



The Food
Foundation

CORPORATE LOBBYING:

The dark side of the plate



ABOUT THE FOOD FOUNDATION



The Food Foundation is an independent charity working to address challenges in the food system in the interests of the UK public. Working at the interface between academia and policymakers (parliamentarians, civil servants, local authorities, business leaders and investors) we use a wide range of approaches to make change happen including events, publications, media stories, social media campaigns and multistakeholder partnerships. We also work directly with citizens to ensure their lived experience is reflected in our policy proposals. We work with many partners on a range of different thematic areas, working closely with academics to generate evidence and campaigners who can drive change. We are independent of all political parties and business, and we are not limited by a single issue or special interest.

Visit: foodfoundation.org.uk

CONFLICT OF INTEREST DECLARATION

The Food Foundation only accepts funding which does not compromise our independence. We do not take funding directly from food companies and use The Financial Relationship Policy developed by World Obesity Federation to help us consider new financial engagements.

WITH THANKS TO OUR FUNDER

Impact on Urban Health

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Executive summary

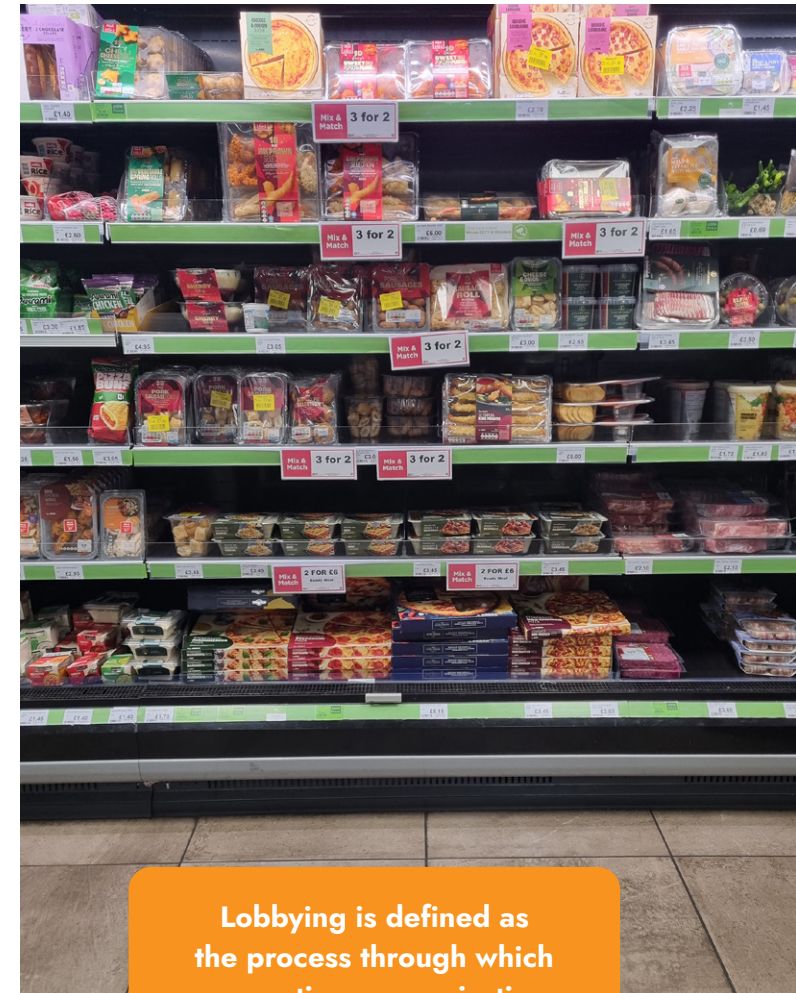
The extent to which endemic power imbalances within the food system are warping democratic processes and hampering the ability of governments to intervene in support of people and planet is now a serious cause for concern.

While the role played by companies in shaping the food on offer to us is well understood, the extent to which corporate lobbying and conflicts of interest are negatively impacting on food policy and, in turn, our diets is a growing matter of concern. And with good reason – UK dietary health is at a crisis point. Babies born today will enjoy a year less of good health compared to babies born a decade ago, while type two diabetes among under 25-year-olds has increased by 22% in just five years (Food Foundation, 2025). The cost of our poor diets is ravaging the NHS, hampering economic growth, and ultimately impacting on the long-term sustainability of food businesses (Planet Tracker, 2024). Yet despite this, food policymaking is often unambitious, stuck in a cycle of weak and repetitive policy design (Theis and White, 2021) with initial policy proposals often watered down through rounds of industry consultation and lobbying (House of Lords, 2024).

Yet it needn't be this way. **Lobbying is defined as the process through which corporations, organisations and citizens can make their views known to policymakers.** It's an essential part of an open and consultative policymaking process which, if done transparently, can empower citizens to participate in the democratic process. However, while lobbying in and of itself is not necessarily a cause for concern, the extent to which endemic power imbalances within the food system are warping democratic processes and hampering the ability of governments to intervene in support of people and planet is now a serious cause for concern.

For investors looking to reduce the systemic and material risks facing food businesses within their portfolios, understanding which companies are truly committed to change, and which are saying one thing in public and quite another behind closed doors to policymakers, is a critical part of understanding whether there are strategic misalignments that should inform their decision-making.

This briefing therefore presents initial findings from research conducted by The Food Foundation and others that has begun to explore the extent of food industry lobbying in the UK.



Lobbying is defined as the process through which corporations, organisations and citizens can make their views known to policymakers

KEY FINDINGS:

- › **There is an increasing focus on food industry lobbying** and the commercial determinants of health among academics, the media and investors. The evidence suggests that countries with a greater degree of corporate capture are less likely to implement evidence-based health policies.
- › **Lobbying elected representatives is an essential part of an open and consultative policymaking** process which, if done transparently, can empower citizens to participate in the democratic process. However, many believe endemic power imbalances in the UK food system are hampering the ability of the government to implement policies in support of people and health.
- › Food Foundation analysis of ministerial meeting registers during the last term of government (January 2020 – June 2024) found that at Defra, the department responsible for food and farming, **ministers met with food businesses and their trade associations 1,408 times – 40 times more than with food NGOs and ministers.**
- › Across all nine departments analysed, **39% of the total number of ministerial meetings with the food and drink industry and their representatives were with trade associations** (1,083 meetings), followed by 36% with retailers (1,004 meetings).
- › We also identified a large number of smaller, livestock-focused trade associations regularly meeting with ministers. **15% (114 meetings) of all trade association meetings with Defra between 2020 and June 2024 were with meat and dairy specific trade associations.**
- › Our research reached a similar conclusion to previous studies: that **the UK's system to disclose lobbying practices is opaque at best and could and should be substantially improved.** Canada, Ireland and Washington State offer examples of more robust lobby registers.
- › Investors should look to draw on the **Responsible Lobbying Framework** as part of their engagement with businesses to reduce the risk of strategic misalignment.



Our methodology and scope of this briefing

The Food Foundation, acting on behalf of the [Investor Coalition for Food Policy](#), conducted a pilot study in 2024, with further follow-up in January 2025, to begin to explore the extent of food industry lobbying in the UK. Inspiration came from InfluenceMap's [LobbyMap](#), which is a global database on corporate and industry association climate policy engagement. Our focus to date has been on ministerial meetings with the UK food industry and their major trade associations as documented on the '[Transparency and freedom of information releases](#)' register on the UK government website.

While we initially intended to focus on the food and beverage industry response to a package of high fat/salt/sugar (HFSS) policies that have been legislated for in the UK over the past five years, it quickly became apparent that such is the scarcity of information in the government's transparency registers that it is extremely difficult, if not impossible, to understand the extent of industry lobbying on specific policies.

As a result, we broadened out the initial scope of our research to look more broadly at the frequency of ministerial meetings with the UK food industry and their major trade associations, comparing this to meetings between ministers and food and health focused NGOs. Initially, all lobbying activity was

analysed by assessing 'gifts, hospitality, travel and meetings' documented between 2020 and 2023 for 11 government departments:

1. the Department of Health and Social Care (DHSC)
2. HM Treasury (HMT)
3. the Department for Environment, Food and Rural Affairs (Defra)
4. the Department for Business, Energy & Industrial Strategy (BEIS)ⁱ
5. the Department for Business and Trade (DBT)
6. the Prime Minister's Office (PMO)
7. the Department for Culture, Media and Sport (DCMS)
8. the Department for Education (DfE)
9. the Department for Energy Security and Net Zero (DESNZ)
10. the Department for Science, Innovation and Technology
11. the Department for Levelling Up, Housing and Communities (DLUHC)

Two departments (DLUHC and DfE) were subsequently excluded from analysis as no (obvious) meetings on food were recorded. Our analysis therefore focussed on the remaining nine government departments. In January 2025 we analysed the meetings recorded for these nine departments from January 2020 up to and including Q2 2024 (only data up until Q2 2024 was available at the time of the analysis).

According to the (UK) Government Digital Service and the Central Digital and Data Office, information on ministerial gifts, hospitality, travel and meetings constitutes "departmental core transparency data" which must be released on a quarterly basis. There is [official guidance](#) available (2024) on publishing this information (UK government, 2024).

We pre-identified companies assessed in our [Plating Up Progress](#) benchmarking analysis, in addition to pre-selecting the largest food and beverage trade associations in the UK and key associations for the meat and dairy industry, to search for in the registers. Additional relevant companies and trade associations identified as part of searching the registers were also included in the final analysis. Private sector information was also accessed from the websites of the following pre-identified associations: Agriculture and Horticulture Development Board (AHDB), British Retail Consortium (BRC), Dairy UK, Food and Drink Federation (FDF), Hybu Cig Cymru/Meat Promotion Wales, National Farmers Union (NFU), Institute of Grocery Distribution (IGD), and the Country Land and Business Association (CLBA).

Please refer to the [technical report](#) for the full methodology and the list of companies and trade associations included.

ⁱ BEIS existed until February 2023 when it was split to form the Department for Business and Trade (DBT), the Department for Energy Security and net zero (DESNZ) and the Department for Science, Innovation and Technology (DSIT). Records of BEIS ministerial meetings are therefore only available until February 2023.



PART ONE

WHAT IS LOBBYING AND WHY DOES IT MATTER?

What is lobbying?

Lobbying is often defined as *“any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making and carried out by or on behalf of an organised group”* (Access Info Europe, *et al*, 2015; 2022). Lobbying can also include direct or indirect attempts to influence public opinion, outside of normal advertising and marketing activity, with a view to impacting public decision-making (The Good Lobby, 2020; Access Info Europe, *et al*, 2015; 2022).

In practice, lobbying may therefore take the form of the following:

- › Meetings with ministers and/or civil servants
- › Private emails or calls, texts, social media posts
- › Informal meetings at events or at company premises, in coffee bars, receptions, at weddings or birthday parties, on the golf course etc.
- › The revolving door (companies hiring former government officials in communication and influencing roles)

A related but separate issue is related to the use of corporate funds for influencing the wider political and policy environment. For example, political donations and contributions, the funding of academic research, and the use of strategic litigation.



WHY IT MATTERS

Lobbying is a key process through which corporations, organisations and citizens can make their views known to policymakers. It's an essential and legitimate part of an open and consultative policymaking process which, if done transparently and with integrity, can empower citizens to participate in the democratic process (Transparency International UK, 2015). Done well, lobbying can help level the playing field for stakeholders from different interest groups, ensuring input from a plurality of stakeholders which is crucial for safeguarding the public interest (OECD, 2024).

But when lobbying is done in an opaque and unregulated way, problems can arise (Transparency International). If done secretly it can undermine democratic accountability (including by manipulating public opinion through biased evidence or misinformation), erode public trust, disproportionately benefit those with more financial or political resources or influence (including foreign influence), and result in policies that do not best serve the public (The Good Lobby, 2020; OECD, 2024). There is also an evolving lobbying and influence landscape, with newer and more diverse tools and channels – such as AI and social media – now involved, which can make lobbying activities all the more difficult to expose (OECD, 2024).

Lobbying by (or on behalf of) commercial organisations is one of several forms of corporate political activity (CPA) which aims to influence policy to advance commercial goals. And certainly, the financial and market power of large corporations has been found to correlate strongly with CPA and political power (Mialon et al., 2016). When it comes to large food corporations, this can lead to governmental stasis and delays in implementing regulation that would support public health.

To ensure public trust in the government and to enable good public policymaking, there ought to be integrity, transparency and fair access in decision-making processes. It is therefore crucial that governments set strong frameworks for lobbying activities (OECD, 2024).

WHAT DOES GOOD LOOK LIKE?

The authors of the [Responsible Lobbying Framework](#) have argued that the main distinction between 'good' and 'bad' lobbying is the process through which that lobbying is conducted. The Responsible Lobbying Framework was developed by Carnstone for the Meridian Institute in 2020, initially to allow a group of Civil Society Organisations (CSOs) to hold their corporate partners accountable during a dialogue process. It lays out five principles to help promote and support responsible lobbying practice (The Good Lobby, 2020).

1. **LEGITIMACY:** "responsible lobbying will never be inconsistent with the public interest."
2. **TRANSPARENCY:** "responsible lobbying organisations will be open, complete and truthful in their communications on the topic."
3. **CONSISTENCY:** "responsible lobbying organisations will practice what they preach, remaining consistent with their professional codes, organizational values and other public positions."
4. **ACCOUNTABILITY:** "responsible lobbying organisations and those who lobby for them will be accountable to stakeholders for their actions."
5. **OPPORTUNITY:** "responsible lobbying organisations will coordinate and align activities with others when they identify issues that further the public interest and are of common concern."

Likewise, the OECD has recently updated its [recommendations around transparency and integrity in lobbying and influence](#) (OECD, 2024). These are useful resources that investors and anyone monitoring or involved in lobbying activities can draw on to ensure best practice is followed. We expand on this further in our "Recommendations" section of this briefing.



WHY UNDUE COMMERCIAL INFLUENCE ON FOOD POLICYMAKING CAN BE A CAUSE FOR CONCERN

Commercial actors influence health in positive and negative ways, often simultaneously. The ways in which powerful commercial actors shape public health are termed the Commercial Determinants of Health (CDoH), which the World Health Organization (WHO) defines as the conditions, actions and omissions by corporate actors that affect health.

Powerful corporations engage in a range of practices to influence the political and policy environment. As well as lobbying, wider examples of commercial influence can also include political contributions and donations, litigation, issue framing, and funding academic research (Mialon *et al.*, 2016).

Policy interference is when lobbying by or on behalf of companies is done to influence policy to advance commercial goals and maximise profit from products and practices that may harm the public (ESCR-Net). The ‘Deadly Ds’ of policy interference include denying harms, disputing evidence, sowing doubt, disguising involvement (via front groups), derailing or delaying regulation, and distracting and deflecting criticism with small-scale, but high-visibility partnerships (Gillespie, 2025).

When not properly regulated in a transparent manner, lobbying can result in a form of legal distortion in which a company (or group of companies) funds

lobby groups to select data and arguments to convince policymakers and politicians to act in the company’s interests (Mialon *et al.*, 2015; Nestle, 2007).

There is strong evidence from around the world that lobbyists use cherry-picked evidence from industry-funded research to frame policy debates and to derail or delay proposed regulation. Part of this framing involves a focus on the negative consequences (to their businesses) of regulation, including on employment (Lauber *et al.*, 2022). Lobbyists also discuss donations to political parties (Pereira *et al.*, 2023). Outside of registered meetings, business and policymakers connect in other venues, governance spaces, conferences, social and private events (Gómez, 2023).

Currently, food policy has been seen as an area at risk of becoming “pay-to-play”, whereby those companies or trade associationsⁱⁱ with significant revenues can leverage this to access and influence policymakers. Analysis by the Union of Concerned Scientists shows that between 2019 and 2023, giant agribusiness companies and industry associations spent well over half a billion dollars lobbying US Congress to influence food and agriculture legislation (Goswami and Stillerman, 2024). **A 2024 study of US lobbying using the OpenSecrets database, revealed how, between 1998 and 2020, ultra-processed food**

(UPF) manufacturers spent US\$1.15 billion on lobbying. This was more than any other industry – the second highest was gambling (US\$817 million), followed by tobacco (US\$755 million) and alcohol (US\$541 million) (Chung *et al.*, 2024).

Certainly, Big Food – large transnational corporations who make most of their profits from the sale of less healthy products – spend a lot on lobbying. The financial clout of pro-industry lobbying on top of advertising spend dwarfs the budget of the WHO. Nestlé, for example, spends around \$19 billion on marketing and administration expenses every year, more than the health budgets of most low- and middle-income countries, and more than five times the annual operating budget of the WHO (Allen, *et al.*, 2019; Wunsch, 2024; Nestlé S.A., 2022).

The financial and market power of large corporations has been found to correlate strongly with CPA and political power (Wood, *et al.*, 2023). When it comes to large food corporations, this can translate into governmental inaction in moving to regulate unhealthy products and practices. **Countries with a greater degree of corporate capture have been found to be less likely to implement evidence-based health policies endorsed by the WHO** (Allen, *et al.*, 2022; Allen, *et al.*, 2019).

ⁱⁱ Trade associations are defined as an organisation of businesses in the same industry or with similar interests that work together to promote the industry and advance their members’ interests. We have included membership bodies representing sector interests in our analysis.

FINDINGS FROM BMJ EXPOSÉS ON CONFLICTS OF INTEREST

The British Medical Journal (BMJ) has recently been running a series of exposés focusing on examples of conflicts of interest and corporate influence in the food sector.

McDonald's: The BMJ identified 15 cases between January 2020 and January 2025 in which McDonald's objected to new proposals by local authorities to prevent new fast food outlets close to schools or in areas with a high prevalence of obesity. McDonald's deployed a range of arguments, including using a specialist GP (who was previously a paid medical adviser to McDonald's) and threatening councils with bills for legal costs (Borland, 2025).

Children's education: According to the BMJ the food industry has infiltrated children's education and childcare over many years, through providing funding and sponsorship for breakfast clubs, nutrition guidance, and healthy eating campaigns. The organisations influencing food provision and education in schools include Kellogg's, Greggs, and the British Nutrition Foundation (BNF) which is funded by companies including Coca Cola, PepsiCo, Mars, Nestlé, British Sugar plc, Kellogg's and McDonald's. The BMJ highlighted that the *Food – a Fact of Life* programme, which provides resources and training for teachers, is funded by BNF members (Wilkinson, 2024).

SACN: BMJ analysis found that more than half of the experts on the UK government's Scientific Advisory Committee on Nutrition (SACN) – which advises the government – have links to the food industry. At least 11 of the 17 members of the SACN have conflicts of interest with the likes of Nestlé, Tate and Lyle, and Unilever. Campaigners say the SACN members' conflicts of interest are detrimental to public health, but defenders claim they reflect the lack of funding in nutrition research (Borland, 2024).

Infant feeding advice: The BMJ recently highlighted a controversial pilot scheme in which midwives paid by Danone have been providing infant feeding advice to new parents, although the scheme (run by Tesco) has subsequently been axed after an outcry (Coombes, 2025). The International Code of Marketing of Breast-Milk Substitutes states that "marketing personnel" should avoid direct or indirect contact with "pregnant women or with mothers of infants and young children." UK law covers some but not all the code's provisions.





PART TWO

OUR FINDINGS

How often do ministers meet with the food industry?

Our focus on lobbying to date – which due to the limitations of obtaining data on the extent of lobbying has been very narrow in scope – has focused only on ministerial meetings with the UK food industry and their major trade associations as documented on the ‘*Transparency and freedom of information releases*’ register on the UK government website. Analysis of these meetings was first analysed and reported in The Food Foundation’s [State of the Nation’s Food Industry report](#) in 2024, looking at the period 2020 to 2023. The following analysis has been updated to include the first two quarters of 2024, thus providing a more accurate picture of lobbying under the last conservative government, up until the last General Election in July 2024.

Of the nine departments we looked at, Defra and BEIS (and subsequently DBT), rather than DHSC, had the largest number of ministerial meetingsⁱⁱⁱ with food businesses and their trade associations. 51% and 37% of the total meetings by food businesses for the 2020-2024 period were with Defra and BEIS/DBT respectively. Only 3% of meetings were with DHSC.

- › Across all nine departments analysed, **39% of the total number of ministerial meetings with the food and drink industry and their representatives were with trade associations** (1,083 meetings), followed by 1,004 meetings with retailers (36%), 254 meetings with manufacturers (9%) and 209 meetings with casual dining businesses (8%) (Figure 1).
- › Perhaps unsurprisingly, **trade associations were overwhelmingly the most active food-related organisations in terms of ministerial meetings**. The trade association recording the largest number of official ministerial meetings with our nine focus departments was the British Retail Consortium (BRC), with a total of 321 meetings documented between 2020 and 2024. This was closely followed by the National Farmers’ Union (NFU) with 297 meetings, and the Food and Drink Federation (FDF) with 225 meetings.



ⁱⁱⁱ For clarity of language, we have used “meeting” as an overarching term for the number of organisations’ interactions with ministers. The actual number of bilateral meetings was lower due to some cases where multiple organisations attended one meeting with a minister; for instance, three trade associations might have attended the same meeting, which we counted as three ministerial interactions but is only recorded as one meeting in government registers. Both bilateral meetings with ministers and roundtable meetings with multiple companies in the room have been included.

DEFRA MINISTERIAL MEETINGS WITH THE FOOD INDUSTRY

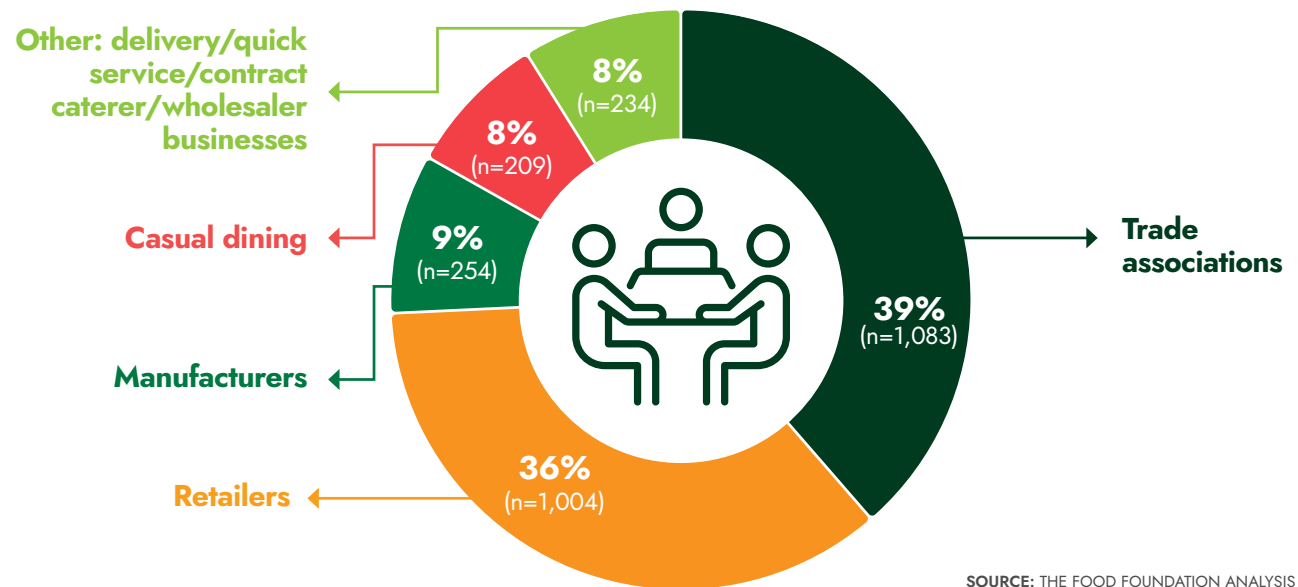
When we looked in more detail at Defra, the department responsible for food and farming, we identified:

- > **1,408 meetings between food businesses and trade associations and Defra – far outnumbering the number of meetings between Defra ministers and food NGOs held during the same period of time (January 2020-June 2024) which was just 35.**
- > Our research also identified a large number of smaller, livestock-focused trade associations regularly meeting with ministers. **15% (114 meetings) of all trade association meetings with Defra between 2020 and 2024 were with**

meat and dairy specific trade associations. The highest number of livestock-focussed trade association meetings were with the British Poultry Council and the National Sheep, Pig and Beef Associations.

This raises questions about the influence the meat and dairy industry has on food and agriculture policy development, given the strong meat and dairy sector representation within NFU membership (who met with Defra 273 times between 2020 and 2024) and the large number of smaller livestock focussed trade association meetings identified. UK policymakers have long been resistant to taking action in this area, despite the clear advice from the Climate Change Committee and the 2021 Independent National Food Strategy that reduction in meat consumption is essential to meeting climate targets.

FIGURE 1
The proportion of food industry meetings by sector with nine government departments between 2020 and 2024



SOURCE: THE FOOD FOUNDATION ANALYSIS 2025

Analysis of those food companies most regularly meeting with Defra found that overwhelmingly it is the supermarkets who are most often in the room with ministers. Deliveroo and Unilever are the only non-retailers in the top ten companies found to be most frequently meeting with ministers. While this is perhaps not surprising given that Defra is the department responsible for retailer relationships (the ‘sponsor ministry’ for the food industry^{iv}), with a large and varied number of issues to discuss, it nevertheless speaks to the power of the supermarkets within the UK food system. Half of the companies recording the largest number of ministerial meetings are publicly listed firms and half are privately owned. Caterers and manufacturers were much less likely to meet with Defra ministers during the period analysed.

^{iv} The Department for Environment, Food and Rural Affairs (Defra) describes its role in food policy as acting as “sponsor department” for the UK food and drink manufacturing and retailing industries, including the food services sector.

TABLE 1
The 10 companies in our analysis recording the largest number of ministerial meetings overall across all nine departments analysed

	COMPANIES	TOTAL MEETINGS 2020-24
1		143
2		132
3		132
4		120
5		105
6		98
7		89
8		83
9		75
10		67

TABLE 2
The 10 companies in our analysis recording the lowest number of ministerial meetings overall across all nine departments analysed

	COMPANIES	TOTAL MEETINGS 2020-24
1		0
=2		1
=2		1
=3		2
=3		2
=3		2
=4		3
=4		3
=4		3
5		4

STRATEGIC MISALIGNMENT BETWEEN TRADE ASSOCIATION LOBBYING AND INDIVIDUAL COMPANY HEALTH AND CLIMATE STRATEGIES

Unilever recently called on industry associations to increase their efforts on climate action having undertaken an independent review of the industry associations they work with to audit their alignment with Unilever's own position. Their review found that eight out of 27 industry associations had no public

record of meaningful climate policy engagement with governments, and eight weren't aligned with one or more of Unilever's priority policy areas. Unilever have stated that they will take action to address the misalignment and that they reserve the right to withdraw their membership if necessary (Unilever, 2024).



ANALYSIS OF DEFRA MEETINGS

Scant information on the subjects of meetings is recorded in the ministerial meeting registers.

For example, in 2023 approximately a third of food businesses' meetings with Defra were to discuss 'farming or agriculture policy, challenges or issues'. No further detail is provided beyond very top-level descriptions, making it impossible to understand what specific policies, challenges or issues are being discussed. Descriptions of meetings are often so brief as to be virtually meaningless e.g. 'Introduction' or 'To discuss business affairs' or 'Catch-up'. This lack of detail is impeding the aim of such registers, which ought to be about increasing transparency.

Nevertheless, with what information is disclosed on meeting topics, we categorised industry and trade association meetings by similar meeting descriptors. Given the far-reaching impact of the Covid pandemic on the food supply chain we split the 2020-24 period into two, looking first at the pandemic period (2020-21) and then separately at the post pandemic period

(2022-24) (See figures 2 and 3). Meetings to discuss Covid (2020-21), the EU deal (with the UK-EU trade deal post-Brexit signed during 2020) and livestock and trade were the most common topics attributed to meetings during the 2020-21 period. Different topics appear more frequently in the meeting registers during the 2022-24 period, which also coincided with a sharp increase in food inflation and the cost-of-living crisis. Prices, livestock and farming policy were the most frequently discussed topics during this later period.

Interestingly, we observed a decrease in the number of meetings as the Conservative government's term drew to a close, with 77% fewer meetings held between Defra and industry in 2023 compared to 2020. While this may simply reflect the unprecedented turbulence of 2020-21, it may also suggest that the window for influencing is towards the start of a government's term of office as new policies are being developed, rather than towards the end of a term of government when the focus shifts from policymaking to shoring up support ahead of General Elections. It will be interesting to observe whether the number of ministerial meetings between industry, trade associations and government increased in the second half of 2024 and into 2025 during the new Labour government's term of office (data forthcoming in the State of the Nation's Food Industry report, 2025).

FIGURE 2
Categorisation of industry and trade association meetings by meeting descriptors with Defra between 2020 and 2021



FIGURE 3
Categorisation of industry and trade association meetings by meeting descriptors with Defra between 2022 and 2024



SOURCE: THE FOOD FOUNDATION ANALYSIS 2025

ANALYSIS OF DHSC MEETINGS

Far fewer meetings were identified between DHSC and the food industry and their trade associations compared to the number identified at Defra, although given that there is less reason for the food industry to engage with DHSC unless to make specific points around health policymaking this is encouraging. A total of 85 meetings between DHSC, food businesses, and their trade associations (the FDF and the BRC) were identified between 2020 and 2024.

Of those companies and trade associations meeting with DHSC during the 2020-24 period, retailers were once again the sector most likely to be meeting with ministers, with 42% of all business and trade association meetings with the retail sector. However, it is notable that all three of the largest online food delivery apps and two large companies from the Out of Home sector (McDonald's and Wetherspoon's) feature among those businesses most likely to be meeting with health ministers.

TABLE 3
The 10 companies in our analysis recording the highest number of ministerial meetings with DHSC from 2020-24

	COMPANIES	2020-24
1		9
2		9
3		5
4		5
5		4
6		4
7		3
8		3
9		3
10		3

While Covid once again dominated the discussion during meetings between industry and government during the 2020-2024 period, other topics discussed included the Food Data Transparency Partnership (FDTP), the advertising restrictions policy, and the obesity strategy. Once again, the vast majority of meetings took place during the 2020-2021 period of time. The meetings between 2022 and 2024 focussed on smoking and the pharmacy first approach.

FIGURE 4
Categorisation of industry and trade association meetings by meeting descriptors with DHSC between 2020 and 2024



SOURCE: THE FOOD FOUNDATION ANALYSIS 2025



CLIMATE & BIG MEAT LOBBYING AND MISINFORMATION

The meat industry lobby has huge influence and power globally with an increasing number of accusations that it uses this power to derail climate action. A Changing Markets Foundation [2024 report](#) accused Big Meat and Dairy companies of mirroring strategies previously used by the tobacco and fossil fuel industries to this end (Changing Markets, 2024).

The report analysed actions by 22 of the biggest meat and dairy companies across four continents, looking at their voluntary climate commitments, green claims, investments in advertising versus low-carbon solutions, and their political engagement. The investigation unpicked how the meat and dairy industry (Big Ag) has largely succeeded in convincing policymakers of ‘agricultural exceptionalism’, i.e. the ways in which the sector is allowed to ‘operate under a different set of rules than other parts of the economy, leading to widespread abuse in the food system’ (Changing Markets, 2024). This has led to agriculture obtaining several concessions, exemptions and delays to climate action in the sector.

Deliberate efforts to spread misinformation are likely to be fuelling increased polarisation on critical health and climate issues

A previous [report](#) by Changing Markets from 2023 (Changing Markets, 2023) investigated the spread of misinformation on social media around production and consumption of animal products. It grouped these misinformation tactics into two categories; narratives that disparage alternatives to meat and dairy, such as alternative protein and vegan diets (78% of misinformation), and narratives that promoted meat and dairy products or diets for their perceived benefits (22% of misinformation). The report found that only a few social media accounts were responsible for most of the misinformation being spread; 50% of engagement comes from just 50 ‘misinfluencer’ accounts, many of which are right-wing media and political figures, or self-described wellness experts.

This suggests a concerted effort to undermine scientific consensus on the reduction of meat and dairy consumption needed to improve public health and prevent further climate change. As Changing Markets point out, misinformation has dangerous knock-on effects for policy development. Deliberate efforts to spread misinformation are likely to be fuelling increased polarisation on critical health and climate issues, ultimately leading to increased inaction by governments.

LIMITATIONS OF THE CURRENT SYSTEM

The Food Foundation's pilot project substantially expanded on work carried out by Antony So for the Food Research Collaboration in 2022 (So, 2022). The pilot project reached a similar conclusion to previous studies: that the UK's system to disclose lobbying practices is opaque at best and could and should be substantially improved. Key issues identified are as follows:

1 Poor specification of purpose and meeting detail

The research – and indeed current rules around lobbying disclosure – are significantly limited by the lack of information on the content of the meetings between food industry representatives and policymakers. The descriptions of these meetings are minimal. Under current rules, the only information available to the public is:

- › the name of the minister who took part in the meeting
- › the date when the meeting took place
- › the name of the organisation (and sometimes, but not always, the name of the organisation's employees) that the minister met with
- › a simple title that is intended to describe the meeting's purpose

Minister's Transparency Guidance (2024) states that regarding the disclosure of a meeting's purpose: *"Departments should make every effort to provide a meaningful and clear description of the 'purpose of the meeting', succinctly capturing a. the key topic(s)*

discussed and state any specific area(s) of government policy/ legislation etc., affected. Broad descriptions such as 'general discussion', 'introductory meeting', 'informal catch-up', 'bilateral meeting' etc. should not normally be used" (Cabinet Office, 2024).

This guidance has clearly not been followed in most statements of meeting purpose.

Requirements to disclose the purpose of lobbying are especially important for government transparency. Requirements ought to include the topics discussed in the meeting, specific policies or legislation discussed, and – in the case of any third-party lobbyist involvement – the views of the client who hired the lobbyist. The paucity of detail on interactions between lobbyists and policymakers erodes public trust – in lobbying in particular and the policymaking process more generally. It also decreases accountability. Increasing transparency of lobbying would be a significant step in improving public understanding and trust in the policymaking process.

2 Undocumented lobbying

Current transparency rules only apply to meetings that take place within ministries or departments. Meetings held outside government buildings – for example, on a corporation's premises, at the offices of a public affairs company, at conferences, in coffee bars, receptions, at weddings or birthday parties, on the golf course etc. – are not logged. Emails, phone calls, texts, social media posts are also not disclosed. Consequently, we have no idea how many interactions may have taken place between food industry lobbyists and policymakers without public scrutiny.

3 Limited disclosure of personnel

The absence of information about meetings with other public servants, such as senior civil servants who are important conduits for policy influence and thus obvious targets for lobbyists, is another significant limitation. Frequently a lobbyist will meet with a senior advisor who will then relay information directly to the Minister often with a personal recommendation (Wood and Griffiths, 2018). Research in the EU, for example, highlights the important role of committee chairs and 'rapporteurs' in setting policy agendas.

Disclosure of lobbyist meetings with UK civil servants is uneven: only the meetings of a department's highest-ranking official, the Permanent Secretary, are routinely made public. Meetings between food businesses and other high-ranking civil servants who may have a significant impact on policy (such as Directors General, Directors, Deputy Directors and Chief Scientific Advisers) are not available for public scrutiny.

4 Data organisation

The way in which data is organised and structured is limiting and makes searching the ministerial registers difficult. The sheer volume of information makes manual coding difficult and time-consuming, exacerbated by problems regarding terms used and misspellings of names (e.g. M&S, Marks and Spencer etc.).

HOW DO OTHER COUNTRIES COMPARE ON LOBBYING DISCLOSURE?

Inaccessible data about lobbying and political contributions is the norm internationally. An analysis of 109 countries' data governance and sharing practices found that few countries provided lobbying information in ways that enabled oversight and accountability (Global Data Barometer, 2022). Only 19 of 109 provide data online, and only 52% of countries around the world are required to disclose the identity of political donors, further compounding issues in accessing this data (International IDEA, 2022).

Work in Australia has shown that opportunities to develop a programme to monitor commercial political practices face major hurdles, including: access barriers arising from poor availability and detail of data, technical barriers arising from the formatting of data disclosures, and coding barriers relating to the diverse nature of the commercial sector (Lacy-Nichols and Cullerton, 2023). Other studies have highlighted similar challenges especially with regards to inaccessible and incomplete data (Mialon *et al.*, 2020).

While 79 countries participate in the Open Government Partnership (an organisation that brings together government leaders and civil society to advocate for and promote transparent, participatory, inclusive and accountable governance), implementation of its national action plan including actions designed to improve political transparency, has been slow (OECD, 2019). NGOs such as OpenSecrets in the US and Transparency International's Open Access in the EU have constructed databases to

monitor and analyse commercial political practices, though they are limited by the data made available by governments (Freudenberg, 2018).

Two countries and one US state – Canada, Ireland and Washington State – offer examples of more robust lobby registers (Boucher and Coope, 2022). Canada and Washington State both require in-house and consultant lobbyists to disclose all meetings with public office holders (including politicians, political staff and government employees) (Solaiman, 2021). Ireland requires a range of different communication methods to be disclosed, including phone calls, emails, meetings and informal communications. Ireland's Register of Lobbying, overseen by the Standards in Public Office Commission, ensures a high level of transparency and accountability (see box) (Huwyler and Martin, 2022).



EXAMPLE OF A MORE ROBUST LOBBYING DISCLOSURE, IN IRELAND'S REGISTER OF LOBBYING ACTIVITY

Nomad Foods Europe disclosed their lobbying activity in May 2023 by listing:

- > Relevant matter: 'Legislation'
- > Public policy area: 'Trade'
- > Period: '1 Jan, 2023 to 30 Apr, 2023'
- > Specific details: 'Trade disruption as a result of Brexit'
- > Intended result: 'To reduce trade disruption to the UK market from Ireland as a result of Brexit'
- > Name of person primarily responsible for lobbying: 'Tom Crossland'
- > Designated public official lobbied: 'Peter Burke - Minister of State (Department of Foreign Affairs)'
- > Lobbying activity: 'Email (2-5); Phone call (1); Meeting (1)'



PART THREE

RECOMMENDATIONS

Recommendations

DISCLOSURE REQUIREMENTS FOR MEETINGS BETWEEN LOBBYISTS AND POLICYMAKERS NEED TO BE SUBSTANTIALLY IMPROVED.

Following Transparency International recommendations (Transparency International, 2024), a comprehensive, user-friendly, accessible, searchable register with a clear template of accurate summary information should cover the following:

- Who is lobbying, on whose behalf, and who is being lobbied? We need to see a list of meeting participants including details of lobbyists – rather than simply the name of a corporation or trade association – as well as the politicians, civil servants and/or special advisers who took part in the meeting.
- Meeting objective: issue(s) addressed, what policy or legislation, what intended result?
- Relevant written or oral communications (before or after the meeting).
- Meeting location and particular circumstances.
- Agreements and outcomes: specific issues meeting participants agreed to address as a result of the meeting.

A full disclosure system would also document how much money is spent on lobbying (including per subject, by donor, and any political contributions).

MORE ROBUST DATA SYSTEMS OUGHT TO BE IMPLEMENTED.

While the monitoring of lobby activities is usually undertaken by NGOs, governments must ensure that a robust system is in place that provides easily accessible, searchable, and reusable data. Policies and regulations mandating better transparency and disclosure of CPA are needed to track a range of CDoH, including lobbying. Lessons can be learned internationally about what frameworks and policies support high quality transparency, such as the OECD's 2020 survey of lobbying regimes (OECD, 2021).

On data, 'FAIR' data principles (that data ought to be Findable, Accessible, Interoperable and Reusable) should apply (Thieme, 2019). This would in turn permit algorithms or machine learning tools to scrape, clean and code cumbersome datasets and websites to more accurately track lobbying (Boucher and Cooper, 2020). Common coding frameworks and data dictionaries could be used to facilitate international and between-study comparisons.

THE 'REVOLVING DOOR' NEEDS TO BE ADDRESSED.

This refers to the movement of people between employment in the public and private sector and represents a key risk for conflicts of interest.

For example, the OpenSecrets website in the US has a revolving door database with information on the previous government employment of US lobbyists. **In 2022, of the 380 lobbyists employed by the UPF industry, 265 (70%) were former government employees** (OpenSecrets, 2023). A 2018 analysis from the Transparency Project run by The Guardian found that more than half of federal lobbyists in Australia had previously worked for government or major political parties. Moreover, in a study of lobbying in Australia, 96 lobbyists said they both *had* and *had not* worked in government, raising serious questions about accuracy and oversight of these registers (Lacy-Nichols *et al.*, 2023).

Food Foundation research to date has not addressed the issue of the 'revolving door' and certainly disclosure of the revolving door is poor in several countries (UK government, 2023). In the UK, registers of lobbyists (the [UK Lobbying Register](#) and the [Office of the Registrar of Consultant Lobbyists](#)) do not detail the specific position or the exact date lobbyists left government. However, there are examples from other countries of imposing stand-down periods for government employees with penalties for non-compliance. In Australia, for example, there are

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18-month and 12-month restrictions respectively for ministers/parliamentary secretaries and their staff to join private companies, while Canada's has a five-year prohibition period (McKeown , 2014).

An improved system of disclosure would need to address the revolving door by specifying whether the lobbyist (or close family members) had ever been employed in public office/government and when. Unique identifiers could match lobby firms, lobbyists, clients across registers (including consistent spelling and labelling). Lengthy stand-down periods would be mandated with meaningful penalties for non-compliance.

DIGGING DEEPER – OUR FUTURE PLANS

The Food Foundation is planning to continue this work, which in the first instance will look to expand on the disclosure sources analysed (for instance looking at political donations, and third-party lobbying registers). We also plan to look in more detail at food and beverage trade associations and any strategic misalignment with their membership companies' stated goals (Solaiman, 2021). If you are interested in learning more about our future plans, you can get in touch [here](#).

Summary

A more transparent food system is a prerequisite for a food system that better serves people and planet. Transparency is essential for ensuring trust, accountability, and compliance. The ability of a broad range of stakeholders to make their views known to policymakers ought to be a key part of an open and consultative policymaking process. The public ought to be able to trust that the process of democratic policymaking is based on clear and comprehensive rules on lobbying, that those rules are being followed, and that they are being enforced in the public interest. And investors looking to allocate funds in a way that supports wider health, social and sustainability goals ought to be able to trust that the food businesses they invest in are complying with their own health and climate strategies and commitments.

Yet the UK's current rules around corporate lobbying (and conflict of interest) are currently not fit for purpose. There is huge potential for improvement through several quick wins, for example simply updating the governance and process for existing transparency registers. With increasing focus on food industry lobbying and conflict of interest, now is the time for investors and civil society to ensure that the process around transparent lobbying is improved.

Engagement questions for investors

The following engagement questions are intended to provide some suggestions as to the types of questions that could be asked by investors in their stewardship and engagement with food and beverage companies on their lobbying activities. These questions draw heavily from the Responsible Lobbying Framework.

LEGITIMACY

- › To what extent does any lobbying you and/or intermediary lobbyists (paid or unpaid) undertake:
 - » Consider the wider public interest (including the needs of people, communities and the environment), and not only your company's needs?
 - » Support, respect and not undermine an evidence-based approach to policymaking, clearly respecting independent, peer-reviewed science, existing public policy and human rights frameworks?
 - » Have clear codes of conduct to prevent bribery and corruption in its relations with public officials?
 - » Have in place policies and processes for managing the “revolving door”, covering the hiring of former politicians and public officials, secondments or placement of staff into the public sectors and cooling-off periods?

TRANSPARENCY

- › To what extent do your in-house and/or intermediary lobbyists (paid or unpaid) adhere to the guidance on transparency (principle 2) set out in the Responsible Lobbying Framework?

CONSISTENCY

- › When did you last review your in-house and/or intermediary lobbyists' (paid or unpaid) membership of third-party membership organisations such as trade associations, to identify any areas of strategic misalignment; and what, if any, remedial actions did you take?
- › Do you have organisational policies, procedures, training, and if needed sanctions, in place to ensure any in-house and/or intermediary lobbyists (paid or unpaid) understand and adhere to organisational goals and positions on matters relating to the wider public interest?

ACCOUNTABILITY AND OPPORTUNITY

- › To what extent do any in-house and/or intermediary lobbyists (paid or unpaid) engage in or involve multistakeholder partnerships, such as CSOs, in setting lobbying positions, agreeing lobbying strategy and in reviewing performance?
- › Do you have an organisational policy and positions on lobbying – set and overseen by the Board and covering any in-house and/or intermediary lobbyists (paid or unpaid) – that support and adhere to national laws, standards and any national codes of conduct for lobbyists, and ensure that any illegal and unethical activity is duly reported to relevant legal or oversight authorities?
- › Do you periodically audit and publicly report your lobbying activities and their results?
- › Do you have an organisational commitment not to spend disproportionate resources on lobbying to crowd out other interests, and do you actively monitor lobbying spend on a regular (e.g. annual) basis?

REFERENCES

- The Food Foundation (2025). The Broken Plate 2025. Available at https://foodfoundation.org.uk/sites/default/files/2025-01/TFF_The%20Broken%20Plate%202005%20FINAL%20DIGITAL.pdf
- UK government (2024). Ministers' transparency guidance. Available at https://assets.publishing.service.gov.uk/media/6604110bf9ab41001aeea39c/2024_04_02-Ministers-Transparency-Guidance.pdf
- Access Info Europe, Open Knowledge, Sunlight Foundation, and Transparency International (2022). International standards for lobbying regulation: Towards greater transparency, integrity and participation. Available at <https://lobbyingtransparency.net/lobbyingtransparency.pdf>
- Theis, D. and White, M. (2021). Is Obesity Policy in England Fit for Purpose? Analysis of Government Strategies and Policies, 1992–2020. Available at <https://onlinelibrary.wiley.com/doi/10.1111/1468-0009.12498>
- Transparency International UK. Lifting the lid on lobbying. Available at https://www.transparency.org.uk/sites/default/files/pdf/publications/TI-UK_Lifting_the_Lid_on_Lobbying.pdf
- OECD (2023). OECD recommendation on transparency and integrity in lobbying. Available at <https://legalinstruments.oecd.org/public/doc/256/256.en.pdf>
- Transparency International. Lobbying. Available at <https://www.transparency.org/en/corruptionary/lobbying>
- The Good Lobby (2020). The responsible lobbying framework. Available at https://static1.squarespace.com/static/5e85df904eec2417de2b4800/t/5ef1e5fd5d6e1015f5b171ef/1592911361771/The-Responsible-Lobbying-Framework_vJune2020.pdf
- Wood, B., Robinson, E., Baker, P., Paraje, G., Mialon, M., van Tulleken, C., and Sacks, G. (2023). What is the Purpose of Ultra-Processed Food? An Exploratory Analysis of the Financialisation of Ultra-Processed Food Corporations and Implications for Public Health. *Global Health*. Vol 19 85. Available at <https://doi.org/10.1186/s12992-023-00990-1>
- Mialon, M., Swinburn, B., Allender, S. and Sacks, G. (2016). Systematic examination of publicly available information reveals the diverse and extensive corporate political activity of the food industry in Australia. *BMC Public Health*, Vol 16 283. Available at <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-016-2955-7>
- ESCR-Net. Manifestations of corporate capture. Available at <https://www.escr-net.org/resources/manifestations-of-corporate-capture/>
- Gillespie, S. (2025). Food Fight: From Plunder and Profit to People and Planet. Canongate, forthcoming.
- Mialon, M., Swinburn, B., Sacks, G. (2015). A proposed approach to systematically identify and monitor the corporate political activity of the food industry with respect to public health using publicly available information. *Obes Rev*. Vol 16(7) 519-30. doi:10.1111/obr.12289.
- Nestle, M. (2007). Food politics: how the food industry influences nutrition and health. Oakland: University of California Press.
- Lauber, K., Rippin, H., Wickramasinghe, K., Gilmore, A.B. (2022). Corporate political activity in the context of sugar-sweetened beverage tax policy in the WHO European Region. *European Journal of Public Health*. Vol 32(5). 786-93.
- Pereira, T.N., Bortolini, G.A., Campos, R.d.F. (2023). Barriers and Facilitators Related to the Adoption of Policies to Reduce Ultra-Processed Foods Consumption: A Scoping Review. *International Journal of Environmental Research and Public Health*. Vol 20(6). 4729.
- Gómez, E.J. (2023). Junk Food Politics: How Beverage and Fast Food Industries Are Reshaping Emerging Economies. Baltimore: JHU Press.
- Goswami, O. and Stillerman, K.P. (2024). Cultivating control: The political economy of corporate concentration in U.S. agriculture. Available at https://www.ucusa.org/sites/default/files/2024-05/Cultivating%20Control_white%20paper%20final_May%2010_OG_PDF.pdf
- Chung, H., Cullerton, K and Lacy-Nichols, J. (2024). Mapping the lobbying footprint of harmful industries: 23 years of data from OpenSecrets. *Millbank Quarterly*. Available at <https://pubmed.ncbi.nlm.nih.gov/38219274/>

- Allen, L.N., Hatefi, A., Feigl, A.B. (2019). Corporate Profits Versus Spending On Non-Communicable Disease Prevention: An Unhealthy Balance. *Lancet Global Health*. Vol. 7(11). Available at [https://www.thelancet.com/journals/langlo/article/PIIS2214-109X\(19\)30399-7/fulltext](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(19)30399-7/fulltext)
- Wunsch, N.G. (2024). Nestlé Group marketing spend 2015-2022. Available at <https://www.statista.com/statistics/685708/nestle-group-marketing-spend/>
- Nestlé S.A. (2022). Financial Statements 2022: Consolidated Financial Statements of the Nestlé Group 2022.
- Allen, L.N., Wigley, S., Holmer, H. (2022). Assessing the Association Between Corporate Financial Influence and Implementation of Policies to Tackle Commercial Determinants of Non-Communicable Diseases: A Cross-Sectional Analysis of 172 Countries. *Soc Sci Med*. Vol. 297 (2022). 114825.
- Borland, S. (2025). McDonald's triumphs over councils' rejections of new branches - by claiming it promotes "healthier lifestyles". *BMJ*. Vol 388 63. doi:10.1136/bmj.r163.
- Wilkinson, E. (2024). Food industry has infiltrated UK children's education: stealth marketing exposed. *BMJ*. Vol 387 2661. doi:10.1136/bmj.q2661.
- Borland, S. (2024). UK government's nutrition advisers are paid by world's largest food companies, *BMJ* analysis reveals *BMJ*. Vol 386 190. doi:10.1136/bmj.q1909.
- Coombes, R. (2025). Unethical infant feeding service is axed in Tesco climbdown *BMJ*. Vol 388 81. doi:10.1136/bmj.r81.
- Changing Markets Foundation (2024). The new merchants of doubt: How big meat and dairy avoid climate action. Available at <https://changingmarkets.org/report/the-new-merchants-of-doubt-how-big-meat-and-dairy-avoid-climate-action/>
- Changing Markets Foundation (2023). Truth, lies and culture wars: Social listening analysis of meat and dairy persuasion narratives. Available at <https://changingmarkets.org/report/truth-lies-and-culture-wars-social-listening-analysis-of-meat-and-dairy-persuasion-narratives/>
- So, A. (2022). To discuss business: food and drink industry lobbying in the UK A Food Research Collaboration Discussion Paper. Available at <https://foodresearch.org.uk/publications/to-discuss-business-food-and-drink-industry-lobbying-in-the-uk/>
- So, A. (2022). Shaping the debate: has corporate lobbying impacted UK laws on promoting products high in fat, salt and sugar? A Food Research Collaboration Discussion Paper. Available at <https://foodresearch.org.uk/publications/shaping-the-debate-has-corporate-lobbying-impacted-uk-laws-on-promoting-products-high-in-fat-salt-and-sugar/>
- UK government Cabinet Office (2024). Ministers' transparency guidance. Available at https://assets.publishing.service.gov.uk/media/6604110bf9ab41001aeea39c/2024_04_02-Ministers-Transparency-Guidance.pdf
- Thieme, S. (2019). Moderation or Strategy? Political Giving by Corporations and Trade Groups. *J Polit*. Vol 82(3). 1171–5.
- Wood, D. and Griffiths, K. (2018). Who's in the room? Access and influence in Australian politics. Grattan Institute. Available at <https://grattan.edu.au/report/whos-in-the-room/>
- Klüver, H., Braun, C., Beyers, J. (2015). Legislative lobbying in context: towards a conceptual framework of interest group lobbying in the European Union. *J Eur Publ Policy*. Vol 22(4). 447–61.
- McKay, A.M., Wozniak, A. (2020). Opaque: an empirical evaluation of lobbying transparency in the UK. *Interest Groups & Advocacy*. Vol 9(1). 102–18.
- Eising, R. (2017). Studying interest groups: Methodological challenges and tools. *J European Political Sci*. Vol 16. 291–305.
- Vegter, A., Taylor, J.K., HaiderMarkel, D.P. (2020). Old and new data sources and methods for interest group research. *Interest Groups Advocacy*. Vol 9(3). 436–50.
- Global Data Barometer (2022). First edition report— Global Data Barometer. IL-DA. Available at <https://doi.org/10.5281/zenodo.6488349>.
- Assistance IfDaE. International IDEA (2022). Supporting democracy worldwide. Available at <https://www.idea.int/>
- Lacy-Nichols, J., Cullerton, K. (2023). A proposal for systematic monitoring of the commercial determinants of health: a pilot study assessing the feasibility of monitoring lobbying and political donations in Australia. *Global Health*. Vol 19 2. Available at <https://doi.org/10.1186/s12992-022-00900-x>

- Mialon, M. *et al.* (2020). Mechanisms for addressing and managing the influence of corporations on public health policy, research and practice: a scoping review. *BMJ Open*. Vol 10(7) 034082.
- Miller, D.R. (2021). Empirical approaches to the study of access. *Interest Groups & Advocacy*. Vol 10(3) 286–302.
- OECD (2019). OECD Open, Useful and Reusable data (OURdata) Index. Available at https://www.oecd.org/gov/digitalgovernment/policy_paper_ourdata_index_2019.html
- Freudenberg, N. (2018). ToxicDocs: a new resource for assessing the impact of corporate practices on health. *J Public Health Policy*. Vol 39(1). 30–3.
- Boucher, M., Cooper, C.A. (2022). Lobbying and Democratic Governance in Canada. *Interest Groups & Advocacy*. Vol 11(1). 157–69
- Global Data Barometer (2022). First Edition Report – Global Data Barometer. Available at <https://doi.org/10.5281/zenodo.6488349>
- Solaiman, B. (2021). Lobbying in the UK: Towards Robust Regulation. *Parliamentary Affairs*. gsab051. Available at <https://doi.org/10.1093/pa/gsab051>
- Public Disclosure Commission (2022). Regulating Candidates, Campaigns, and Lobbyists. Available at <https://www.pdc.wa.gov/>
- Huwylar, O., Martin, S. (2022). Interest group tactics and legislative behaviour: how the mode of communication matters. *J Eur Publ Policy*. Vol 29(8). 1268–87.
- OECD (2021). Lobbying in the 21st Century: Transparency, Integrity and Access. Available at <https://doi.org/10.1787/c6d8eff8en>
- Thieme, S. (2019). Moderation or Strategy? Political Giving by Corporations and Trade Groups. *The Journal of Politics*. Vol 82(3). 11715.
- OpenSecrets (2022). Industry Profile: Food Processing & Sales. Available at <https://www.opensecrets.org/federal-lobbying/industries/lobbyists?cycle=2022&id=a09>
- Knaus, C. and Evershed, N. (2018). ‘In the family’: majority of Australia’s lobbyists are former political insiders. *The Guardian*. Available at <https://www.theguardian.com/australia-news/2018/sep/16/in-the-family-majority-of-australias-lobbyists-are-former-political-insiders>
- Lacy-Nichols, J., Christie, S., Cullerton, K. (2023). Lobbying by omission: what is known and unknown about harmful industry lobbyists in Australia. *Health Promotion International*. Vol 38 (5). Available at <https://doi.org/10.1093/heapro/daad134>
- UK government (2024). Business appointment rules for crown servants. Available at <https://www.gov.uk/government/publications/business-appointment-rules-for-crown-servants/business-appointment-rules-for-crown-servants#notification-of-decisions-on-applications-will-be-made-through-the-department>
- McKeown, D. (2014) Who pays the piper? Rules for lobbying governments in Australia, Canada, UK and USA. Parliament of Australia, Canberra. Available at https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1415/LobbyingRules
- Planet Tracker (2024). The materiality of nutrition: Why investors should care about nutrition risks and opportunities. Available at <https://planet-tracker.org/wp-content/uploads/2024/06/Materiality-of-Nutrition.pdf>
- Wood, D, Griffiths, K. (2018). Who’s in the room? Access and influence in Australian politics. Grattan Institute. Available at <https://grattan.edu.au/report/whos-in-the-room/>
- House of Lords (2024). Recipe for health: a plan to fix our broken food system. Available at <https://publications.parliament.uk/pa/ld5901/ldselect/ldmfdo/19/19.pdf>
- Transparency International (2024). Statement on the revised recommendation of the OECD Council on Transparency and Integrity in Lobbying and Influence. Available at https://www.transparency.org/en/press/transparency-statement-revised-recommendation-oecd-council-lobbying-influence?utm_source=share&utm_medium=email&utm_campaign=share-button



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