbying is the actor's willingness to survive. Lowery (2007) claims that there are multiple reasons for organizations to lobby, and not all of the reasons are related to the concern of securing the legislative environment.

3.3 LOBBYING STRATEGIES

Lobbying strategy is based on proper planning of lobbying. Information gathering is a fundamental phase in the planning process. Information is utilized in formal strategic planning which makes information processing and dissemination key elements in lobbying. Information gathering is a vital part of lobbying planning, since it helps the organization to find out the political issues that are most important for the organization's survival. Analysis of information allows the organization to consider how it should respond to the relevant political issues. The second phase of the strategic planning of lobbying is to set objectives and plan the lobbying activities. The success of strategy is connected to the internal and external factors, such as the amount of resources available, opinions, and the resources of other stakeholders of the political decision-making process. (Jaatinen 1999, 47-48)

Thirdly, an organization needs to implement the strategy, which demands the selection of tactics and the planning of operations. In the fourth phase of strategic planning of lobbying, an organization should evaluate all the previous phases. The most essential criteria in lobbying evaluation should be the evaluation of achieved results. The achieved results may be, for example, passing desirable legislation, preventing unfavorable decisions, causing change in opinions, attitudes or in behavior, maintaining good relations, or building a respectful profile. In addition, an important phase of planning is the review of planning premises and the definitions of an organization's political role. (Jaatinen 1999, 49) All the five phases of strategic planning of lobbying are presented in the figure 6. In this study the consideration of strategies is limited to the classification of the different strategies used. The strategic planning process of lobbying has an influence on the strategy selection. However, the determinants of strategy selection are not essential from the perspective of this study, and are for that reason excluded.

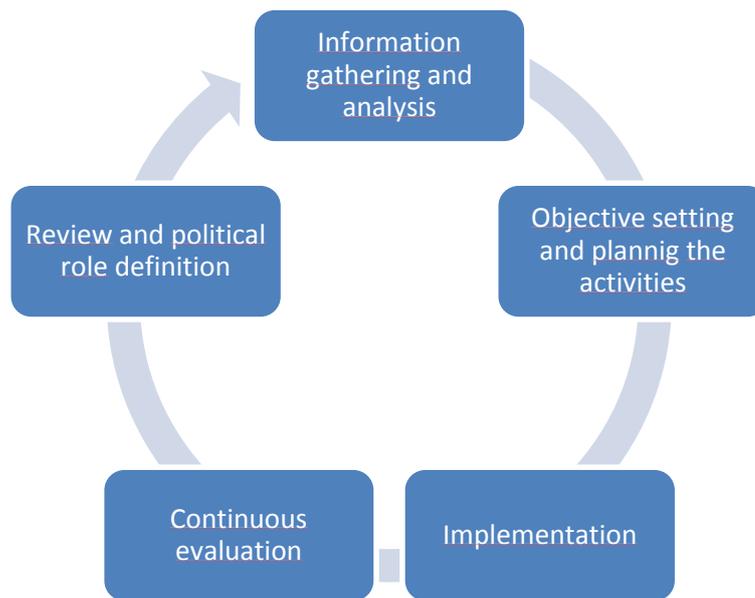


Figure 6. Phases of strategic planning of lobbying (adapted from Jaatinen 1999, 48)

When it comes to the means of lobbying, according to Jaatinen (1999) they can be divided into influence means, competitive means, probing, emergency means, and conflict solving and controlling means. Milbrath (1969) in turn approaches the means of lobbying through the communication process. Milbrath (1969) divides lobbying into three categories of communication based on a study of Washington lobbyists. The categories are facts, arguments and power. The message the lobbyists send are generally based on factual information, particularly when the lobbyists want to provide information on how certain policy would effect the lobbying group. However, lobbyists also present arguments based justice or wisdom, not just on facts. The communication of power is complex and actualized mostly in subtle ways. The communication of power happens, for example, by means of public relations campaigns and by collaborating with other groups. Power is a relationship through which information can be communicated. Power is also a vital factor for keeping the communication channels open for the interest groups possessing power. (Milbrath 1960)

According to the study of Milbrath (1960) the interviewed lobbyists divided the tactics of lobbying into three categories. The first category is direct personal communication with the decision-maker, which includes personal presentation of arguments,

presentation of research results and testifying in hearings. Here, personal presentation of arguments and presentation of research results were seen as the most important tactics. The second category is communication through intermediaries, which includes for example contacting decision-maker as confidants and executing public relations campaigns. The third category includes tactics for keeping channels of communication open. The third category includes tactics such as direct bribery, making monetary contributions and collaboration with other groups. (Milbrath 1960) Taminau & Wilts (2006) agree with Milbrath (1960) that one of the most important tactics of lobbying is to provide reliable information to public officials in direct interaction with the committees and decision making bodies of the EU. Hence it is vital for a lobbying firm to possess and be able to provide information.

By classifying the political strategies based on information, financial incentive and constituency building, Hillman and Hitt (1990) present a similar approach to lobbying strategies as Milbrath (1960). The theory of Hillman and Hitt (1990) is one of the most cited corporate political strategy decision theories. According to Hillman and Hitt (1999), corporate strategy can be divided into parts that represent the decisions made by the senior decision-makers within the firm. First, the company must choose whether to relate government on a long term relational basis or in one-to-one meetings. First option is called relational mode and second as transactional mode. Second, a company has to choose whether it practices individual or collective participation. The strategies include either collective or individual level participation, and are based on providing information to public decision-makers, providing financial support to political institutions and building constituency. (Hitt & Hillman 1999)

Hillman and Hitt (1999) were the first who created a holistic classification of the political strategies used by companies. However, Hillman and Hitt (1999) were not the first addressing the elementary resources from the perspective of industry influence. According to Fainsod (1940) as cited by Dahan (2005), the favorable regulatory environment for an industry is achieved through the firm's capacity to mobilize three distinct resources. The three types of resources are categorized as financial (political campaign financing), human (the use of lobbyists) and political (political coalition-building). As for Hillman and Hitt (1999), they state that the exchange theory of

lobbying proposes three political strategies that companies and interest groups can use to battle in the public policy process, based on the elementary resources exchanged. The elementary resources are divided into information, financial incentive and constituency building. Hence the strategies are concluded from the elementary resources, being information strategy, financial incentive strategy and constituency-building strategy. (Hillman & Hitt 1999) In this thesis, the classification of Hillman & Hitt (1999) is utilized to analyze the lobbying strategies.

Information strategy consist of four tactics, and its primary characteristic is that it targets political decision-makers by providing information. The tactics that information strategy includes are lobbying, commissioning research projects and reporting research results, testifying as expert witness, and supplying position papers or technical reports. The financial incentive strategy targets political decision-makers by presenting financial incentives. The tactics that are included in this strategy are contributions to politicians or parties, honoraria for speaking, paid travels and personal services. (Hillman & Hitt 1999)

The constituency-building strategy has a characteristic that differs it from the other two. While information and financial strategy target political decision-makers directly, constituency-building strategy targets them indirectly, through constituent support. The tactics of constituency-building strategy are grass roots mobilization of employees, suppliers, customers and other stakeholders, advocacy advertising, public relations, press conferences and political education programs. (Hillman & Hitt 1999) Hillman and Hitt (1999) also recognized variables that have an effect on specific decisions. These variables are the degree of dependence, corporatism or pluralism, diversification level, nature of issue, company collective's resources and issue life cycle. (Hillman & Hitt 1999) The classification of the political strategies used by companies as proposed by Hillman and Hitt (1999) is used in this thesis in regards to the means of lobbying. Means of lobbying refer to the strategies and tactics used by companies in order to influence policies. The classification of political strategies of Hillman and Hitt (1999) can be seen from the table 1.

STRATEGY	TACTICS	CHARACTERISTICS
Information strategy	<ul style="list-style-type: none"> ➤ Lobbying ➤ Commissioning of research and reporting results ➤ Testifying as experts witnesses ➤ Supplying papers or reports 	Targets political decision makers by providing information
Financial information strategy	<ul style="list-style-type: none"> ➤ Contributions to parties ➤ Honorarium for speaking ➤ Paid travel, etc. ➤ Personal services 	Targets political decision makers by providing financial incentives
Constituency-building strategy	<ul style="list-style-type: none"> ➤ Grassroots mobilization of interest groups ➤ Advocacy advertisement ➤ Public relations ➤ Press conferences ➤ Political education programs 	Targets political decision makers indirectly through constituent support

Table 1. Classification of Lobbying Strategies (adapted from Hillman & Hitt, 1999 p. 835)

3.4 EFFECTIVENESS OF LOBBYING

In many studies lobbying effectiveness is not clearly conceptualized. Some researchers define lobbying influence from the perspective of the achieved outcomes. Dür and De Bièvre (2007) define lobbying actors powerful if they are brought closer to their aims by being able to influence policy outcomes. In this study, effectiveness is conceptualized as the ability of a lobbying actor to achieve the desired policy outcomes by sending a message to a decision-maker through different channels. A lobbyist can be effective even if the policy outcome is not the same as the objective the lobbyist had in the beginning of the process, if the policy outcome is still superior

to an alternative policy outcome. With the perspective on this study, it is assumed that lobbying actors have preferences concerning policy outcomes. However, lobbyists may be able to change their preferences during the policy process, or the preferences can be affected by others (Dür & De Bièvre 2007). From the perspective of communication research, the effects of lobbying are based on a linear model of communication and the features of its components. Communication is considered effective when the sender is credible, the message is politically attractive, the presentation style is informative, the channel is direct and personal, and the social context is favorable (Jaatinen 1999, 754).

Traditionally it has been viewed that lobbyists lobby those decision-makers that share the same interests. According to Milbrath (1963) lobbying does not have much effect on the outcomes of the legislative process, since lobbyists only lobby the decision-makers that share the same interest, in which case their view does not change but rather strengthens. However, Austen-Smith and Wright (1994) have created a model of counteractive lobbying, which suggests that the lobbyist also targets the decision-makers opposing the interests of lobbyists.

In the assessment of lobbying effectiveness, one should take the gained effects into account. According to Jaatinen (1999, 66) the effectiveness of lobbying should be measured from the perspective of the real effects on the process in question. In addition, the evaluation should include the effects on the political process. Also the constraints posed by rival influences should be taken into account. The results should be evaluated based on the final political decision, including the consideration whether the result is similar to the objectives of lobbyists and whether they were able to resolve the conflict. Resolving the conflict refers to the adaptation of objectives and strategies in order to meet the demands of other participants. (Jaatinen 1999) Lowery (2007) does not fully agree with Jaatinen (1999), and takes the consideration of the assessment of effectiveness a step further. Lowery (2007) claims that organizations lobby because they want to survive and therefore the success of lobbying should not only be measured by the ability to secure public policy. According to Lowery (2007) the success should rather be measured by securing access from political elites, and by the ability to change the salience and popularity of the

issues that are meaningful to the organization. In addition, blocking the competitors could be a valid measure.

Lobbying success has been explained from various perspectives. Commonly lobbying success is explained based on certain characteristics that an interest group possess. For example, one could define that lobbying success is determined by the actor type or resource endowment. (Klüver 2011) Resources may refer to campaign funding or possession of different kinds of information or expertise (Dür & De Bievre 2007). Many studies agree that information is a key factor on lobbying success (e.g. Chalmers 2011). The study of Austen-Smith (1993) explores the extent and character of the lobbying group effect on legislative policy in a model of decision making under imperfect information. According to Austen-Smith (1993), the lobbying influence is dependent on the stage of lobbying and on the information lobbyists possess and distribute. Also Taminiau and Wilts (2006) emphasize the importance of information from the perspective of effectiveness. According to Taminiau and Wilts (2006) in the European Union the effectiveness of corporate lobbying is based on the quality of firms' knowledge and information strategies. Taminiau and Wilts (2006) state that the most important thing in handling public affairs, is to be able to manage knowledge and information strategies in a competent way. According to Taminiau and Wilts (2006) these information flows increase the knowledge flows toward EU institutions.

In the recent studies on lobbying success, the contextual factors have commonly been the subject of research (e.g. Klüver 2011; Mahoney 2007; Michalowitz 2007). According to Rasmussen (2014) industry influence is a conditional concept. Thus, industry influence cannot be studied without institutional and issue-specific context. (Rasmussen 2014) Contextual factors have a significant role from the perspective of the effectiveness of communication (Hollensen 2004, 559; Jaatinen 1999). Based on reviewed literature, the factors that define lobbying success are at least the strategies lobbyists use, the resources lobbyists have, the characteristics of the political issue and the political institutions lobbyists operate within (e.g. Dür 2008).

The contextual factors that have an impact on the effectiveness of lobbying can be categorized, for example, as the political resources of participants, the decision-making history and the characteristics of the political decision making arena, and the political action field. (Jaatinen 1999, 67) According to Dahar (2005) the political resources can be categorized as expertise, financial resources, relational resources, organizational resources, reputation, public image, support of stakeholders and, recreational skills. It is often assumed that financial resources have a significant role in the lobbying effectiveness. However, McKay (2012) founded that there is no clear relationship between lobbying success and financial resources. Rather it is more important how the financial resources are spend (McKay 2012). Expertise can be achieved, for example, in social and economic areas. Financial resources refer to direct political resources such as campaign contributions, and indirect political resources such as financing other political resources. Relational resources include formal and informal relationships, referring to memberships of committees and contacts with non-market actors. Organizational resources include aspects such as having permanent office of representation. Reputation is considered as reputation with other non-market actors and refers, for example, to institutional reputation. Recreational skills refer to recreational services offered by a firm to decision-makers and journalists, in order to gain informal and personal contacts. (Dahan 2005, 47)

The decision making history refers to the political system of the society. The political action field consists of all the actors that take part in the political process and the arenas in which the decisions are made. (Jaatinen 1998, 28) Arenas of political decision making can be divided into national level, regional level, local level and the level of European Union. The political action field consists of the interest groups and competing interest groups, organized groups and individual citizens and media. (Jaatinen 1999, 69) Gamson (1975) classifies different levels of access to the political decision making arenas into full access & full influence, access & no influence, no access & no influence and no access & influence. The features of the political arena and the political action field of this study are presented in the empirical section 5.

Of the contextual factors, institutions of the government with whom the lobbyists interact are identified as a factor that influences lobbying success (Mahoney 2007). Institutions are able to influence the degree of access the lobbyists have to the policymakers (Dür & De Bievre 2007). Also, the type of the policy in question explains the lobbying success, since it has a role in regards to the existence of opposing lobbyists. In case of regulatory policies, the likelihood of opposing groups is high since the policy issues often include benefits for a certain group and costs for another group. If the constituencies have divergent interests in case of regulatory policy, it may enhance the ability of a policymakers to gain their own interest through coalitions and compensations to opposing lobbyists. (Dür & De Bievre 2007).

Characteristics of the policy issue is one of the contextual factors that has gained notable foothold in the field of lobbying research. It has been argued that the success of lobbying is dependent on the characteristics of the policy issue. Policy issues vary a lot and can create both favorable and unfavorable operational environments for the lobbying actors. The distinct features of issues are, for example, the attention they raise, their complexity and technicality, and the conflict they cause among stakeholders. The complexity of an issue effects lobbying success because the more complex the issue is, the more information is needed by the decision-makers. By giving this information, interest groups have a possibility to influence the outcomes of the policy making process. Hence, it can be assumed that the complexity of an issue increases the possibility to succeed in lobbying. (Klüver 2011) According to Mahoney (2007) the degree of conflict over a policy issue is a factor that strongly effects lobbying success. When the degree of conflict is high, decision-makers are faced with countervailing forces that try to push them into opposite directions. In these circumstances interest groups should have difficulties to lobby successfully, due to the strong opposing forces. On the other hand, in the circumstances where most of the interests groups share the same policy preferences, there should be increased possibility to succeed in lobbying. (Klüver 2011)

The empirical study of Michalowitz (2007) addresses the influence of interest groups from the perspective of degree of conflict, structural conditions and the type of interest pursued, in European context through case studies. According to the study, all

of the three factors have an effect on the degree of influence that an interest group may manage to exert. From the perspective of influence, the study raised two factors above others: structural conditions and the uniformity of the interests pursued with the interests of public actors. (Michalowicz, 2007) Also salience of the issue has been identified as a factor that has a role in the lobbying influence (Mahoney 2007). If the public pays a lot of attention to a political decision, it should be hard for a lobbyists to influence the policy outcome (Dür & De Bievre 2007).

Against the theoretical expectations, the study of Klüver (2011) does not agree with the above mentioned findings. Klüvers (2011) results suggest that the complexity and the degree of conflict do not have a statistically significant impact on lobbying success. Furthermore, according to Klüver (2011) the resources of certain interests groups do not have a significant impact on lobbying success. Klüver (2011) discovers that the size of the lobbying coalition has a statistically significant positive impact on lobbying success. According to the findings of Klüver (2011) it can be concluded that the lobbying success is not only dependent on the individual group characteristics, and that attention should also be paid to the other interest groups that have similar policy preferences. Hence, lobbying is a collective enterprise determined by the efforts of coalitions.

3.5 LOBBYING COALITIONS

Already in 1997, research revealed that the structure of lobbying is changing because organizations are building their own lobbying networks independent of trade associations. In 1997 it was noticed that there is an increasing tendency to try to influence the members of parliament. (Haug & Koppang 1997) Multinational companies have created political capacity that allows them to establish multilevel and ad hoc political alliances (Coen 1998). According to Haug and Koppang (1997) some companies have really strong lobbying networks and the lobbying is systematic, regular and carefully planned in those networks.

There are simultaneously many interest groups that try to lobby decision-makers towards certain directions. The lobbying actors that have similar policy preferences, form coalitions. These coalitions are issue specific and ad hoc, since the policy issue in question determines which side interest groups lobby. (Klüver 2011) The interest groups that have similar political preferences, do not have to form formal coalitions and exchange information or coordinate strategies. In order to form a lobbying coalition, it is enough that the interest groups lobby decision-makers towards the same direction. (Klüver 2011) Hence lobbying coalitions can be formed without communication or official ad hoc coalitions between the different groups of lobbyists (Mahoney 2007).

Many studies agree that the size of the lobbying coalition is a significant factor when it comes to effectiveness. Klüver (2011) claims that the size of lobbying coalitions crucially affects the success of lobbying. According to Klüver, (2011) a high number of interest groups lobbying in the same direction makes it easier for decision-makers to listen them, considering that the number of opposing interest groups is low. The research of Nelson and Webb Yackee (2012) shows that regulatory policy outputs are influenced by coalitions of lobbyists. Nelson and Webb Yackee (2012) agree with Klüver (2011). According to Nelson and Webb Yackee (2012) lobbying in the form of coalitions is more effective when larger and expanded coalitions are present. Also Mahoney (2007) identifies the amount of the interest groups defending a certain issue as a factor that influences the ability to achieve the desired lobbying goals. In her in-depth interview study of 149 advocates in Washington and Brussels with a random sample of 47 policy issues, Mahoney found out that in addition to lobbying coalitions, also the design of the political system, issue context and time are vital factors defining the success of lobbying. However, Klüver (2011) points out that the size of the lobbying coalition itself is not the success factor as much as the relative size when compared to the opposing lobbying coalition.

Lobbying in the European Union is interesting in many ways. In the European Union the Union- and national-level lobbying are combined. The special circumstances have created a growing market for very complex lobbying networks. These networks are utilized by European companies to collect information and to pursue their own

interests. (Jokinen 2000, 13) David Coen has done a lot of research regarding lobbying from the perspective of the European Union. (see eg. Coen 1997; Coen 1998; Coen 1999; Coen & Grant 2001) According to Coen (1998) the recent development has been towards the trend that the European Commission rewards the firms who lobby regularly in Europe with favored access to its policy forums. Hence the significant of lobbying on the national level is decreasing. (Coen 1998) From the viewpoint of this study, lobbying in European Union is essential since the networks in regards to lobbying are examined. According to Coen (1998) multinational corporation lobbying alters the national public policy systems. The international networks are assumed to have an impact on lobbying also in Finland. Consequently, it is vital to identify the alcohol industry's interest groups operating in the European Union and examine their relations to the Finnish actors.

In sum, in the context of this study the effectiveness of lobbying is the ability of a lobbying actor to achieve the desired goals in the legislative process by sending a message to a decision-maker. The factors that play a role in the effectiveness of lobbying, as based on the findings from previous research, are presented in the figure 7. In this study, the factors that influence the efficiency of lobbying are divided into four. First of all, the characteristics of the lobbying determine the effectiveness. Second, the contextual factors have an influence on the effectiveness of lobbying. Thirdly, the external and internal noise play a role in regards to the effectiveness of lobbying. Lastly, the lobbying coalitions and their size have an influence on lobbying success. (Klüver 2011; Austen-Smith 1993; Taminiau & Wilts 2006; Jaatinen 1999; Jaatinen 1998; Dür & De Bievre 2007)

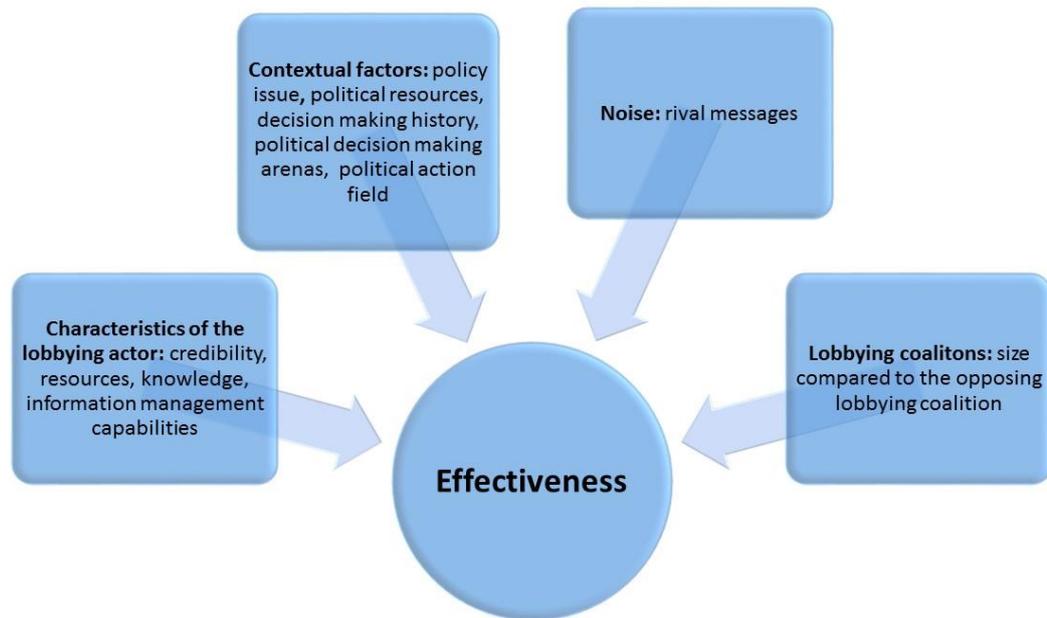


Figure 7. The factors influencing the effectiveness of lobbying

3.6 ALCOHOL INDUSTRY LOBBYING

It can be stated that in alcohol policy, there is a conflict between the national health perspective and the profits of alcohol industry. First of all, it is important to consider that alcohol industry is highly innovative and remarkably concentrated, including a small number of organizations, especially when it comes to beer and distilled spirits (Jernigan 2009). Secondly, alcohol industry and the governmental organizations together with the NGO's view the role of alcohol industry in alcohol policy very differently, highlighting divergent aspects. Alcohol industry opposes regulatory measures and sees itself as an essential actor in the composition of alcohol policy. Government officials and non-governmental organizations view alcohol industry lobbying as a considerable barrier for effective alcohol policy. (Anderson & Baumberg 2005) In addition, alcohol industry utilizes a variety of marketing tactics in order to market their products, but the effects of the tactics are unclear from the perspective of national health (Jernigan 2009).

Alcohol industry utilizes a variety of tactics in its lobbying. Casswell (2012) states that during the last three decades, the international alcohol industry has executed a functional campaign including, for example, funding of educational initiatives and research, and sponsorship on intergovernmental events that have created a picture of alcohol industry as a good corporate citizen. As a central part of campaigning, the alcohol industry has promoted arguments that focus on the consumers of alcohol rather than the supply of alcohol. (Casswell 2012) Alcohol industry also pursues to maintain good relationships with the most important decision-makers. The question of objectivity of the scientific research provided by alcohol industry has raised attention among researchers. The reason for grown attention could be that the involvement of alcohol industry in alcohol research has increased in recent years (Casswell 2012). Babor (2008) states that the an extremity of industry involvement in research is that it confuses the public discussion in relation to health issues and policy options and raise doubts of the objectivity of researchers. However, according to Babor (2008) industry involvement in research activities constitutes quite a small direct investment in scientific research.

Babor (2008) claims that alcohol industry involvement in alcohol science is executed through multiple channels. These channels include among others, direct financing of university-based scientists and centers, and sponsorships of research funding organizations. The alcohol industry has contracted research organizations and trade organizations through which it conducts studies. The alcohol industry also has public relations organizations, and it tries to influence public impression of research, research findings and alcohol policies. In addition, the alcohol industry publishes scientific documents and gets support from scientific journals. (Babor 2008) Scientific activities can create a picture of industry attempting to avoid taxation and regulation. On the other hand, the alcohol industry's scientific involvement can support the work of behavioral science and basic research. (Babor 2008) Consequently, Stenius and Babor (2009) suggest that there should not be financial relationships between alcohol research and the alcohol industry, based on the lessons learned from the tobacco and pharmaceutical industries. In this way the integrity of alcohol research is preserved. (Stenius & Babor 2009)

Hawkins, Holden and McCambridge (2012) have described the situation in the UK regarding the alcohol industry's influence on alcohol policy. According to Hawkins et al. (2012) there has been criticism towards the British government for weighting the alcohol industry interests in its decision making too much. On the other hand, it has been said that the alcohol policies in the UK are built on a weak evidence base. (Hawkins et al. 2012) Similar concerns have been brought forth in Finland also. Montonen (2008) states, that during the government of Matti Vanhanen, alcohol policy was industry-orientated or even industry-led. According to Montonen (2008) this can be concluded, for example, from the price-setting of alcohol beverages which was shaped according to the interest of Finnish Federation of Brewery and Soft Drinks Industry. In addition, this can also be concluded from the nature of the restrictions in regards to alcohol policy, and from the industry representation in the working groups on alcohol policy during the government of Matti Vanhanen.

In the Nordic countries alcohol industry has not traditionally participated in the decision-making processes in regards to alcohol policy. The EU-membership of Nordic countries has led to more loose national alcohol policy. As a consequence, global alcohol industry has aggressively pursued to penetrate the Nordic markets. In Finland the starting point of the alcohol industry's influence on alcohol policymaking was the EU-membership. (Hellman 2012) According to Montonen (2008) the political influence of the alcohol industry in Finland has increased during the past few years. The key factor increasing the influence has been the participation of the alcohol industry in the working groups on alcohol policy.

4 RESEARCH METHODS

4.1 QUALITATIVE RESEARCH

This thesis is a qualitative study addressing the significance of lobbying of the alcohol industry. The study is delimited to the context of alcohol industry lobbying performed in Finland. Qualitative research can be used for a variety of purposes, since it retains different kinds of research methods (Tuomi & Sarajärvi, 2002, 7). In addition qualitative methods make it possible to take the context into account (Marshall & Rossman 1995, 39). The objective of qualitative research is to produce novel knowledge with respect to real-life context, and it can especially be utilized when earlier insights about the phenomenon under examination are slim (Eriksson & Kovalainen, 2008).

Qualitative studies include both empirical and theoretical aspects. (Tuomi & Sarajärvi 2009, 18-19) In a qualitative study the focus of interest is a relatively small amount of cases which are analyzed as accurately as possible (Eskola & Suoranta 2008, 18-20). The weakness of qualitative research is that it is based on small sample groups which rely on the interpretation and subjectivity of the researcher. Data from qualitative research can be very revealing which is why it suits the purposes of this study. (McDaniel & Gates, 2013, 81) Qualitative research can be executed with multiple data collection methods. The purpose of the different data collection methods is to choose the best ways to get the most appropriate answers to the research questions. (Hirsijärvi, Remes, Sajavaara 2009, 156, 183) In this study a variety of data collection methods are utilized in order to get as extensive and reliable results as possible, while taking the scope of the study into account.

4.2 DATA COLLECTION

The empirical part of this master's thesis is executed with qualitative methods. The empirical part of this study consists of four different sections. First, the actors of alcohol lobbying in Finland are represented. In addition, the coalitions the actors form are presented including the international actors since they play an important role in the overall picture. Second, the alcohol legislation is examined focusing on the time frame of 2010 until 2015, since this was the period of legislation that resulted in the changes in alcohol policy in 2014 and 2015. Third, the media discussion is analyzed to form a picture of the actors taking part in the lobbying process opposing and supporting the restrictions of alcohol marketing. Lastly, the interviews of each actor is presented.

The data collection method of this study is triangulated since the complex phenomenon analyzed in this study demands extensive examination. The data collection method for the empirical part is triangulated since the phenomenon examined is very complex in nature and politically very sensitive. Therefore, the empirical data collection method is completed with the description of the legislative process and the analysis of the media discussion. Denzin (1970) has divided triangulation in research into three types. Data triangulation refers to data collection by means of many sampling strategies. Data from distinct times, situations and from different people are being collected. Investigation triangulation refers to involvement or multiple researchers and theoretical triangulation to the use of more than one theoretical perspective in the interpretation of data. Methodological triangulation refers to utilizing multiple methods in the data collection. Hence triangulation method refers to the use of more than one data collection method or source in the research (Bryman & Bell, 2011). By using triangulation the validity and thoroughness of the research improves. Above all triangulation leads to a better understanding of the phenomenon examined. (Wagner 2006)

In regards to qualitative studies, one of the most common data collection methods is interviewing (Tuomi & Sarajärvi 2009, 71). The data collection method used in this study resembles theme interview, which by some definitions also referred to as

semi-structured interview. One of the features of a theme interview is that it is focused on particular themes that are identical in each interview. A theme interview gives a voice to the interviewees and takes the interpretations and implications into account. (Hirsijärvi & Hurme 2008, 47-48) The aim of this study is to deeply analyze a particular phenomenon and specific case. Therefore a theme interview is the most suitable method for the data collection of the empirical part.

Interviews are used as a primary data collection method. The interview method used in this study can be categorized as semi-structured. However, the method includes some aspects of theme interview since the questions are composed beforehand but are not exactly the same for all interviewees. In the semi structured interview method the interviewees answer to the beforehand composed questions in their own words (Metsämuuronen 2006, 115). Due to the characteristics of the empirical part, this study can be characterized as qualitative.

The selection of interviewees in this study is based on the objective to get a comprehensive picture of the phenomena. The objective is to present the viewpoint of all the different groups of actors involved in the process. The viewpoint of alcohol industry is represented a person in a leading position in alcohol industry. The viewpoint of the decision-makers is represented by a public servant and a member of parliament. In addition, the viewpoint of lobbying coalitions is represented by a company supporting the same interest as alcohol industry.

The sampling method of the interviewees can be called elite sampling, since the sample of interviewees is selected based on consideration of the key actors in the legislative process. The key actors have been active in the process and brought out their viewpoints. The selected informants are considered to possess important information regarding the legislative process. Through the selected informants it is reckoned to gain the most valuable information on the phenomenon examined. (Tuomi & Sarajärvi 2002, 88)

The secondary data is collected from multiple sources. To represent the actors and networks of alcohol industry lobbying in Finland, the data is collected from reliable

internet sources. In the description of the legislative process the data from public legislative documents, statements, memos and plenary sessions are utilized. To analyze the media discussion, data is collected from Finnish newspapers, magazines and social media. In addition, other www-documents are used. By using multiple forms of data it is possible to get a more comprehensive picture of the situation. The different data collection methods utilized in this this are illustrated in the figure 8 and examined more closely in the following chapters.

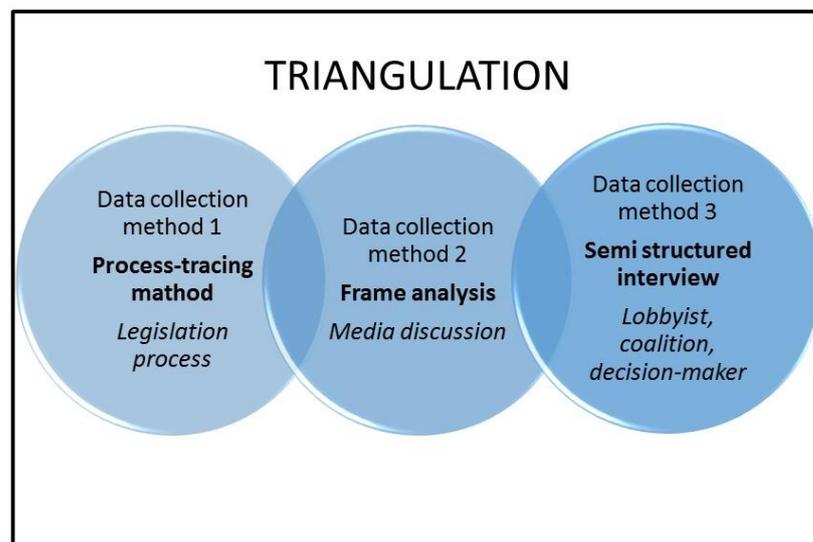


Figure 8. Data collection methods

4.2.1 STRUCTURE OF THE INTERVIEWS

The interviews were conducted as a method that resembled semi structured interview and theme interview. Four interviews were carried out. The subjects represented the views of alcohol industry, lobbying coalitions, public servant and member of the parliament. The interviews stay anonymous even though their position in the process is described. The questions were formulated and the subjects were selected based on the observations from the analysis of the legislation process and media discussion. Themes concerning alcohol industry lobbying were discussed in the interviews.

Alcohol industry lobbyist works in a leading position in the field of alcohol industry lobbying. The interviewee will be referred as Z. Member of lobbying coalition works in a leading position in the field of marketing. The member of the lobbying coalition will be referred as X. The public servant works as an expert in the public sector and is referred as Y. The subject will be referred as Y. The member of parliament was at the position during the time period of 2011 until 2015 and will be referred as B.

The subjects were told that they would remain anonymous if they wish so. The subjects were asked permission to mention the company/ industry they represent. The permission to record the interviews was asked and approved by the subjects in every case. Two of the interviews were conducted with connection to a report for Finnish Association for Substance Abuse Prevention, which was communicated to the subjects. Rest of the interviews do not have any connection to the report for Finnish Association for Substance Abuse Prevention.

The subjects were met separately, and every interview was recorded and transcribed. The interviews took place in February 2015, March 2015, July 2015 and November 2015. The duration of the interviews ranged between 27 minutes and 1 hour 17 minutes. Finnish was the mother tongue of the interviewees thus interviews

were conducted in Finnish. Question can be found from the appendix 3-6. The findings from the interviews are presented in the chapter 5.2.

In each interview, lobbying was first discussed on a general level. In the second phase, lobbying in regards to alcohol marketing restrictions was discussed. The time period discussed was defined by the interviewer. The subjects were able to freely answer to the questions and the order of the questions changed based on the directions of the discussion. In regards to some questions, the subjects were asked to elaborate their answers and additional questions were presented.

The question were modified according to the position of the subject. The representative of the alcohol industry lobbyist was asked about the strategies and networks they utilize in their operations. The representative of the coalitions was asked about their strategies, objectives and connections to alcohol industry. In both interviews the interest was especially on lobbying in regards to alcohol marketing restrictions. Both of the subjects were asked to evaluate their impact and success or failure concerning the phases and outcomes of the legislative process.

The public servant was asked to describe his/her point of view on lobbying in general and on alcohol policy lobbying. The subject was asked to describe his/her experience about alcohol industry lobbying and evaluate the impact and effectiveness of alcohol industry lobbying. The time period discussed was the same as with the other subjects. The subject was asked to describe the work in the working groups on alcohol policy in which the subject took part. The subject was also asked to evaluate the success or failure of alcohol industry lobbying.

4.2.2 DESCRIPTION OF OTHER DATA

From the perspective of the media discussion, the subject of examination were the arguments opposing and supporting the restrictions of alcohol marketing in addition to the actors representing the arguments. The data for the media discussion analysis was collected from multiple newspapers and magazines to form a comprehen-

sive picture of the data. The data examined was published from 2010 until 2014. Secondly, the data was carefully read. The data was chronologically ordered to get a picture of the development of the discussion. After that the most essential themes and actors were selected from the data. The most relevant writers and subjects are tabulated in appendix 2. Two ways to discuss the subject were discovered from the media discussion. The ways to discuss the subject are roughly divided as supporting and opposing opinions for the additional restrictions in alcohol marketing.

The media discussion is examined through frame analysis which enables the identification of the central arguments used in the discussion and the key actors that took part in the discussion. The media analysis reveals how the subject is framed in the discussion. Media is one of the channels for lobbying and through the analysis of media discussion it is possible to conclude who and which frames are dominating the discussion. (e.g. Kunelius, Noppari & Reunanen 2009, 51) Today frame analysis is often utilized in the research of journalism and the analysis of data collected from the media (Borah 2011).

According to Entman (1993) framing highlights particular sides of a matter and encourages to interpret texts in a certain frame. According to Entman (1993) framing is choosing particular sides and making them visible in the communicated texts by favoring certain definitions of the problem, causal interpretation, and moral judgement and/ or activity. Framing defines problems, diagnoses causes and both makes and suggests remedies. (Entman 1993) Media is a field committed to social structures in which different meanings are competing. In media, stories are framed and images are created by means of journalism. Hence media constructs reality and rebuilds social practices. (Wiio 2006, 26) From the perspective of a lobbyist, media is a channel through which to bring out the desired message and to gain influence. The message of a lobbyist is constantly competing with the opposing messages.

The data to represent the legislative process was collected from different secondary sources and organized into chronological order. The timeline of the legislative process was set from 2004 until 2014, since major changes in the alcohol legislation

took place in 2004. However, the main focus is in the period from 2010 until 2014, since the process that led to the changes of 2014 and 2015 began in 2010.

The legislative process is examined with process tracing method. Process tracing method is traditionally used in cognitive sciences (e.g. Billings & Marcus 1983; Schulte-Mecklenbeck, Kühberger, & Ranyard 2011). However, process tracing is a method often used in social sciences as well. Process tracing method refers to tools used to examine causal mechanisms in single-case research designs (Beach & Brun Pedersen 2013, 2). By means of process tracing it is possible to formulate a story that enlightens the course of events. Process tracing can also be utilized to test fixed hypotheses. To benefit from the process tracing method, it is vital to ask the right questions. One must also consider alternative courses of actions that could have resulted in the same outcomes. (George & Bennet 2005, 207, 211) Different process tracings can be divided into three variants. The variants vary within their relation to theory. Theory-testing process tracing utilizes existing theories to test them in the given case, while theory-building process tracing aims at building theoretical explanations based on empirical evidence. Explaining outcome process tracing aims at crafting explanations of the outcome of the case. (Beach & Brun Pedersen 2013, 3) The idea of process tracing is to examine the phases between the beginning and end of the process by paying attention to the factors that resulted in the certain outcome. (George & Bennet 2005, 213)

One must adapt the interpretation depending on the characteristics of the process, since there are multiple diverse causative processes. Causality of the process might be complex when there are many different processes, circumstances and variables influencing the outcome. Hence one must avoid assumptions of some certain event doubtlessly affecting the outcome on its own. According to some process tracing methods, the comparison of many processes is always demanded, and hence it is not possible to formulate a good theory based on single occasions. (George & Bennet 2005, 212-213, 220) However according to George & Bennet (2005, 220) it is still possible to make noteworthy observations and confirm assumptions based on a single occasion.

In this thesis the legislative process that resulted in the changes in alcohol legislation in 2014 and 2015 is analyzed through process tracing method. The main focus is placed on the time frame from 2010 until 2014, which was the most crucial period from the perspective of the changes. In the center of the attention is the examination of the arguments of alcohol industry and how these arguments affected the outcome of the legislative process.

The material for the analysis of the media discussion was collected as part of a University of Helsinki working group report on alcohol industry lobbying strategies ordered by Finnish Association for Substance Abuse Prevention. Also parts from the material for the analysis of the legislative process was collected in touch with the report ordered by Finnish Association for Substance Abuse Prevention.

5 EMPIRICAL RESULTS

5.1 ALCOHOL INDUSTRY LOBBYING IN FINLAND

In this chapter the empirical results are analyzed. First, the actors in the field of Finnish alcohol industry are represented. Alcohol industry operates on a global scale and the biggest companies operating in the Finnish markets are owned by global corporations. Hence the international level of alcohol industry lobbying needs to be taken into account. In addition, Finnish interest groups of alcohol industry are members of the interest groups of alcohol industry operating in the European Union. It can be assumed that the interest groups operating in Finland and in the European Union have similar interests. Consequently it is considered important to present the key players operating in the European Union.

The examination of the legislation process aims at presenting the changing points during the process of alcohol policy regulation. The time period from 2010 until 2014 is considered the most essential since it influenced the most recent changes in alcohol policy. The interviewees are actors that were closely involved in the process during the period of time in question. After the analysis of legislation process, the

media discussion relating to restrictions in alcohol marketing is introduced. The central arguments are highlighted and the voice of alcohol industry is identified. Lastly, the perspective of the essential actors are represented. The interviewees advocate the viewpoints of different interest groups that took part in the process. In the last chapter conclusions are drawn from the theoretical considerations and the empirical results.

5.1.1 ACTORS AND NETWORKS

In this thesis the political action field consist of alcohol industry, lobbying coalitions, health sector, public servants and political decision-makers. Health sector refers to the quarters that aim at preventing the harm caused by alcohol. This study covers the national political decision making arena. In addition the key actors operating in the European Union are presented since they are linked to the Finnish actors.

Alcohol producers include breweries and producers of strong alcohol beverages. In Finland the key players are companies producing beer, cider and long drink beverages, since the consumption of these beverages is higher than the consumption of other alcohol beverages (THL 2014, 5 – 6). For example, in 2013 the consumption of malt liquor was 52 percent of all the consumed alcohol when the consumption of wine was only 13 percent (Varis & Virtanen 2014, 5).

The revenue of the Finnish beverage industry is a bit over one billion euros per year. In terms of the revenue and the value of production, the alcohol industry is one of the most important sectors in the food industry. In 2012 the revenue of alcohol industry was 1.07 billion euros when the revenue of the industry producing other beverages was only 95.1 million euros. (Tilastokeskus 2015) The commercial value of alcohol industry is also highlighted by the indicators of Finnish Food and Drinks Industries' Federation. In 2014 alcohol was the most important import and export product. In addition, alcohol was one of the most valuable of the food industry sectors in 2010. (ETL 2014; ETL 2012). In 2012 the beverage industry used 64.7 million euros on marketing and sales activities. In the same year the alcohol beverage industry used 57.7 million euros on marketing and sales activities. Hence the expenses of

alcohol industry on marketing and sales activities composed 88.7 percent of all the expenses of the beverage industry on marketing and sales activities. (Tilastokeskus 2015)

Federation of the Brewing and Soft Drinks Industry is the lobbying organization of alcohol industry in Finland and is in this thesis often referred as alcohol industry. The Finnish Federation of the Brewing and Soft Drinks Industry represents several companies producing beer, ciders and long drink beverages. The objective of the Federation of Brewing and Soft Drinks Industry is to promote the interests of these producers. The member organizations of the Federation of the Brewing and Soft Drinks Industry are Capitol Invest Oy, Hartwall Ab, Olvi Oyj, Red Bull Finland Oy, Saimaan Juomatehdas Oy and Oy Sinerbrychoff Ab. Hence all the major brewing companies in Finland are its members. (Panimoliitto 2015a) The chairman of the executive committee of The Federation of the Brewing and Soft Drinks Industry is the managing director of Oy Sinerbrychoff AB. The other members of the executive committee are managing director of Olvi Oyj, managing director of Oy Hartwall Ab and vice managing director of Saimaan Juomatehdas Oy. (Panimoliitto 2015b)

The lobbying of the alcohol industry culminates into the Federation of the Brewing and Soft Drinks Industry since lobbying is what the company is established for. (Panimoliitto 2015a) The Federation of the Brewing and Soft Drinks Industry is not the only channel for alcohol industry lobbying in Finland. For example Hartwall co-operates with the communication agency Milton Group. One of the reasons for Hartwall to choose Milton was its focus on lobbying. (Milton Group 2012) However, due to the scope of this study only the activities of The Federation of the Brewing and Soft Drinks Industry are examined. However, it is a natural choice since The Federation of the Brewing and Soft Drinks Industry represents all the brewing companies of the alcohol industry.

When it comes to Finnish companies operating in the alcohol industry it has to be taken into account that many of them are in foreign possession, and hence operate on a global alcohol markets. Sinebrychoff is owned by Carlsberg corporation and Carlsberg owns foreign manufacturers and importers. (Sinebrychoff 2015) Hartwall

is owned by Danish Royal Unibrew, but partly returned to Finnish possession when Hartwall Capital become the second largest shareholder of Unibrew. (Hartwall 2015; Taloussanomat 2013; Sinebrychoff 2015) Olvi oyj is a part of Olvi corporations, which operates mainly in the Baltic region. These above mentioned three companies dominate the Finnish brewing sector. Hence the competition of the market shares of beer labels takes place mainly between these companies. (Sosiaali- ja terveystieteiden ministeriö 2007a)

Hartwall has financed a communication campaign called Kotirintama in 2013. The campaign was executed by Finnish Parents' League. It emphasized the responsibility of the parents in the prevention of alcohol harm among young people. The campaign was an example of a campaign highlighting the societal responsibility. It can be seen that by means of financing the campaign Hartwall pursued to acquire responsible corporate image. (Vanhempainliitto 2013) According to Hartwall it was a pleasure to be able to support the job of by Finnish Parents' League (Hartwall 2013). The campaign was criticized as contradictory (Helsingin Sanomat 2013). The executive manager of Finnish Parents' League stated that it can fairly be seen that there is a conflict in alcohol industry supporting the campaign of Finnish Parents' League (Vanhempainliitto 2013).

From the perspective of alcohol industry lobbying the essential interest groups are also the actors that share the same goals as the alcohol industry. The shared goals include, for example, having the income from the alcohol industry and the need for minimum regulation of alcohol markets. The interests of the groups can be seen for example from the statements the groups have given in media and from the statements during the circulations of proposals for comment. Since regulation sets boundaries to business, the common goal of all the interest groups is to increase or maintain the level of self-regulation. The principle of self-regulation has been accepted in the European commission and in the commercial commission of United States. (European commission 2006, 8–9; The Federal Trade Commission 2014, 32)

The Association of Finnish Alcoholic Beverage Suppliers (SAJK) supports companies involved in import, wholesale and distribution of alcohol beverages in the Finnish markets. The objectives of SAJK consist of protecting the operational environment of alcohol industry, preventing the black markets, securing the openness and fairness of retail sale, influencing the attitudes towards alcohol, securing responsible alcohol business and maintaining the internal cohesion of alcohol industry lobbying in Finland. (SAJK 2015) SAJK has not taken actively part in the media discussion but has lobbied behind the scenes. It has taken part in writing the memo of the working group on restrictions on alcohol marketing and has given critical statements on alcohol marketing laws directly to the Ministry of Social Affairs and Health. (Sosiaali- ja terveystieteiden ministeriö 2010; SAJK 2012)

The Finnish Hospitality Association (MaRa) together with SAJK could also be included as an interest group of the alcohol industry since they share some common goals. However MaRa has not been a visible actor in the lobbying process. One could also identify media and advertisement agencies as interest groups of alcohol industry, since the alcohol industry spends a notable amount of its income to marketing and sales activities. In addition to the Finnish interest groups, Finnish alcohol industry is also connected to actors operating in the European Union.

Alcohol industry also supports consumer associations. Finnish beer association (Olutliitto ry) claims to be an independent interest group of beer consumers. Finnish beer association has taken a stand on alcohol policy restrictions. In 2012 Finnish beer association announced that the ongoing changes on alcohol policy should be put back until next government. The announcement also states that the opposition to patronizing alcohol policy and inefficient tax increases has grown among the members of parliament during the last months. (Olutliitto 2014) In addition to the support of Laitilan Wirvoitusjuomatehdas all the three major brewing companies operating in Finland support Finnish beer association.

In the European Union the communication between alcohol industry and its interest groups takes place in the alcohol and health forum of the European Commission. It is a place where all the interest groups are able to discuss about the best practices

to reduce the harm caused by alcohol in society. Co-operation between the parties has an essential role in the forum. All the parties have committed themselves to decreasing the problems relating to alcohol abuse. (European commission 2006) In the alcohol and health forum the alcohol industry and its interest groups are brought together in spite of their commercial motives. This represents the basic operational principles implemented in the European Union. In the forum there are members both from the alcohol industry and from the health sector. In addition researchers take part in the discussion. (European commission 2014) The commission does not possess any power of decision in regards to national alcohol policies, since EU highlights national alcohol policies instead of harmonization (European commission 2006, 17).

In the European Union there are two professional lobbying organizations of the alcohol industry. One of them is The Brewers of Europe and the other is Spirits Europe. (The Brewers of Europe 2015a; SpiritsEurope 2015) Together with their partners these organizations operate in the European Alcohol and health forum. Both of the two organizations have members from all over Europe. Finnish Federation of Brewing and Soft Drinks Industry is a member of The Brewers of Europe. The two international organizations share the common goals in regard to functional business and economic influence. (The Brewers of Europe 2015a; SpiritsEurope 2015)

5.1.2 LEGISLATIVE PROCESS

5.1.2.1 BACKGROUND OF ALCOHOL LEGISLATION

Until the year 2004 passenger import of alcohol beverages from another EU-country to Finland was restricted. From the beginning of the year 2004, Finland has followed the principle of free movement of goods. Due to the free movement of goods and the alcohol policy carried out by European Union, the quantitative quotas for alcohol beverage import from another member country were removed on 1.1.2004. Estonia became a member of the European Union on 1.5.2004 and along with Estonia's membership free and unlimited passenger import of alcohol beverages was possible. (Korolainen & Österberg 2004) Consequently, in the beginning of the century

remarkable changes took place from the perspective of Finland's alcohol policy. Under these circumstances the Finnish government had to act.

In the government bill in 2003 (VaVM 2003) it was estimated that the removal of the quantitative quotas for alcohol beverages together with the EU membership of Estonia will cause a significant increase in the passenger import of alcohol beverages and a remarkable decrease in the domestic sale of alcohol, if the alcohol taxation remained unchanged. In the bill it was also estimated that the indirect tax incomes will decrease over 400 million euros if there would be no reduction in the alcohol tax. The Social Affairs and Health Committee estimated in its statement that if the reductions in the alcohol tax will be executed, the consumption of alcohol will increase and the harm caused by alcohol will grow. (HE 80/2003) According to Östberg (2005) the increase in import of alcohol beverages would have caused narrowing of the alcohol taxation and decreases in the Finnish alcohol production and trade. In addition, the increase in import would have had influence on employment and the prevalence of black markets. As a solution the government proposed decreases in the excise of alcohol beverages. The proposal was approved in the Finnish parliament on 18.12.2003 and came into effect the following year. Hence the taxation of alcohol beverages decreased between 10 and 44 percent. (Östberg 2005)

The tax reduction led to decreases in the prices of alcohol beverages. However the prices still remained higher than in Estonia. As a consequence of the tax reductions the total consumption of alcohol beverages increased 9.9 percent between 2003 and 2004. The retail sale of alcohol beverages increased 8.8 percent when converted to 100 % pure alcohol. The licensed sale of alcohol beverages decreased 3.8 percent. As such, the increase in alcohol beverage retail sale was notable. (Österberg 2005) In April 2004, as a response to the worrying situation, the Finnish Ministry of Social Affairs and Health commenced the "Alcohol Program 2004-2007". (Sosiaali- ja terveystieteiden ministeriö 2006).

The Finnish government was concerned about the increased harm caused by alcohol and nominated a working group of ministers in November 2005. The working

group proposed and the government supported the following actions: to refine the retail sale of alcohol beverages, to allow television advertisement of alcohol beverages only after 9 pm, to deny the volume discounts of beer and to mark alcohol beverages with warning labels. The government did not propose alcohol tax increase even though the tax reductions in 2004 caused significant increase in the consumption of alcohol. (Sosiaali- ja terveystieteiden ministeriö 2006; Montonen 2008) The next tax increase of alcohol beverages after the increase of 2003 came into effect not until 2008, when the taxes of strong alcohol beverages increased 15 percent and other alcohol beverages by 10 percent. The increases came into effect in 2009. At the end of year 2009 the government proposed a new 10 percent increase in the taxes of alcohol beverages as a response to damages caused by the economic crises. The next increase took place in 2012 when the taxation of alcohol beverages increased from 10 to 15 percent. (Karlsson, Kotovirta, Tigerstedt, Warpenius 2013)

The changes that the ministry working group proposed came into effect in 2008, apart from the changes in the time of the retail sale of alcohol beverages. The parliament approved the warning labels in February 2007. (STM, tiedote 9/2008) The implementation was planned by a working group of Paula Risikko. The working group consisted of six members from which three members represented industry and commerce. Again the Finnish Brewing and Soft Drink Industry was one of the members. (Montonen 2008) Before minister Risikko nominated the members of the warning label working group she arranged a hearing, to which the representatives of alcohol industry took part. (Montonen 2008)

Before the warning label law came into effect, minister Risikko made a proposal to revoke the law. The proposal led to the annulment of warning labels. (STM, tiedote 9/2008) Risikko claimed, that the reason for the annulment was the feedback from the European Commission. However, the Commission did not recommend Finland to revoke the warning labels, but rather resisted the phrasing. The alcohol industry began to lobby in 2005 in order to keep the changes in the licensing law to a minimum level. The focus of lobbying varied between opposing the restrictions in marketing and the warning labels. The alcohol industry strived to influence the alcohol policy throughout the process led by Finnish Brewing and Soft Drink Industry. The

Finnish Brewing and Soft Drink Industry opposed the warning labels throughout the process. (Montonen 2008; Karlsson et. al. 2013)

Between 2003 and 2007 the first government of Matti Vanhanen had ambitious goals to restrict the marketing and availability of alcohol beverages. Eventually the government decided to nominate a working group instead of executing the changes in the licensing law. The objective of the working group was to consider how the marketing of alcohol beverages would better fit on the goals of the licensing law. The working group on alcohol marketing was organized by minister Hyssälä. In this working group industry and commerce had four representatives out of six, the Finnish Federation of Brewing and Soft Drink Industry being one of them. This was exceptional since traditionally the industry did not take part in the process of licensing law preparation. As a result a paper was introduced which did not point out any practicalities how to restrain the marketing of alcohol beverages and did not resulted in any measures. (Montonen 2008)

In the spring of 2009 the government proposed reforms regarding alcohol criminal law and mental image marketing of alcohol. In addition the government proposed that the mental image marketing and the marketing crime paragraphs of the law should be included into criminal law, which came into effect at the end of the year 2009. (Karlsson et al. 2013) Mental image marketing refers to advertisement that pursues to effect the consumer through mental images. Hence, mental image marketing highlights for example lifestyle, instead of the product itself. (BusinessDictionary 2015).

In the autumn 2009 as a response for demand from the government Ministry of Social Affairs and Health nominated a working group on alcohol marketing restrictions. The objective of this working group was to evaluate the need for additional restriction in alcohol marketing, to collect scientific evidence of the effects of alcohol marketing and to clarify the ways to intervene the alcohol consumption of the youth. (Karlsson et.al. 2013; Hellman 2012) The working group was led by Paula Risikko, the minister of social affairs and health. The chairman of the working group was secretary of the state Ilkka Oksala, a representative of National Coalition Party (Finnish Kokoomus;

kok) and also nominated by National Coalition Party. The chairman was changed in the middle of the process. The new chairman was Vesa Rantahalvari from National Coalition Party. (Hellman 2012)

Matilda Hellman interviewed the members of Risikko's working group on alcohol marketing restrictions, and according to them The Finnish Brewing and Soft Drink Industry had a close relationship with both of the chairmen. Three of the nine members of the working group represented industry and commerce and two represented the ministry of Finland. Alcohol industry was represented by the CEO of the Finnish brewing and soft drink industry. Industry and commerce was nominated to pursue its own interests (*ajamaan omaa etuaan*), which was executed by opposing the restrictions of alcohol marketing. Other members were representatives of foundations including, Alko, national health organizations and public servants of the social and health sector. (Hellman 2012; Sosiaali- ja terveystieteiden ministeriö 2010) The working group did not reach consensus. The focus of attention was the question of the restrictions of mental image marketing, which led to voting. The majority of the members voted against the restrictions. (Hellman 2012)

The working group of Risikko was criticized for overrepresentation of industry and commerce. The members of the working group voted against the restrictions of alcohol marketing, even though the majority of the members of the Finnish parliament supported the restrictions. It had been said that the representation of the alcohol industry in the working group was against the principles of democracy. However, the public servants of the social and health sectors were criticized for creating an opposing dichotomy. (Hellman 2012) However, in the decision making processes of the European Union these types of working groups are basic practice. As it is, the working group decided that there is no need for additional restrictions on alcohol marketing regulation. However, restrictions related to alcohol marketing were put into the Government Program 2011. (Karlsson et. al. 2013)

In addition to the official working group of Risikko, she also nominated two unofficial working groups in 2010 in response to the bill of Inkeri Kerola, which demanded the prohibition of mental image marketing. One of the working groups considered the

means of Finnish alcohol policy and made a proposition of operations. The other unofficial working group was focused on alcohol marketing and advertisement. There were no representatives of industry and commerce in these working groups. The members were from the Ministry of Social Affairs and Health, university of Helsinki, University of Tampere and National Institute for Health and Welfare (THL). First group gathered five times and the other seven times. The chairman of both groups was Vesa Rantahalvari. Apart from the chairman, all the members supported the restriction of mental image marketing. Rantahalvari supported the negative list, which refers to a detailed catalog of the forbidden elements. Positive list is the opposite, a catalog showing the allowed elements, which is used for example in Sweden (Alkohollag 2010:1622). (Alkoholimainonta työryhmä muistio 2010; Alkoholipolitiikka työryhmä muistio 2010)

The working group on alcohol marketing listed proposals in regards to restrictions of alcohol marketing. The first proposal of the working group suggested that the mental elements should be removed from alcohol marketing. To execute this the working group suggested two alternative models. The first model was to limit the marketing of alcohol beverages to only product information with a positive list, which was supported by the majority of the working group. The other model was to change alcohol law 33 § second monument with the negative list. The negative list has turned out to be problematic for example in regards to surveillance, limitations and legal certainty. The opponents of alcohol marketing restrictions tend to support the negative list. In media the negative list is often shown as a constant catalogue of prohibitions and regulations which can be seen from the media discussion in relation to the subject. The other model of the unofficial working group was to limit alcohol marketing primarily with legislation and with functional regulatory supervision alongside with the self-regulation of alcohol industry. The working groups finished working in 2010. There were no official written memos. In addition, no official voting took part in the working groups. (Alkoholimainonta työryhmä muistio 2010; Alkoholipolitiikka työryhmä muistio 2010)

Members of the Finnish parliament have constantly propose restrictions in regards to marketing of alcohol beverages. In 2010 the member of the parliament Paula

Sihto (Centre Party) made a written inquiry about the prohibition of mental image marketing of alcohol beverages. In 2011 Reijo Hongisto (Finns Party) made a written question regarding the prohibition of marketing alcohol beverages in general. (Eduskunnan kirjasto 2015)

5.1.2.2 THE BACKGROUND OF THE CHANGES IN ALCOHOL MARKETING LAWS

In 2010 congresswoman Inkeri Kerola (Centre Party) introduced a bill on the prohibition of mental image marketing of alcohol beverages. At the same time minister Päivi Räsänen (Christian Democrats) introduced an equivalent bill (LA 59/2010 vp). (Eduskunnan kirjasto 2015) The working group that researched alcohol marketing gave its memo to the Ministry of Social Affairs and Health in June 2011. The experts of the working group supported complementing restrictions on alcohol marketing. During the summer 2010, 106 members of parliament signed the bill of Inkeri Kerola, which is over half of the representatives. It was unusual that over half of the representatives signed a bill founded by a member of the parliament. The bill proceed into preparation. The experts of the working group supported the suggested complementing restrictions on alcohol marketing. However Risikko's (kok) working group on alcohol marketing decided that there was no need for further restrictions. In 2012 the bill of Inkeri Kerola was rejected. (LA 90/2012 vp)

After the working group of Risikko (kok), the restrictions on alcohol marketing were again processed in 2012 when the Ministry of Social Affairs and Health gave a proposal for parliament's bill in the spring 2012 to change the alcohol- and criminal law's sections 33 and 40, which was a starting point to the changes of the licensing law in 2015 (lakimuutos). The proposal included the prohibition of mental image marketing of alcohol beverages and prohibition of the outdoor marketing of mild alcohol beverages, excluding the immediacy of retail selling locations. In addition, time limits for alcohol advertisement in radio and limitations to television advertisement of alcohol were proposed. (Sosiaali- ja terveystieteiden ministeriö 2012)

There were two circulations of a proposal for comment regarding changes in the licensing law. The first circulation of a proposal took place in spring 2012, and the second in spring 2013. In the first circulation of a proposal for comment different authorities, health organizations, child protection organizations, communication interest groups, alcohol industry, commerce interest groups and Finnish Ice Hockey Association gave statements. Opinions were divided in two, the health sector supported restrictions and the alcohol industry together with the commerce, communication and Finnish Ice Hockey Association opposed all the restrictions. (Sosiaali- ja terveystieteiden ministeriö 2012)

Finnish Federation of the Brewing and Soft Drinks Industry was one of the organizations giving its statement during the first circulation of a proposal for comment. The Finnish Federation of the Brewing and Soft Drinks Industry stated that the competitiveness of Finnish brands become weakened with the restrictions, which will endanger Finnish jobs. Finnish Federation of the Brewing and Soft Drinks Industry also stated that the existing self-regulation of advertisement is functional, and that the mental image marketing does not raise the total consumption of alcohol. In addition, Finnish Federation of the Brewing and Soft Drinks Industry highlighted the responsibilities of society in alcohol education and appealed to neutrality in restrictions towards different media channels. Finnish Federation of the Brewing and Soft Drinks Industry also stated that the alcohol consumption of youth is decreasing, and that advertisement decreases the mystification of alcohol. Moreover Finnish Federation of the Brewing and Soft Drinks Industry stated that the scientific evidence on the effects of alcohol marketing in Finland is insufficient. (Panimoliitto 2012)

In the second circulation of a proposal the proposal was changed. In the new proposal mental image marketing of alcohol was no longer proposed to be forbidden. In addition, there was a new exception related to outdoor advertisement of alcohol. According to the exception, the outdoor advertisement was prohibited excluding public events, such as sporting events. In the first proposal it was stated that alcohol marketing should be defined in law, while in the second proposal this was changed into the proposal to add more definitions of forbidden means of alcohol marketing. (HE luonnos 25.4.2012; HE 70/2013 vp)

Finnish Federation of the Brewing and Soft Drinks Industry gave a statement also in the second circulation of a proposal for comment. In the statement the Finnish Federation of the brewing and soft drinks Industry opposed the changes, by claiming that the changes will weaken the competitiveness of Finnish brewing companies and due to that put jobs in danger. In addition, the Finnish Federation of the Brewing and Soft Drinks Industry emphasized that the abuse of alcohol is a problem of old people and not of youths. Hence, society should focus on developing culture related to alcohol consumption instead of restrictions. According to the Finnish Federation of the Brewing and Soft Drinks Industry, the restrictions will lead to price wars between brewing companies, and are based on defective scientific evidence. The Finnish Federation of the Brewing and Soft Drinks Industry also highlighted the functional self-regulation of alcohol industry and the freedom of trade. (Panimoliitto 2013)

In 2013 in the plenary session on changing the alcohol- and criminal law's sections 33 and 40 congresswoman Jaana Pelkonen (kok) strongly opposed the prohibition of mental image marketing and all additional restrictions. The congresswoman argued that the restrictions are inefficient, and highlighted the responsibilities of parents. According to the congresswoman, society should not take responsibility for controlling alcohol usage, but that it should rather offer alcohol education and coercive treatment for alcoholics. (Pelkonen 2013)

In 2012 Congressman Lasse Männistö (kok) and Congresswoman Sanni Grahn-Laasonen (kok) brought out their views concerning alcohol marketing restrictions. Both of the representatives were in the social and health committee, but rejected the proposal of social and health committee concerning alcohol marketing restrictions. According to the representatives, the proposal was too restrictive and against the government policy statement. The representatives appealed to the harms the restrictions may cause, including the increased consumption due to the price competition. In addition, the representatives claimed that the advertisement will move to the internet due to the restrictions. The representatives also claimed that the restrictions on outdoor marketing endanger the existence of sport clubs and

world-class sport. (Männistö 2012) However, in 2014 both of the representatives voted for the restrictions of alcohol marketing. In the vote, 99 representatives voted for the restrictions and 70 opposed the restrictions. The ones who opposed the restrictions supported the protest, in which it was stated that the proposal is insufficient. Hence these representatives supported more intensive restrictions on alcohol marketing. (Verkkouutiset 2014; StVM 29/2013)

The second proposal was accepted. As such, after the second circulation of a proposal for comment in 2013, the Committee of Ministry of Social Affairs and Health outlined that the proposition to forbid mental image marketing of alcohol beverages will be dismissed. In addition they added a new exception, which included allowance of outdoor advertisement in public events. In addition a new restriction concerning alcohol marketing in social media was added. In the second circulation of a proposal for comment most of the actors that had given a statement maintained the same position. (Sosiaali- ja terveystieteiden ministeriö 2013) Consequently, in 2013 the consensus was reached and new amendments were sealed. Based on the proposals of the working group, new amendments came into effect in 2015. Outdoor marketing of alcohol beverages was prohibited excluding public events. In addition, amendments in regard to television and radio advertisement took place. (Karlsson et. al. 2013) The turning points of the legislative process are pictured in the figure 9.

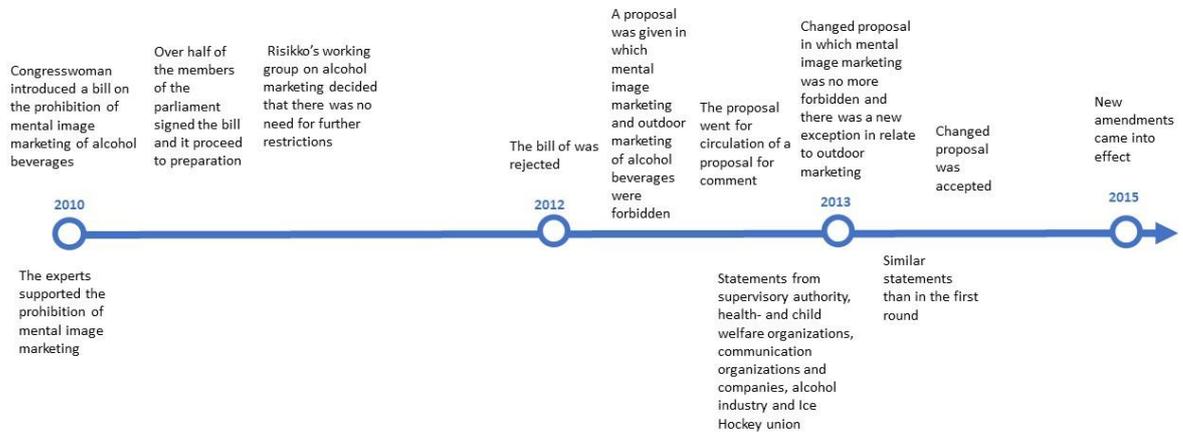


Figure 9. Legislation process timeline

5.1.2.3 CHANGES IN THE DRAFT LAWS

In the first governments proposition for the parliament it was stated that the most recent studies on alcohol marketing clearly reveal that alcohol marketing increases alcohol consumption of and the youth (HE luonnos 25.4.2012, 3). In the second governments proposition for the parliament the former was changed into “According to studies alcohol marketing increased the consumption of alcohol of the youth for its part.” (HE 10/2013 vp, 3) The stated objective of the first proposal was to minimize the situations in which youth are exposed to alcohol marketing. In the second proposal the objective was changed into allowing alcohol marketing to an extent that is necessary from the perspectives of the producers, sellers and consumers. (HE luonnos 25.4.2012; HE 70/2013 vp)

In the first governments proposition for the parliament it was stated that according to European court of justice alcohol marketing increases the consumption of alcohol (Tuomio C-152/78 Komissio vastaan Ranska). In addition, in the statement it was stated that the restrictions in alcohol marketing might harm alcohol beverage selling and company penetration to markets. According to the proposition, the restrictions

might also limit the freedom of service supply. In the second government's proposition for the parliament the statement that alcohol marketing increases the consumption was removed and it was stated that there is no clear scientific evidence on the alcohol marketing influence on the total consumption of alcohol (HE luonnos 25.4.2012, 6; HE 10/2013 vp, 6-7, 11). In the second government's proposition for the parliament it was once more highlighted that this proposal does not concern the effects of alcohol marketing on total consumption since the scientific evidence on the subject is not unambiguous. This was not stated in the first government's proposition for the parliament at all. (HE luonnos 25.4.2012; HE 10/2013 vp, 11) In addition to the second proposition for the parliament a sentence was added according to which it is clear that alcohol marketing is not the only or not the most influential factor in regards to alcohol consumption of the youth. (HE 10/2013 vp, 17)

In the first government's proposition for the parliament it was stated that the objective of advertisement is to represent a product in a way that increases the positive attitude of a consumer towards the product and encourages to purchase it. According to the proposition the goal of advertisement is to increase the consumption which makes the alcohol marketing contrary to the objectives of alcohol policy. In the proposition it was stated that the biggest conflict is created when a young person faces alcohol education and alcohol marketing based on mental images at the same time. (HE luonnos 25.4.2012, 8). In the second government's proposition for the parliament this chapter was removed (HE 10/2013 vp, 9).

In the first government's proposition for the parliament it was suggested to change the paragraph of alcohol advertisement, promotion and indirect marketing. In the proposition it was suggested that the current listing of prohibited subjects in alcohol advertisement would be changed into positive listing, which refers to a list of allowed subjects in alcohol marketing. In the second government's proposition for the parliament the suggested positive listing was changed back to present negative listing with new additional prohibitions. The positive listing basically refers to the prohibition of mental image marketing of alcohol. In this situation the advertisement based on product information was suggested to remain allowed. (HE luonnos 25.4.2012; HE 70/2013 vp)

In the first government's proposition for the parliament the prohibition of advertisement in public places was suggested. In the second government's proposition for the parliament there was a new exception in the prohibition. In the first government's proposition for the parliament it was suggested that the prohibited presentation time of alcohol advertisement in television would be lengthened by two hours. In the second government's proposition for the parliament the lengthening was only one hour. In addition, in the second proposal there was a new insertion, according to which alcohol marketing through games, lotteries and content created by consumers would be forbidden. (HE luonnos 25.4.2012; HE 70/2013 vp)

5.1.3 MEDIA DISCUSSION

Between the years 2004 and 2006 the discussion about the marketing of alcohol beverages was relatively slim and the arguments were fairly simple. Arguments that supported restrictions for alcohol marketing were focused on the protection of youth and children, while arguments against the restrictions doubted the functionality and effectiveness of the restrictions. The opponents stated that the restrictions are just dappling and do not really pursue to influence alcohol consumption. (Sosiaali- ja terveystieteiden ministeriö 2007b) After the bill of Inkeri Kerola in 2012, the media discussion about alcohol marketing escalated.

After 2012 the Federation of the Brewing and Soft Drinks Industry was the voice of the alcohol industry in the media discussion, together with the Federation of the Finnish Media Industry, the Association of Finnish Alcoholic Beverage Suppliers, Sinerbrychoff and the Finnish Association of Marketing Communication Agencies together with some other companies from media industry. In addition, a few professors of marketing have expressed similar arguments in the media discussion. These actors have been opposing the restrictions on alcohol marketing, while the health sector has been supporting them. The health sector refers to actors such as the Finnish Association for Substance Abuse Prevention, National Institute for Health and Welfare, child protection organizations and the Ministry of Social Affairs and Health.

Professors of marketing Tikkanen and Aspara opposed the restrictions on alcohol marketing in their letter to the editor in 2012 in Helsingin Sanomat. Aspara and Tikkanen opposed the restriction by claiming that there is no unambiguous evidence that the restrictions on marketing will decrease total consumption of alcohol. In addition, the professors appealed to scientific evidence that demonstrates that alcohol marketing does not have any influence on total consumption of alcohol. The professors also stated that the prohibition of alcohol marketing increases the significance of brand and price of the product. Consequently according to the professors the restrictions on alcohol marketing might increase the total consumption of alcohol. (Aspara & Tikkanen 2012)

In 2013 Aspara and Tikkanen criticized the research that demonstrated the influence of alcohol marketing which was used by the Ministry of Social Affairs and Health to justify the restriction. The professors claimed that the studies used were too narrow and that the studies that showed no correlation between alcohol marketing and consumption were excluded. (Aspara & Tikkanen 2013b) Eventually the professors published a review of the studies that the Ministry of Social Affairs and Health used in the law drafting (Aspara & Tikkanen 2013c). The same studies, utilized by the Ministry of Social Affairs and Health and criticized by the professors, are also the basis of a report of Science Group of European Commission. The studies demonstrated that the restrictions on alcohol marketing are an efficient way to influence the alcohol consumption of youth. This report consists of several longitudinal studies on the effects of alcohol marketing on the alcohol consumption of youth. (Anderson, Foxcroft, Kner, Martinic, Moskalewicz, Nociar 2009)

The Chairman of the Association of Finnish Alcoholic Beverage Suppliers Tarja Uitti was critical towards the bill that suggested restrictions on alcohol marketing. Uitti highlighted the influence of the circle of acquaintances in regard to alcohol consumption. Uitti argued that the restrictions will not lead to the desired results. In addition, according to Uitti the definition of mental image marketing is problematic and cannot be precisely defined. Uitti also united with other opponents by emphasizing the negative economic effects and distorted competition. Furthermore, Uitti

expressed her trust concerning the self-regulation of alcohol industry. (Uitti 2012) Also Tarja Virmala, the Chairman of the Finnish Association of Marketing Communication Agencies criticized the bill of Ministry of Social Affairs and Health by claiming that restrictions on alcohol marketing do not influence alcohol consumption of youth, and do not stop youth from seeing alcohol advertisements. Virmala claimed that the advertisement will take place in social media in spite of the restrictions. Virmala also stated that the cultural aspects and education are more important factors than marketing with respect to alcohol consumption. Like other opponents of the restrictions, Virmala highlighted the potential price war and competitive advantages of foreign companies. Virmala was also active in social media opposing the restriction in a discussion platform of the Joisitko vähemmän –campaign. (Virmala 2012)

Outdoor advertising company JCDecaux has actively opposed the restrictions of mental image marketing of alcohol marketing via campaigning (Joisitko Vähemmän) and through discussion in social and traditional media. The CEO of the company claims in the Trade Newspaper (Finnish Kauppalehti) and in the internet pages of the company that the reasons to consume alcohol comes from attitudes and culture, and not from marketing. In addition the CEO does not rely on the scientific evidence on which the alcohol marketing restrictions are based. According to the CEO, the changes in the licensing law violate the freedom of the speech and does not represent responsible business policy. (e.g. Kuhanen 2012a; Kuhanen 2012b) The campaign (Joisitko Vähemmän) opposed the restrictions in mental image marketing of alcohol being a response to the bill on the prohibition of mental image marketing. (Facebook 2015) In connection to the campaign, the CEO of JCDecaux also published an open letter to Finnish Association for Substance Abuse Prevention and National Institute for Health and Welfare in which he opposed the restrictions (Kuhanen 2012c). In addition, JCDecaux carried out surveys concerning the beliefs of Finnish people towards the correlation between alcohol marketing and alcohol consumption (Kauppalehti 2012).

The Federation of the Brewing and Soft Drinks Industry has expressed its opinion mostly through interviews and social media. Especially the Managing Director actively uses social media to bring out their views. In media the Federation of the Brewing and Soft Drinks industry has concentrated on arguments suggesting that the alcohol consumption of young people is not influenced by restrictions, but rather with education and with the change of alcohol culture implemented through self-regulation. The Federation of the Brewing and Soft Drinks industry claims that the cultural aspects together with the international trends, guide the alcohol consumption of the youth which makes the restrictions ineffective. In addition, The Federation of the Brewing and Soft Drinks tends to diminish the effects of alcohol marketing by emphasizing the influence of family and the circle of acquaintances. The Federation of the Brewing and Soft Drinks industry also appeals to the loss of jobs caused by weakened competitiveness produced by alcohol marketing restrictions. (e.g. *Helsingin sanomat* 2012; *Kauppalehti* 2014; *MTV* 2014).

5.1.3.1 SOCIAL MEDIA DISCUSSION

In social media the objective of the Federation of the Brewing and Soft Drinks Industry is to raise discussion and share information that fit together with its own intentions. For example, in Twitter the Federation of the Brewing and Soft Drinks Industry has shared over 11000 publications. In Twitter the Federation of the Brewing and Soft Drinks Industry concentrates on sharing news, studies and comments that support its own views. For example alcohol industry tends to share and address writings that are critical towards restriction of alcohol marketing. In addition, the Federation of the Brewing and Soft Drinks Industry actively takes part in conversations concerning its own subjects of interest. In spring 2015 the Federation of the Brewing and Soft Drinks Industry has often expressed its worries about the high tax rate of alcohol and the loss of jobs in Finnish alcohol industry *due to the lower taxation in Estonia*. (*Twitter account of the Federation of the Brewing and Soft Drinks Industry*) In addition to Twitter, the Federation of the Brewing and Soft Drinks Industry has user accounts in Facebook, Instagram and in LinkedIn.

In their Facebook page the Federation of the Brewing and Soft Drinks Industry shares similar material as in Twitter. The CEO of the Federation of the Brewing and Soft Drinks Industry Z took actively part in the discussion of Joisitko vähemmän – campaign by bringing forward the views of the Federation of the Brewing and Soft Drinks Industry. Many representatives of the health sector also took part in the discussion. (see Joisitko vähemmän -Facebook –yhteisö)

The Federation of the Brewing and Soft Drinks Industry has ordered the production of so called silent reportages and teds to be shared in social media. The Federation of the Brewing and Soft Drinks Industry orders the reportages from Newsbrokers Ltd, which is specialized in these type of reportages. The reportages concern compilation of statistics on deaths caused by alcohol, public sector support on temperance work and the beneficiaries of Finnish alcohol policy. The silent reportage is a collection of expert's statements and interviews compiled to answer the need of the customer. Newsbrokers Ltd claims that the quality and the objectivity of the reportages is guaranteed by the fact that the customer is only in charge of defining the subject, extent of the reportage and the purpose of use. (Newsbrokers 2014) The silent reportages are not scientific publications but can be utilized as a conversation piece.

5.2 INTERVIEWS

5.2.1 ALCOHOL INDUSTRY LOBBYISTS

According to Z, lobbying is equally important to all industries. Z states that alcohol industry lobbying has an important role in the political decision making process by bringing out different viewpoints. According to Z, the lack of lobbying would be a huge loss in the process of building this country. However, Z does not agree with the statement that alcohol industry lobbying has an effect on alcohol policy.

Z claims that alcohol industry does not have any lobbying strategy due to lack of time and resources. According to Z they simply deal with one issue after another. Z thinks that, for example, communication agencies are not able to create a proper

strategy, and as such the strategy has to be created by the organization itself. Hence alcohol industry does not utilize the services of communication agencies in its lobbying.

When it comes to the means of lobbying utilized by the Finnish federation of brewery and soft drink industry, Z mentions that she closely follows the discussion about alcohol policy and lobbying. According to Z, alcohol industry communicates about everything that it does.

Z states that the lobbying of alcohol industry is based on networks and building confidential relationships, so that it becomes possible to communicate without restrictions. The relationships are constantly built upon and are an essential part of the lobbying of industry and commerce, Z claims. According to Z meeting the right persons is an essential part of the lobbying of the Finnish Federation of brewery and soft drink industry. However, Z denies utilizing former relationships. According to Z every position comes with its own networks to take up with.

Z cannot address any specific matters that alcohol industry has achieved through lobbying. According to Z, a single actor cannot influence political decision making but it demands prolonged discussions or the support of other parties'. Lobbying is done in co-operation and politicians make up their minds individually, Z claims. According to Z, one could see that alcohol industry has failed in its lobbying efforts since many disadvantageous policies have come into effect. However, Z points out that without lobbying even more disadvantageous policies could have come into effect.

With respect to alcohol marketing restrictions, alcohol industry began to lobby in 2005. However, in 2014 and 2015 the subject has been more topical. In regard to alcohol marketing restrictions, alcohol industry sees that the policies before the changes in 2015 were appropriate. Principally alcohol industry sees that there is no need for more restrictions, which is the message that alcohol industry tried to emphasize in the legislation process. Hence, Z cannot point out anything in which alcohol industry had succeeded in during the legislation process.

Z sees that the result of the legislative process in 2015 was a fiasco. Z states that many important subjects disregarded by the decision-makers during the legislative process, and hopes that some changes would take place during the next administration. Z does not think that the prohibition of mental image marketing of alcohol would have been a better result than the prohibition of outdoor marketing and restrictions in social media marketing. However, she is not able to compare the two different kinds of results and cannot say that the current solution is better than the prohibition of mental image marketing. Z cannot assess why the process ended up with the current result. According to Z, the new restrictions do not serve anyone's interests.

Z believes that in 2007 when the warning labels on alcohol beverages were accepted and dismissed right afterwards, alcohol industry was not able to have alone influenced the outcome. However, according Z the removal of the warning labels was in the interests of the Finnish Federation of brewery and soft drink industry. Z was not in the position of CEO at the time.

Concerning the discussion about medium strength beer, the success of alcohol industry according to Z might be based on the behavior of citizens that raised up the subject in media. Alcohol industry is not able to guide such discussions. Alcohol and drinking culture per se are subjects that raise the interest of citizens.

Alcohol industry actively uses social media in its lobbying. According to Z, active openings in social media are a vital part of her job description. Z states that one of the most important aspects is also to follow the discussion concerning alcohol industry. Z claims that the Federation of the brewing and soft drink Industry does not try to raise certain topics in social media, but comments on subjects that are already being discussed. However, according to Z the Federation of the brewing and soft drink industry shares its own materials in social media. According to Z, it is better that someone else starts the conversation concerning alcohol policy than an actor who represents the alcohol industry.

The annual budget of the Federation of the Brewing and Soft Drinks Industry is 420 000 euros. According to Z, the Federation of the Brewing and Soft Drinks Industry does not use resources for lobbying through media. However they have executed the “Kännissä olet ääliö” campaign and ordered silent reportages from Newsbrokers Ltd. According to Z, the silent reportages have been utilized as opening statements for discussions in social media. Z has been satisfied with the reportages and considers them to be objective, considering the critical perspectives in each reportage and due to the fact that Newsbrokers Ltd. has decided the contents. She states that the reportages highlight different viewpoints. Z claims that the reportages are utilized to raise attention towards different subjects.

According to Z the Federation of the Brewing and Soft Drinks Industry does not carry out or order scientific research. According to Z, one has to manage with the studies on alcohol policy that the National Institute for Health and Welfare and universities produce. However, she hopes scientific studies from different fields are taken into account. Z claims that scientific research that is ordered by some actor is not objective. However, according to Z this does not apply for the silent reportages, since they are not scientific studies but rather interviews and every interviewee is responsible for their own responses.

According to Z, there are shortcomings in the process of how scientific evidence influencing the alcohol marketing restrictions are chosen. The scientific evidence behind the restrictions are based on the report of European science group. Z claims that it is a Finnish mentality to rely blindly on statements of the public servants. She thinks that critical discussion about the scientific studies behind the restrictions is a good thing, and hopes that there would be even more of it.

The Federation of the Brewing and Soft Drinks Industry has taken part in three working groups on alcohol policy during 2004-2014. When asked about the working groups, Z says she cannot comment since she was not in her current position at that time.

According to Z, the Federation of the Brewing and Soft Drinks Industry does not have special relationships with any Finnish political parties, but does have good rapport with every party. The three last CEO's of the Federation of the Brewing and Soft Drinks Industry have strong political backgrounds closely connected with the Finnish National Coalition party. According to Z, her work is consists of constant network building, and therefore old relationships are not utilized. Z claims that the lobbying is not targeted to any specific political party, rather the goal is to find the right people that share the same interest, possess the political influence and are willing to speak and act.

According to the Federation of the Brewing and Soft Drinks Industry, alcohol marketing does not have an influence on the total consumption of alcohol beverages. According to the Federation of the Brewing and Soft Drinks Industry, alcohol marketing influences the market share between different brands. According to Z, clever alcohol marketing can have a positively effect on drinking culture. According to Z the Brewers of Europe collects information from the European Union and are able to pass the information to the Finnish alcohol industry.

According to Z, the concept of mental image marketing is hard to define, which makes the legislation hard to interpret. Z also emphasizes the functional self-regulation of alcohol industry in Finland. Z also states that if the mental image marketing of alcohol would be prohibited, careful effectiveness assessment should be conducted. Z emphasizes the lack of Finnish scientific research on the matter, and claims that the studies from, for example, the United States do not apply in Finland. Z wonders why there is not any Finnish studies on the matter, while the National institute for health and welfare uses notable resources on alcohol studies. Z ponders whether the lack of domestic scientific evidence is intentional because public servants are afraid to present studies that do not support the restrictions of alcohol marketing. According to Z, since there is no scientific evidence from Finland one cannot claim that alcohol marketing influences the total consumption of alcohol.

5.2.2 MEMBER OF LOBBYING COALITION

According to X the company became interested in alcohol marketing restriction in 2006 or 2007 when they discussed with alcohol industry about the marketing of alcohol in the immediacy of schools. X claims that the company has been aware that it should be ready to react in regards to discussion about alcohol marketing restrictions.

According to X, the company has tried to bring out their views in form of campaigning. X states that the aim was to raise discussion and opposing reactions towards the restrictions of alcohol marketing among the public. However, according to X the reactions arose when it was already too late. X claims that there was discussion among the experts but not among the public. According to X, the company campaigned against marketing regulation in general. X states that campaigning was a way for the company to try to influence the political decision-makers through media. X claims that it is possible that today lobbying is executed more and more through the public opinion, rather than by face to face discussion between the lobbyist and the political decision-maker.

According to X it seems that the alcohol industry does not have a major influence on political decisions in regards to alcohol regulation. X states that media and social media are much more powerful in the sense of influence.

X had understood that the Finnish political party National Coalition Party did not want to prohibit the mental image marketing of alcohol beverages. X estimates that the legislation process ended up with the prohibition of outdoor marketing due disagreements between the two political parties National Coalition Party and the Social Democratic party of Finland. The company is very disappointed with the outcome of the legislative process, since it had influence on its business. X cannot comment whether the prohibition of outdoor marketing of alcohol beverages would have been preferred by alcohol industry in comparison to the prohibition of mental image marketing of alcohol.

5.2.3 PUBLIC SERVANT

Y assesses that from the perspective of industry and commerce, lobbying is probably a significant channel of influence. According to Y, lobbying is a normal and understandable part of a company's marketing and communication strategy. However, in Y's opinion from the viewpoint of our democratic decision making system, there should be some kind of lobbying register to guarantee transparency. Y states that the same applies for alcohol industry lobbying. Industry needs to fight their case and bring out their point of view. According to Y though, the question is whether the alcohol industry recognizes the appropriateness of the execution of their lobbying. Y adds, that recently alcohol industry lobbying has had features that can be considered ethically questionable.

Y states that from the viewpoint of alcohol industry, lobbying is definitely effective. According to Y, alcohol industry has succeeded in stopping initiatives that would have been disadvantageous from the viewpoint of their interests. Y claims that the alcohol industry has succeeded in affecting the contents of the initiatives regarding alcohol marketing restrictions. Y states that the alcohol industry is surely able to influence alcohol policy a great deal, but the effects are hard to demonstrate.

In Y's opinion, nowadays alcohol industry lobbies in a way that we are not used to seeing. According to Y, the lobbying of the alcohol industry has changed in the recent years. Y claims that the lobbying has not been this aggressive before. According to Y, in Finland a novel and aggressive way of lobbying has been to attack certain individuals from the health sector. Y states that alcohol industry has succeeded in slandering certain individuals and painting a picture of "the evil health sector". Y believes that alcohol industry keeps contact regularly with the decision-makers. Y gives an example that, in order to support their communicational activities, Hartwall requested the communication agency Milton to profile all the members of the parliament in regards to their position on alcohol legislation.

According to Y, alcohol industry acts in same manners that the tobacco industry acted years ago. Y states that the strategy of alcohol industry is to question the

existing scientific evidence on the influence of alcohol marketing, or to highlight results that are in conflict with the evidence. Y claims that by doing so, the industry pursues disorder. According to Y, the strategies utilized by alcohol industry for its lobbying also include the production of information that is not actually scientific but rather pre ordered reports and reviews, like the silent reportages that alcohol industry has ordered. Y states that from the perspective of communication, the situation is unbalanced since the alcohol industry is able to utilize anything as information because they are not the producers of information, as is the case in the health sectors. According to Y, planting a seed of doubt in regards to information that the health sector produces is an effective way to influence the decision-makers.

Y has also noticed that Alcohol industry utilizes social media in its communicational activities quite a lot. According to Y, also attending to working groups on alcohol policy is an effective way to influence from the perspective of alcohol industry. Y states that today alcohol industry is increasingly taking part in the expert working groups of industrial politics. Y claims that currently some members of the parliament lobby the interest of the industry and commerce from the inside. Members of parliament have verifiably gained funding from the industry and commerce.

When it comes to the international level, Y states that the restrictions in alcohol marketing are not just national questions. Y claims that if Finland would have decided to allow alcohol marketing based only on product information other countries would have followed, and the so called harmonization of alcohol legislation would have started. Y states that the questions of alcohol legislation are global questions, and global alcohol industry strives to block the potential domino effects.

Y states that in the period of 2004 until 2014 alcohol industry lobbying has had definitive effects. According to Y, the big picture is that the industry has succeeded in delaying the process. Y wonders how it was possible that the bill of Inkeri Kerola in 2010 to prohibit mental image marketing was supported by over the half of the members of the parliament, but two years later the members of the parliament were bringing down the bill they had themselves built. Y concludes that the industry must have had an effect on the process. Y claims that the alcohol industry has succeeded

in influencing the public opinion and the general ambiance. Y states that this has affected the decision-makers willingness to push the case, since they hope to be re-elected. In Y's opinion the public sector viewpoint is not appealing to the public.

Y was an expert member in both of the unofficial working groups on alcohol policy and alcohol marketing created by Risikko. According to Y, the reason for Risikko to establish the working groups was to exhaust time. It was the time when the bill of Kerola was under process. According to Y, since the first meeting the whole group of experts in the working group supported the model of France, which was to prohibit the mental image marketing of alcohol and to only allow marketing based on product information. Y tells that for some reason Risikko did not want to accept this model and wanted to establish a Finnish one. Y speculates that Risikko established the working groups since she wanted to use up time, due to the bill of Kerola which Risikko did not want to come into effect.

Y speculates that Risikko might have had promised to some that the mental image marketing of alcohol will not be prohibited. The working group ended up with a paper in which they recommended the model of France, but no actions were taken based on the paper. According to Y, the members of the working group were insulted and displeased since they felt that their time had been wasted. Based on the work of the working group, no official papers were published, and there was no discussion in the media. According to Y, it was a very unpleasant experiment to work in the group, since from the first meeting the arrangement was very clear. Y states that Risikko and the chairman of the working group were both against the prohibition of mental image marketing since the very beginning.

5.2.4 MEMBER OF PARLIAMENT

B states that an indispensable part of the work of a member of a parliament is to meet different interest groups. B highlights that meeting interest groups is essential in relation to decision making because the decision-makers need information to support their decision-making. B views lobbying positively and openly. However according to B in a small country like Finland there is tension in relation to independence. B states that in regards to alcohol the national health perspective confronts the industrial policy. In relation to lobbying B claims the voice of the national health perspective is notably less united than the voice of the alcohol industry. According to B the lobbying of economic life is usually much more organized when compared to health sector. B sees that alcohol industry and especially the Federation of the Brewing and Soft Drinks Industry lobbies in a very consistent, aggressive and efficient way. As an interest group The Federation of the Brewing and Soft Drinks Industry is very successful. B validates this argument by the volume, effectiveness and ways of lobbying of the Federation of the Brewing and Soft Drinks Industry.

B lists face to face meetings, modification of the public opinion and personification as means that alcohol industry utilizes in its lobbying. In addition B tells that the Federation of the Brewing and Soft Drinks Industry organized cocktail parties and sends product samples to decision-makers. B has him/herself been in one of these cocktail parties and describes them as a joyful event where the decision-makers are gathered together to enjoy alcohol beverages. B states that these events are mental image marketing of alcohol for their part since they communicate a message of alcohol consumption as reasonable and pleasant enjoyment. According to B alcohol industry sends product samples of new alcohol beverages and soft drinks two times per year to selected decision-makers. B states that alcohol industry has succeeded in modifying its argumentation suitable for the interest of each decision-maker.

B highlights the importance of targeting the lobbying to the right decision-makers. B does not know to whom alcohol industry targets its lobbying. However B sees that alcohol industry mostly targets its lobbying to the decision-makers that share the

same interests. According to B the aims of alcohol industry during the legislative process included argumentation against the opposing messages.

According to B there are a lot negative emotions towards the lobbying of the Federation of the Brewing and Soft Drinks Industry among the decision-makers. B states that the emotions evolve from the aggressive confident and lobbying style of the Federation of the Brewing and Soft Drinks Industry.

According to B the reason for the rejection of the prohibition mental image marketing of alcohol beverages was that the wing of the government that considered the restrictions unnecessary and was responsive to the lobbying of alcohol industry was stronger than the other wing. According to B among the decision-makers there is a clear understanding that alcohol industry has a strong connection to the National Coalition party that has been in the government for a very long time. This comes up for example from the backgrounds of the CEO's of the Federation of the Brewing and Soft Drinks Industry. B states that the mental image marketing did not progressed and the alcohol law was left undone because of the National Coalition party wanted so. B sees that the prohibition of outdoor marketing was more preferable option also for the alcohol industry than the prohibition of mental image marketing. However B cannot say what analyze what was the effort of alcohol industry and what was the effort of the National Coalition Party. However B points out that the lobbying of alcohol industry happened in the context where the politic atmosphere and the public opinion was against all kind of regulation and thus the context was favorable for the interest of alcohol industry.

B states that during the process alcohol industry succeeded in its argumentation and in highlighting the self-regulation of alcohol industry and in targeting the lobbying to the right decision-makers. However B emphasizes that alcohol industry cannot be blamed or praised for anything since the changes and delays in the legislation process resulted from the decisions of the decision-makers. B states that the parties that bought the arguments of alcohol industry are responsible of the delays.

B sees that lobbying always has an influence. According to B lobbying does not always have an effect on the viewpoint of the decision-maker but always influences somehow. However, B views that alcohol industry is able to influence Finnish alcohol policy. B states that the interest group is much more likely to be heard when the interest group is well organized and possess money and volume. According to B the lobbying is more likely to be successful when there is face to face meeting and interest group events and the material given is carefully built. In addition, B lists active communication, professionalism and good personal relationships as a success factors of lobbying. According to B alcohol industry lobbying meet the demands of successful lobbying.

However, B states that the strong connection to the National Coalition party has been an essential factor in regards to the success. B emphasizes that alcohol industry cannot directly influence the legislation but only in the political parties. B states that without the support of the National Coalition party alcohol industry would not had been able to influence this strongly. However, B points out that in every party there is decision-makers that are open for the messages of alcohol industry. Also the current spirit of the time is deregulation and stability of economy which is a favorable context for the lobbying of alcohol industry.

5.3 SUMMARY OF THE EMPIRICAL RESULTS

5.3.1 SUMMARY OF LEGISLATIVE PROCESS

The political action field consists of the health sector, alcohol industry, lobbying coalitions, political decision-makers and public servants. The key actors in the process are alcohol industry and its coalitions, the so called health sector, public servants, and members of parliament. The lobbyist of the alcohol industry is the Finnish Federation of Brewing and Soft Drink Industry which represents all the major brewing companies operating in the Finnish markets. The Federation of Brewing and Soft Drink Industry has had the most visible role as a lobbyist during the process. The coalitions of alcohol industry include private sector companies and their interest groups pursuing the same interests. The health sector includes institution such as

Finnish Association for Substance Abuse Prevention, National Institute for Health and Welfare, child protection organizations and the Ministry of Social Affairs and Health.

Remarkable changes happened in the Finnish alcohol policy when Estonia became a member of the European Union in 2004 and the quantitative quotas for alcohol beverages from another member country were removed. After the removal of the quantitative quotas of passenger import of alcohol beverages the executed tax reductions led to the increase of the total consumption of alcohol. Due to worries of increased harm caused by alcohol, a working group was nominated. Restrictions concerning alcohol marketing, retail sell time and warning labels came into effect in 2008. Minister Risikko's working group planned the implementation of the warning labels in a working group that consisted of six members of whom three represented industry and commerce, including the Finnish Federation of Brewery and Soft Drink Industry. However, the law was repealed before it came into effect for the proposal of minister Risikko.

Between 2003 and 2007 several working groups on alcohol marketing were established. However, concrete changes did not take place. In 2009 the mental image marketing and the marketing crime paragraphs were included into criminal law. In addition, government proposed reforms regarding mental image marketing of alcohol. In 2009 a working group on alcohol marketing restrictions was established. Alcohol industry was again represented in the working group. The working group did not reach consensus and voted against the restrictions of mental image marketing. In addition to the official working group, Risikko named two unofficial working groups on alcohol marketing restrictions. All the members of the working group supported the prohibition of mental image marketing.

In 2010 congresswoman Inkeri Kerola introduced a bill on the prohibition of mental image marketing of alcohol beverages. Over half of the members of the parliament signed the bill and it proceeded to preparation. Risikko's working group on alcohol marketing decided that there was no need for further restrictions. In 2012 the bill was rejected. In the spring of 2012 a proposal was given in which mental image

marketing and outdoor marketing of alcohol beverages was forbidden. In the circulation of a proposal for comment interests groups, including alcohol industry, gave their statements. Opinions were divided in two: the health sector supported restrictions and the alcohol industry together with the commerce, communication- and Ice Hockey Associations opposed all the restrictions. In the second circulation of a proposal the proposal no longer included the prohibition of mental image marketing. In 2014 the second proposal was accepted.

During the process, the prohibition of mental image marketing of alcohol beverages was introduced and supported in several working groups. However, the process ended up as a compromise where the prohibition of mental image marketing was changed into prohibition of outdoor marketing of alcohol beverages. During the process, in addition to the approval of mental image marketing, the proposal of warning labels was overruled. In conclusion, the changes in alcohol policy that came into effect in 2015 did not concern mental image marketing, but instead alcohol marketing in public places and in social media.

The most essential changes between the government's two propositions for the parliament were the following:

- 1) Positive listing was changed into negative listing (the suggestion to prohibit mental image marketing was removed)
- 2) There was a new exception in the prohibition of alcohol advertisement in public places
- 3) The prohibited presentation time of alcohol advertisement in television was reduced from two hours to one hour
- 4) The phrasing was changed into less disapproving of alcohol marketing

5.3.2 SUMMARY OF THE MEDIA DISCUSSION

In the media discussion, arguments supporting restrictions on alcohol marketing state that alcohol marketing causes alcohol consumption to start at an earlier age. The arguments are represented mostly by the so called health sector. The proponents of the restrictions claim that alcohol marketing increases the consumption of alcohol amongst the youth. Hence the restrictions for alcohol marketing are justified as protection of the youth.

However the opponents of the restrictions from Finnish brewing companies claim that the restrictions give a competitive advantage to foreign companies when they are able to continue their marketing in cable television, in social media and on the internet regardless of the restrictions. According to the opponents, due to the restrictions the competitiveness of Finnish brewing companies will weaken in relation to foreign companies. Opponents also argue that the restrictions will cause a price war, which causes decline in prices of alcohol beverages which leads to increased consumption among the youth. Opponents also typically appeal to imperfect scientific evidence on the influences of alcohol marketing among the youth. In addition, the freedom of the speech has been used as an argument against the restrictions. (e.g. MTV 2014; Aspara & Tikkanen 2013a; Aspara & Tikkanen 2013b; Aspara & Tikkanen 2012) Social media is a vital channel of influence for the Federation of the Brewing and Soft Drinks Industry.

5.3.3 SUMMARY OF THE INTERVIEWS

Every interviewee agreed that lobbying is an important part of the political decision making process. However, among the interviewees the evaluation of alcohol industry lobbying effectiveness varies a lot. Yet all the interviewees identify similar success factors of lobbying. These are important observations that indicates that the subject requires further research.

Concerning the alcohol marketing restrictions of 2015, the position of alcohol industry was that the policies before the changes were appropriate and that there is no need for further restrictions. Alcohol industry has resisted the restrictions of alcohol

marketing by criticizing the scientific evidence behind the restrictions. In addition, alcohol industry opposed the restrictions by appealing to the weakening of the competitiveness of Finnish brands and the resulting loss of jobs. Alcohol industry has also highlighted the self-regulation of alcohol industry and the responsibility of the society in alcohol education. According to the Member of Parliament B during the legislative process the objective of alcohol industry was to block the noise of the opposing lobbyists in which it succeeded.

Alcohol industry viewed that it does not have any lobbying strategy. However, the interviewees identified similar tactics as tactics utilized by alcohol industry. Yet some of the tactics identified by the public servant and the Member of the Parliament are not presented by the representative of alcohol industry. According to the representative of alcohol industry its lobbying consists of information collection, communication to the public, relationship and network building and meeting people. According to the representative alcohol industry has good relations to every political party. Alcohol industry actively shares publications that support its own views in social media. Alcohol industry has also ordered reportages that it shares in social media. As for Member of the parliament, she/he claims that in addition to face to face meetings alcohol industry uses cocktail parties, product samples and media in its lobbying. According to the public servant, lobbying of alcohol industry is aggressive. Public servant claims that the strategies that alcohol industry applies in lobbying include the questioning of the scientific evidence and production of information and influencing public opinion. The Member of the Parliament shares the views of the public servant. According to Member of the Parliament, lobbying of The Federation of the Brewing and Soft Drinks Industry is well-organized and aggressive.

Based on the empirical findings it seems that the lobbying of alcohol industry is mainly targeted to the decision-makers that already share the same views. The representative of alcohol industry states that the lobbying is targeted on the political decision-makers that share the same interests and are willing to speak and act. The Member of the Parliament shares the same view. According to The Member of the Parliament alcohol industry is very talented in getting its voice heard and targeting its arguments suitable for the interests of each decision-maker.

The representative of alcohol industry was not able to identify any matter that alcohol industry has achieved through lobbying during the legislative process. However, the representative stated that without lobbying even more disadvantageous policies could have come into effect. The representative of alcohol industry could not assess reasons why the legislative process ended up in the way it did. The representative did not see that the restriction of mental image marketing would have been a better solution than the restriction of outdoor marketing. According to the representative any changes in the legislation process were not credit of alcohol industry.

Concerning the legislative process the public servant viewed that alcohol industry succeeded in delaying the process and the Member of the Parliament saw that alcohol industry succeeded in blocking the noise of rival messages during the legislative process. The member of the lobbying coalition believed that the National Coalition party did not want to prohibit the mental image marketing of alcohol, which was one of the reasons the process ended up like it did. Also the public servant and the Member of the Parliament shared the same view. Member of Parliament emphasized the strong connection to the National Coalition party as an essential success factor. However, according to the Member of Parliament it is hard to evaluate what was the effort of alcohol industry and what was the effort of the National Coalition party.

The views of the interviewees diverge greatly on the evaluation of alcohol industry lobbying effectiveness. The member of the lobbying coalition agreed with the representative of alcohol industry that the alcohol industry does not have a major influence on political decisions in regards to alcohol regulation. According to the public servant and Member of the Parliament alcohol industry lobbying is effective since alcohol industry has succeeded in stopping disadvantageous initiatives. However the public servant emphasized that the effects are hard to evaluate. The Member of Parliament saw that alcohol industry lobbying has an influence on Finnish alcohol policy since it is able to influence the decision-makers.

The interviewees emphasized different success factors in lobbying but are unanimous regarding to some. According to the Member of Parliament during the process the success factors of alcohol industry were well-organized operations, volume, face to face meetings, personal relationships and active communication. The public servant identified working groups as an effective way to influence. The representative of alcohol industry highlighted the significance of lobbying coalitions and discussions regarding the influence of lobbying. The member of the lobbying coalition also emphasizes the influence of media and social media. According to the representative of the lobbying coalition, his/her company strived to influence political decision-makers through the public. However, all the interviews agree that lobbying coalitions and public support have an impact on lobbying success.

5.3.4 COMPARISON OF THE EMPIRICAL RESULTS

Based on the analysis of the legislative process it is possible to view that the alcohol industry was able to influence the legislative process, since many of the decisions were in accordance with the interests of alcohol industry, and alcohol industry took part in the working groups concerning alcohol policy. The most significant political decisions that indicated the influence of alcohol industry include the withdrawal of warning labels and the rejection of the prohibition of mental image marketing several times. In addition, the changes in the draft laws indicated the influence of alcohol industry. However, the causality of the lobbying of the alcohol industry and the political decisions is hard to represent. In addition, it is hard to specify the influence of alcohol industry and the influence of certain political parties. Based on the media discussion it is possible to come to a conclusion that alcohol industry aimed at influencing the decision-makers since it strongly disagreed with the arguments of the opposing lobbyists. Based on the volume of the messages of the alcohol industry, it is also possible to conclude that these messages reached the decision-makers to a greater extent than the messages of the opposing lobbyists which supported the results from the analysis of the legislation process by indicating the effectiveness of alcohol industry lobbying.

The interviews gave contradictory results in regards to lobbying influence and strategies. The data from the interviews of the public servant and the member of the parliament supported the findings from the legislation process and media discussion in regards to the influence of alcohol industry lobbying. Both of the interviewees viewed that through lobbying it is possible to influence decision-makers. However, even though the political decisions in the legislative process and the volume of the messages sent by alcohol industry indicate the impact of alcohol industry, it not possible to safely conclude that alcohol industry was able to influence on decision-makers since the causality is not clear. In addition, the viewpoints of the member of the lobbying coalition and the alcohol industry lobbyists do not support these findings. In regards to the means of lobbying of alcohol industry the findings from the media discussion supported partly the viewpoint of the member of the parliament and public servant. Based on these two interviews and the analysis of media discussion it seems that the alcohol industry used the public opinion and questioning of the scientific evidence as tactics. However, the lobbyist of the alcohol industry did not identify influencing on public opinion and questioning of the scientific evidence as tactics utilized by alcohol industry.

The analysis of the legislative process shows some kind of association between alcohol industry and the National Coalition party. The data from the interviews of the public servant, the member of the parliament and the representative of the lobbying coalition supported this finding. However, the alcohol industry lobbyist denies the association. Based on the analysis of the media discussion it was possible to identify the lobbying coalitions. The findings from the legislative process, media discussion and interviews supported the finding of the significant impact of lobbying coalitions on lobbying effectiveness. The results from the empirical section are presented in the table 2. The results from the interviews represent the viewpoints of the interviewees and the results from other sources are interpretation of the researcher based on the collected data.

	ALCOHOL INDUSTRY (interview)	MEMBER OF THE LOBBYING COALITION (interview)	PUBLIC SERVANT (interview)	MEMBER OF THE PARLIAMENT (interview)	OTHER SOURCES (process-tracing, media analysis)
ALCOHOL INDUSTRY LOBBYING OBJECTIVES	No further restriction	-	No further restrictions, restriction of outdoor marketing rather than the prohibition of mental image marketing	No further restriction, block the rival messages	Rejection of the prohibition of mental image marketing, rejection of the prohibition of outdoor marketing
ACHIEVED OBJECTIVES OF ALCOHOL INDUSTRY	Possibly blocking disadvantageous policies	-	Delaying the process, stopping disadvantageous policies	Influence on policymakers, block the rival messages	Rejection of the prohibition of mental image marketing, influence on proposals, blocking the messages of opposing lobbyists
MEANS OF LOBBYING OF ALCOHOL INDUSTRY	Information collection, communication to the public, relationship and network building, meeting people	-	Questioning of the scientific evidence, production of information, influencing public opinion, participation on working groups	Face to face meetings, cocktail parties, product samples, communication through media	Communication to public through media and social media, participation on working groups, statements, questioning the scientific evidence
FACTORS THAT INFLUENCE ALCOHOL INDUSTRY LOBBYING EFFECTIVENESS	Lobbying coalitions, public support	Media, social media, public support	Lobbying coalitions (especially support of a political party), public support, participation on working groups	Lobbying coalitions (especially support of a political party), public support, well-organized operations, volume, face to face meetings, personal relationships, active communication	Lobbying coalitions (especially support of a political party), public support, participation on working groups
ALCOHOL INDUSTRY LOBBYING INFLUENCE ON LEGISLATIVE PROCESS	No influence	No major influence	Lobbying is effective, it is possible to influence on legislative process through lobbying	Influence on policymakers	It may be possible to influence on legislative process through lobbying

Table 2. Summary and comparison of the empirical results

6 DISCUSSION AND CONCLUSIONS

6.1 CONCLUSIONS

This thesis 1) formulated a novel theoretical framework through which to examine lobbying from the perspective of communication by objectives 2) examined the concepts of lobbying objectives, strategies and effectiveness from the perspective of communication process 3) applied the theoretical findings in the context of alcohol industry lobbying in Finland. In addition, this study brought the concept of lobbying forward in the field of marketing research.

This thesis pursued to examine the objectives the alcohol industry lobbyists have, the strategies the lobbyists use and the influence the lobbying has on the legislative process. The aim was to clarify the significance of alcohol industry lobbying in the legislative process. The theoretical framework was formulated based on models of

communication by objectives and traditional marketing communications. The framework was complied with the elements of lobbying.

In regards to the communication process, the sender of the message was the alcohol industry and its lobbying coalitions. However, based on the empirical findings it seems that the political decision-makers can also be the senders of the message and hence be part of the coalitions of alcohol industry. The message was that there is no need for further limitations of alcohol marketing and sales. In fact, according to the lobbyists restrictions may cause severe harm. In regards to the legislative process from 2010 until 2015, the objective of the lobbyist was to maintain the restrictions at the level they were in the beginning of the process. However, it seems that the objective changed in 2012 into minimizing the upcoming restrictions. The message was sent through direct and indirect channels exploiting several different tactics. The receivers of the message were political decision-makers. The message was targeted to decision-makers who share the same interest with the lobbyist. The noise in the communication process consisted of the messages the opposing parties. The senders of the competing messages were mainly representatives from the health sector.

The first sub-question concerned the objectives lobbyists have.

The reviewed literature emphasizes that lobbying is information collection and influencing business environment to serve the interests of the lobbyists. From the perspective of the communication process, sender's objective is to change the behavior, attitudes, opinions or information of the receiver. Communication is an objective driven process. Hence it is clear that the objectives guide the communication process. The message sent is not necessarily the same as the objective. However, by analyzing the messages it may be possible to find out the objective.

Concerning the present case, based on the analysis of the media discussion and the legislative process and the interviews it can be concluded that the objective of alcohol industry was to secure the legislative environment by influencing the political

decision-makers. In general, lobbying of alcohol industry includes information gathering and environmental scanning, but in regards to the legislative process in question, it seemed that the objective of alcohol industry was to influence.

Among the literature that was examined, the possibility of changed objectives had not been analyzed. By examining the legislative process, it was possible to notice that the lobbyist changed the preferences. It seemed, that at first the objective was to minimize the restrictions. However, during the circulation of a proposal of 2012 it seemed that alcohol industry and National Coalition party aimed at preventing the prohibition of mental image marketing. However, according to the interview of alcohol industry lobbyists they did not have a preference for preserving the legality of mental image marketing.

The second sub-question pursued to find out the strategies lobbyists use.

The channels through which the message was sent included direct and indirect channels. This study does not provide evidence that the Finnish alcohol industry would be contributing to political parties financially or by giving honorarium for speaking. In addition, there is no evidence of paid travel or personal services. Hence it can be concluded that alcohol industry have not used financial information strategy in Finland.

Based on the findings from the interviews and media discussion, it can be concluded that alcohol industry has used information and constituency-building strategy in Finland. Alcohol industry has met and discussed with political decision-makers aiming at communicating with the political-decision-makers that share the same interests. Industry has also criticized the scientific evidence behind the planned prohibition of mental image marketing of alcohol. In its argumentation, alcohol industry has claimed that the restrictions may lead to decreases of the prices of alcohol and cause increased consumption among the youth. In addition, alcohol industry has claimed that the restrictions may lead to loss of jobs due to weakened competitiveness. It can be stated that this kind of argumentation represent intimidation. Accord-

ing to the alcohol industry lobbyist, the Brewers of Europe actively follows the alcohol policy in Europe and informs Finnish alcohol industry about the observations. In addition, the alcohol industry lobbyist actively meets decision-makers and follows the discussion in Finland. Hence it can be concluded that alcohol industry collects information in order to assess prospective changes.

The coalition of the alcohol industry lobbying also used advocacy advertising in the form of campaigning against the prohibition of mental image marketing. Alcohol industry took part in the media and social media discussion concerning alcohol policy. Media and social media are vital channels of influence since the public opinion has an influence on the decision-makers. In addition, the lobbying organization of alcohol industry has executed the “Kännissä olet ääliö” campaign in order to emphasize the functional self-regulation of alcohol industry, by which the aim is to eliminate the need for further restrictions. Finnish beer association represent consumer associations that create a picture of civil society support for alcohol industry. Alcohol industry sponsors sport events. Hence Finnish Ice Hockey Association shared the same interest with alcohol industry during the legislative process. In addition, the interest groups of communication agencies and commerce shared the same interests based on the analysis of the media discussion and legislative process. This has enabled the emergence of powerful lobbying coalitions. In addition alcohol industry utilized participation in the working groups on alcohol policy based on the analysis of the legislative process. The strategies and tactics exploited by alcohol industry in Finland are presented in the table below combined with the classification of the political strategies used by companies (Hillman & Hitt 1999).

STRATEGY	TACTICS	TACTICS USED BY ALCOHOL INDUSTRY IN FINLAND	CHARACTERISTICS
Information strategy	<ul style="list-style-type: none"> ➤ Lobbying ➤ Commissioning of research and reporting results ➤ Testifying as experts witnesses ➤ Supplying papers or reports 	<ul style="list-style-type: none"> ➤ Lobbying ➤ Criticizing research results ➤ Intimidation ➤ Information collection in order to assess prospective changes ➤ Participating into working groups 	Targets political decision makers by providing information
Financial information strategy	<ul style="list-style-type: none"> ➤ Contributions to parties ➤ Honorarium for speaking ➤ Paid travel, etc. ➤ Personal services 		Targets political decision makers by providing financial incentives
Constituency-building strategy	<ul style="list-style-type: none"> ➤ Grassroots mobilization of interest groups ➤ Advocacy advertisement ➤ Public relations ➤ Press conferences ➤ Political education programs 	<ul style="list-style-type: none"> ➤ Media discussion ➤ Social media discussion ➤ Campaigning ➤ Advocacy advertisement ➤ Consumer associations ➤ Creating coalitions ➤ Philanthropy 	Targets political decision makers indirectly through constituent support

Table 3. Tactics exploited by alcohol industry in Finland (adapted from Hillman & Hitt 1999)

The third sub-question examined how can the effectiveness of lobbying be evaluated from the perspective of the lobbyist and the decision-maker?

The impact of lobbying is the ability of a lobbying actor to achieve the desired goals in the legislative process. However, lobbying impact also regards to the ability to dominate the competing messages and influence the popularity of the lobbied issue. According to the model of communication by objectives the impact should be evaluated by comparing the pursued effects (objectives) of the sender to the achieved effects. According to the marketing communication literature, sending a message effectively demands consciousness of the ultimate purpose of the message and the recognition of the target audience. In addition, the sender should take the competing messages into account. Based on the interviews and the media discussion it can be

concluded that alcohol industry was effective on reacting to the noise in the communication process and was able to eliminate it to a certain point. According to the public servant, alcohol industry slandered the health sector. In addition, the lobbyist of alcohol industry criticized the process through which the scientific evidence behind the restrictions is chosen. The spreading of doubt can be seen as an efficient way to delay the legislative process. When considered the effectiveness from the perspective of the desired goals and pursued goals in the process, it can be seen that alcohol industry failed to reach its objectives since it was not able to reject the prohibition of outdoor marketing of alcohol beverages. However, the prohibition of mental image marketing of alcohol did not come into effect which was preferable than the prohibition of outdoor marketing from the perspective of alcohol industry since the prohibition of mental image marketing includes more restrictions. Yet the influence of alcohol industry in the rejection of mental image marketing prohibition is hard to evaluate.

Based on the findings from the empirical section it can be stated that the context was affirmative towards the message the alcohol industry lobbied. This can be concluded from the interviews of the public servant and the representative of the lobbying coalition. Both of the respondents viewed that National Coalition Party did not want to prohibit the mental image marketing of alcohol beverages. At the time National Coalition Party was in the government and a member of National Coalition Party was leading several working groups on alcohol policy. In addition in 2011 National Coalition Party was the biggest political party in Finland. Hence it can be concluded that the party has significant decision-making power. In addition, it can be seen that the public opinion was of like mind on many issues with alcohol industry. In media the positive listing (the prohibition of mental image marketing) was made to look like an endless list of prohibitions. In addition, there were a lot of protests in social media towards the alcohol marketing limitations. This may be credited to the alcohol industry. However, there is no causal evidence that the discussions were set in motion by alcohol industry.

This study suggests that lobbying coalitions, noise, and context influence lobbying effectiveness. Hence it can be stated that in the evaluation of lobbying effectiveness

one must consider the characteristics of the lobbyist, the noise in the communication process, the context and the lobbying coalitions. In addition, the choices of channels must be examined and the chosen strategies and tactics must be identified. The sender must also be aware of the target audience and the ultimate purpose of the message. Based on the findings from the empirical section it can be stated that lobbying is more effective when the lobbyist is able to eliminate or dominate the competing messages. In addition lobbying is more effective when the lobbying coalition is bigger than the opposition coalition. In addition, lobbying is more effective when the political issue is supported by the public opinion and the political decision-makers that possess decision-making power.

The main research question studied the significance of alcohol industry lobbying in a legislative process.

According to the empirical material it seems that lobbying is pursuing to influence the decision-making process in order to secure the operational environment of an industry. The significance of lobbying is formulated in the process where the message reaches the receiver. The lobbying is significant if the message will reach the receiver causing changes in the behavior, attitudes, opinions, or giving new information to the receiver.

The findings from previous literature reveal that there are different levels of access into arenas of policymaking. It can be seen that alcohol industry was able to access to the field of policymaking. During the legislative process from 2004 until 2014 alcohol industry took part in three working groups on alcohol policy. The level of influence is harder to evaluate. By comparing the draft laws of 2012 and 2013 it is possible to observe the potential influence of alcohol industry and its lobbying coalitions.

Firstly, the part in which the influence of alcohol industry and its coalitions is visible is that the positive listing was changed into negative listing (the suggestion to prohibit mental image marketing was removed). Secondly, there was new exception in the prohibition of alcohol advertisement in public places, which meant that the outdoor marketing is prohibited excluding for example sport events. This was clearly in

line with the interests of alcohol industry and Ice Hockey Union. Thirdly, the prohibited presentation time of alcohol advertisement in television was reduced from two hours into one hour. Lastly in a more general level, the phrasing of the draft law was changed into less disapproving towards alcohol marketing. For example the sentence "Alcohol marketing increases the consumption of alcohol" was changed into: "There is no clear scientific evidence on the alcohol marketing influence on the total consumption of alcohol". This was an argument often used by alcohol industry.

In addition, the law concerning warning labels on alcohol beverages did not come into effect which was in accordance with the interests of alcohol industry. The same happened with the prohibition of mental image marketing. In 2010 over half of the members of parliament supported the prohibition of mental image marketing. However the proposition was rejected in the working group of minister Risikko, although experts in the working groups supported the prohibition. In addition, several representatives of National Coalition party loudly opposed further restrictions for alcohol marketing in 2012 and 2013. However, these members of parliament voted for the draft law of 2013. It seems that the members of the parliament in question rather chose the restrictions of outdoor marketing and social media than the prohibition of mental image marketing. To conclude, it seems that alcohol industry is able to influence the legislative process if there are relatively big lobbying coalitions, and the context is favorable for the lobbied issue.

6.2 THEORETICAL CONTRIBUTIONS

Lobbying should be viewed more broadly in the field of marketing. Lobbying has had a solely bad reputation, which may be one of the reasons why it is not highlighted in the traditional marketing mix. However, this study suggests a broader definition for lobbying in relation to marketing, since lobbying is no more only directly influencing the decision-makers, but instead increasingly indirectly having an impact by means of media, social media and public opinion. Hence public relations should not be the dominating notion when considering the concept of lobbying. Many of the models of lobbying were formulated before the era of social media, and hence do not take into

account the current significance of indirect communication that is becoming increasingly important in lobbying. Lobbying is nowadays more than just direct communication with the decision-maker. Social media is an essential tool for a lobbyist nowadays. Answering the arguments of opposing lobbyists through media and social media is a central channel of influence. Like Hollensen (2004) defined, the aim of public relations is to gain public understanding and acceptance. Lobbying pursues the same goal. However, in lobbying this is an indirect aim in the pursuit of influencing the decision-makers to secure the operational environment. As Jaatinen (1999) stated, lobbying and public relations can be seen as two different forms of communication. Both have the same objective to collect information and have an effect on the public and on the key interest groups. Hence this study suggests that lobbying should not be placed under the concept of public relations but rather addressed as an equal form of communication. To the knowledge of the author, no previous research has studied lobbying as marketing communication by objectives. Hence this is a novel way to examine lobbying by bringing lobbying forward in the field of marketing.

The significance of lobbying is formed within the process of the message reaching the receiver. If the message reaches the receiver and has an influence the receiver, the process is effective. This study agrees with the previous findings (e.g. Mahoney 2007; Klüver 2011) that indicate that the objective of lobbying is to influence decision-makers so that the operational environment remains as favorable as possible for the lobbyist. However, from the perspective of the lobbyist, findings from this study support the findings of Lowery (2007). In case of an industry which is exceptionally affected by regulation due to its significance from the perspective of public health, the reasons behind lobbying may relate to the willingness to survive.

The present empirical evidence supported the findings of Milbrath (1963) in regards to the targets of lobbying. This study found that lobbyist commonly lobby the ones who already share the same interests. The empirical evidence suggests that the lobbying strategies should be viewed more broadly (e.g. Hillman & Hitt 1999). This study identified participation in working groups and participation in discussions in

social media as tactics that have not previously been taken into account in the literature. In this study the classification of tactics has been updated to meet the modern day needs of the lobbyist.

This study found contradictory results in regards to lobbying influence and effectiveness. The lobbyist and the decision-maker view the influence of lobbying in very different ways. Not many previous studies have paid attention to the different perceptions of lobbying influence.

The results of this study agreed with the reviewed findings (e.g. Chalmers 2011; Austen-Smith 1993; Taminiau & Wilts 2006) suggesting that the characteristics of the lobbying actor play a role in the effectiveness of lobbying. When it comes to information that the lobbying actors possess, the empirical evidence agreed with the previous findings that information is an essential factor in the effectiveness of lobbying. The empirical evidence of this study suggested that knowledge of the interests and viewpoints of the decision-makers is a crucial aspect in managing information. However, this study suggested that from the perspective of effectiveness, the well-organized operations and personal relationships of the lobbyists are more important than, for example, the financial resources. Hence, the empirical evidence supports the findings of McKay (2012). As such, this study suggests that the relational resources and the organizational resources play a bigger part in determining the lobbying effectiveness than the financial resources. The reviewed studies have not defined the degree of influence of the different resources.

It can be concluded that the degree of conflict was high concerning the political issue of the case study. The empirical evidence is in conflict with the results of Klüver (2011) and in agreement with the findings of Mahoney (2007) and Michalowitz (2007), that the degree of conflict influences the success of lobbying. In the case of this study, two opposing lobbying coalitions could be identified that pushed the decision-makers into opposite directions. This may be one of the reasons why the alcohol industry was not able to reject the prohibition of outdoor marketing of alcohol beverages. However, it must be taken into account that the voice of the alcohol industry and its coalition was much louder than the voice of the opposing lobbyist.

Klüver (2011) emphasizes the significance of lobbying coalitions as a determinant in lobbying effectiveness. This study agrees with the findings of Klüver (2011). Based on the findings from this study, it can be concluded that the size of the lobbying coalition in comparison to the opposing lobbying coalition is a significant factor in the effectiveness of the lobbying. However, in addition to the reviewed findings (e.g. Klüver 2011; Nelson & Webb Yackee 2012; Mahoney 2007) this study suggests that the ability of the lobbying actor to eliminate the competing messages, e.g. noise, is a crucial factor determining lobbying effectiveness. This study suggests that the ability is not only dependent on the relative size of the lobbying coalition, but also on the volume of lobbying and the ability to send credible messages and slander the rival messages.

The empirical evidence of this study agrees with the findings of Michalowitz (2007), suggesting that the uniformity of the interests pursued with the interests of public actors has a crucial role from the perspective of lobbying influence. In support of this notion, this study showed that one of the most effective single factors in lobbying success is the support from a political party, which requires similar interest of both actors. The empirical evidence is in line with the findings from the reviewed literature concerning the assumption that it is easier to influence through lobbying when the context is already affirmative towards the lobbied subject. Hence the public opinion plays an important role. From the reviewed literature, evidence was not found on behalf of the effects of political party support on lobbying success. This study suggests that the support of a ruling political party is one of the most important factors determining the success of lobbying. With respect to this, the internal lobbying of the Members of the Parliament is one of the success factors.

According to Lowery (2007) the evaluation of lobbying impact should also take into account the ability of the lobbyist to change the salience and popularity of the issues that are meaningful to the lobbyist, and the ability to block competitors. The findings from this study support the findings of Lowery (2007). However, this study suggests in addition to having an impact on the popularity of the lobbied issue, lobbying impact is also determined by the ability to dominate the competing messages. The

reviewed literature rarely considered the influence of public opinion on the effectiveness of lobbying. This study emphasizes that in the current era of social media, the influence of public opinion has become a crucial factor in lobbying success.

Hence this study suggests that the evaluation of lobbying effectiveness should include the evaluation of the characteristics of the lobbying actor, most importantly the relational resources, the organizational resources, the knowledge of decision makers, and credibility. When evaluating the lobbying effectiveness one should also pay particular attention to the ability of the lobbying actor to block the rival messages in the communication process and ability to gain public support on the policy issue in question. In addition, the lobbying coalitions, and their power should be evaluated particularly by considering their relationships to ruling political parties. The results in regards to the evaluation of lobbying effectiveness can be applied in other contexts as well since the effectiveness of lobbying always consists on similar factors. However, in different context the influence of this factors can vary. Yet the certain success factors may be applicable in other contexts as well.

6.3 MANAGERIAL IMPLICATIONS

It seems that lobbying is a way for a lobbyist to provide information to political decision-makers. However, lobbying is also a way to have influence on the legislative process. The effects are hard to evaluate, but it can be stated that the likelihood of success is higher when there is a powerful lobbying coalition and the context is favorable towards the lobbied message. Hence in regards to lobbying success, it is important for the lobbyist to find the political decision-makers that share the same interests. If these decision-makers possess power, lobbying is more likely to be successful. In order to succeed in lobbying, the lobbyist should also recognize the competing messages and eliminate them, or at least dominate them. It is also important to bring the message forth by means of social media and traditional media. Social media and traditional media are important channels through which to influence the public opinion and raise the popularity of the issue. Sending contradictory messages

may be an efficient way to delay the legislative process in order to prevent harmful changes.

To be successful in lobbying, a lobbyist needs to identify the competing messages and eliminate them as effectively as possible. Slandering and the questioning of the competing messages seems to be an effective tactic. In addition, a lobbyist should strive to utilize social and traditional media as much as possible, since the volume of the lobbying also matters. A lobbyist should identify its coalitions and utilize their messages in its own lobbying. A lobbyist should acquire and sustain close relationships with the decision-makers that share the same interest and formulate the messages accordingly for each decision-maker. Hence it is essential to possess knowledge about the decision-makers. Direct communication with the decision-maker is effective. In addition, lobbyist should utilize every possibility to attend to the political decision making process, for example by taking part in working groups. A lobbying organization should also pay attention to its credibility. Therefore, the personal characteristics of a lobbyist are important in regards to recruiting. In addition to credibility, a lobbyist should have relationships that can be utilized in the lobbying.

The decision-maker must be aware of the power of lobbyist influence. A decision-maker must become conscious of the means lobbyist use in order to gain influence, and be aware of the most effective means. In this way the decision-maker is able to make the right decision from the perspective of the public. A decision-maker should be aware that the messages lobbyists send may be customized to suit the interests of the decision-maker. It is important to identify the customized messages so that the decision-maker is able to conceive the bigger picture and the objectives lobbyists have. It is also important for the decision-maker to conceive the objectives of the lobbyists. The objectives of securing the operational environment or willingness to survive may both be in conflict with the benefit of the public.

For the decision-maker it is important to be conscious of that the messages sent through media and social media which gain the acceptance of the public, have a stronger influence on the decision-makers than opposing messages that do not get

comparable attention from the public. A decision-maker must be aware that the lobbying actors aim at blocking the rival messages. Hence the messages of the opposing lobbyists may not be heard. The volume and the credibility of the messages, and also the credibility of the sender of the message have an influence on the effectiveness of the message. Hence the decision-maker should take effort to hear the messages of every actor, and not let the volume, public opinion or slandering of the messages cause confusion. By taking into consideration all the messages and the objectives of the senders, a decision-maker is able to perceive the overall picture and is thus able to make a better decision from the viewpoint of the society and the public. All of these factors are emphasized in the case of policy issues where an industry's interests are significantly in conflict with public health.

Lobbying has always had an important role in democratic processes. Lobbying is a way for an interest group to have its voice heard. However, it is important that lobbying is transparent so that the evaluation of its significance is possible. This is particularly important in regards to industry that is in conflict with public health. The decision-makers and the society should be conscious of the significance and influence of lobbying in legislative processes, since the interest of society and businesses may be divergent. Hence lobbying should be more transparent and regulated. In the legislation process, the benefits of businesses should not be put before the benefits of public health.

6.4 LIMITATIONS AND DIRECTIONS FOR FUTURE RESEAERCH

The context of the research was alcohol industry lobbying in Finland. The results may be applicable to other national political decision making arenas in the context of alcohol industry. However, the national decision making arena should be quite similar. All the results may not be applicable to the context of other industries. However, the aim of this study was to find out the significance particularly of alcohol industry lobbying. The results are not necessarily meant to be applicable to other industries since alcohol industry differs from other industry in many ways. There is

significantly more regulation in regards to alcohol industry compared to other industries. In addition, the conflicts between industry profits and public health is exceptional. However, several data collection methods revealed matters that would not have been visible by exploiting only one data collection method. Hence by utilizing triangulated data the validity of the present study increased.

However, even though several data collection methods were used, there still is an insufficient amount of information about the effects of lobbying. The effects and their causal relationships are very hard to evaluate. In addition, lobbying is not visible to the public. Hence the effects are hard to demonstrate. In addition, like mentioned before, the subject is politically sensitive. Hence there is a possibility that the subjects of interviews do not answer honestly to the posed questions.

All research faces problems concerning objectivity. Despite the pursuit of objectivity, a researcher most often has viewpoints that may influence the interpretation of matters. The problem of objectivity is highlighted in regards to areas of research that raise strong feelings. Even though the researcher of this study pursued objectivity, previous experience and opinions have inevitably influenced the interpretation of the research results. Even though this study does not have any linkage to Finnish Association for Substance Abuse Prevention, some of the interviews were carried out during the preparation of a University of Helsinki working group report for the Finnish Association for Substance Abuse Prevention and hence the role of the interviewer may have had an influence on the attitudes and answers of the interviewees.

Clearly, there is a need for lobbying research. To evaluate the effectiveness of lobbying, the political decision-makers should be interviewed more broadly. In order to evaluate the effects in the legislative process in question, all the decision-makers should be interviewed. To evaluate the effectiveness of lobbying there should be comparative analyses on the impacts of lobbying contexts. To identify the significance of every factor of the lobbying impact, the characteristics of lobbying actors and the lobbying coalitions should also be analyzed more closely. The evaluation of the degree of impact of single contextual factor would be fruitful. The identified success factors should be tested in the contexts of other industries. In addition, the

current evidence is not unanimous in regards to the influence of lobbying coalitions, policy issue and the degree of conflict. Hence there is a need for further research.

In this study the subject of research was alcohol industry lobbying. The evaluation of the lobbying of the opposing lobbyist and lobbying coalitions that support the restrictions was excluded from this study. However, also this coalition lobbies. Hence the future studies should evaluate the significance of the lobbying of these lobbyists. Future studies should also compare the significance and impact of these two opposing coalitions.

All things considered future studies should closely analyze the significance and effectiveness of lobbying, so that society is able to control it. If the analysis reveals that industry lobbying is able to significantly influence the legislation process to serve its own interests, there should be some kind of control mechanisms of lobbying. The evaluation of lobbying is important so that the industry is not able to influence over the interest of public health. The research on lobbying significance and impact would be beneficial from the perspective of the society and the decision-makers. In order to serve the interests of the society, the political decision-maker must recognize the influence of lobbying.

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APPENDICES

Appendix 1: Media discussion 2010-2015

Appendix 2: The most relevant texts

Appendix 3: Questions to the alcohol industry lobbyists

Appendix 4: Questions to the member of lobbying coalition

Appendix 5: Questions to the public servant

Appendix 6: Questions to the member of parliament

APPENDIX 1: Media discussion 2010-2015

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APPENDIX 2: The most relevant arguments in the media discussion (*)

Tekijä, foorumi	Otsikko	Haastatellut	Tiivistelmä	Linkki
Raeste, J. (2014) HS	"Kokoomuksen Kataja viskikohusta: Maltillinen viinapolitiikka ei vie kieltola-kiin"	Sampsa Kataja	Päihdepolitiikan tavoitteet on pidettävä mielessä linjauksia tehdessä.	http://www.hs.fi/politiikka/a1413343041929
Peura-koski, T. (2014) HS	"Viskikohun yllättämä ylijohtaja Anneli Taina: Virkamiehet menivät ehkä liian pitkälle"	Anneli Taina	Anneli Taina kertoo olevansa alkoholimai- nonnan täydellisen vapauttamisen kannalla.	http://www.hs.fi/kotimaa/a1413077845647?ref=hs-art-lue-seuraavaksi-3 "
Rautio, P. (2013) HS	"Tämä ei ole viinamainos"	-	HS pääkirjoitustoimitaja ihmettelee mai- nonnan rajoitusta	http://www.hs.fi/paakirjoitukset/a1415847859838
Tyynysniemi, M. (2013) HS	"Amerikkalaisprofessori: "Lapsille on turha opettaa "alkoholikulttuuria"	David Jernigan	Jerniganin mukaan niin vahvaa näyttöä alkoholimainonnan vaikutuksista nuoriin on, että sen perusteella kannattaa tehdä poltiikka.	http://www.hs.fi/kotimaa/a1378892812627#
Tyynysniemi, M. (2013) HS	"Professori: Viinamainonta lisää nuorten juomista"	Elina Ussa David Jernigan	Ussa kysyy miksei Suomesta ole yhtään tutkimusta, jos yhteys mainonnan ja nuorten alkoholin kulutuksen välillä on niin vahva-	http://www.hs.fi/paivanlehti/#mielipide/Alkoholiohjelmilla+tuskin+saa-daan+kulutusta+ku-riin/a1377753159484?src=haku&ref=%23arkisto%2F
Kiuru, P. (2013) HS.	"Hallituksen esitykseen uudesta alkoholilaista jäi merkittäviä valvikoja"	-	Alkoholin mainostus urheilutapahtumissa on edelleen sallittua, mikä on ristiriidassa alkoholimarkkinoiden tavoitteiden kanssa	http://www.hs.fi/mielipide/a1370955104891
STT (2013) HS	"Panimoliitot: Mainontakielto tappaa kotimaiset brändit"	Elina Ussa Esa Österberg	Mainonta ei vaikuta kulutukseen vaan brändiin joten kotimaiset brändit kärsii	http://www.hs.fi/kotimaa/a1305561764733

Matturi, S. (2013) HS	"Myös alkoholin mielikuvamainontaan pitää puuttua"	-	Asparan ja Tikkasen krisointi. Mielikuvamainontakin pitäisi kieltää.	http://www.hs.fi/paivanlehti/#mielipide/My%C3%B6s+alkoholin+mielikuvamainontaan+pit%C3%A4%C3%A4+puuttua/a1366861965991
Aspara, J. & Tikkanen, H. (2013) HS	"Haluamme estää päättäjiä tekemästä tyhmiä päätöksiä"	-	Vastaus Tuomiselle (alla)	http://www.hs.fi/paivanlehti/#mielipide/Haluamme+est%C3%A4%C3%A4+p%C3%A4%C3%A4tt%C3%A4ji%C3%A4+tekem%C3%A4st%C3%A4+tyhmi%C3%A4+p%C3%A4%C3%A4t%C3%B6ksi%C3%A4/a1367209471496?src=haku&ref=%23arkisto%2F
Tuominen, I. (2013) HS	"Sosiaali ja terveysministeriä arvostaa tutkimusta"	-	Vastaus Asparalle ja Tikkaselle (alla)	http://www.hs.fi/paivanlehti/#mielipide/Sosiaali-+ja+terveysministeri%C3%B6+arvostaa+tutkimusta/a1366691865464
Aspara, J. & Tikkanen, H. (2013) HS	"Ministeriöt eivät piittaa tieteellisestä tutkimuksesta"	-	Tutkimustulokset eivät anna perusteita tehdä lisärajoituksia alkoholituotteiden mainontaan	http://www.hs.fi/paivanlehti/#mielipide/Ministeri%C3%B6t+eiv%C3%A4t+piittaa+tieteellisest%C3%A4+tutkimuksesta/a1366431563797
Hietaneva, P. (2013) HS	"Mainonnalla mainontaa vastaan – Onko alkoholivastaisessa mielikuvamainonnassa järjettä"	-	Alkoholin vastainen mielikuvamainonta voi kääntyä itseään vastaan	http://www.hs.fi/paivanlehti/#sunnuntai/Mainonnalla+mainontaa+vastaan/a1360987493368
Paaso, K. (2012) HS	"On kyse mainonnan rajoituksesta, ei kiellosta"	-	Oluen hinta vaikuttaa nuorten alkoholin kulutukseen vähemmän kuin mielikuvamainonta. Laskenut hinta kompensoitavissa alkoholiveron korotuksella.	http://www.hs.fi/paivanlehti/#mielipide/On+kyse+mainonnan+rajoituksesta+ei+kiellosta/a1340945983626
Aspara, J. & Tikkanen, H. (2012) HS	"Mainontakielto ei vähennä alkoholin kulutusta"	-	Monet tutkimukset osoittaa, että mainonnalla ei vaikutusta alkoholin kokonaiskulutukseen. Rajoitukselle lieveilmiöitä.	http://www.hs.fi/paivanlehti/#mielipide/Mainontakielto+ei+v%C3%A4henn%C3%A4+alkoholin+kulutusta/a1339812221868

Hakkarainen, P. (2012) HS	"Mainonta lisää alkoholimyönteisiä uskomuksia"	-	Vastaus Kuhaselle	http://www.hs.fi/paivanlehti/#mielipide/Mainonta+lis%C3%A4%C3%A4+alkoholimy%C3%B6nteisi%C3%A4+uskomuksia/a1339206338570?src=haku&ref=%23arkisto%2F
Uitti, T. (2012) HS	"Alkoholimainontaa koskeva laki olisi vanhentunut jo syntyesään"	-	Alkoholinkäyttöön vaikuttaa lähipiiri, ei rajoitukset. Rajoitukset tehoton vaikutuskeino.	http://www.hs.fi/paivanlehti/#mielipide/Alkoholimainontaa+koskeva+laki+olisi+vanhentunut+jo+syntyesaan/a1338517458371
Soikkeli, M. (2012) HS	"Mainonta aikaistaa alkoholin käyttöä"	-	Vastaus Virmalalle. (Alla). Tutkijayhteisössä yksimielisyys alkoholimainonnan vaikutuksesta nuoriin.	http://www.hs.fi/paivanlehti/#arkisto/Mainonta+aikaistaa+alkoholin+k%C3%A4ytt%C3%B6%C3%A4/aaHS20120229S11MP01go8?src=haku&ref=%23arkisto%2F
Virrala, T. (2012) HS	"Alkoholin markkinointiin löytyy aina keinot."	-	Mainonta siirtyy nettiin rajoitusten johdosta .	http://www.hs.fi/paivanlehti/#arkisto/Alkoholin+markkinointiin+l%C3%B6ytyy+aina+keinot/aaHS20120222S11MA01a6l?src=haku&ref=%23arkisto%2F
Hautala, H. (2010) HS	"Teollisuus torpedoi alkoholimainonnan rajoitukset" Saatavilla	-	Heidi Hautala kritisoi alkoholiteollisuuden toimintaa ja mainontaa.	http://www.hs.fi/paivanlehti/#arkisto/Teollisuus+torpedoi+alkoholimainonnan+rajoitukset/aaHS20100620S11MP0285l?src=haku&ref=%23arkisto%2F
Soikkeli, M., Mäkelä, P., Hellman, M. (2013) Suomen Kuva-lehti	"Alkoholimainonta lisää nuorten juomista – miksi uhataan rikkoa nuoria suojelevaa lakia?"	-	Tutkijat vastaavat Asparalle ja Tikkaselle (alla) esittelemällä tutkimusaineistoa, joihin lakivalmistelu perustuu.	http://suomenkuvalehti.fi/jutut/mielipide/puheenvuoro/alkoholimainonta-lisaa-nuorten-juomista-miksi-uhataan-rikkoa-nuoria-suojelevaa-lakia/
Aspara, J. & Tikkanen, H. (2013) Suomen Kuva-lehti	"Tapaus alkoholimainonta: Lainsäädäntö ei saa perustua tieteellisen tiedon vääristelyyn"	--	Professorit kritisoivat tieteellisiä tutkimuksia, joihin lakiesitys perustuu ja esittelevät rajoitusten mahdollisia lieveilmiöitä.	http://suomenkuvalehti.fi/jutut/mielipide/puheenvuoro/tapaus-alkoholimainonta-lainsaadanto-ei-saa-perustua-tieteellisen-tiedon-vaaristelyyn/

Jernigan, D. (2012) Suomen Kuva-lehti	"Lapset ansaitsevat mahdollisuuden kasvaa aikuisiksi ilman alkoholimainontaa"	-	Professori esittelee alkoholin haittoja ja mainonnan vaikutusta Yhdysvaltojen näkökulmasta.	http://suomenkuvalehti.fi/jutut/mielipide/puheenvuoro/lapset-ansaitsevat-mahdollisuuden-kasvaa-aikuisiksi-ilman-alkoholimainontaa/
Anttila, P. (2010) Suomen Kuva-lehti	"Alkoholimainonnan rajoittamisesta syntyi raju kiista."	Tero Kallio, Markku Soikkeli	Näkökulmia mainonnan rajoittamisen puolesta ja vastaan	http://suomenkuvalehti.fi/jutut/kotimaa/alkoholimainonnan-rajoittamisesta-syntyi-rajukiista/
Tammi, T. (2013) Yhteiskuntapoliittika	"Alkoholiteollisuuden tutkimusraha ja yhteiskuntavastuu"	.	Tammi esittelee Alkoholiteollisuuden suhdetta tutkimuksen rahoittamiseen. (Aspara & Tikkanen mainittu)	"Alkoholiteollisuuden tutkimusraha ja yhteiskuntavastuu"
Soikkeli, M. (2010) Yhteiskuntapoliittika	"Mitä tutkimusnäyttö kertoo alkoholimainonnan vaikutuksista lapsiin ja nuoriin"	.	Artikkeli perustuu kahteen sosiaali- ja terveysministeriön alkoholimainonta-työryhmän vuonna 2009 tilaamaan tutkimuskatsaukseen.	https://www.julkari.fi/bitstream/handle/10024/100560/soikkeli.pdf?sequence=1
Savaspuro, M. (2014) Kauppalehti	"Alkoholin mainontakiellosta jättilasku panimoille, mainostajille"	Klaus Kuhanen, Elina Ussa, Lasse Aho	Esitellään rajoituksista aiheutuvia kustannuksia alkoholiteollisuuden toimijoille	http://www.kauppalehti.fi/5/i/talous/uutiset/pika/uutinen.jsp?direct=true&selected=uuti_yri&comid=OLV&oid=20141101/14168283421270
Kuhanen, K. (2012) Kauppalehti	"Viestintätöimistö MYY OY: Tutkimus: 93 prosenttia suomalaisista ei vähentäisi alkoholikulutusta vaikka markkinointia rajoitettaisiin"	.	Kritisoidaan lakiesityksen taustalla olevaa tutkimusta ja esitellään ulkomainosyhtiö JCDecauxin omistamaa kampanjaa.	http://www.kauppalehti.fi/5/i/yritykset/lehdisto/cision/tiedote.jsp?direct=true&selected=kaikki&oid=20120501/13376045471080&lang

Aalto-Matturi, S. & Pehkonen, J. (2012) Kauppalehti	"Tiedote/Ehkäisevä päihdetyö Ehyt ry_ Kolme neljästä suomalaisesta ei hyväksy alkoholin mielikuvamainontaa."	.	Esitellään Ehyt ry:n toimeksiannosta tehty gallup. (TNS Gallup Oy)	http://www.kauppalehti.fi/5/i/yritykset/lehdisto/stt-info/tiedote.jsp?direct=true&selected=kaikki&oid=20120301/13317144073530
Varamäki, R. (2011) Kauppalehti	"Tiedote/ Terveyden edistämisen keskus Tekry: Terveyden edistämisen keskuksen selvitys: Alkoholimainonta vetoaa nuoriin"	-	Esitellään Tekryn teettämä selvitys mainonnan vaikutuksesta nuoriin. (TNS Gallup Oy)	http://www.kauppalehti.fi/5/i/yritykset/lehdisto/stt-info/tiedote.jsp?direct=true&selected=kaikki&oid=20111001/13183399007200
MTV. (2014) MTV.	"Panimoliitto: Alkoholimainonnan aikana kulutus laskenut rajusti"	Ismo Tuominen, Elina Ussa, Räikkönen, Tikkanen	Esitellään Tikkasen & Asparan raporttia lain vastaiskuna sekä alkoholiteollisuuden itesesäntelyä.	http://www.mtv.fi/uutiset/kotimaa/artikkeli/panimoliitto-alkoholimainonnan-aikana-kulutus-laskenut-rajusti/4366710
Laaksonen, P. (2014) Markkinointi ja mainonta	"Säätely seis ja alkoholimainonta kouluihin"	-	Laaksonen pitää mainonnan rajoituksia järkevinä.	http://www.marmai.fi/blogit/vierasblogi/saantely+seis+ja+alkoholimainonta+kouluihin/a2269877
Aspara, J. (2014) Markkinointi ja Mainonta	"Alkoholimyynnin sääntelyssä kohderyhmä ja prioriteetit hukassa"	-	Aspara kritisoi lakia ehdottaen mielestään parempia toimia	http://www.marmai.fi/blogit/markblogi/alkoholimyyntin+saantelyssa+kohderyhma+ja+prioriteetit+hukassa/a2239608
Yle. (2012) Yle.	"Alkoholimainonta suosii jatkossa lehdistöä."	Ismo Tuominen	STM:n mukaan lakiesitys ei kohtelisi mediaa tasapuolisesti.	http://yle.fi/uutiset/alkoholimainonta_suosii_jatkossa_lehdistoa/6073691

Honka- nen, V. (2014) Talous- sanomat	"Viiniä ja vii- naa – milloin tulee viimei- nen erhe?"	Jaakko Aspara, Markku Soikkeli	Puidaan aiheesta käy- tyä keskustelua ja eri- mielisyyksiä	<a href="http://www.taloussanomat.fi/ihmi-
set/2014/10/17/viinia-ja-viinaa-milloin-
tulee-viimeinen-erhe/201414336/139">http://www.taloussanomat.fi/ihmi- set/2014/10/17/viinia-ja-viinaa-milloin- tulee-viimeinen-erhe/201414336/139
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APPENDIX 3: Questions to the alcohol industry lobbyists

TEEMA 1. VAIKUTTAJAVIESTINNÄSTÄ YLEISESTI

Millaisena koet vaikuttajaviestinnän merkityksen alkoholiteollisuuden näkökulmasta?

Kuinka tärkeä vaikuttamiskeino vaikuttajaviestintä on organisaatiollenne?

Miten kuvailisitte vaikuttajaviestintästrategiaanne?

TEEMA 2. VAIKUTTAJAVIESTINTÄ ALKOHOLIMAINONNAN RAJOITUKSIIN LIITTYEN

Kuinka paljon ja millä tavoin Panimoliitto pystyy mielestänne vaikuttamaan alkoholipoliittisiin päätöksiin?

Miten kuvaisit Panimoliiton vaikuttajaviestintää alkoholimainontaa koskevissa lakivalmisteluissa? Mitä tavoittelitte vaikuttajaviestinnällänne ja mitkä olivat teille tärkeimpiä kysymyksiä?

Miten olette mielestänne onnistuneet tavoitteiden saavuttamisessa? Miten mielestänne onnistuitte vaikuttajaviestinnässänne ajatellen 2015 voimaan tulleita alkoholimainonnan rajoituksia? Mitä ajattelette lopputuloksesta?

Miksi mielestänne lopulta päädyttiin ulkomainonnan kieltoon, eikä mielikuvamainonnan kieltoon?

Millaisia muutoksia vaikutusviestintästrategiassanne on tapahtunut viimeisen 10 vuoden aikana?

Mikä on syynä siihen, että olette onnistuneet vaikuttajaviestinnän kautta saavuttamaan tavoitteenne useissa tapauksissa (esim. varoitusmerkinnät)?

Kertoisitteko viestintäryhmänne kokoonpanosta, tarkoituksesta ja toiminnasta?

Kuinka paljon resursseja käytätte vaikuttajaviestintään ja miten resurssit jakautuvat eri vaikutuskanavien kesken?

Miten käytätte mediaa ja julkista keskustelua hyödyksenne vaikuttajaviestinnässänne? Entä miten hyödynnätte mainostoimistojen palveluita vaikuttajaviestinnässänne?

Millainen merkitys Kännissä olet ääliö -kampanjan kaltaisilla kampanjoilla on vaikuttajaviestintänne kannalta?

TEEMA 3. VERKOSTOT

Millainen merkitys alkoholipoliittisiin työryhmiin osallistumisella on vaikuttajaviestinnässänne?

Miten kuvailisitte suhdettanne Kansalliseen Kokoomukseen? Millainen suhde teillä on muihin puolueisiin?

Tulivatko puolueiden ja virkamiesten roolit tässä prosessissa yllätyksenä? Yllätytkö siitä, että Kokoomus ilmeisesti toimi sen puolesta, että juuri mielikuvamainontaa ei kiellettäisi?

Mistä uskot tämän johtuvan?

Mitä olette tavoitelleet Newsbrokers yritykseltä tilaamillanne neljällä raportilla liittyen alkoholikuolemien tilastointiin, raittiustyön saamaan julkiseen tukeen, alkoholipolitiikan edunsaajiin sekä alkoholivalistukseen?

Kuinka hyvin tunnet Asparan & Tikkasen tutkimuskatsauksen ja mitä ajatuksia se sinussa herättää?

Rahoittaako Panimoliitto alkoholiin liittyvää tutkimusta?

TEEMA 4. KANSAINVÄLINEN TASO

Olette The Brewers of Europe –järjestön jäsen. Millä tavoin kyseinen järjestö vaikuttaa toimintaanne? Miten kuvailisitte yhteistyötänne kansallisessa tasolla ja EU:ssa?

Minkälaista keskustelua olette käyneet kyseisen järjestön kanssa liittyen Suomen alkoholipoliittisiin muutoksiin? Miten 2015 voimaan tullut alkoholipoliittinen uudistus sopi The Brewers of Europe -järjestön tavoitteisiin?

Millaisina koet The Brewers of Europe -järjestön vaikutusmahdollisuuden alkoholipolitiikkaan EU:n tasolla?

Euroopan komissio korostaa kansallisesti säädeltyä alkoholipolitiikkaa. Kuinka suuri vaikutus kansallisesti säädellyllä alkoholipolitiikalla on EU:n agendaan ja muiden maiden alkoholipolitiikkaan?

Ajatteletko, että alkoholimainonnan tiukat rajoitukset yhdessä EU-maassa, esimerkiksi Ranskan mielikuvamainonnan kieltä, voidaan omaksua helposti koko muissa EU -jäsenmaissa?

Ajatteletko, että kansainvälinen alkoholiteollisuus valitsi Suomeen mieluummin ulkomainonnan kiellon kuin mielikuvamainonnan kiellon?

Millaisia suhteita teillä on muihin alkoholiteollisuuden toimijoihin? Voisitko kuvailla yhteistyöverkostojanne?

Mikä on teidän suhteenne EU:n strategiaan tukea jäsenvaltioita alkoholihaittojen vähentämisessä? Miten EU:n strategia sopii yhteen Panimoliiton tavoitteiden kanssa?

APPENDIX 4: Questions to the member of lobbying coalition

TEEMA 1. LOBBAUKSEN KEINOT

Millainen merkitys lobbauksella on omalle organisaatiollenne?

Millaisia keinoja käytätte vaikuttajaviestinnässänne ja miten arvioisitte niiden tehokkuutta?

Kuinka tehokas keino Joisitko vähemmän –kampanjan kaltaisten kampanjoiden toteuttaminen on lobbauksen näkökulmasta?

Miten kyseinen kampanja mielestänne onnistui ja millaisia vaikutuksia kampanjalla oli?

TEEMA 2. KANSAINVÄLINEN TASO

Mitä mieltä olet väitteestä, että kansainvälinen alkoholiteollisuus valitsi Suomeen mieluummin ulkomainonnan kiellon kuin mielikuvamainonnan kiellon?

Mitä ajattelet väitteestä, että Ranskan alkoholimainonnan tiukat rajoitukset, erityisesti mielikuvamainonnan kiello, toimisivat esimerkkinä muille EU maille?

Olette alunperin ranskalainen globaali suuryritys, millaista yhteistyötä teillä on kansainvälisten kumppaneidenne kanssa? Voisitko kuvailla yhteistyöverkostonne?

Onko teihin otettu yhteyttä esimerkiksi panimoiden liitosta (The Brewers of Europe) tähän alkoholipoliittiseen keskusteluun liittyen?

TEEMA 3. ALKOHOLIMAINONNAN RAJOITUKSET

Mitkä ovat olleet teille tärkeitä kysymyksiä tässä alkoholipoliittisessä keskustelussa?

Miten kuvaisit teidän lobbaustanne alkoholimainontaa koskevissa lakivalmisteluissa?

Miten arvioisitte käyttämienne keinojen vaikuttavuutta?

Miten onnistuitte lobbauksessanne huomioon ottaen, että kampanjoitte mielikuva-mainonnan kieltoa vastaan, ja voimaan tulikin ulkomainonnan kielto alkoholin osalta? Minkä tekijöiden luulet vaikuttaneen lopputulokseen? Mitä ajattelet lopputuloksesta?

Tulivatko puolueiden roolit tässä prosessissa yllätyksenä? Yllätytkö siitä, että Kokoomus ilmeisesti toimi sen puolesta, että juuri mielikuvamainontaa ei kiellettäisi?

Kuinka hyvin

Kuinka hyvin tunnet Asparan & Tikkasen tutkimuskatsauksen ja mitä ajatuksia se sinussa herättää?

APPENDIX 5: Questions to the public servant

Miten suhtaudut lobbaukseen?

Miten suhtaudut alkoholiteollisuuden lobbaukseen?

Millaisena näet lobbauksen merkityksen alkoholiteollisuuden näkökulmasta?

Kuinka paljon ja millä tavoin alkoholiteollisuus pystyy mielestänne vaikuttamaan alkoholipoliittisiin päätöksiin?

Voiko kansainvälinen alkoholiteollisuus mielestänne vaikuttaa Suomen alkoholipoliittisiin päätöksiin? Miten? Miksi?

Millainen vaikutuskeino työryhmiin osallistuminen on mielestänne alkoholiteollisuuden kannalta?

Aikajanalla 2004-2015 koetteko, että alkoholiteollisuuden lobbauksella on ollut vaikutusta lainsäädäntöprosessiin? Jos on, niin millaista vaikutusta?

Miksi Risikko mielestänne perusti vuoden 2010 kaksi epävirallista työryhmää?

Ollessanne mukana Risikon vuoden 2010 epävirallisissa työryhmissä, koetteko, että teihin pyrittiin vaikuttamaan (kohtasitteko lobbausta)?

Kenen toimesta? (Panimoliitto, alkoholiteollisuus)

Tiedätekö, että alkoholiteollisuus olisi lobannut sidosryhmiänne? Jos tiedätte, niin miten lobbasi?

Millä tavoin teihin on pyritty vaikuttamaan? Millaisia keinoja lobbauksessa on käytetty?

Millainen ja mikä on ollut lobbauksen viesti?

Onnistuiko alkoholiteollisuus vaikuttamaan teihin? Jos onnistui, niin miten? Lisäksi se tietoisuuttanne jostain asiasta?

Ollessanne työryhmässä, muuttuiko mielipiteenne prosessin aikana? Jos muuttui, niin miten ja miksi?

Mistä erimielisyys Risikon työryhmässä puheenjohtajan ja muiden jäsenten välillä mielestänne johtui? (työryhmissä kaikki paitsi pj kannattivat mielikuvamainonnan kieltoa, pj negatiivilistaa)

Miksi lainsäädäntöprosessissa mielestänne lopulta päädyttiin ulkomainonnan kieltoon, eikä mielikuvamainonnan kieltoon?

APPENDIX 6: Questions to the member of parliament

TEEMA 1. VAIKUTTAJAVIESTINNÄSTÄ YLEISESTI

Miten suhtaudut alkoholiteollisuuden lobbaukseen?

Kuinka paljon ja millä tavoin alkoholiteollisuus pystyy mielestänne vaikuttamaan lainsäädäntöprosesseihin?

Millainen vaikutuskeino työryhmiin osallistuminen on mielestänne alkoholiteollisuuden kannalta?

Millainen on mielestänne median ja sosiaalisen median merkitys alkoholiteollisuuden vaikuttamistyössä?

TEEMA 2. VAIKUTTAJAVIESTINTÄ ALKOHOLIMAINONNAN RAJOITUKSIIN LIITTYEN

Millaisia keinoja alkoholiteollisuus on mielestänne käyttänyt lobbauksessaan ajanalla 2004 - 2014?

Millaisia tavoitteita alkoholiteollisuuden lobbauksella on mielestänne ollut?

Miten alkoholiteollisuus on onnistunut tavoitteidensa saavuttamisessa ja miksi?

Millaisia vaikutuksia alkoholiteollisuuden lobbauksella on mielestänne ollut ja miksi?

TEEMA 3. AIKAVÄLI 2011-2013

Miksi lakiprosessissa mielestänne lopulta päädyttiin ulkomainonnan kieltoon ja somerajoihin, eikä mielikuvamainonnan kieltoon, josta prosessi alkoi (Kerolan aloite)?

Mikä mielestänne vaikutti 2011 Kerolan lakialoitteen hylkäämiseen?

Millaisia merkittäviä muutoksia lainsäädäntöprosessissa mielestänne tapahtui jos tapahtui?

Mikä mielestänne vaikutti muutoksiin vuoden 2012 lakiluonnoksen ja vuoden 2013 lakiluonnosten välillä?

Mikä mielestänne vaikutti siihen, että vuoden 2012 lakiluonnoksessa ehdotettiin mielikuvamainonnan kieltoa mutta vuoden 2013 luonnoksesta se oli poistettu ja tilalla?

Miksi mielestänne vuoden 2012 lakiluonnoksessa ehdotettu ns. positiivilista muuttui ns. negatiivilistaksi?

Miksi mielestänne vuoden 2012 lakiluonnoksessa korostettiin alkoholimainonnan negatiivisia vaikutuksia huomattavasti enemmän kuin vuoden 2013 luonnoksessa?

TEEMA 3: OMAT KOKEMUKSET

Millä tavoin alkoholiteollisuus on pyrkinyt vaikuttamaan sinuun? Mikä on ollut lobbauksen viesti?

Jos on, niin milloin?

Jos on, niin mitä keinoja lobbauksessa on käytetty (suoria tai epäsuoria)??

Jos on, niin mihin lobbauksella on mielestänne pyritty?

Jos on, niin onko lobbaus vaikuttanut teihin? Jos on, niin miten?

Jos on, niin onko suhtautumisenne johonkin asiaan muuttunut lobbauksen (esim. lisääntyneen tiedon saannin) ansiosta?