

# The revolving door between government and the alcohol, food and gambling industries in Australia

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## Article history

Publication date: September 2019

Citation: Robertson NM, Sacks G, Miller PG.

The revolving door between government and the alcohol, food and gambling industries in Australia. Public Health Res Pract. 2019;29(3):e2931921.

<https://doi.org/10.17061/phrp2931921>

## Key points

- More than one-third of people registered on the Australian Government Register of Lobbyists have previously been government representatives
- The political 'revolving door' between government and the alcohol, food and gambling industries potentially undermines good public health policy by creating an imbalance between the influence of industry and that of public health advocacy
- Mechanisms for ensuring healthy and transparent governance need to be established, potentially including revisions to Ministerial codes and public servant conditions, and a Federal anticorruption body

## Abstract

**Objective:** To explore the incidence of the 'revolving door' phenomenon, whereby individuals move between positions in government and positions in the Australian alcohol, food and gambling industries.

**Methods:** This exploratory study was composed of two substudies: 1) an analysis of existing Australian Government Register of Lobbyists databases and related social network content; and 2) a series of 28 in-depth semistructured interviews with key informants discussing industry tactics for influencing policy, of which 15 interviewees explicitly discussed the revolving door phenomenon.

**Results:** More than one-third of people registered on the Australian Government Register of Lobbyists were previously government representatives. We report on several examples of government employees going on to work directly for alcohol, food or gambling industries, some taking employment directly related to their previous employment in government. Key informants highlight the potential risks this poses to good governance.

**Conclusion:** This study suggests that the revolving door that sees people move between roles in the Australian Government and alcohol, food and gambling industries is commonplace, creating a range of ethical and moral problems, and posing a risk to public health.

## Introduction

The harmful impacts of alcohol use, unhealthy food consumption and gambling on public health are well documented.<sup>1</sup> Correspondingly, there is a need to ensure that strong, evidence-based public health policy is in place to improve population health outcomes. However, the development and implementation of public health policy often runs counter to the interests of companies in the alcohol, food and gambling industries. These industries adopt a range of strategies in an attempt to influence policy in their favour, including: information and messaging; financial incentives; constituency building; legal strategies; policy substitution; opposition; fragmentation and destabilisation.<sup>2</sup> As part of these strategies, industry representatives use a range of tactics to establish relationships with policy makers ([www.industryinsight.info/](http://www.industryinsight.info/)) and to lobby for their companies' interests.<sup>3–5</sup> One mechanism for doing so is through what is known as the 'revolving door', whereby (typically senior) employees move between positions in government (the regulator) and positions in industry (the regulated), or vice versa. Several scholars have noted the potential for the revolving door to favour industry interests by enhancing insider knowledge of policy making, increasing industry access to policy makers through personal ties<sup>6</sup>, and/or through various forms of *quid pro quo* (e.g., current policy making may favour industry interests on the understanding or possibility of likely future industry roles or remuneration for key players).<sup>7</sup>

Globally, political lobbying has become a billion-dollar industry that represents clients' interests to government, sometimes at the expense of robust, evidence-based public health policy.<sup>8,9,10</sup> There has been a steady encroachment by corporations into the sphere of government<sup>3</sup>, resulting in them garnering increasing influence over public policy. Political donations, for example, can facilitate industry members' access to decision makers and influence policy outcomes.<sup>11</sup> This highlights the potential dependence on corporate money in party politics, and the long-term approach taken by industries to build relationships with governments. Although there have been some efforts made to increase transparency around political lobbying through the creation of government lobbyist registers in Australia and elsewhere, the data in these registers has been shown to be limited and insufficient to support transparent oversight of industry activities and political influence.<sup>12</sup>

Industry's privileged access to government threatens unbiased policy making and creates an imbalance between the influence of industry and evidence-based public health advocacy.<sup>1</sup> This can take the form of active interference in the development of policy and/or the delays in the introduction of policies and the promotion of the status quo.<sup>13</sup> In cases such as alcohol warning labels, these delays continue.<sup>14</sup> In another example, despite strong public support for gambling reform in Australia, such reforms have not been implemented, highlighting

diminished democratic processes.<sup>15</sup> There have been several Australian examples highlighting similar conflicts of interest.<sup>16</sup>

However, the extent to which the phenomenon of the revolving door shapes industry influence on public policy is largely unknown. The problem has been previously noted within tobacco control by Fooks' assessment of the implementation of the World Health Organization (WHO) Framework Convention on Tobacco Control.<sup>17</sup> Fooks notes that Recommendation 4.4 in the Convention seeks to reduce the impact of the revolving door by ensuring that government officials declare their intention to work with industry post-employment.<sup>17</sup> Williams also investigated the impact of 'Big Food' in China and India and the strong prior associations of ministers with the food industry.<sup>18</sup> In Australia, examples of the food industry revolving door issue have also been identified by Mialon et al<sup>2</sup>; and more recently, a comprehensive report released by the Grattan Institute highlighted that the revolving door phenomenon is growing among the varied avenues of industry influence.<sup>16</sup> However, research into the prevalence of the revolving door phenomenon with respect specifically to the alcohol, food and gambling industries has not previously been explored. This paper aims to begin to address this gap.

## Method

This exploratory study comprised two substudies. Substudy 1 consisted of an analysis of existing government databases and related social network content. Substudy 2 consisted of qualitative key informant interviews that provided context and additional detail to the information garnered from substudy 1, particularly in relation to the particular industries of interest. These studies were part of a larger program of work into how these industries influence policy making and the findings from substudy 1 informed the development of substudy 2.

### Substudy 1

A list of lobbyists who self-identified as former government representatives was created from three publicly available online sources: 1) the Australian Government Register of Lobbyists<sup>19</sup>; 2) LinkedIn, a business and employment-oriented social networking platform; and 3) lobbyist business websites. The Australian Government Register of Lobbyists website was scanned for registered lobbyists who were listed (as at 11 November 2017) and who answered 'yes' to the question 'former government representative'. Those who answered 'yes' were searched in LinkedIn and the lobbyist business websites (as at 11 November 2017) to identify their previous government positions and experience. Those whose previous job history was identified were assigned to types of positions: Member of Parliament (MP) or Senator; senior adviser/chief of staff; adviser (a ministerial staffer who advises the minister and

can exercise authority on behalf of their ministers – in their minister’s name) and media adviser/communications officer. The list was also categorised based on the length of time the lobbyist had served in government. This study was not able to distinguish what industries individual lobbyists represented as a lobbyist’s portfolio is often broad and these details are not readily available; a serious limitation of the register that we have previously identified.<sup>12</sup> We screened LinkedIn profiles for those who had links to alcohol, food and/or gambling companies. Few lobbyist websites list the companies they represent.

## Substudy 2

The second substudy was a thematic analysis of in-depth, semistructured interviews with 28 key informants that were conducted in June–December 2016, as a part of the ‘Corporate Political Activity of Tobacco, Alcohol and Gambling Companies in Australia’<sup>20</sup> research project funded by the Australian Research Council. Interview participants were identified through a stakeholder analysis and snowball sampling, and were chosen for their experience of, or strong understanding of, corporate political activity. Interview participants included former Australian politicians ( $n = 7$ ), current Australian politicians ( $n = 6$ ), journalists ( $n = 6$ ), former political staffers ( $n = 3$ ), public health advocates ( $n = 3$ ), current civil servants ( $n = 1$ ), current lobbyists ( $n = 1$ ) and current police ( $n = 1$ ). Topics discussed in the interviews included participants’ direct experience interacting with and observing representatives of the alcohol, gambling or tobacco industries, influence of these industries on policy decisions, tactics used by these industries to garner influence, political donations, and perceptions of conflicts of interest. Interviews were recorded, transcribed and analysed thematically using Nvivo software. There were 15 individual interviewees coded into the ‘revolving door’ subcategory out of the 28 key informant interviews. The analysis focused only on the data from these 15 interviewees.

This study was approved by the Human Ethics Advisory Group of the Faculty of Health at Deakin University, Australia (project number HEAG-H 101-2016).

Thematic analysis of the interviews was conducted using inductive coding. This allowed themes to emerge during initial analysis. Once clear themes were established, transcripts were re-analysed to establish consistent categories.

## Results

### Substudy 1: Register of Lobbyists

Of the 569 people listed on the Australian Government Register of Lobbyists, 206 (36%) stated that they had been a former government representative. Of those 206, nine individuals had multiple entries (where a person’s registration was listed twice) and the previous

job histories of 122 individuals could be ascertained from the other selected data sources. Of the 122 former government representatives for which job histories were ascertained, there were former MPs, Senators, chiefs of staff, senior advisers, advisers, and media/communications advisers to MPs or Senators (see Table 1). The ‘time spent in government’ category showed that a high number ( $n = 55$ ) of former government representatives who were working as lobbyists had been in government for more than 10 years (Table 2).

The individuals worked for a variety of lobbying firms, and the types of industries that the firms represented included food, alcohol, gambling, telecommunications, pharmaceutical and mining, among others. Appendix A (which is available from: [hdl.handle.net/10536/DRO/DU:30129453](http://hdl.handle.net/10536/DRO/DU:30129453)) lists some of the clients of major Australian lobbying firms that are currently listed on the Australian Government Register of Lobbyists. Although some of these firms have clients that include major players in the gambling, food and alcohol industries in Australia, the Register does not disclose what industries individual lobbyists represent.

**Table 1.** Lobbyists on the Australian Government Register of Lobbyists who answered ‘yes’ to previously being an Australian Government representative, and whose past job history was ascertained ( $N = 122$ )<sup>a</sup>

Former position	Total (%)
Member of Parliament (MP)/Senator	22 (18.1%)
Chief of staff/senior adviser	57 (46.7%)
Adviser	24 (19.7%)
Media adviser/communications adviser	12 (9.8%)
Other	7 (5.7%)
Total	122 (100%)

<sup>a</sup> Data as at 11 November 2017

**Table 2.** Time former government representatives spent in government prior to roles as lobbyists ( $N = 122$ )<sup>a</sup>

Time (years)	Total (%)
<2	2 (1.7%)
2-5	26 (21.3%)
>5-10	27 (22.1%)
>10	55 (45.1%)
No dates available	12 (9.8%)
Total	122 (100%)

<sup>a</sup> Data as at 11 November 2017

## Substudy 2: Informant interviews

As described above, we analysed 15 key informant interviews that were coded into the revolving door subcategory. The key themes that arose from these interviews were that participants felt: 1) revolving door appointments have the potential to influence political decisions; 2) the revolving door creates an imbalance between industry and public health advocates and their ability to influence government; and 3) the revolving door creates industry-friendly networks.

There was a view among many informants that the revolving door phenomenon had the capacity to influence policy decisions, and that it was an entrenched part of how industry–government relationships functioned. For example, a police officer interviewee cited a case where a former state MP had become a lobbyist acting on behalf of an alcohol industry–related association, and was planning a meeting with the state’s police minister to discuss issues affecting the industry. In a separate example, a public health advocate interviewee spoke about an individual who was in a senior role in an alcohol regulatory body and had intimate knowledge of the public system and all the players, and then moved to a senior role with an industry organisation lobbying on behalf of the alcohol industry.

Other interviewees’ comments included:

*“The politicians would go nuts [be strongly opposed to such measures] if it was felt that the regulator was going to suddenly do things that would be entirely consistent with reducing [alcohol-related] harm, but might reduce economic benefits of the [alcohol] industry itself. You’d find pretty quickly that they’d step in [to avoid changes to regulations].” (Ex-political staffer)*

*“There are issues of actual or perceived conflicts of interest. You see former politicians popping up in these lobbying organisations, and the only reason they’re employed is because they can wield influence, or that’s the perception.” (Ex-politician)*

Interviewees stated that they believed the revolving door created an imbalance between industry and public health advocates in terms of their access, advocacy and influence with government. Specifically, interviewees indicated they felt that when lobbyists had established relationships and networks within government, it increased the potential for undue influence.<sup>13</sup>

*“There’s a new minister and I met his chief of staff and like, six months ago, I met him as the industry group lobbyist and now he’s working in the minister’s office. And so that just amplifies the disparity and the influence between the industry and the community sector, the sort of revolving door.” (Ex-political staffer)*

Participants described many examples of how the revolving door resulted in potential or perceived conflicts

of interest. One participant explained that the revolving door phenomenon created circumstances where potential conflicts of interest may affect the outcomes of policy or undermine confidence in the process.

*“When you have registered lobbyists working for firms who are lobbying a particular government, taking leave and working on the political campaigns of particular MPs, and then that MP getting into government and potentially into the ministry, and then that person re-joining the lobbying firm and proceeding to potentially lobby the very person they helped get into government, I think that’s of great concern as well... it still raises questions about whether or not that creates a situation where there may be undue influence on that MP/Minister.” (Journalist)*

Participants also spoke about the importance of the networks and relationships established through the revolving door.

*“So someone retires from politics and then they have a ready-made set of relationships nurtured over many years of being colleagues with other Members of Parliament that they can then go and leverage on behalf of a commercial partner.” (Politician)*

A journalist interviewee said a problem occurred when there was crossover between political parties and lobbyists, citing the example of one of the biggest power brokers in the Liberal party moving on to be on the payroll of an organisation that lobbies on behalf of the gambling industry.

## Discussion

This exploratory research suggests that the revolving door phenomenon between government and industry is relatively commonplace in Australia, with examples of government representatives moving to roles within alcohol, food and gambling industries. More than one-third of people listed on the Australian Government Register of Lobbyists in late 2017 were former government representatives. Most former government representatives who had become lobbyists had previously held influential positions as MPs, chiefs of staff or senior advisers. This poses a substantial risk to the development of effective public health policies for the reasons described below.

### How the revolving door creates an imbalance between industry and public health advocacy

Several Australian examples highlight the potential for conflicts of interest and the strong influence that industry can wield when policy makers, or those closely bound to them, have close industry ties. A former key player in New South Wales (NSW) politics and an unsuccessful



candidate for the NSW Liberal Party in the 2003 state election, Paul Nicolaou, also ran the Millennium Forum, the NSW Liberal Party's main fundraising arm for more than 10 years. Shortly after stepping down as chairman of the Millennium Forum, Mr Nicolaou became managing director of the political lobbying firm Premier State. In 2012, Mr Nicolaou became the Chief Executive Officer (CEO) of the Australian Hotels Association NSW. During a media interview with an alcohol industry publication in 2012 he outlined why, he believed, it made sense for him to be appointed as the CEO of the AHA:

*"Well look, it's a Liberal Government. Let's be up front and honest, it's no good beating around the bush – you're not going to put a person with Labor ties in as the CEO. I'm very keen to work with the Premier and the Minister [for Tourism and Hospitality] George Souris to see that the industry is looked after," Mr Nicolaou said.<sup>21</sup>*

An example of the revolving door between government and the gambling industry is the widely reported case of the former Federal Labor Senator and Minister, Mark Arbib, who resigned from politics in 2012 and in the same year went to work for Consolidated Press Holdings which controls a major shareholding in Crown Casino, joining former Australian Labor Party national secretary Karl Bitar who was working for Crown Limited.<sup>22</sup> Finally, in an example of the revolving door between government and the food industry, it was revealed in 2014 that Alastair Furnival, the then chief of staff to former Assistant Federal Health Minister, Fiona Nash, co-owned a lobbying firm that had represented major food companies. During his tenure as chief of staff, the website launching a new front-of-pack food labelling system (the Health Star Rating system) – which was endorsed by the government but opposed, at that time, by several major food companies – was temporarily and controversially shut down by the Minister, sparking claims of a conflict of interest, and resulting in Mr Furnival's resignation from the chief of staff role.<sup>23</sup>

## Establishing industry-friendly networks and relationships

It is well established that industry efforts to secure privileged access to policy makers with the aim of influencing policy outcomes is common.<sup>3,5</sup> This is supported by the key informant responses in this study, which emphasised the importance of networks and relationships in providing lobbyists with leverage with political actors, and the risks associated with individuals going from roles regulating an industry to working for that industry. Networks and relationships between former government employees and private industry can erode bureaucratic integrity<sup>24</sup> and competence (through former colleagues knowing many trade 'secrets' or 'fixes'), and undermine democratic representation.<sup>25</sup> Certainly, previous research has shown that former public officials,

and the networks and ties they have, are an asset to lobbying firms.<sup>26</sup> Industry representatives and lobbyists build positive relationships with policy makers and can develop a relationship of reciprocity.<sup>3,5</sup>

## Regulations to reduce the revolving door phenomenon

In Australia, there are Ministerial codes of conduct<sup>27</sup> that provide guidelines for 'cooling-off periods' and post-government employment decisions. The rules prevent Federal Ministers and parliamentary secretaries from lobbying in related areas for 18 months, while the cooling-off period for other government members is 1 year. However, in practice, such codes are not always well enforced as demonstrated in the 2016 case of former Australian Government Trade Minister Andrew Robb. Mr Robb took up employment with a Chinese-owned company soon after retiring from his political role in which he had been involved in the negotiation of trade agreements that could potentially affect his new employer.<sup>10</sup>

To distance those who have held public office from industry, it is important to consider robust regulation of post-government employment for public servants. Cooling-off periods vary across countries. In the Federal Canadian jurisdiction there is a 5-year (i.e. 1 year longer than a cycle of government) prohibition on lobbying by individuals who have held public office.<sup>28</sup> Recently, the US also adopted a 5-year lobbying ban on administration officials.<sup>29</sup> In Cyprus, politicians have a 2-year period where they cannot accept private employment.<sup>8</sup> In the UK, members of the government are prohibited from engaging in lobbying activities for a period of 2 years after leaving public office<sup>30</sup>, although there are suggestions that the UK post-public employment rules are not enforceable.<sup>31</sup> Indeed, there is recognition that cooling-off periods need to be supported by appropriate enforcement and penalties for noncompliance in order to prove effective.<sup>31</sup> As well as adequate cooling-off periods, it is important that there are restrictions on individuals passing on confidential information gained while in government. In Canada, Ministers are prohibited from passing on information that is not accessible to the general public to any nongovernmental or corporate interests for a period of 5 years after leaving their position. Breaches are subject to fines, damages or termination or reduction in a government pension.<sup>32</sup>

## Limitations

There are a number of limitations associated with this research. Firstly, the publically available data accessed in this study was incomplete and we could only audit lobbyists who were registered on the Australian Government Register of Lobbyists. Therefore, these results do not include in-house lobbyists (e.g. company executive, union official) who are not required to register,

as discussed by Robertson et al.<sup>12</sup> Secondly, we only looked at the Australian Government Register of Lobbyists, not at equivalent state and territory registers. Historical data from Australian Government and state lobbyist registers is not readily available. This makes it difficult to evaluate trends over time. Further, the Australian Government Register of Lobbyists does not disclose the domains/industries that lobbyists represent, so it is difficult to ascertain the specific industry on behalf of which former government representatives are lobbying. It is possible that former government representatives could be employed by a lobby firm but not undertake work related to the food, gambling or alcohol industries. However, analysis of the Register data in combination with insights from the interviews indicates this is unlikely, due to the number of examples given and comments about the revolving door between government and these industries by the interviewees. A final limitation is that the interviewees in substudy 2 have personal biases and perspectives, which may have influenced their responses or memory of events. However, we sought responses from individuals with expertise in the areas of interest who had first-hand knowledge or experience of the revolving door phenomenon and aimed to ensure there was diversity in the sample.

## Future research

Future research would benefit from having access to complete longitudinal data on: 1) all those who have registered on Australian lobbyist registers (state and federal) for the entire period data has been collected; 2) the companies or organisations represented by the lobbyists; and 3) specific information about former government roles of registered lobbyists. This would enable researchers to undertake more comprehensive analysis and assess whether the revolving door phenomenon is increasing in Australia. We suggest future research could explore the number of former industry employees who take staffing positions in government, perhaps through social network platforms and online sources or interviews with senior government informants. Finally, future research could explore the phenomenon of the revolving door with respect to the use of consultants by government.

## Conclusion

This study has provided evidence that the revolving door between government and industry is common in Australia. This phenomenon is likely to have a major impact on public health policy, particularly when combined with other strategies known to be used by industry to influence public policy, potentially undermining evidence-based approaches in favour of industry interests, including in food, alcohol and gambling industries. The frequency of revolving door appointments suggests there is a need to

adopt tighter post-employment codes for public servants and penalties for breaches. Policies such as enforceable cooling-off periods before moving to industry or lobbyist roles, and bans on information sharing by former government representatives are indicated. A Federal anti-corruption body to provide oversight and ensure transparency of this area may also be warranted.

## Acknowledgements

PM has received research grants from the Australian Research Council (ARC) (Linkage Project Grant: LP130100046), the Foundation for Alcohol Research and Education (FARE), and the Cancer Council Victoria to support this research. PM received a grant from The Centre for Social and Early Emotional Development (SEED) at Deakin University to fund part of this study. GS was the recipient of an ARC Discovery Early Career Researcher Award (DE160100307) and a Heart Foundation Future Leader Fellowship (102035) from the National Heart Foundation of Australia. GS was also a researcher within National Health and Medical Research Council (NHMRC) Centres for Research Excellence entitled Reducing Salt Intake Using Food Policy Interventions (APP1117300) and a Centre of Research Excellence in Food Retail Environments for Health (RE-FRESH) (APP1152968).

## Peer review and provenance

Externally peer reviewed, invited.

## Competing interests

GS is an academic partner on a healthy supermarket intervention trial that includes Australian local government and supermarket retail (IGA) collaborators. In 2018, GS led a study to benchmark the policies and commitments of food companies related to obesity prevention and nutrition.

PM has received fees from Greenland Legal Pty Ltd for acting as an expert witness for a licensed venue and security service case and has received travel costs for facilitating a forum for the NT Government.

## Author contributions

NR, GS and PM were responsible for the design and sampling of participants. NR was responsible for data collection and management. NR analysed the data. All authors reviewed and approved the final manuscript.

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