



PLATING UP PROGRESS 2021

Recommendations for policy makers, food businesses and investors



SECTION 2a: RECOMMENDATIONS FOR POLICY MAKERS



SECTION 2a: Recommendations for policy makers



WHO SHOULD READ THIS?

Policy makers looking to gain an understanding of the next steps we recommend the government take to accelerate food business reporting on key issues.



WHAT THIS SECTION INCLUDES

This section argues that the government should follow the National Food Strategy recommendations for mandatory food business reporting on sales of healthy and sustainable food, and on food waste. We highlight some key areas where we think detailed consultation with industry and civil society will be needed, and what actions the government can take to improve reporting on other metrics outside of the National Food Strategy recommendations.

Finally, we briefly make a case in support of the more structural recommendations from the National Food Strategy, such as a central agency to oversee change, a national food database, and an innovation centre to facilitate reporting and implementation of best practice in the industry.



RECOMMENDED PRE-READ

Executive summary and Section 1 of this report.



WHERE CAN YOU FIND OUT MORE?

Read our [Plating Up Progress 2021](#) policy briefing from April 2021, before the National Food Strategy report was released.

PROJECT CONTACT: Will Nicholson, Project lead – Plating Up Progress, will.nicholson@foodfoundation.org.uk

OUR RECOMMENDATIONS ON MANDATORY REPORTING

In April 2021 we produced a [policy briefing](#) calling for the UK government to legislate for mandatory reporting in the food industry across a number of key metrics. Because business reporting on different metrics is not consistent, with varying levels of progress across issues, we recommended that the government's approach to this should in some cases be strengthening existing reporting requirements and in other cases introducing new requirements.

National Food Strategy recommendations

We strongly support the National Food Strategy's recommendation for mandatory reporting on sales of healthy and sustainable food and on food waste (see **Box 1**) as this would, at least in part, fulfil the recommendation we made for sales-based reporting in our original policy briefing, as well as making reporting on some of the key issues for supply chains mandatory, at least for protein sources (see **Figure 1**). The mandatory reporting requirement should be implemented as primary legislation in the form of a Food Bill.

It should be noted, however, that mandatory reporting provides an insight for the government at a certain point in time but does not itself create change in the industry. We further recommend that the government sees mandatory reporting as only the starting point, and that food businesses should in the future be expected to set sales-based or procurement-based targets. These targets should be to increase their proportional sales (or procurement) of healthy food, fruit and vegetables, and plant-based proteins; to reduce sales (or procurement) of animal proteins; and to ensure that animal proteins are being produced in a sustainable way.

BOX 1: THE NATIONAL FOOD STRATEGY'S RECOMMENDATION FOR MANDATORY REPORTING

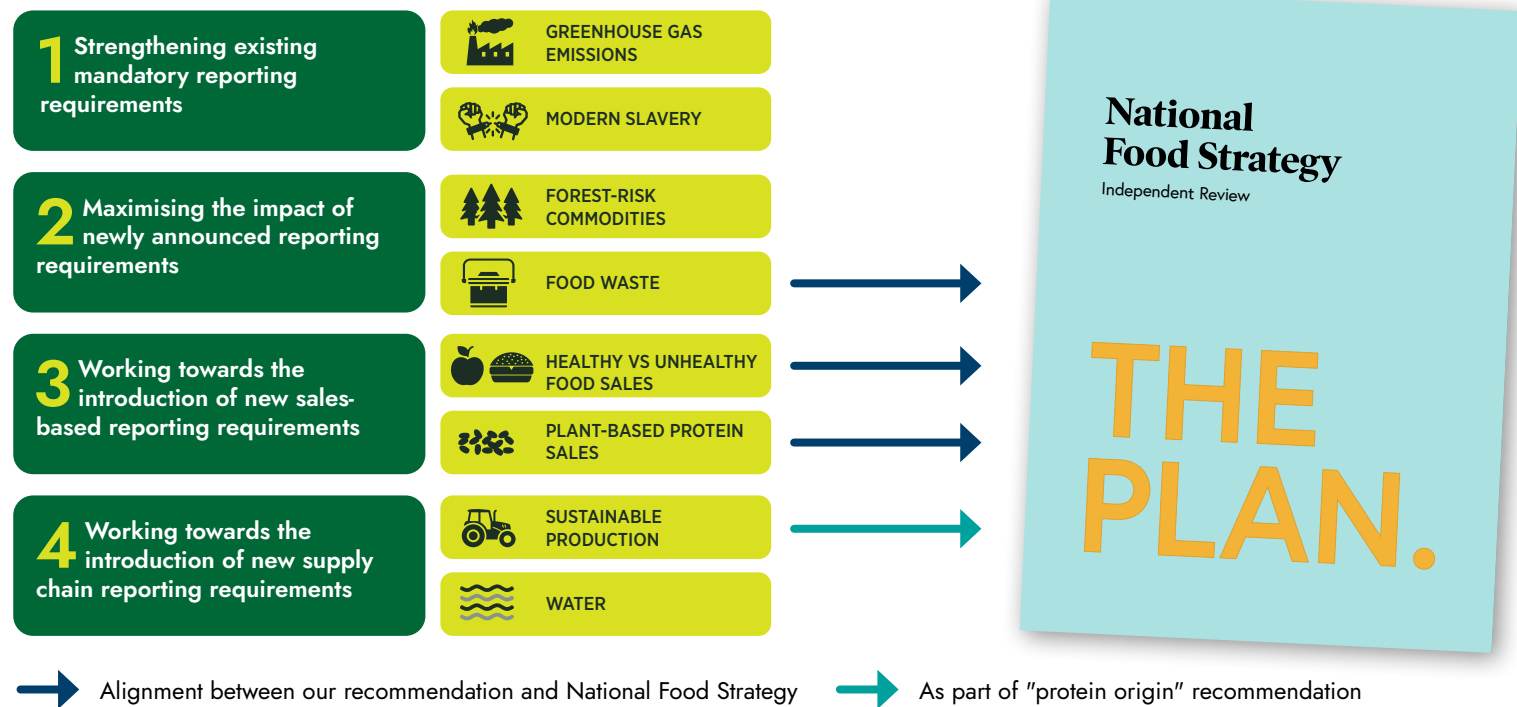
There should be a statutory duty for all food companies with more than 250 employees – including retailers, restaurant and quick service companies, contract caterers, wholesalers, manufacturers and online ordering platforms – to publish an annual report on the following set of metrics:

- Sales of food and drink high in fat, sugar or salt (HFSS) excluding alcohol
- Sales of protein by type (of meat, dairy, fish, plant or alternative protein) and origin[†]
- Sales of vegetables^{††}
- Sales of fruit
- Sales of major nutrients: fibre, saturated fat, sugar and salt
- Food waste
- Total food and drink sales.

[†] For all protein this should include country of origin. For pork, poultry, dairy, eggs and fish, it should additionally include welfare or method of production accreditations (e.g. Red Tractor, RSPCA, Freedom Food, organic, pasture-fed, Better Chicken Commitment, MSC).

^{††} "Fruit and vegetables" includes frozen, tinned and composite meals as well as fresh.

FIGURE 1: FOOD FOUNDATION RECOMMENDATIONS FOR MANDATORY REPORTING AND NATIONAL FOOD STRATEGY RECOMMENDATIONS FOR REPORTING



As shown in Section 1, we have now seen a number of supermarkets introduce new targets and disclosure on their food sales (for overall sales of healthy or healthier food, for fruit and vegetables, and for the sales proportion of protein from animal and plant-based sources). These advances make the recommendations from the National Food Strategy all the more reasonable by showing that this kind of reporting can indeed be achieved, although more progress will be required for the out of home sector. Furthermore, a number of businesses publicly supported the National Food Strategy on publication, calling for reporting requirements that would level the playing field in the food industry (see **Box 2** for these and for subsequent comments provided

to The Food Foundation). A key point here is that this support comes from businesses that are not yet reporting on all of these metrics voluntarily. In other words, it suggests that a government mandate would be welcomed by many in the industry in preference to the current inconsistent and completely voluntary reporting approach.

Additionally, a coalition of investors, representing £2.8 trillion in assets under management or under advice, have already voiced support for this through an open letter to the government following publication of the **National Food Strategy**.

BOX 2: SUPPORT FROM THE FOOD INDUSTRY**Public support shown in July 2021**

SOURCE: 🍷 RETAIL TIMES

JASON TARRY, TESCO UK & ROI CEO, SAID:

“*Tesco was the first retailer to publish its food waste data, and this year we have begun sharing the details of our protein sales, so we support the Strategy’s call for mandatory reporting requirements, and with it the aim of delivering affordable, healthy, sustainable food for all.*”

SIMON ROBERTS, SAINSBURY’S CEO, SAID:

“*We are supportive of the mandatory reporting recommendations laid out in the National Food Strategy and believe that better transparency across the food sector will develop industry insights that positively influence customer health outcomes.*”

ROGER WHITESIDE, GREGGS CEO, SAID:

“*We support the introduction of mandatory reporting across our sector which will create a level playing field for the largest food providers and help deliver a step change in the health of the nation’s diet.*”

RICHARD WALKER, MANAGING DIRECTOR, ICELAND FOODS SAID:

“*Transparent mandated business reporting will ensure customers are able to judge the true context of the commitments businesses make and the progress being reported.*”

JO WHITFIELD, CO-OP FOOD CEO, SAID:

“*We welcome these new recommendations which could revolutionise food reporting and provide greater transparency but, importantly, bring about a consistent approach across the sector.*”

Additional comments provided to the Food Foundation

MARK DAVIES, MANAGING DIRECTOR, ISS UK FOOD SERVICE SAID:

“*As a leading caterer, we believe in being transparent and honest about our ambitions for a healthy and sustainable food system, and welcome the recommendation for workable, proportionate reporting obligations for food businesses in their transition towards this.*”

ROBIN MILLS, MANAGING DIRECTOR, COMPASS GROUP UK & IRELAND SAID:

“*We believe the food industry has a responsibility to be part of the transition to healthy and sustainable food systems and must work together to achieve lasting change. As Plating Up Progress shows, Compass Group UK&I is committed to transparency and will be monitoring our carbon footprint to deliver a science based target of Net Zero by 2030. As a large food business on a transformational journey, we want to work collaboratively with others in the industry to benchmark and report on progress.*”

Our recommendations beyond the National Food Strategy

In addition to implementing mandatory reporting as per the National Food Strategy's recommendations, we make further recommendations to the government, as specified in our original policy briefing (See **Box 3**).

BOX 3: ADDITIONAL RECOMMENDATIONS FOR IMPROVING BUSINESS REPORTING, BEYOND THE NATIONAL FOOD STRATEGY RECOMMENDATIONS

- › Make the **REPORTING** of scope 3 greenhouse gas emissions mandatory (and work with stakeholders to develop a consistent protocol for measuring and reporting on this).
- › **STRENGTHEN** deforestation reporting requirements to include legal (not just illegal) deforestation in businesses' supply chains.
- › **CONSULT** on supply chain reporting requirements for sustainable food production and sustainable water management.
- › Make **SUBMISSIONS** of modern slavery statements to the government mandatory and consider making businesses legally responsible for human rights in their supply chains.

See
our previous
[policy briefing](#)
for more detail on
these "supply chain"
recommendations.



IMPLEMENTING THE NATIONAL FOOD STRATEGY RECOMMENDATIONS FOR MANDATORY REPORTING

There are a number of issues that will need to be resolved for the National Food Strategy's mandatory reporting recommendation to be implemented.

Cross-cutting considerations

We recommend that the following factors be considered:

- What common baseline year should be used for reporting, from which progress can be measured?
- What definitions are needed for food products and categories? For example, composite products containing vegetables and both animal and plant-based proteins could be reported under both the fruit and vegetables metric or the protein metric. Clarity will be needed (see later for specifics regarding each metric).
- Should volume- and revenue-based data be used and, whether for some sectors, procurement data are more appropriate than revenue data?
- How should reporting account for business growth or shrinkage if that would impact the reported data?
- What procedures need to be in place for verification of data?
- What systems need to be in place (for example, a centralised reporting portal) for efficient reporting and dissemination?



Agreeing the methodology for reporting on healthy vs. unhealthy food sales

Reporting on sales of foods high in fats, sugar or salt (HFSS) will require a consistent methodology for quantifying healthy and unhealthy food, with consideration for how this will apply across the relevant food sector. This should be developed in consultation with industry and civil society. We recommend the use of the government's HFSS model (the UK Nutrient Profiling Model 2004/5) and stress that it should be updated in line with the latest Scientific Advisory Committee on Nutrition (SACN) guidance. ShareAction also point out that four supermarkets already use this in their reporting on food sales, making it probably the easiest to implement across the sectors¹. Recent research also shows good alignment between this nutrient profiling model and the government's Eatwell Guide².

The government should also consider whether a clear distinction between healthy and unhealthy food is sufficient, or whether food businesses should also report on improvements to products, through reformulation for example, making them healthier rather than simply categorising all food as healthy or unhealthy.

Defining the parameters for reporting on sales of fruit and vegetables

Currently there are a variety of ways in which companies are quantifying how they are making vegetables more available to customers, largely driven by the Peas Please partnership's work on targets for sales of vegetables, for which The Food Foundation is a project partner. Some companies are already committing to providing at least two portions of vegetables across their menus, or to increase their sales of vegetables

“ All of these reporting requirements should be seen as a first step, with the ultimate goal being that food businesses set targets for, and report on, an actual shift in their food sales across each metric.”

- ▶ in specific product categories, while a smaller number have set clear targets for increasing sales and procurement of vegetables. There is now an opportunity to formalise how fruit and vegetables are reported and to ensure that fruit and vegetables in composite products are also considered within that scope.


Defining the parameters for reporting on sales of protein sources

Currently, two retailers are disclosing the proportion of protein sales that are animal-based or plant-based. Consistent parameters need to be defined for reporting on protein such as whether to include fresh, frozen and composite products. Within categories there will also need to be a definition of whether composite products should be classed as a “protein product” or not. For example, does a ham sandwich (and therefore, as a potential plant-based protein, a houmous sandwich) count as a protein product and should the sales value of the sandwich or the volume of the ham (or houmous) be reported?

Refining the reporting on protein “origin” and production systems

Currently the National Food Strategy recommendation is for protein reporting to be supplemented with “origin” data relating to the country of origin and (for pork, poultry, dairy and fish) animal welfare standards and some sustainable production standards. Sustainable animal feed should also be added to this list, so that food businesses are required to report on the percentage of soy in animal feed that comes from segregated conversion-free supply chains. Because this reporting requirement is in effect about food businesses reporting on sales of “better meat”, we recommend that the government consult with NGOs such as the Eating Better Alliance who have identified eight areas for food businesses in sourcing and reporting on “better meat”: animal welfare, antibiotic use, greenhouse gas emissions, land use change, biodiversity, soil health, local pollution and water scarcity.³

Agreeing the data to be reported for food waste

For this metric we simply recommend that the reporting framework is aligned with the existing roadmap and metrics defined by  WRAP.

Going beyond reporting to targets

As mentioned earlier, we further recommend that all of these reporting requirements should be seen as a first step, with the ultimate goal being that food businesses set targets for, and report on, an actual shift in their food sales across each metric. As a minimum, the government should in the future compare food industry performance to the National Food Strategy targets for national diets (to include 30% more fruit and vegetables, 50% more fibre, 25% less foods high in fats, salt or sugar, and 30% less meat by 2032). Business targets will need to shift their sales accordingly.



STRUCTURAL RECOMMENDATIONS FOR ACCELERATING CHANGE IN THE FOOD INDUSTRY

Food system data and collaborations

As recommended in our previous [policy briefing](#), there are a number of supply chain issues where challenges exist for both data collection and data quality – sustainable production practices and sustainable water management being two where we have previously identified challenges. The government can play an important role in facilitating cross-industry collaboration to address these complex supply chain issues by committing to facilitate and encourage collaborative efforts to address the data gaps and inconsistency in reporting standards that currently act as barriers.

Part of this could be assisted through, as recommended by the National Food Strategy, a food database that would provide environmental data such as greenhouse gas emissions, biodiversity impacts and water use, to facilitate reporting by food businesses. However, without pre-competitive and collaborative initiatives on how to use such data, we believe the industry may fall short of being able to report on genuine progress. In the section on recommendations for businesses (Section 2b) we list the main pre-competitive initiatives that we recommend. There is a role for the government in finding ways to ensure these initiatives are supported and can contribute to lasting change and that collaborative initiatives do indeed make use of the proposed food database.

Food industry governance

As recommended in the National Food Strategy, we also support the need for a non-ministerial department such as the Food Standards Agency to oversee the reporting methodology and data collection, and to support government action on the basis of the reported data to accelerate change in the food industry. As noted above, we see the mandatory reporting recommendation from the National Food Strategy as the starting point for change in the industry – not the end point.

“ A food database could provide environmental data such as greenhouse gas emissions, biodiversity impacts and water use, to facilitate environmental reporting on complex issues by food businesses.”

KEY MESSAGES

- **Mandatory reporting by large food businesses, as specified in this report, should be implemented as primary legislation in the form of a Food Bill.**
- **Multi-stakeholder input is needed to shape the reporting criteria, definitions and parameters in order to implement the National Food Strategy recommendation.**
- **The correct infrastructure also needs to be in place, both for reporting and for the governance and ownership of that process. In the future, mandatory reporting should include targets that evidence a shift in business models towards healthy and sustainable food sales.**
- **In the wider context, the government should also make progress on our own recommendations concerning supply chain issues such as business reporting on scope 3 greenhouse gas emissions, land use conversion in supply chains, sustainable food production, sustainable water management and strengthening modern slavery reporting, as outlined in our previous policy briefing.**

References

1. ShareAction (2021) Tracking for health: 2021 update. Available at: <https://shareaction.org/wp-content/uploads/2021/07/Tracking-for-Health-2021.pdf>
2. Pinho-Gomes, A.-C.; Kaur, A.; Scarborough, P.; Rayner, M. (2021) Are the Eatwell Guide and Nutrient Profiling Models Consistent in the UK? *Nutrients* 13, no. 8: 2732. <https://doi.org/10.3390/nu13082732>
3. Eating Better (2021) Sourcing better: a pathway to less and better meat and dairy. Available at: https://www.eating-better.org/uploads/Documents/Sourcing_Better_Framework.pdf

About Plating Up Progress

This report is an output of Plating Up Progress, a Food Foundation project. The project has two aims. First, to forge a consensus on metrics and reporting mechanisms that allow assessment of food industry progress in transitioning to sustainable and healthy diets. Second, to engage stakeholders to advance the uptake of these metrics and track progress in the industry.

Acknowledgements

We would like to thank our funders the Children's Investment Fund Foundation and the Joseph Rowntree Charitable Trust.



The Food Foundation CIO

c/o Spayne Lindsay & Co. LLP; 55 Strand, London, WC2N 5LR
+44(0)20 3086 9953

foodfoundation.org.uk  [@Food_Foundation](https://twitter.com/Food_Foundation)

©Food Foundation. All rights reserved.
Reproduction in part or in whole is
prohibited without prior agreement with the
Food Foundation. Charity number: 1187611.