More Than a Watchdog: Harnessing State, Civil Society and Academia to Tackle Unhealth Commodity Industries; A Response to Recent Commentaries

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More Than a Watchdog: Harnessing State, Civil Society and Academia to Tackle Unhealth Commodity Industries; A Response to Recent Commentaries

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### Introduction

We thank colleagues for their thoughtful commentaries on our scoping review and framework synthesis of national public health surveillance of corporations in key unhealthy commodity industries (UCIs).<sup>1-7</sup> Our review aimed to consolidate existing frameworks to monitor the influence of UCIs on health to inform future surveillance efforts and reduce the impact of corporate practices that undermine health.<sup>2</sup>

Commentators widely acknowledge the importance and urgency of monitoring UCIs and the value our review adds advancing this agenda. Four core themes emerged from the commentaries for further discussion: 1) who should own surveillance, 2) the need for structural and systematic change alongside monitoring, 3) expanding scope of monitoring beyond the 'harmful trinity' and 4) the role of data and technology in enhancing surveillance. Here, we reflect on these insights and propose a future direction for advancing effective, accountable and systematic monitoring of UCIs.

### Who should 'own' surveillance? Limits of government-led surveillance

Authors raise legitimate concerns around limitations of government-led surveillance of UCIs, citing the risk of corporate capture, resource constraints, policy incoherence and limited political will. Indeed, a prevailing view among the commentaries is that civil society, academia and independent organisations may be better suited to lead monitoring efforts instead of government bodies.<sup>1,3-7</sup>

While these are valid challenges, they are not unique to the commercial determinants of health. Similar limitations and patterns affect other areas of public health and have not deterred expectations for government accountability.

We applaud the leadership that civil society, academia and independent organisations have demonstrated in mobilising public pressure on UCIs, promoting transparency, and making the monitoring more effective. Their role is critical and independent oversight must remain central to any surveillance model.

However, we argue that this status quo, where responsibility of monitoring is largely external to the state, is insufficient. As Delobelle highlights, new whole-of-government approaches, backed by political commitment and coherent policy, are required.<sup>4</sup> Models that enable governments to support and fund accountability mechanisms and independent surveillance, as suggested by Lacy-Nichols and Delobelle, offer a pragmatic path forward.<sup>4,7</sup>

Precedents exist in areas like anti-corruption (e.g. anti-corruption commissions), financial regulation (e.g. securities commissions), and environmental protection (e.g. environmental protection agencies), where state-sponsored bodies operate with legal authority, independence, and public reporting mandates. Applying or adapting such models to UCI surveillance could institutionalise transparency, reduce political interference, and demonstrate that corporate practices harmful to health are under formal scrutiny.<sup>8</sup> These new models should also embed mechanisms for bottom-up approaches to guide the design and priorities of surveillance systems, anchoring top-down models in public accountability and real-world relevance.<sup>3,5</sup>

Importantly, advocating for government-led surveillance is not only about improving data collection and enforcement capacity. If governments begin systematically monitoring all UCIs as vectors of non-communicable diseases, similar to tobacco, this signals a paradigmatic shift in how their role in public harm is understood. This reframing positions UCI as systemic risks to health, rather than legitimate stakeholders. Predictably, such moves will face resistance, making political will and institutional autonomy essential, as the commentators highlight. Nonetheless, taking surveillance seriously is a strategic intervention that sends a powerful signal that these industries warrant the same scrutiny as other public health threats.<sup>9,10</sup>

Incremental approaches, as suggested by Lacy-Nichols and colleagues, may be a pragmatic starting point in politically constrained environments. But ultimately, integrated governance model is needed to match the scale and ubiquity of UCI influence.<sup>7</sup>

# Surveillance must be embedded in structural and systemic change

As several authors note, surveillance alone is insufficient to reduce corporate harms to health.<sup>1,5,6</sup> Monitoring must be accompanied by meaningful change to the political and economic structures that enable UCI influence. Surveillance should function as a lever for broader systemic transformation – not just an observational exercise.

Government-led models are better positioned to deliver this, given proximity to policy levers, and have the potential to deliver a more coordinated and sustained response. Civil

society initiatives, while impactful, often face challenges related to scale, sustainability

and fragmentation.

**Expanding scope of surveillance: Beyond the 'harmful trinity'** 

While our review focused on tobacco, alcohol and ultra-processed food and beverages,

commentators rightly urge expansion to other industries.<sup>1,6,7</sup> As discussed in our article,

sectors such as fossil fuels, gambling, pharmaceuticals and technology, increasingly shape

health outcomes and policy environments. Surveillance efforts must evolve to include

these industries and adapt tools accordingly.

Baum & Anaf underscore the need to move beyond individual practices and address

broader economic and political norms that legitimise harmful corporate influence. 1,11

Surveillance should be responsive to these interconnections and monitor the synergistic

impact of practices across industries.

Leveraging data and technology for more effective surveillance

Since publication of our review, data science and artificial intelligence (AI) tools have

rapidly advanced. Commentators highlight the potential of technologies such as web

scraping, natural language processing and large language models to automate of data

collection and improve pattern recognition.

These tools can help identify networks of influence, link health outcomes to specific

corporate products, and estimate societal costs of UCIs in real time. 6 Integration into open-

access platforms could democratise surveillance, increase transparency and broaden

public access to critical information.

Conclusion

We thank our colleagues for reinforcing the importance of UCI surveillance that is

independent, well-resourced, and rooted in broader structural reforms.

Civil society and academia have led this work for too long in the absence of meaningful

government engagement. But we need more than a watchdog - surveillance of UCIs is not

just about collecting data; it is a political act that signals institutional recognition of harm.

Governments must now take ownership.

Academic and civil society actor can support this transition by offering expertise, tools,

and collaborative models that help embed UCI surveillance as a core public health function.

In the face of concentrated corporate power, fragmented efforts are no longer enough.

Working together, we can build robust and enduring systems that expose harmful

practices, hold UCIs to account, and ultimately, protect public health.

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### **Disclaimers**

The views expressed in this article are those of the authors.

### **Authors' Contributions**

EB conceived the paper and and wrote the first draft. ST and RM reviewed and edited the manuscript. All authors contributed to manuscript revision, read, and approved the submitted version

### References

- 1. Baum F, Anaf J. Practices of Trans-National Corporations: The Need to Change Global Economic and Political Norms Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries A Scoping Review and Framework Synthesis". *Int J Health Policy Manag.* 2024;13:8660. doi:10.34172/ijhpm.8660
- 2. Bennett E, Topp SM, Moodie AR. National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries A Scoping Review and Framework Synthesis. *Int J Health Policy Manag.* 2023;12:6876. doi:10.34172/ijhpm.2023.6876
- 3. Carriedo A, Otero-Alvarez M, Levis C. Is a Government-Led Approach to Surveil Unhealthy Commodity Industries Feasible? Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries A Scoping Review and Framework Synthesis". *Int J Health Policy Manag.* 2024;13:8601. doi:10.34172/ijhpm.8601
- 4. Delobelle PA. Governing Political Realities in NCD Agenda Setting in LMICS: a Case of the Carrot and the Stick?; Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries: a Scoping Review and Framework Synthesis". *Int J Health Policy Manag.* 2024;13. doi:10.34172/ijhpm.8836
- 5. Freudenberg N. The Role of Social Movements in Reducing Harmful Corporate Practices Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries A Scoping Review and Framework Synthesis". *Int J Health Policy Manag.* 2024;13:8664. doi:10.34172/ijhpm.8664
- 6. Gilmore AB, Alebshehy R, Bialous S. How Could We Establish Monitoring and Surveillance of Health-Harming Corporations and Can Governments Be Trusted to Do It? Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries A Scoping Review and Framework Synthesis". *Int J Health Policy Manag.* 2024;13:8621. doi:10.34172/ijhpm.8621

- 7. Lacy-Nichols J, Jones A, Cullerton K. Political Considerations When Monitoring the Commercial Determinants of Health; Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries A Scoping Review and Framework Synthesis". *International Journal of Health Policy and Management.* 2024;13(1):1-4. doi:10.34172/ijhpm.8777
- 8. Zuegel K, E. Cantera and A. Bellantoni *The role of Ombudsman Institutions in Open Government*. Paris2018.
- 9. Mialon M, Vandevijvere S, Carriedo-Lutzenkirchen A, et al. Mechanisms for addressing and managing the influence of corporations on public health policy, research and practice: a scoping review. *BMJ Open.* 2020;10(7):e034082. doi:10.1136/bmjopen-2019-034082 10. Moodie R, Stuckler D, Monteiro C, et al. Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra-processed food and drink industries. *Lancet.* 2013;381(9867):670-679. doi:10.1016/S0140-6736(12)62089-3
- 11. Gilmore AB, Fabbri A, Baum F, et al. Defining and conceptualising the commercial determinants of health. *Lancet.* 2023;401(10383):1194-1213. doi:10.1016/S0140-6736(23)00013-2