7-13-2017

Analyzing the Intersection of Transparency, Issues Management and Ethics: The Case of Big Soda

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Accepted version. *Journal of Medial Ethics: Exploring Questions of Media Morality*, Vol. 32, No. 3 (2017): 154-167. DOI.

Journal of Media Ethics : Exploring Questions of Media Morality, Vol. 32, No. 3 (2017): 154-167. DOI.

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ABSTRACT

This article critically analyzes the ethics of Coca-Cola's public relations strategies through the lens of corporate social responsibility, issue management, and moral legitimacy. Corporate legitimacy is essential for corporate survival and, in today's complex environment, expectations for legitimacy have shifted. Corporations are called on to consider their roles in the context of the greater good. These changes call for an examination of what constitutes ethical communication for public relations practitioners. While theoretical advancements in the area of ethics sketch the landscape for providing for greater transparency in what the aims of organizations should be in providing for ethical communication, more needs to be done to examine the specific content of this communication. Toward this end, the authors seek to extend conversations and draw from Habermas's theories of communicative action and Principle U to propose a new direction for evaluating public relations ethics.

Introduction

As stakeholders demand more transparency from corporations, corporations must continually engage in practices of issue management and legitimacy building. Unfavorable media coverage is inevitable for most organizations (Lyon & Cameron, 2004); yet how organizations respond to such coverage is imperative, particularly from an issue management and legitimacy-building perspective. Today, the stakes are even higher given the role of technology in society and the increased scrutiny of stakeholders, the media, and consumers. News travels much faster, the audience is much broader, and the issue can linger much longer (Rahmati, 2014 Rahmati, R.). According to Coombs and Holladay (2013), trust and transparency are increasingly important for organizations to build relationships and create support. Yet as the authors explain, "There are far too many incidents where corporations have used public relations in unethical ways to pursue economic self-interests at the expense of the public interest, thereby reinforcing its tainted image" (Coombs & Holladay, 2013). Coombs and Holladay highlight the reality that what might be considered good public relations practices, relative to organizational aims, might not be considered good ethical practice. Plaisance (2007) agrees: "The industry has been repeatedly stung by revelations of deceptive tactics in the service of private clients, and these examples often have undermined the insistence by PR [public relations] officials that their professionalism requires them to serve the public good" (p. 195). This tension is one that public relations scholars and practitioners must examine.

One such case is Coca-Cola's reaction to public criticism of its products and their connection to obesity rates and type 2 diabetes. From working with dieticians who suggest soda as a healthy treat to funding a new research group to shift the discussion of obesity from calorie intake to exercise, Coca-Cola's public relations strategies came under fire in 2015 (Choi, 2015; LeVaux, 2015; O'Connor, 2015a, 2015b; Radcliffe, 2015). In fact, LeVaux calls them "increasingly desperate and insidious" (para. 1). She also notes that the soft drink industry is following in the footsteps of big tobacco and the gun lobby by trying to "misdirect" the discussion of obesity. Given the era of transparency in which corporations now exist, this case not only speaks volumes about the importance of issue management, but also questions the practice from an ethical perspective. This article critically analyzes the ethics of Coca-Cola's public relations strategies through the lens of issue management and legitimacy building, and then uses Habermas's principle of universalization (Principle U) to examine the ethical implications.

Literature review

In an increasingly saturated and technology-driven communication environment, corporate practice is increasingly scrutinized by shareholders, media, and consumers (Christensen & Langer, 2009). Public awareness of an interest in corporate activity is enhanced by increased use of technology that grants greater access to information and increases the speed with which information becomes available. In this context, organizations are under greater pressure to make a case for the legitimacy of their actions and advocate for the interests of the organization (Feldner & Meisenbach, 2007; Heath, 2002). This increased stakeholder scrutiny reflects heightened expectations for the responsibility of corporations to provide for social good (Fyke, Feldner, & May, 2016).

Issue management and legitimacy-building efforts are two concepts that have long been in the repertoire of communication managers, and yet little focused attention has been given to how legitimacy building and issue management have changed in the contemporary communication landscape with increased emphasis on corporate social responsibility. Much of the theorizing of legitimacy and issue management was done before the rise of the dialogic model of public relations (Heath, 2007; Meisenbach & Feldner, 2009, 2011), in which *dialogue* is defined as "any negotiated exchange of ideas and opinions" (Kent & Taylor, 1998, p. 325). In theory, public relations can facilitate dialogue by establishing channels and procedures for dialogic communication (Kent & Taylor, 2002). But in practice, it "does not simply entail exchange between two parties in a single interaction. Rather, it seems in today's ever-changing communication climate that the dialogue entails participation from multiple parties, in a variety of forums" (Meisenbach & Feldner, 2009, p. 268).

Given the changing tides of expectations for professional projects, there is a need to reexamine best practices in the context of transparency and stakeholder engagement. This new environment blurs the lines between the best interests of the corporation and the ethical principles of the profession. Corporate efforts to manage issues can seem effective in addressing the public relations challenge, but be at odds with prevailing expectations for ethical corporate behavior. Thus, Coombs and Holladay (2013) note that "when making decisions, PR practitioners are likely to consider that complex web of relationships as well as issues pertaining to the power of stakeholder groups" (p. 50). To address these complexities, we look at the questions of issue management and legitimacy as they emerge in the context of corporate social responsibility.

Managing issues and building legitimacy via corporate social responsibility

Often when delineating guidelines and perspectives for best practice in communication, specific strategies and tactics are addressed in isolation. That is, issue management is often addressed as a challenge that exists separately from legitimacy. While this provides a particular ease in identifying key constructs in practice, this certainly does not reflect the reality of the complex communication environment in which public relations practitioners operate as these questions overlap and intersect. Added to this is the recognition that corporations operate within broader social and political contexts, and they are not immune from these broader social expectations (Gond, Cruz, Raufflet, & Charron, 2016). Traditional views of public relations practice need to be updated to account for these complexities and to draw from current understanding of corporations' relationship to society.

Corporate social responsibility (CSR) provides one avenue for drawing together questions of issue management, legitimacy, and ethics in the context of stakeholder expectations. There are a range of definitions of corporate social responsibility (see Christensen, Morsing, & Thyssen, 2013; Garriga & Mele, 2004), but each one highlights the extent to which corporations have obligations not only to shareholders, but to all stakeholders that include consumers, employees, and the community (Fyke et al., 2016; Moon & Hyun, 2009). Approaches to CSR have evolved over time. Garriga and Mele categorize theories of CSR into four groups: instrumental, political, integrative, and ethical theories. The groupings differ based on CSR as a means of wealth creation, a call for responsible use of a corporation's social power, an obligation to respond to social demands and needs of society, and an ethical consideration for corporations. These latter categories anticipate further development of CSR that outline a model of political corporate social responsibility (PCSR) which, as Scherer and Palazzo (2010) argue, pushes CSR beyond economic purposes and legal obligations to consider the role corporations play in meeting social and political responsibilities. In this framework, ethical considerations are central to CSR efforts and corporations are called to be accountable to the role they play in shaping social expectations and in providing for a greater good. This frame calls attention to the moral obligations of the corporation.

While theorizing of PCSR most directly taps into expectations of corporations providing for political activity to provide for basic social needs for human welfare such as health, education, and human rights in global contexts in which the government may not be fulfilling this need, we argue here that the robustness of this theory has salience across public relations practice in general. Simply stated, corporate communication plays an important role in shaping the political and social landscape regardless of the context. We turn to the idea of PCSR because it offers the kind of nuanced views of issue management and legitimacy that allows for a consideration of the ethical implications for contemporary public relations.

Before considering the ethical dimensions of PCSR, we begin by examining issue management and legitimacy within this context. These concepts identify the ways in which these interrelated strategies create expectations for communication managers. Heath (2006) defines *issue management* as "the management of organizational and community resources through the public policy process to advance organizational interests and rights by striking a mutual balance with those of stakeholders" (p. 79). An *issue* is a question that is yet unresolved (Heath, 2010; Hoffman & Ford, 2010). More specifically, an issue can be understood as a question that is in dispute or calls for a resolution, a gap between corporate actions and stakeholder expectation, or an event or condition that will have an impact on an organization's operation (Heath, 2010). The aim of issue management is to establish and maintain the organization's image as a proactive and respected organization (Heath, 2002). Defined in this way, issues are largely managed through communication efforts—that is, organizations advocate for their positions and actions. Issue management is focused on creating arguments and establishing positions that will create conditions that are favorable for a corporation's operation and interest. In this way, issue management is an inherently strategic communication process (Heath & Palenchar, 2008). Organizations, through their public relations functions, seek to understand those issues that are contested or that could impact the organization and seek to persuade the public of a particular viewpoint.

Issue management in the context of PSCR focuses on the extent to which the management of issues and the public relations efforts can have implications for public policy and the provision of social welfare (Frynas & Stephens, 2015). Issue management in this way is bound up in PSCR. Corporations shape the environment in particular ways and they have a moral obligation to think about the implications of these efforts (Scherer & Palazzo, 2010). Issue management efforts in this context must balance the self-interests of the corporation with the protection and enabling of citizens' rights and social needs.

Linking issue management to corporate social responsibility necessarily raises questions of organizational legitimacy as the expectation for corporations to see themselves as providing for social good. *Organizational legitimacy* refers to the fit between stakeholder expectations and perceptions of the organization's actions (Boyd, 2000; Dowling & Pfeffer, 1975; Epstein & Votaw, 1978). Legitimacy focuses specifically on societal values and the perceived congruence between these values and corporate actions (Dowling & Pfeffer, 1975; Epstein & Votaw, 1978). Through public relations efforts, corporations make arguments about how their actions are both responsible and effective. Palazzo and Scherer (2006) argue that legitimacy is essential for corporate survival, and that over time the political dimension of legitimacy has diminished in favor of consideration of economic success. They contend that public relations scholars and practitioners need to reembed discussions of legitimacy within its political contexts. Doing so requires a consideration of corporate legitimacy as a moral legitimacy (Gond et al., 2016; Mele & Armengou, 2016; Scherer & Palazzo, 2010). Establishing moral legitimacy is no easy task, as today's global and connected environment is marked by an increasingly heterogeneous sense of cultural norms and values (Christensen, Morsing, & Thyssen, 2011; Palazzo & Scherer, 2006). Because there are competing expectations for corporations, legitimacy efforts must be understood within a two-way communicative or dialogic context (Seele & Lock, 2015). As Palazzo and Scherer (2006) rightfully observe, a corporation cannot manipulate moral legitimacy; rather, it must earn legitimacy through discursive efforts. This points to a need to establish an ethical communication framework for PCSR, issue management, and legitimacy that creates space for clear stakeholder engagement.

Communicative action and Habermas's Principle U: An ethical framework for communication practice

While great strides have been made on a theoretical front that calls attention to the political social responsibility of corporations, these theoretical conversations have not extended to concrete practical applications in significant ways (Seele & Lock, 2015). There is a need to consider what the call for PCSR expects corporations to do in terms of making decisions about communication. PCSR asks corporations to engage in dialogue with stakeholders and allow for deliberation on competing values. Scholars turn to the work on Habermas and deliberative democracy to outline the ethical demands of CSR. However, before turning to Habermas, it is important to situate theses issues within current conversation. Toward this end, public relations and ethical scholars in particular offer many insights that provide important elements for such a framework. In particular, Christensen and Langer (2009) and others make a call for the need for public relations and corporate communication scholars to specifically focus on the role of transparency in communication. Further, Bowen (2005) and others have articulated a moral basis for ethical communication rooted in Kant's categorical imperative. Both perspectives emphasize why transparency is significant to the field of ethics. Plaisance (2007) explains, "Kant's work provides the critical philosophical basis for claims that truth telling (and thus being forthright in all interactions) deserves the premium it is usually given in ethical deliberation" (p. 189).

First, as calls are made for engagement with stakeholders, there is a need for transparency in communication. Plaisance (2007) argues, "If ethics is all about struggling to find rational ways to balance competing interests and values, the concept of transparency ensures that all the players, or stakeholders, are speaking the same language" (p. 191). Indeed, some argue that we have entered into an age of transparency (Tapscott & Ticoll, 2003). In this climate, public relations and corporate communication professionals are called to "participate in ongoing provision of knowledge and insight and thus help citizens, consumers and other stakeholders make decisions that are in the interest of the common good" (Christensen & Langer, 2009, p. 129). A strengthened call for transparency increases the need for corporations to engage in issue management and legitimacy building. Moreover, Coombs and Holladay (2013) note that trust and transparency are increasingly important for organizations to build relationships and create support. A call for transparency is a call for openness and accountability—making information more accessible, clear, and understandable (Christensen et al., 2011). All of these are attributes that are necessary for dialogue with stakeholders. Communication must be transparent to provide for stakeholder ability to engage with ideas.

A second necessity for the kind of engagement called for in moral legitimacy is an understanding of how moral decisions might be integrated in public relations practice. Recently, a great deal of attention has been given to the categorical imperative and its application to public relations practice (Bowen, 2004, 2005; Fitzpatrick & Bronstein, 2006; Place, 2010). This ethical stance is one that calls for practitioners to take an abstract moral principle and make practical decisions (Bowen, 2005). Practitioners are asked to think about how they would respond in similar situations. In this way, the public relations practitioner takes on the role of the corporate conscience (Fitzpatrick & Bronstein, 2006). This view on ethics introduces the idea of a need to balance the interests of the corporation with the interests of stakeholders. As Bowen and Prescott (2015) explain, Kant foregrounds a respect for the stakeholder and duty to fully to disclose information to allow for dialogue. People are not a means to an end, but rather they are an end in and of themselves. Thus, communication decisions that focus on dignity of stakeholders and issues should provide positive outcomes. Yet Place's (2010) research revealed that public relations professionals found it difficult to uphold the deontological decision-making models. She explains, "In some cases, due to lack of experience or client demand, practitioners not only failed to utilize a deontological decision-making procedure but also filed to rely upon *any* form of ethical thought" (Place, 2010, p. 240).

Many public relations scholars advocate dialogue as the most ethical form of public relations. While the Kantian view of ethics for strategic management, developed by Bowen (2005), elevates our view of corporate communicator obligations to focus on moral dimensions, it focuses in the individual decision maker rather than thinking about the content of the communication itself. As Meisenbach (2006) argues, Kant's categorical imperative allows for imagined conversation without addressing actual dialogue. What is called for is a view of ethics that includes the standard of providing information that can be processed and a stance that is open to argument and disagreement. While much of the discussion of PCSR draws from Habermas's idea of deliberative democracy, we find value in turning to his idea of the ideal communication situation and what it offers in terms of providing for conditions of dialogue. As Seele and Lock (2015) point out, Habermas's ideal communication provides for ethical discourse because it requires corporations to formulate arguments and engage in open and transparent debate.

We contend that such a view of ethics is provided by Meisenbach's (2006) use of Habermas's principle of universalization to explore ethics of communication practice. Habermas argued that Kant's categorical imperative was overly monologic and called for a view of communication that considered moral norms not to be decided on an individual basis, but rather that they should be publicly debated and discussed (Meisenbach, 2006). Communicative action, the basis of Principle U, rests on the notion that to be a legitimate claim, the audience or public must be in a position to accept or reject a claim. That is, for any given claim to be considered legitimate, audiences must have full opportunity to engage with the ideas that are either agreeing or disagreeing with them. For this to be possible, a claim should be judged on its truthfulness, its rightness, and its sincerity (Feldner & Meisenbach, 2007). Truthfulness of a claim speaks to its accuracy; rightness addresses questions of morality, or whether or not a claim ought to made and is just. Finally, the sincerity of a claim addresses the extent to which the intention of the speaker is earnest and free from any duplicity. This Habermasian view of ethics fits with the calls for transparency introduced earlier. To suggest that organizations must be open to argument and present information in ways that can be processed by stakeholders is to suggest that claims should be valid legitimacy claims—claims that, as Meisenbach (2006) suggests, can be accepted by all parties and that have taken into consideration possible consequences.

Meisenbach (2006, p. 46) clarified the implication of discourse ethics for scholars by breaking down Principle U into five practical steps:

1. Identify an utterance for deliberation,
2. Identify all stakeholders who would be affected by the implementation of this utterance,
3. Articulate the utterance to all identified as affected,
4. Discursively debate among affected parties the consequences and value of the utterance, and form judgment of the validity and acceptability of the proposed utterance.

Habermas's discourse ethics provides guideline for considering the content of issue management and legitimacy claims, thus allowing for an analysis of the ethicality of the communication efforts. As organizations argue for their fit with social expectations, such claims can be evaluated according to their truth, rightness, and sincerity. To consider how such a framework might be applied to issue management, we consider the case of Coca-Cola and its use of public relations strategies to manage public criticism of the connection of its products to obesity and type 2 diabetes. This case is particularly salient because it addresses a situation in which a corporation simultaneously sought to manage an issue and establish the legitimacy of its efforts.

Case Study of Coca-Cola: Addressing Its Big Fat Problem

The soft drink industry is in crisis mode; consumption of full-calorie sodas by the average American has dropped by 25% over the past two decades; laws are being passed to tax and limit soda sales; and cities and school districts are trying to discourage consumption of sugary beverages, especially by children (Sanger-Katz, 2015). According to Michele Simon, a public health lawyer, there is “huge political and public backlash against soda” (O’Connor, 2015a, para. 5). As a result, Coca-Cola, the world’s largest producer of such beverages, has seen soda sales slip for nine straight years, with Diet Coke tumbling especially hard with an almost 6% drop. Much of the criticism has to do with the soft drink industry being blamed for helping to fuel obesity rates in the United States. One of the ways in which Coca-Cola has tried to fight this criticism is by spending millions of dollars to defeat soda taxes (Stanford, 2012). The company has also tried to ignore health concerns and instead launched “Share a Coke,” the recent marketing campaign that put people’s first names on bottles and cans (Esterl, 2014). But now Coca-Cola accepts health issues as reality (Suddath, 2014). In its annual report, Coca-Cola regularly cites “obesity and other health concerns” as the biggest risk to the company’s future (Coca-Cola, 2014). In choosing this case, we seek to analyze the ethical implications revealed in considering Coca-Cola’s actions against the backdrop of PCSR and the extent to which the public communication efforts provided opportunity for dialogue. Health care is a particularly significant political and social issue today. Corporate issue management efforts around health and wellness have clear social responsibility implications.

Partnering with nutritionists on sponsored content

In February 2015, Coca-Cola worked with dieticians who wrote online posts for American Heart Month that appeared on nutrition blogs and others sites, including those of major newspapers (Choi, 2015). Each post included a picture of a minican of Coke or suggested soda as a snack idea. Some of the authors, such as Robyn Flipse and Sylvia Meléndez Klinger, were listed as consultants for food companies, including Coca-Cola. A column that ran on more than 1,000 sites was marked as a “sponsored article,” which is an advertisement designed to look like a regular story. The other posts were not marked as sponsored content, but followed a similar format. On March 16, 2015, the Associated Press ran an article exposing the ploy (Choi, 2015), which ran throughout the month of March in multiple news outlets. Additionally, many activist websites published the story (Chan, 2015; Gibson, 2015). Coca-Cola acknowledged that, like other food companies, it works with health experts “to help bring context to the latest facts and science around our products and ingredients” (Choi, 2015, para. 9). It also said that any communications by the experts it works with contain the appropriate disclosures. Kelly McBride, who teaches media ethics at the Poynter Institute, described the tactic as “an example of opaque sponsored content” because it was not made clear that the authors were specifically paid by Coca-Cola for the column (Choi, 2015, para. 11). Interestingly, 3 days earlier, Coca-Cola published a story on its website about the importance of partnering with health professionals. The blog post written by Coca-Cola Journey Staff explains:

> From dietitians and nurses to fitness experts and physicians, these health professionals regularly collaborate with us to share practical nutrition education across the country, whether on your local morning show or at a national conference. As partners, they share their own views and perspectives and always disclose this relationship with our company in every communication, article and speaking engagement. (2015, para. 2)

The blog post features three health professional partners—Sylvia Meléndez Klinger; Robyn Flipse; and Rani G. Whitfield—and asks them to share their greatest tips on well-being and discuss why they think it is important for food and beverage companies to focus on nutrition and wellness. However, this blog post was not referenced in any of Coca-Cola's responses to the criticism of paying nutritionists. Although it seems that the company was being proactive by attempting to be transparent in its relationship with health professionals, a blog post that is not widely promoted will not gain as much attention as sponsored content carried in thousands of daily newspapers across the country. From a purely shareholder value standpoint, the efforts of Coca-Cola might be cast as a standard practice in issue management. Further, there is no obvious attempt to deceive, as there are cues (albeit obscure), which indicated the sponsored nature of the message. Here, Bowen's (2005) decision-making framework is useful in that it asks if any reasonable person might be able to discern the source of the information. A moral imperative would argue for greater clarity to allow for the public to truly engage in a dialogue and evaluate the claims presented.

Funding scientists to shift blame for obesity

Less than 6 months later, Coca-Cola found itself once again in the public spotlight. This time the beverage giant was being criticized for its involvement in the creation of a new nonprofit organization called the Global Energy Balance Network (GEBN), which promotes the argument that weight conscious Americans are overly fixated on how much they eat and drink while not paying enough attention to exercise (O'Connor, 2015a). Once again, Coca-Cola was partnering with influential third parties to the tune of a $1.5 million donation to help start the organization. According to a *New York Times* report, Coca-Cola provided financial and logistics support for GEBN, a new nonprofit whose website (www.gebn.org) was registered to Coca-Cola's headquarters in Atlanta (O'Connor, 2015a). The beverage company also provided more than $4 million in project funding to two university professors—Steven Blair and James O. Hill—who were the organization's founding members.

Health experts say that GEBN's message about exercising more and worrying less about cutting calories is misleading and meant to deflect attention away from recent studies about sugary drinks and their link to obesity and type 2 diabetes. Critics specifically contend that Coca-Cola is "using the new group to convince the public that physical activity can offset a bad diet despite evidence that exercise has only minimal impact on weight compared with what people consume" (O'Connor, 2015a, para. 4). Michelle Simon, a public health lawyer, agrees that "this is a direct response to the ways that the company is losing. They're desperate to stop the bleeding" (O'Connor, 2015a, para. 6). At the time, Coca-Cola offered the following statement: "We partner with some of the foremost experts in the fields of nutrition and physical activity. It's important to us that researchers we work with share their own views and scientific findings, regardless of the outcome, and are transparent and open about our funding" (O'Connor, 2015a, para. 12). Yet the group's Twitter and Facebook pages, which promote physical activity as a solution to chronic disease and obesity, made no mention of Coca-Cola's financial support. And it wasn't until after an obesity expert at the University of Ottawa, Yoni Freedhoff, inquired about the group's funding that Coca-Cola was added to the website as a funding source. On August 19, 2015, Muhtar Kent, chairman and chief executive officer of the Coca-Cola Company, published an opinion piece in the *Wall Street Journal* in which he admitted fault and vowed to improve transparency at the company. In an attempt to regain trust, Kent charged Sandy Douglas, executive vice president and president of Coca-Cola North America, to engage with public health advocates around the country. After months of pressure from public health authorities who said the group's mission was to play down the link between soft drinks and obesity, GEBN disbanded. Not only did Coca-Cola provide financial support for the nonprofit, but it was also instrumental in shaping the group, including choosing its leaders, creating its mission statement, and designing its website (O'Connor, 2015b). According to e-mails released by the Associated Press (2015), Rhona Applebaum, chief health and science officer at Coca-Cola, orchestrated the entire network starting in 2012. In an e-mail to Hill on July 9, 2014, Applebaum wrote, "Akin to a political campaign, we will develop, deploy and evolve a powerful and multi-faceted strategy to counter radical organizations and their proponents" (Associated Press, 2015). Coca-Cola wanted GEBN to become the go-to resource for the media by attempting to "inject sanity and reason" into the debate about obesity.

Shortly after the Associated Press released the excerpts from e-mails between Applebaum and the founders of the antiobesity group, Coca-Cola announced her retirement from the company. Additionally, Kent said in a statement on November 24, 2015, that the company was working on becoming more transparent: "Our support for scientific research was based on the desire to identify a more holistic, workable approach based on the best evidence. It has become clear to us that there was not a sufficient level of transparency with regard to the company's involvement with the Global Energy Balance Network. Clearly, we have more work to do to reflect the values of this great company in all that we do" (Whipp, 2015). Clearly, the departure of Applebaum and disbanding of GEBN suggest that Coca-Cola recognized its missteps. We cannot know if the company felt its involvement was violating basic ethical principles. Regardless, Coca-Cola took corrective action only when its actions were called into question. This suggests a closer look at the ethical challenges tied to this case.

An Ethical Analysis of Coca-Cola's Strategies

A critical analysis of this case can be conducted at two levels that could lead to competing and contradictory conclusions. First, we examine how one might assess the issue management and legitimacy-building efforts of Coca-Cola. Then, we look at how the case fits with Habermas's view of communication ethics by evaluating the bases of Coca-Cola's validity claims including: the truth of the proposition, the normative rightness of a way of acting, and the relative appropriateness of the claim being made (Habermas, 1984).

Analyzing Coca-Cola through the lens of issue management and legitimacy

From an issue management and organizational legitimacy perspective, one might argue the company was following best practices. First, Coca-Cola is constantly confronted with a need to address the issue of health and its role in promoting it. To manage the issue, Coca-Cola needs to persuade key stakeholders that the company is operating responsibly. The company's blog post on March 13, 2015, is an example of how it attempted to act responsibly by being transparent about its relationship with nutritionists and dieticians and its focus on health and wellness. The question and answer format allowed the three health professionals to explain why they think it is important for food and beverage companies to focus on nutrition and wellness. It also gave Coca-Cola the opportunity to advocate its position.

> At Coca-Cola we want to do our part—from providing easy-to-understand calorie information to offering a range of choices, including beverages with or without calories and in varying portion sizes. Like many companies in other industries, we work with health experts to help bring context to the latest facts and science around our products and ingredients. (Coca-Cola Journey Staff, 2015)

However, the extent of such partnerships is not explained nor is the fact that these health professionals were paid to write favorably about Coca-Cola's products. So while Coca-Cola was being transparent about how it works with health professionals, the company was unable to establish trust with stakeholders because it is not clear if the authors who wrote columns suggesting a minican of Coke as a healthy snack were paid by Coca-Cola to do so. Thus, the approach seems like an attempt to deceive the public.

Yet the introduction of smaller portion sizes does position Coca-Cola in a favorable manner. It suggests that the company is responding to and adjusting its products to fit with public health concerns about serving sizes, obesity rates, and type 2 diabetes. But the use of opaque sponsored content diminishes the return the company could see from stakeholders because it appears to be an unethical strategy to increase sale of its products with the help of third parties who are seen as trusted authorities. To its credit, Coca-Cola, again tried to position itself in a particular way to manage the issue by saying it wants to “help people make decisions that are right for them” and “to help bring context to the latest fact and science around our products and ingredients” (as cited in Choi, 2015, para. 9). Thus, Coca-Cola is managing the issue by announcing its relationship with health professionals, stressing the appropriateness of disclosures, and redirecting the attention to individual consumers who need information to make their own decisions.

However, the creation of GEBN presents a different side of issue management and legitimacy building because Coca-Cola participated in the creation of a research front group with the ostensible goal of shifting the discussion of obesity away from diet to focus on exercise instead. By obscuring the truth and muddying the issue, Coca-Cola did not position itself in a responsible position nor did it create a favorable position by which the company could claim to be responsible. LeVaux (2015) explains,

> This complexity might very well be in Coca-Cola’s best interest, because it makes it impossible to say, in sound bites, how much a person will have to do in order to work off a can of Coke. And obscuring the answer for as long as possible, while misdirecting the discussion away from simple, well-established fact, might be the best case scenario for future sales. Muddying the issue even keeps alive the idea that laughing out loud for a minute and a half might actually burn off a can of Coke’s worth of calories. But what it’s really doing is kicking the can down the road. (para. 17)

The legitimacy of GEBN was questioned by multiple stakeholders, including the media, activist groups, and the public health community. Public pressure eventually forced Coca-Cola to disband the network, remove its chief science officer, reexamine its values, and promise to improve transparency. One editorial writer expressed that

> I am disappointed that some actions we have taken to fund scientific research and health and well-being programs have served only to create more confusion and mistrust. I know our company can do a better job engaging both the public-health and scientific communities—and we will. (Kent, 2015)

Coca-Cola was not meeting public expectations; thus, the company’s efforts were not legitimate. To establish legitimacy, the company must either show how it is meeting public expectations or change the standards. The creation of GEBN did not meet public expectations; however, the company’s response demonstrates its willingness to acknowledge fault and attempt to change standards within the company.

Beyond overall legitimacy, this case raises questions about how effectively the communication efforts of Coca-Cola address the question of rightness and appropriateness of the company’s action. Coca-Cola argues, “Like many companies in other industries, we work with health experts to help bring context to the latest facts and science around our products and ingredients” (Coca-Cola Journey Staff, 2015, para. 1). So while the company can justify its relationship with health experts, the more problematic issue is the appropriateness of the action of not adequately disclosing the fact that the health professionals were paid specifically by Coca-Cola to promote its products. Of course, food and beverage companies like Coca-Cola want to work with dieticians, nurses, fitness experts, and physicians to collaborate and share nutrition education; however, Coca-Cola staff clearly state that they always disclose this relationship with their company in every communication, article, and speaking engagement. This was not the case in the heart healthy articles that ran in February 2015 nor was it the case of GEBN, until public pressure forced Coca-Cola to be named as a primary sponsor on the GEBN website. In Kent’s editorial, he writes,

> By supporting research and nonprofit organizations, we seek to foster more science-based knowledge to better inform the debate about how best to deal with the obesity epidemic. We have never attempted to hide that. However, in the future we will act with even more transparency as we refocus our investments and our efforts on well-being. (2015, para. 5)

Again, the partnership with scientists can definitely be justified, but it is the lack of transparency that hinders the appropriateness of the action. The leaders of GEBN clearly tried to hide the role that Coca-Cola played in the creation of the nonprofit organization. Kent tries to argue that the company does not hide its investment with the scientific community, but also admits that transparency can be improved. The fact that Coca-Cola was paying researchers to misdirect the discussion of obesity and potentially harm the public is an unethical approach of issue management and legitimacy building.

Coca-Cola was actively seeking to manage the issue of its impact on consumer health while, at the same time, seeking to establish the legitimacy of its approach. On this basis alone, we find concerns with the approach. Yet from a theoretical and practical standpoint, there was nothing inherently wrong with the ways in which Coca-Cola sought to manage the issue. The issue management efforts may have been poor and ineffectual, but this alone does not make them unethical. But at face value, there are clear concerns that should be addressed. To this end, a second level of analysis is needed and that is to consider the ethics at play in this situation.

Analyzing Coca-Cola through the lens of Habermasian ethics

Here, we seek to elevate thinking about corporate social responsibility, issue management, and legitimacy to incorporate a sense of corporate moral obligation to provide for social good. Beyond any decision-making processes that lead to the communication, a framework of PCSR asks for a consideration of how the communication strategies allowed for public deliberation. Our final analysis uses Habermas's Principle U, which asks whether or not stakeholders have the ability to accept or reject the claims being made by the corporation. For stakeholders to accept or reject a claim, the idea must be judged on its truthfulness, its rightness, and its sincerity (Meisenbach & Feldner, 2007). Applying Habermas's perspective fits with the calls for transparency introduced earlier. According to Habermas (1984), the bases of validity claims that can be made by a speaker (and challenged by an audience) include: the truth of the proposition, the normative rightness of a way of acting, and the relative appropriateness of the claim being made. Truth, rightness, and sincerity of utterance are connected and considered together. Meisenbach and Feldner (2009) suggest, "When placed in the context of public relations, if they discuss their claims at all, corporations often limit themselves to focusing on the truth or falsity of their claims, while overlooking discussion of whether the utterance promotions something good or is sincerely offered" (p. 256). They further this argument by linking it to how the issue management literature considered gaps in organization-public perceptions of fact and value relating to issues.

We must look more specifically at the claims Coca-Cola made in 2015 to legitimize its relationship with third parties. First, one might examine whether or not the claims are true or untrue. Coca-Cola was forthcoming about its partnership with health professionals in the blog post. The company writes that it regularly collaborates with third parties "to share practical nutrition education across the country, whether on your local morning show or at a national conference. As partners, they share their own views and perspectives and always disclose this relationship with our company in every communication, article and speaking engagement" (Coca-Cola Journey Staff, 2015). The facts of the statement are true; however, in practice Coca-Cola cannot guarantee the correct disclosure of the relationships, which causes confusion. So although the facts are accurate, the nuances of the partnerships are not always necessarily clear to the audience. In the GEBN case, the statement written by Kent in the *Wall Street Journal* speaks to similar concerns of truth. In his statement, Coca-Cola acknowledges the accusations and expresses concern about its role in the confusion: "I am disappointed that some actions we have taken to fund scientific research and health and well-being programs have served only to create more confusion and mistrust. I know our company can do a better job engaging both the public-health and scientific communities—and we will" (Kent, 2015). The statements are truthful at one level, but key details are obscured, making it difficult for audiences to truly engage with the claims based on their accuracy. That is, the approach violates the expectations within Principle U in that stakeholders are not truly able to challenge the accuracy because the source of the information is unclear.

In addition to the truth or falsity of the statements, the validity of the claims are judged on rightness. The rightness of a claim has less to with the accuracy and more of whether it is the morally correct thing to do. Should the company be engaging in such communication? In this case, based on commonly held moral standards, is it right for a soda company to be establishing itself as a nutritional expert? In its statements, Coca-Cola sought to establish itself as keeping broader social needs at the forefront:

> Our business will continue to evolve and respond to the needs of society—from product innovation to responsible marketing to our sponsorships and partnerships. And we will expand on the good things we are already doing so people may enjoy Coca-Cola products that have the calories and ingredients that fit their lifestyle. We will also continue our work to provide more choices, in smaller pack sizes, in more communities—waters, lower-calorie and lower-sugar drinks, diet soda and zero-calorie drinks. (Kent, 2015)

The principle of rightness can be among the more difficult to determine, as the judgment of moral standards can be a moving target. In this scenario, "rightness" should be considered according the extent to which Coca-Cola sought to manage the issue of health by employing nutritionists to conduct scientific studies. The challenges from the public suggest that a primary basis of the critiques was that it was not right (i.e., appropriate) for a soda company to make claims about nutrition and health. Probing deeper, from the standpoint of Principle U and communicative action, Coca-Cola's strategy did not provide the means for dialogue with the public because it was unclear who was sponsoring the research. Therefore, judgments about the rightness of claims were difficult to determine, as the source of the message was unclear.

The final basis on which we might evaluate the validity of Coca-Cola's claims is sincerity. Habermas (1984) explains that "the truthfulness that the speaker claims for expression of a subjective experience to which he has privileged access" (p. 309). When judging the sincerity of Coca-Cola's response to the two cases, we examine the intention of the organization. In the company's responses, the organization seems more focused on justifying and responding to criticism. To evaluate the sincerity of Coca-Cola's claim is to determine the extent to which Coca-Cola's intention was to improve the health of its consumer base and society. That is, was the health information provided sincerely aimed at addressing the issue of obesity, or was it an exercise of reducing scrutiny from the public? In this case, we cannot claim to have access to the intentions of the communication managers, but the overall lack of transparency suggests that Coca-Cola's communication efforts were not truly intended to be sincere. Again, hiding behind a fronted nonprofit organization eliminates the potential of true communicative action; that is, the ability for the public to accept or reject the claims as valid legitimacy claims.

Conclusion and discussion

The Coca-Cola case is illustrative because it brings to light a particular framework for understanding corporate issue management within an ethical frame. The public commentary and media critique made it clear that the tactics of Coca-Cola were not fitting with broader social expectations. We argue here that the problem with Coca-Cola's public relations efforts were not simply because the public did not approve nor should the problem be understood as an inherent lack of ethicality in issue management and legitimacy-building efforts. The root of the problem comes to light when this is considered in the way in the approach to issue management and legitimacy building. Should companies like Coca-Cola seek to frame their issue management efforts as valid legitimacy claims, they may be better able to meet broader social expectations while effectively managing the issue.

In this case, the communication efforts of Coca-Cola failed to meet the standard of Principle U because of the company's lack of transparency. Key stakeholder groups were unable to engage in deliberation and discussion with the company about these claims because there was no clarity on whose utterance was to be debated. The public was unable to reject or accept any given claim of the company because people did not have the full context and information to make any clear judgments. In this way, transparency and communicative action might be understood as intertwined. That is, communicative action cannot be achieved without transparency.

To date, public relations research has not sought to connect transparency, issue management, and ethics. Based on this case study, we argue that such connections should be explored more fully. From a theoretical standpoint, cases such as this require a more nuanced look at the ethicality of issue management efforts. Companies will continue to need to manage issues in an increasingly complex communication environment, but they will need to do so in a way that allows for genuine and open engagement with the public. We believe a Habermasian frame of ethics provides the means by which this type of engagement might achieved. Beyond an ethical framework that asks for moral judgment, Principle U calls for an openness to discuss and deliberate with audiences.

Clearly, a framework such as this creates more complexity for the public relations practitioner. It is imperative that practitioners consider how they might adapt communication to more fully be open to claims as open to critique and deliberation. With the increase in technology and continued demand for transparency, the public expects to be able to engage with corporations in a genuine and open way. And as this case illustrates, failure to provide the means by which the public can assess the truth, rightness, and sincerity of the claim leads to failure of the argument as a whole. In short, to be considered legitimate, issue management must be seen as an exercise of communicative action.

This research underscores the importance of holding corporations and public relations practitioners to a higher standard. It recognizes that public expectations are likely to increase, which means corporations will be called on to self-regulate and be accountable for the power they have to contribute to public understanding of social issues such as health. Additionally, public relations professionals must be willing and "prepared to counsel management on ethical dilemmas, confirming that public relations practitioners do see themselves in a corporate conscience role" (Bowen, 2007). This research extends Bowen's decision-making framework centered in Kant's categorical imperative by providing a means of evaluating content. It suggests providing assurance that the public can engage fully, which can happen only with true transparency balanced with quality information (truth) that is sincerely (sincerity) offered with an eye of what provides for social good (right). As such, this is a particular guideline for establishing ethical practice of issue management. While some empirical studies like Gond et al. (2016) focus on Habermas in their analysis, we believe that there is more work to be done to guide further inquiry in this field of research. Multiple types of methodological approaches should be used to more fully investigate the relationships explored in this study, particularly given the role of corporations in society today and their role in political and social issues.

References

Associated Press. (2015, November 24). "Excerpts from emails between Coke, anti-obesity group." *The Big Story*. Retrieved from http://bigstory.ap.org/article/eac573c073b6429bb302d94acc787c2b/excerpts–emails–-between-coke–anti–obesity–group

Beverage Digest. (2013). Beverage Digest Fact Book 18th Edition. Retrieved from https://www.beverage-digest.com/factbook

Bowen, S. A. (2004). Expansion of ethics as the tenth generic principle of public relations excellence: A Kantian theory and model for managing ethical issues. *Journal of Public Relations Research*, 16, 65−92.

Bowen, S. A. (2005). A practical model for ethical decision making in issue management and public relations. *Journal of Public Relations Research*, 17, 191−216.

Bowen, S. A. (2007). Ethics and public relations. Retrieved from http://www.instituteforpr.org/ethics-and-public-relations/

Bowen, S. A., & Prescott, P. (2015). Kant's contribution to the ethics of communication. *Ethical Space: The International Journal of Communication Ethics*, 12, 38−44.

Boyd, J. (2000). Actional legitimation: No crisis necessary. *Journal of Public Relations Research*, 12, 341−353.

Chan, A. (2015, March 18). Coca-Cola is paying nutritionists to advertise Coke as a healthy snack. Retrieved from https://nextshark.com/coca-cola-is-paying-nutritionists-to-advertise-coke-as-a-healthy-snack/

Choi, C. (2015, March 16). Coke as a sensible snack? Coca-Cola works with dietitians who suggest cola as snack. *Star Tribune*. Retrieved from http://www.startribune.com/coke–a–good-snack–health–experts–-working–with–coke–say–so/296404461/

Christensen, L. T., & Langer, R. (2009). Public relations and the strategic use of transparency: Consistency, hypocrisy, and corporate change. In R. L. Heath, E. L. Toth, & D. Waymer (Eds.), *Rhetorical and critical approaches to public relations* (pp. 129−153). New York, NY: Routledge.

Christensen, L. T., Morsing, M., & Thyssen, O. (2013). CSR as aspirational talk. *Organization* 20, 372−393.

Christensen, L. T., Morsing, M., & Thyssen, O. (2011). Polyphony of corporate social responsibility: Deconstructing accountability and transparency in the context of identity and hypocrisy. In G. Cheney, S. May, & D. Munshi (Eds.), *The handbook of communication ethics* (pp. 457−474). New York, NY: Routledge.

Coca-Cola Journey Staff. (2015, March 13). Q&A with three of Coca-Cola's health professional partners. Retrieved from http://www.coca-colacompany.com/stories/q–a–with–three–of–coca–colas–health–-professional–partners/

Coca-Cola. (2014). Sustainability Report. Retrieved from http://assets.coca-colacompany.com/1a/f6/89303ab746bcbf67f9fdc25fd93b/2013-2014-coca-cola-sustainability-report-pdf.pdf

Coombs, W. T., & Holladay, S. J. (2013). *It's not just PR: Public relations in society*. Medford, MA: Wiley.

Dowling, J., & Pfeffer, J. (1975). Organizational legitimacy: Social values and organizationalbehavior. *Pacific Sociological Review*, 18, 122−136.

Epstein, E. M., & Votaw, D. (1978). *Rationality, legitimacy, responsibility: Search for newdirections in business and society*. Santa Monica, CA: Goodyear.

Esterl, M. (2014, September 25). "Share a Coke" credited with a pop in sales. Retrieved from https://www.wsj.com/articles/share-a-coke-credited-with-a-pop-in-sales-1411661519

Feldner, S. B., & Meisenbach, R. J. (2007). SaveDisney.com and activist challenges: A Habermasian perspective on corporate legitimacy. *International Journal of Strategic Communication*, 1, 207−226.

Fitzpatrick, K., & Bronstein, C. (Eds.). (2006). *Ethics in public relations: Responsible advocacy*. Thousand Oaks, CA: Sage.

Frynas, J. G., & Stephens, S. (2015). Political corporate social responsibility: Reviewing theories and setting new agendas. *International Journal of Management Reviews*, 17, 483−509.

Fyke, J. P., Feldner, S. B., and May, S. K. (2016). Discourses about righting the business ← → society relationship. *Business and Society Review*, 121, 217–245. doi:10.1111/basr.12086

Garriga, E., & Mele, D. (2004). Corporate social responsibility theories. *Journal of Business Ethics*, 53, 51−71.

Gibson, S. M. (2015, March 16). Coca-Cola pays nutritionists to promote Coke as heart healthy *The Anti-Media*. Retrieved from http://theantimedia.org/coca-cola-pays-nutritionists/

Gond, J.-P., Cruz, L. B., Raufflet, E., & Charron, M. (2016). To frack or not to frack? The interaction of justification and power in a sustainability controversy. *Journal of Management Studies*, 53, 330−363.

Habermas, J. (1984). *Theory of communicative action: Vol. 1. Reason and the rationalization of society* (T.McCarthy, Trans.). Boston, MA: Beacon Press.

Heath, R. L. (2002). Comment: Issue management: Its past, present and future. *Journal of Public Affairs*, 2, 209−214.

Heath, R. L. (2006). A rhetorical theory approach to Issue management. In C. H. Botan & V. Hazeltn (Eds.), *Public relations theory* (Vol. 2, pp. 55−86). New York, NY: Routledge.

Heath, R. L. (2007). Management through advocacy. In E. L. Toth (Ed.), *The future of excellence in public relations and communication management: Challenges for the next generation* (pp. 41−65). Mahwah, NJ: Erlbaum.

Heath, R. L. (Ed.). (2010). *The SAGE handbook of public relations*. Thousand Oaks, CA: Sage.

Heath, R. L., & Palenchar, M. J. (2008). *Strategic issue management: Organizations and public policy challenges*. Thousand Oaks, CA: Sage.

Hoffman, M. F., & Ford, D. J. (2010). *Organizational rhetoric: Situations and strategies*. Thousand Oaks, CA: Sage.

Kent, M. (2015, August 19). Coca-Cola: We'll do better. *Wall Street Journal*. Retrieved from https://www.wsj.com/articles/coca-cola-well-do-better-1440024365

Kent, M. L., & Taylor, M. (1998). Building dialogic relationships through the World Wide Web. *Public relations review*, 24, 321−334.

Kent, M. L., & Taylor, M. (2002). Toward a dialogic theory of public relations. *Public relations review*, 28, 21−37.

LeVaux, A. (2015, August 17). How Coca Cola's obesity PR stunt blew up in the company's face. Retrieved from http://www.alternet.org/personal-health/how-coca-colas-obesity-pr-stunt-blew-companys-face

Lyon, L., & Cameron, G. T. (2004). A relational approach examining the interplay of prior reputation and immediate response to a crisis. *Journal of Public Relations Research*, 16, 213−241.

Meisenbach, R. J. (2006). Habermas's discourse ethics and principle of universalization as a moral framework for organizational communication. *Management Communication Quarterly*, 20, 39−62.

Meisenbach, R., & Feldner, S. B. (2009). Dialogue, discourse ethics, and Disney. In Heath, R. L., Toth, E. L. & Waymer, D. (Eds.), *Rhetorical and critical approaches to public relations* (Vol. 2, 253−271). New York, NY: Routledge.

Meisenbach, R. J., & Feldner, S. B. (2011). Adopting an attitude of wisdom in organizational rhetorical theory and practice: Contemplating the ideal and the real. *Management Communication Quarterly*, 25, 560−568.doi:0893318911409548.

Mele, D., & Armengou, J. (2016). Moral legitimacy in controversial projects. *Journal of Business Ethics*, 136, 729–742.

Moon, S. J., & Hyun, K. D. (2009). The salience of stakeholders and their attributes in public relations and business news. *Journal of Mass Media Ethics*, 24, 59−75.

O'Connor, A. (2015a, August 9). Coca-Cola funds scientists who shift blame for obesity away from bad diets. *New York Times*. Retrieved from https://well.blogs.nytimes.com/2015/08/09/coca-cola-funds-scientists-who-shift-blame-for-obesity-away-from-bad-diets/?_r=0

O'Connor, A. (2015b, December 1). Research group funded by Coca-Cola to disband. *New York Times*. Retrieved from http://m.cn.nytimes.com/readers-translation/20150916/c16coke-reader/en-us/

Palazzo, G., & Scherer, A.G. (2006). Corporate legitimacy as deliberation: A communicative framework. *Journal of Business Ethics*, 66, 71−88.

Place, K. R. (2010). A qualitative examination of public relations practitioner ethical decision making and the deontological theory of ethical issues management. *Journal of Mass Media Ethics*, 25, 226−245.

Plaisance, P. L. (2007). Transparency: An assessment of the Kantian roots of a key element in media ethics practice. *Journal of Mass Media Ethics*, 22, 187−207.

Radcliffe, Dana. (2015, August 19). Is it ethical for Coke to sponsor conflicted research on weight loss? *Huffington Post*. Retrieved from http://www.huffingtonpost.com/dana-radcliffe/is-it-ethical-for-coke-to_b_8009304.html

Rahmati, R. (2014, July 29). Bad news travels fast in social: A framework for social issue management. *Spredfast*. Retrieved from https://www.spredfast.com/social-marketing-blog/bad-news-travels-fast-social-framework-social-issues-management

Sanger-Katz, M. (2015). Americans are finally eating less. *New York Times*. Retrieved from https://www.nytimes.com/2015/07/25/upshot/americans-are-finally-eating-less.html

Scherer, A. G., & Palazzo, G. (2010). The political role of business in a globalized world: A review of new perspectives on CSR and its implications for the firm, governance and democracy. *Journal of Management Studies*, 48, 899−931.

Seele, P., & Lock, I. (2015). Instrumental and/or deliberative? A typology of CSR communication tools. *Journal of Business Ethics*, 131, 401−414.

Suddath, C. (2014, July 31). Coke confronts its big fat problem. Retrieved from https://www.bloomberg.com/news/articles/2014-07-31/coca-cola-sales-decline-health-concerns-spur-relaunch

Tapscott, D., & Ticoll, D. (2003). *The naked corporation: How the age of transparency will revolutionize business*. New York, NY: Simon & Schuster.

Whipp, L. (2015, November 24). Coca-Cola's science officer resigns. *Retail and Consumer*. Retrieved from https://next.ft.com/content/fcbebfb0-92dc–11e5–bd82c1fb87bef7af