THE STATE OF THE NATION'S FOOD INDUSTRY:

WHERE ARE UK BUSINESSES IN SUPPORTING A SHIFT TOWARDS MORE SUSTAINABLE, HEALTHY DIETS?

The Food Foundation

Examining how the food industry impacts our diets with recommendations for changing business practice to deliver healthy and sustainable diets for everyone

ABOUT THE FOOD FOUNDATION

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

Visit: foodfoundation.org.uk

The Food Foundation

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An introduction

This report assesses how the out of home and retail sectors are performing on both their sustainability and health commitments, showcasing examples of best practice and leadership, as well as identifying businesses that are consistently falling short. The report sets out what best practice looks like (in the form of setting targets, reporting on them, and having strong accountability mechanisms) before drawing on a range of research and scoring systems to assess how businesses are currently changing to encourage consumers eat more healthy and sustainable foods.

We have focused on the retail and out of home sectors in this year's report as they are the focus of our ***Plating Up Progress*** and ***Peas Please*** projects, but that is not to say that other sectors – notably manufacturing and wholesale – do not also wield a huge amount of control over what we eat. They too must change if we are to effectively shift UK diets towards more healthy and sustainable dietary patterns.

AT A GLANCE

1 The businesses currently performing most strongly when it comes to **healthy and sustainable diets** are Sainsbury's, Lidl, Tesco, and Greggs.

2 Morrisons, and to a lesser extent Asda, are the two supermarkets that are consistently toward the bottom of food retail league tables - **not setting targets nor disclosing information, and not engaging with sustainability or health initiatives**. Given that both retailers are two of the biggest UK supermarkets we would like to see much more engagement and action from them in tackling the UK's public health and climate crises in the future.

3 Retailers are currently **under far greater scrutiny** than the Out of Home sector and there is a **lack of available data** to assess how the Out of Home sector is performing that urgently needs addressing.

4 The limited data that is available on the Out of Home sector shows it is woefully behind in setting health targets and providing healthier food options for citizens. **More research and data are needed** – especially for delivery and takeaway businesses – but the sector as a whole must be **held to account** given its increasing influence on public health.

5 **Voluntary reporting does not work anywhere near as well as mandatory reporting**. This is demonstrated through analyses from Plating Up Progress and results from the Government's voluntary calorie and sugar reduction targets for industry. Government must stand by its commitment in the Food Strategy to **make business reporting mandatory** so that there is consistency in the way businesses monitor and report on their sustainability and health metrics.

7 The growing trend towards plant-based eating has resulted in **a proliferation of plant-based alternatives on menus and to a lesser extent, on supermarket shelves. This represents a huge opportunity for food businesses to shift portfolios away from animal protein**. However, there is little research on how healthy these plant-based alternatives are. **Investigation is needed into the nutritional value of plant-based alternatives** and the food industry needs to be thinking about how it can reformulate products to include more vegetables, pulses and fibre as less processed plant-based alternatives.

6 The **cost-of-living crisis and the rising price of food** are currently key concerns for UK citizens, increasing the risk of sustainable and healthy choices becoming **even harder to afford** for those with the least resources. Businesses need to be mindful of this and look at rebalancing the cost of products to ensure that healthy and sustainable options are the most affordable within categories and do not become foods accessible only to the wealthiest.

TO SUPPORT THE UK IN SHIFTING TOWARDS MORE SUSTAINABLE, HEALTHY DIETS WE WOULD LIKE TO SEE BUSINESSES:

1. Support and work with the Government in implementing mandatory business reporting and in the creation of a Food Data Transparency Partnership (FDTP) to develop consistent metrics for the health and environmental impacts of food.

2. Set SMART targets for improving their health and environmental sustainability credentials, and publicly report progress against these.

3. Act to ensure that marketing and promotional budgets are directed towards schemes and campaigns that promote healthier, more sustainable foods that are accessible for all.

BUT THERE IS ONLY SO FAR THAT BUSINESSES CAN MOVE WITHIN THE STRUCTURES THEY OPERATE IN.

Big shifts in the food environment can only be achieved by shifting the incentives and standards in the system within which businesses operate. Shifting these incentives is the role of Government.

They also has a vital part to play in ensuring a level playing field for all businesses and in seeing through their commitment to mandatory reporting against a standardised set of metrics. They too must use the tools at their disposal to rebalance the food environment so that it supports the UK's health and environment – protecting the healthy and sustainable growth of the economy in the years ahead.

PART ONE

THE ROLE OF THE FOOD INDUSTRY IN INFLUENCING CITIZEN DIETS

FOOD ENVIRONMENTS PLAY AN IMPORTANT ROLE IN SHAPING OUR DIETARY CHOICES

The choices people make when eating out or food shopping are often habitual or impulsive. Although businesses and government often focus heavily on individual responsibility and free choice, food choices are shaped by multiple factors, including those individuals have little influence on - such as price and affordability, appeal and availability. Increasing the visibility of products in a retail environment by featuring them at the ends of aisles, for example, leads to an increase in sales of those products[1].

Similarly, the Out of Home sector can adjust the placement, size, pricing, position, or language used to describe food on their menus to influence consumer choice. Within the UK, both the retail and Out of Home sectors can play important roles in enabling dietary change. **More than a quarter of adults and a fifth of children eat out each week**[2], but the retail sector remains the main vehicle for sales of most commercially produced food. What happens in these two sectors therefore has a profound impact on what we actually eat.

THE FOOD INDUSTRY HAS A RESPONSIBILITY TO HELP CONSUMERS MAKE HEALTHIER AND MORE SUSTAINABLE CHOICES.

In our current food system less healthy and environmentally unsustainable foods are the norm, contributing to unprecedented levels of obesity and diet-related disease, and making food production and consumption major drivers of climate change. Given the large influence that food businesses play in shaping our food environment and food decisions, it is imperative that they use their position of power to help consumers make healthier choices that are also better for the planet.

- Globally over **800 million** people go hungry, while two billion people are living with obesity or overweight[3]
- In England **63%** of adults have overweight or are living with obesity (67% of men, 60% of women)[4]
- The food system contributes up to **37%** of greenhouse gas emissions, with agriculture representing **23%**[5]
- Agriculture is responsible for **80%** of global deforestation[6]
- **One third** of all food produced is either lost or wasted[7]

HEALTHY AND SUSTAINABLE FOOD NEEDS TO BE MORE AFFORDABLE, MORE AVAILABLE, AND MORE APPEALING THAN UNSUSTAINABLE AND LESS HEALTHY FOOD.

More often than not our food environments are failing us, cajoling and sometimes forcing citizens into food purchasing decisions. The relative price of different products plays a huge part as foods high in fat, salt and sugar (HFSS) continue to be cheaper than healthier foods, and plant-based alternative products are typically more expensive than their meaty equivalents[8]. **More nutritious food is nearly three times more expensive than less healthy products, with more healthy foods costing an average of £8.51 for 1,000 calories compared to just £3.25 for 1,000 calories of less healthy foods**[9]. Between 2021 and 2022 healthier foods became even more expensive, increasing in price by an average of 5.1% compared with 2.5% for the least healthy foods.

WHAT DO WE MEAN BY PLANT-BASED ALTERNATIVE PRODUCTS?

Plant-based alternative products are defined as those either labelled as suitable for vegans or which do not contain animal products. This does not include products such as tinned pulses or vegetables. Plant-based alternatives are a separate category from vegetarian products, which may contain eggs or dairy products, but no meat, fish or seafood.

In some cases, access to the sustainable or healthy option is not even available to citizens; both Asda and Morrisons have recently removed plant-based sandwich options entirely from their stores[10], while one in four (27%) hot chocolates and seasonal beverages from high street cafes have increased the amount of sugar they contain, in spite of the voluntary sugar reduction targets introduced in 2015[11].

PART TWO

WHY MANDATORY REPORTING WILL BE KEY FOR ENSURING GREATER BUSINESS TRANSPARENCY AND ENCOURAGING PROGRESS

Data transparency to track industry progress

GETTING THE DEFINITION RIGHT ON HOW TO MEASURE SUSTAINABLE AND HEALTHY PRODUCTS IS CRUCIAL

One of the challenges the food industry is currently grappling with is the lack of a clear definition of what sustainable and healthy products are and how to measure them. Clarity on how to define and measure these products comes hand in hand with a need to agree a set of metrics to use. **Currently businesses are using different definitions and ways to measure what a healthy or sustainable product is**. This makes it very hard for businesses to track their progress against competitors and means there is no meaningful transparency within the food industry as a whole.

Before there can be any concerted action there must be consistent agreed legal definitions of what healthy and sustainable products are, including universally shared reporting metrics and mechanisms.

For example, Nutritional Profiling Models (NPM) are used to classify and rank foods according to their nutritional composition. For UK retailers the relevant model is the government-endorsed FSA 2004/5 NPM. Although the government is yet to respond to a 2018 consultation intended to update the NPM, it is notable that just 5 of the 11 major UK retailers have adopted the government's full NPM[12]. Moreover, the ways in which these 11 retailers use these NPMs varies widely between companies leading to a lack of consistency in how the models are used to define 'healthy' products. If food businesses are to start reporting more transparently on what proportion of their portfolios are comprised of more healthy foods for example, more consistency around definitions and mechanisms such as NPMs will be essential – particularly if the intention is to benchmark and compare progress across the sector.

FIGURE 1: THE DIFFERING ADOPTION OF NUTRITIONAL PROFILING MODELS BY UK RETAILERS [ADAPTED FROM THE ACCESS TO NUTRITION INITIATIVE (ATNI) RETAILER INDEX]

Does the company use FSA 2004/5 NPM?

M&S EST. 1884 Yes	ALDI Yes with minor adaptations	Waitrose No	Iceland No evidence found
Morrisons Yes	TESCO Yes with minor adaptations	LIDL No	ocado No evidence found
co op Yes	Sainsbury's Internal use only	ASDA Not clear	

FEW FOOD BUSINESSES ARE BEING TRANSPARENT WITH THEIR DATA

We have seen some isolated examples of businesses taking positive steps to improve people's diets, such as Lidl trying to increase their sales of fruit and vegetables by repositioning fresh produce towards the front of their stores, and Tesco committing to increase their sales of healthier products in the UK and Ireland from 58% to 65% by 2025, but our analysis shows **only a minority of companies are disclosing data and those that do so are using inconsistent definitions**.

Of the 27 major supermarkets, leading restaurant chains and caterers within the UK, The Food Foundation's data[13] shows that:

Less than 20% report on sales of healthy or healthier[i] food (45% of supermarkets but no restaurant chains or caterers).

Only 22% report on sales of fruit or vegetables (18% of supermarkets and 25% of restaurant chains and caterers).

Only 7% report on sales of animal-protein vs plant-based proteins (18% of supermarkets but no restaurant chains or caterers).

Sainsbury's is the only food business that reports on all three metrics.

Given the small number of major food businesses who are currently doing this on a voluntary basis, and the confusion around how to define and measure sustainable and healthy products, Government intervention is urgently needed to ensure that all businesses disclose data in an agreed format.

MANDATORY REPORTING WOULD ALLOW ALL FOOD INDUSTRY RETAILERS TO REPORT ONE CLEAR SET OF DATA

In 2021 the National Food Strategy for England recommended mandatory reporting for all large food businesses with over 250 employees, suggesting businesses should start to disclose information on:

- **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**

Reporting data of the kind proposed would be a game changer in encouraging greater transparency and allowing for more accurate benchmarking and monitoring of food industry actions and would have few, if any, detrimental commercial impacts. Indeed, it would allow organisations to avoid the requirement to respond to or fend off repeated requests for information from charities, NGOs and environmental interest and lobby groups of all descriptions. It would allow companies to benchmark their actions in meaningful ways alongside their competitors and address the problems of definitions and data sources which they are currently required to address in a piecemeal fashion.

In June 2022 the Government responded to the recommendations outlined in the National Food Strategy. While generally considered to have been weak, the Government's response did include commitments to "create a more transparent food system", recognising the need for improved reporting standards by the larger players in the food industry and the creation of a Food Data Transparency Partnership (FDTP). The FDTP is intended to develop consistent metrics for the health, environmental sustainability, and animal welfare impacts of food.

No clear timeline has been laid out, but if these metrics are agreed and adopted by the food industry and enforced by Government, they will help to bring consistency and transparency to the assessment of food industry performance and enable policymakers, investors, and members of the public to scrutinise action on health and sustainability among all the players in food retailing and service, as opposed to the minority who are currently reporting.

[i] *There is currently no clear consensus on how to quantify "healthy" food in different sectors. Within the PUP methodology a maximum score (of 3) can be applied for a time-bound target and performance data as long as the methodology is provided by the company.*

PART THREE

WHAT DOES BEST PRACTICE FOR THE FOOD INDUSTRY LOOK LIKE?

BUSINESSES NEED TO HAVE STRONG GOVERNANCE AND LEADERSHIP TO CREATE HEALTHIER AND MORE SUSTAINABLE FOOD SYSTEMS

Businesses that have clear targets and report on them, perform better on their sustainability and health commitments. The recent Access to Nutrition Initiative (ATNI) Index of UK Retailers demonstrated the positive correlation between robust governance for their commitments, and performance. Those who did well on governance also scored highly in the Overall Index.[14]. **Businesses need to set SMART targets for sales of HFSS, sales of fruit and veg and sales of protein, report on these targets and have board-level accountability for the targets that are being set. These targets then need to be coupled with implementation plans to achieve them**.

In setting targets and plans to deliver them, business leaders will inevitably identify potential actions which they could take but judge these actions to be too commercially damaging. In doing so they will identify areas where government regulation will create more conducive conditions for businesses to act. It is important that businesses highlight these areas to policy makers to help create political space for government action.

FIGURE 2: TARGET SETTING; A VIRTUOUS CYCLE

BUSINESSES SHOULD DRAW ON EXISTING GUIDANCE TO HELP WITH TARGET SETTING AND REPORTING

There are already several pieces of work that map what 'good' looks like when it comes to setting and reporting on targets for healthy food, fruit and vegetables, protein procurement, protein disclosure and food waste as per the National Food Strategy's recommendations. While The Food Foundation's '***Plating Up Progress***' project assesses progress across a wide range of metrics, the following initiatives seek to encourage improved reporting in specific areas:

HEALTHY FOOD SALES
Share Action's Healthy Markets Initiative

VEGETABLE SALES
The Peas Please initiative

ANIMAL VS PLANT-BASED PROTEIN SALES
WWF's Basket – the diet element focusses on protein

PROTEIN SOURCING
Eating Better's Better by Half roadmap

FOOD WASTE
WRAP's Courtauld Agreement

FIGURE 3: MAPPING EXISTING GUIDANCE AND INITIATIVES FOR FOOD SYSTEM METRICS

PART FOUR

THE STATE OF THE FOOD INDUSTRY TODAY

The following section looks at how businesses within the retail and Out of Home sectors are currently performing on both their sustainability and health commitments, looking in turn at what (if any) targets businesses are setting for HFSS, fruit and vegetable, and protein sales; the strategies they have in place to deliver on these targets; and any accountability mechanisms or examples of leadership for the targets that have been set.

1 *SMART* TARGETS AROUND SUSTAINABILITY AND HEALTH ARE IMPORTANT BUT RARE

BUSINESSES THAT DON'T REPORT, DON'T HAVE TARGETS

The Food Foundation's Plating Up Progress analysis shows that out of the 27 major supermarkets, restaurant chains and caterers within the UK, only ten report on any quantifiable data for sales of HFSS food, fruit & veg or the sales split between animal and plant-based proteins. Of these ten, seven businesses only report on one metric, two businesses (Tesco and Aldi) report on two metrics and **Sainsbury's is the only food business to report on all three metrics; reporting sales of HFSS foods for own-brand products only with plans to report on total sales going forward**. Notably, the ten businesses that do report had also set a SMART target. Conversely, the businesses that don't currently disclose data on sales of HFSS, fruit and veg or protein, do not have targets.

FIGURE 4: PLATING UP PROGRESS 2022 ANALYSIS OF THE OUT OF HOME SECTOR AND RETAILERS

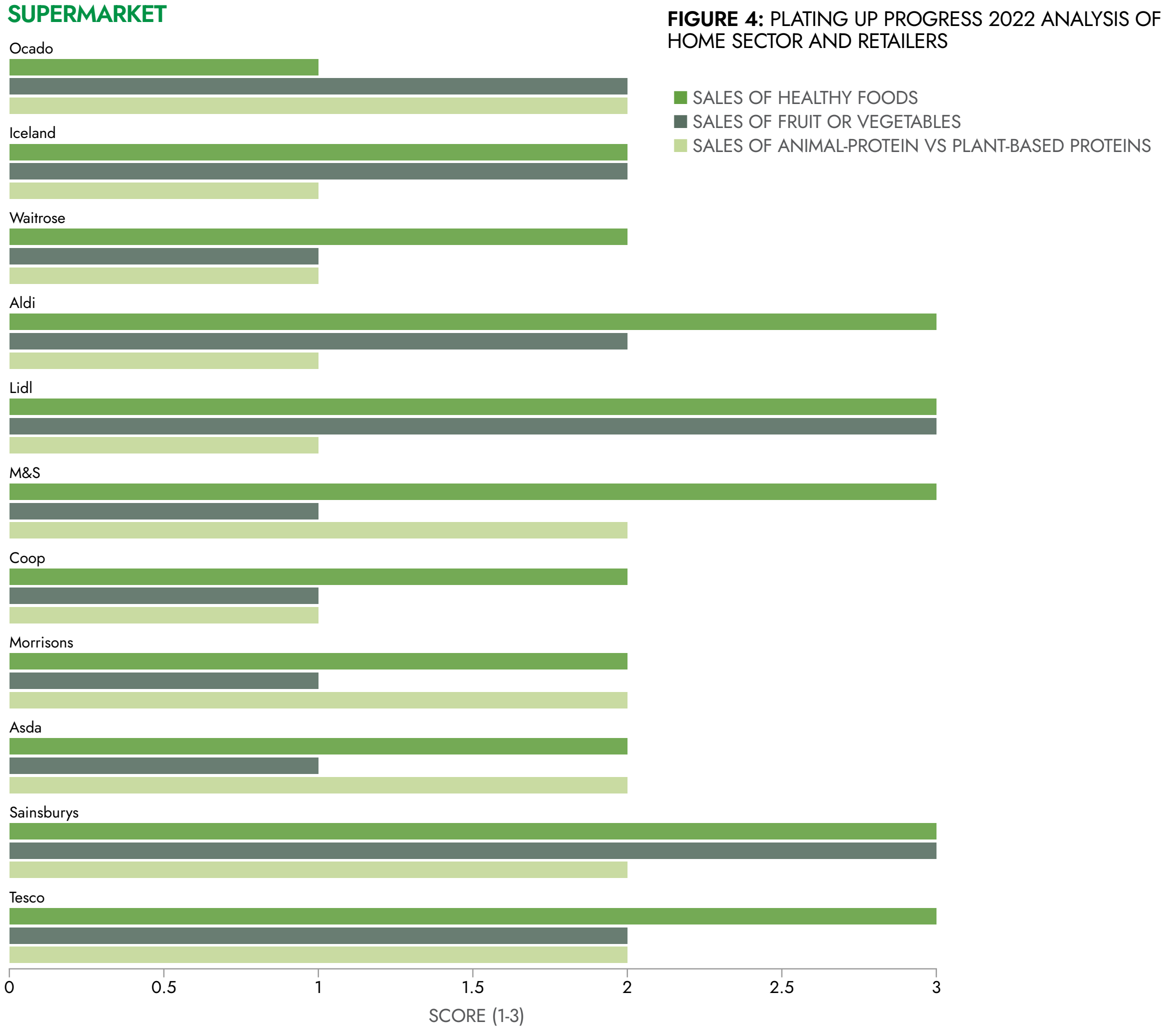
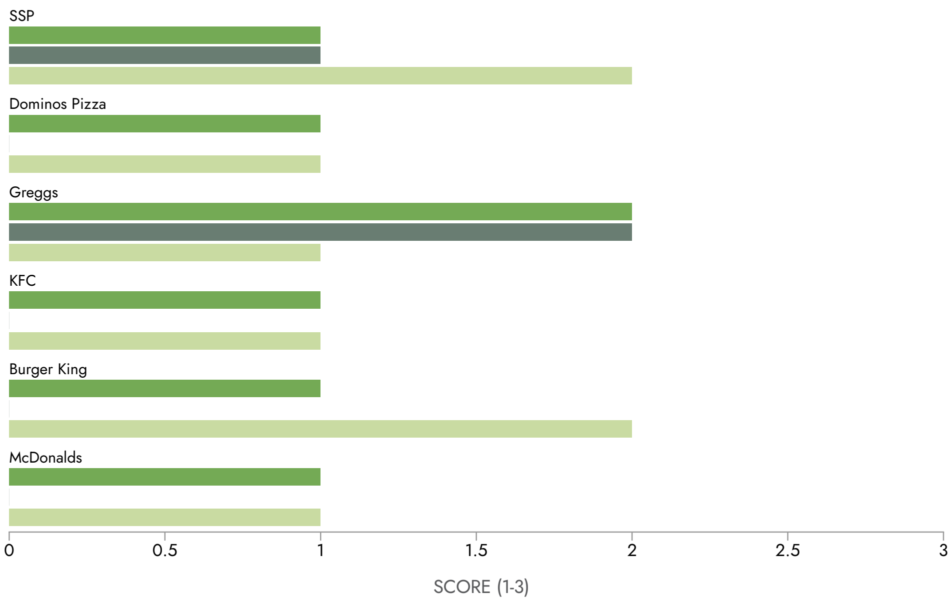


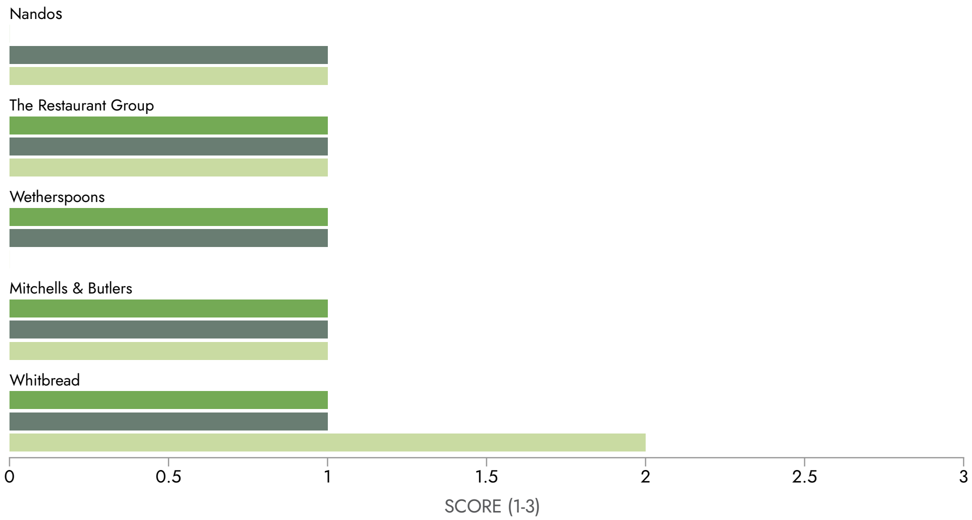
FIGURE 4: PLATING UP PROGRESS 2022 ANALYSIS OF THE OUT OF HOME SECTOR AND RETAILERS (CONTINUED)

- SALES OF HEALTHY FOODS
- SALES OF FRUIT OR VEGETABLES
- SALES OF ANIMAL-PROTEIN VS PLANT-BASED PROTEINS

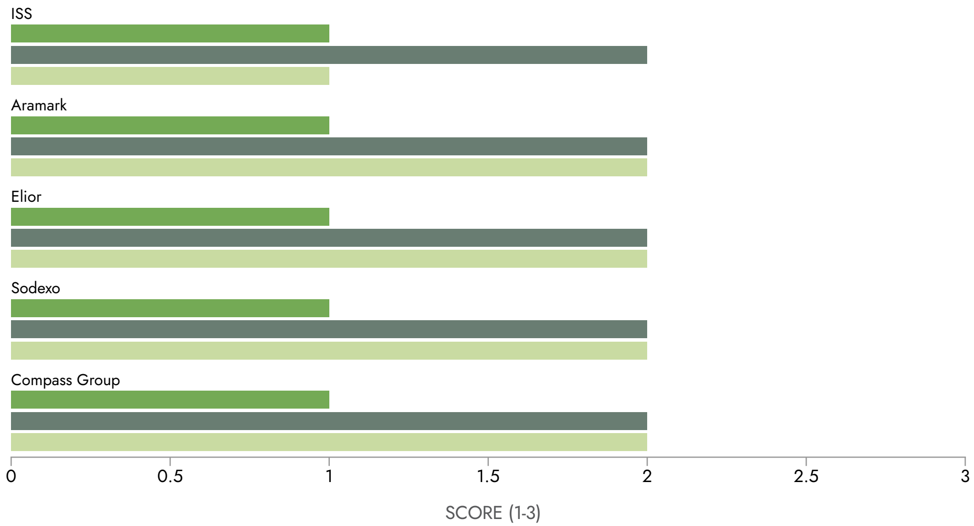
QUICK SERVICE RESTAURANTS



CASUAL DINING



CATERERS

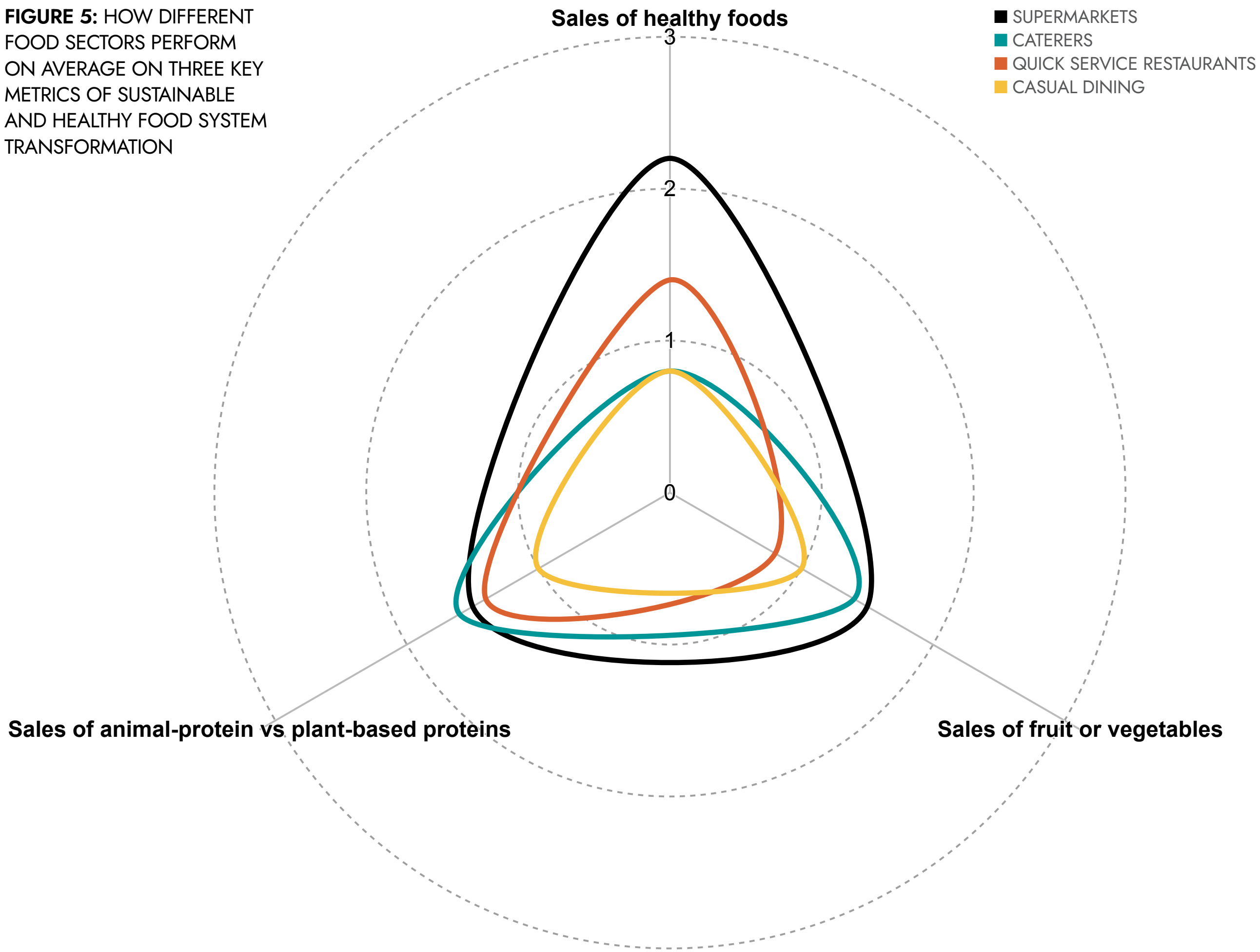


THE OUT OF HOME SECTOR IS NOT SETTING TARGETS

The level of disclosure outside the supermarket sector is significantly worse. **Greggs is the only quick service restaurant business to have a target for sales of healthy food**. Contract caterers fare slightly better, with Compass Group, Sodexo and ISS all having targets for the reporting of sales of healthy food.

Figure 5 shows the average performance of food businesses by sector, showing that casual dining and quick service restaurants are lagging behind supermarkets and contract caterers across all three metrics that look at healthy and sustainable diet performance.

FIGURE 5: HOW DIFFERENT FOOD SECTORS PERFORM ON AVERAGE ON THREE KEY METRICS OF SUSTAINABLE AND HEALTHY FOOD SYSTEM TRANSFORMATION



More complete data on this and wider metrics used in our Plating Up Progress dashboard can be found here for UK-operating **supermarkets**, **caterers**, **quick service restaurant chains** and **casual dining chains**.

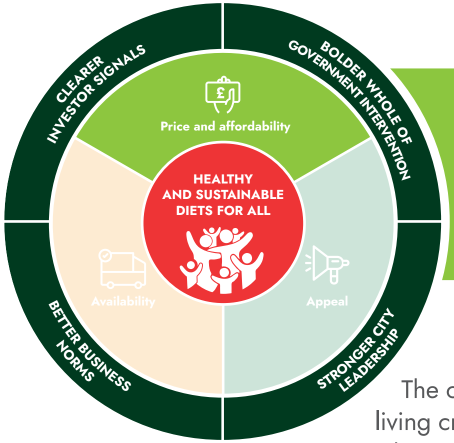
2 DELIVERY OF PROGRESS AGAINST TARGETS

TARGETS NEED TO BE SUPPORTED WITH IMPLEMENTATION PLANS TO BE EFFECTIVE

Targets are important for establishing a company's strategic priorities and ambition, as well as providing a common goal to engender a sense of collective workforce pride in the ethics and success of the business. They have little value however, without the support of clear plans and strategies for their achievement.

A series of key dietary drivers influences food choice. These are price and affordability, appeal, and availability. This next section looks at the different strategies food businesses could put in place to deliver their sustainability and health commitments through the lens of these dietary drivers, identifying examples of both leaders and laggards.

FIGURE 6: KEY DRIVERS OF DIETARY CHANGE



i. Price and Affordability

Healthy and sustainable food needs to be more affordable than less healthy and unsustainable alternatives

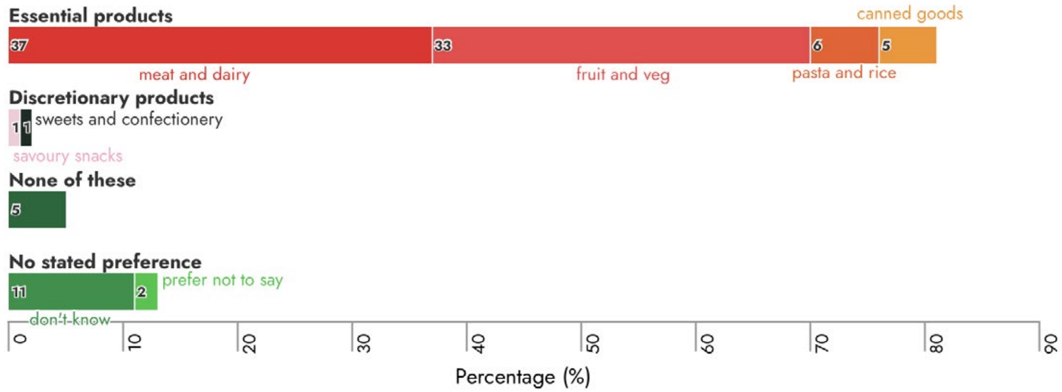
The current cost of living crisis is plunging more households into food insecurity. The cost of the Government's recommended healthy diet (the Eatwell Guide) amounts to 47% of the poorest fifth of households' disposable income compared with just 11% for the wealthiest fifth of households[15]. Further impacting on the affordability of a healthy diet is the fact that food prices are rising extremely rapidly in the wake of the Covid-19 pandemic and the invasion of Ukraine. ONS data show that while sugar and confectionary prices have risen by 6.6% in the 12 months to August 2022, healthy staples such as vegetables, bread, meat and dairy have all gone up by more than 12%.

In a recent survey 9.7 million adults lived in households where people reported they had gone without food or had been unable to physically get it in the past month, twice as many as at the start of the year[16]. As food insecurity goes up, so too does childhood obesity as families on low incomes are pushed into buying less healthy foods that are cheaper and more filling per calorie and much more heavily promoted than the nutritious options. We have seen that healthy calories are almost three times more expensive than less healthy ones, and that the cost of a healthy diet is out of reach for a significant proportion of the population. Evidence also shows **that citizens want healthy food to be more affordable, with 81% of adults wanting essential items to be put on promotion (as opposed to just 2% wanting to see more promotions of HFSS foods)**[17]. The relative price of food must be rebalanced so that healthy and sustainable food is more affordable than less healthy and unsustainable food.

FIGURE 7: YOUGOV SURVEY FROM APRIL 2022 OF UK HOUSEHOLDS

81% of households would find it most helpful for supermarkets to put essential products on promotion

Thinking about the rising cost of living...Which ONE, if any, of the following food items would you find MOST helpful for supermarkets to put on promotions/ discount in order to help with your weekly shopping bill?



Survey conducted by YouGov Plc. between 11th-12th April 2022 with 2083 UK adults (ages 18+). The survey was carried out online. The figures have been weighted and are representative of all UK adults 18+.

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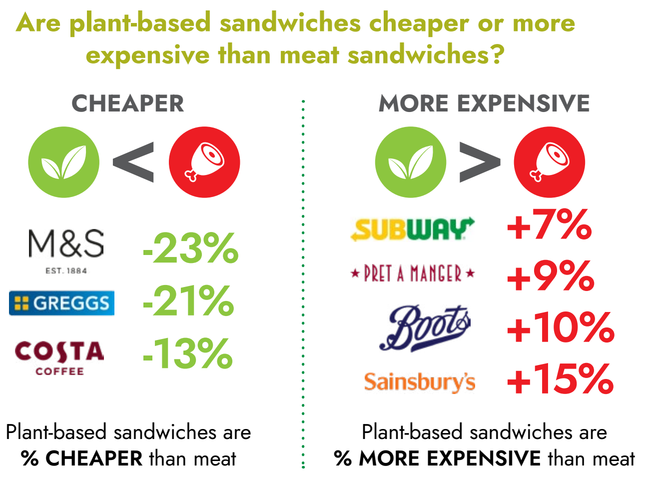
Plant-based alternative products must not be more expensive than less sustainable products

Eating Better's recent review of sandwiches across food service and supermarkets shows that in most stores, plant-based sandwiches cost more than meat, fish or other animal protein-based fillings (£3.25 on average), making the most sustainable option less accessible[18]. Alternative milks are also more expensive than dairy milk. **Oat and rice milks are the most expensive alternatives at £1.79 and £1.72 per litre respectively**. Soya is more affordable at £1.31 per litre. By contrast, dairy milk is just £1.00 per litre on average (based on dairy milk sold in 2 pints)[19].

WHAT CAN THE GOVERNMENT DO?

As well as businesses needing to act, the government must also engage with the need to shift the UK towards more healthy and sustainable diets. Despite clear recommendations from both the Climate Change Committee and the National Food Strategy on reducing consumption of animal based foods, the government has to date failed to acknowledge that a dietary shift will be required if the UK is to meet Net Zero commitments. One place where government intervention could help to rebalance the relative cost of more and less sustainable products is through fiscal intervention. Using fiscal incentives and disincentives would be a powerful lever for encouraging sales of healthier and more sustainable products.

FIGURE 8: COMPARING THE PRICE OF MEAT AND PLANT-BASED SANDWICHES (REPRODUCED FROM EATING BETTER)



The outlook is better with ready meals. Plant-based and vegetarian meals cost less at most retailers. The Co-op has committed to cutting the cost of its plant-based range to the same price as equivalent meat and dairy-based products and is delivering on this target with meat-based meals costing 9% more than their plant-based range in 2021, a switch from the previous year when their meat meals were priced 8% lower than their plant-based foods. Conversely, Iceland is moving in the wrong direction. The price for their meat meals has gone from being 3% cheaper than plant-based dishes, to 30% cheaper in 2021[21]. Both retailers and the Out of Home sectors need to address this price imbalance so that sustainable food is cheaper than unsustainable food.

HOW AFFORDABLE ARE SUPERMARKETS?

At a time when food insecurity is so high the price of nutritious food is essential. A price comparison of 52 staple grocery items shows that Lidl has been the cheapest supermarket throughout the first half of 2022, with Morrisons and Ocado in the second bottom spot, beaten unsurprisingly by Waitrose.

FIGURE 9: PRICE COMPARISON OF GROCERY STAPLES AT THE MAJOR SUPERMARKETS

£	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE
CHEAPEST	Lidl	Lidl	Lidl	Lidl	Lidl	Aldi
	Aldi	Aldi	Aldi	Aldi	Aldi	Lidl
	ASDA	ASDA	ASDA	ASDA	ASDA	ASDA
	TESCO	TESCO	TESCO	Sainsbury's	Morrisons	TESCO
	Sainsbury's	Sainsbury's	Sainsbury's	ocado	Sainsbury's	Sainsbury's
	Morrisons	Morrisons	ocado	TESCO	ocado	Morrisons
	ocado	ocado	Morrisons	Morrisons	TESCO	ocado
MOST EXPENSIVE £	Waitrose	Waitrose	Waitrose	Waitrose	Waitrose	Waitrose

Source: WHICH? (2022) Supermarket comparison.

MAXIMISING GOVERNMENT SCHEMES IS A GOOD STRATEGY FOR MAKING HEALTHY FOOD MORE AFFORDABLE

The Government's Healthy Start scheme offers funds worth £4.25 per week to pregnant women and children (0-4 years) from low-income families, as well as to all pregnant women under the age of 18. Funds can be used to purchase fruit, vegetables, pulses, milk and infant formula and the scheme is an important safety net for those less able to afford healthy food.

Before Healthy Start was digitised, retailers were able to add value to the scheme, providing customers with additional money to spend on healthy food. Retailers that leveraged this opportunity offered the following:

- **Sainsbury's** topped up Healthy Start vouchers with a **£2** coupon towards the customers' next shop.
- **Waitrose** topped up the vouchers by **£1.50**
- **Lidl** deducted **£1.15** off their customers' shop
- The **Co-op** topped up the value of Healthy Start coupons by **£1**
- **Tesco** gave shoppers a 'money-off coupon' worth **£1** to redeem off their next shop
- **Iceland** gave their shoppers free frozen veg worth **£1** per voucher

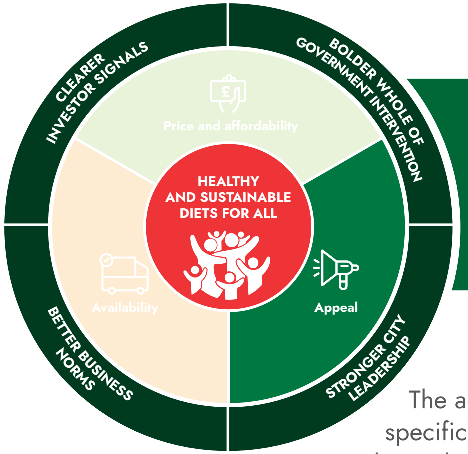
Aldi, **Asda** and **Morrisons** did not provide additional support to the Healthy Start scheme.

However, since the Healthy Start scheme was digitised and the vouchers replaced with a Mastercard, persistent unresolved technical problems have prevented retailers from offering additional support. Some major food companies are nevertheless making commendable efforts to increase uptake for the scheme. For example, Sodexo has partnered with 'The Bread and Butter Thing', a charity that checks eligibility and signs up customers as food parcels are delivered. Waitrose has promoted the Healthy Start scheme through its 'Healthy Happy Homes' programme, while Iceland has to date been the most proactive business in trying to increase awareness of Healthy Start and tackle the wider issues around food insecurity.

DEEP DIVE: HOW BUSINESSES ARE SUPPORTING LOW INCOME GROUPS TO ACCESS VEG

Building on Iceland's promotion of Healthy Start and Best Start (the Scottish equivalent of the scheme) to customers and communities in 2020/21 - which included a 12-month offer of a free £1 pack of frozen veg for every voucher presented in stores - the business has relabelled all of its own brand milk to advertise the schemes over the next two years. 81 million milk bottles will advertise the Healthy Start scheme in England and a further 9 million bottles will carry information about the Best Start scheme in Iceland's Scottish stores. The retailer has also created special campaign home delivery vans which will deliver in areas of low Healthy Start take-up across the UK and be seen by thousands of people each week. From September 2022, a second phase of the campaign has also seen Healthy Start and Best Start Foods promoted on 100 million packs of frozen fruit and vegetables over the next two years – raising valuable awareness of the scheme among eligible families. A partnership with Del Monte will also see the Healthy Start scheme on 4.6 million packs of the brand's frozen fruit products.

Iceland has also partnered with award winning ethical credit provider Fair for You to pilot bespoke micro loans - supporting 3,500 financially excluded families who are vulnerable to being hit by unexpected shocks to their budget. By providing average loans of between £25 and £75, and harnessing Fair for You's deep knowledge of the sector, the early effects of the Food Club loan scheme indicate a 65% reduction in food bank use, and an 80% improvement in the mental health of customers, with 95% of them reporting that Food Club access has given them the opportunity to obtain adequate food to feed their family. The pilot scheme has been developed to support the 12 million people unable to access mainstream credit in the UK, many of whom rely on Universal Credit.

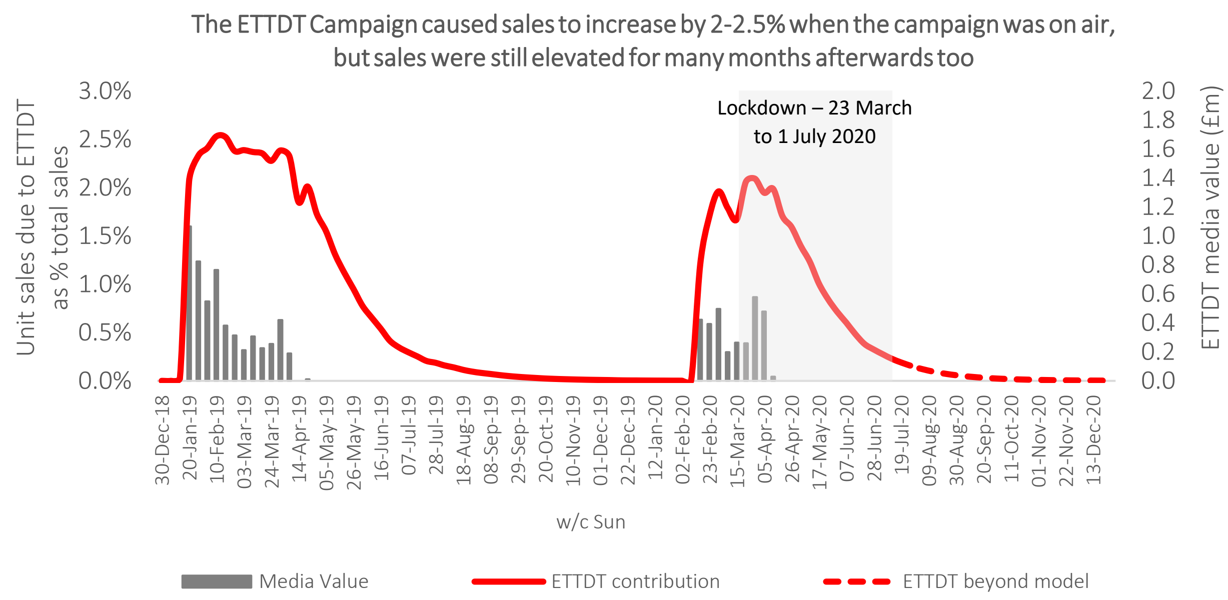


ii. Appeal

Addressing the imbalance in marketing spend between more healthy and less healthy foods is one tactic businesses should be using to deliver on their health and sustainability commitments.

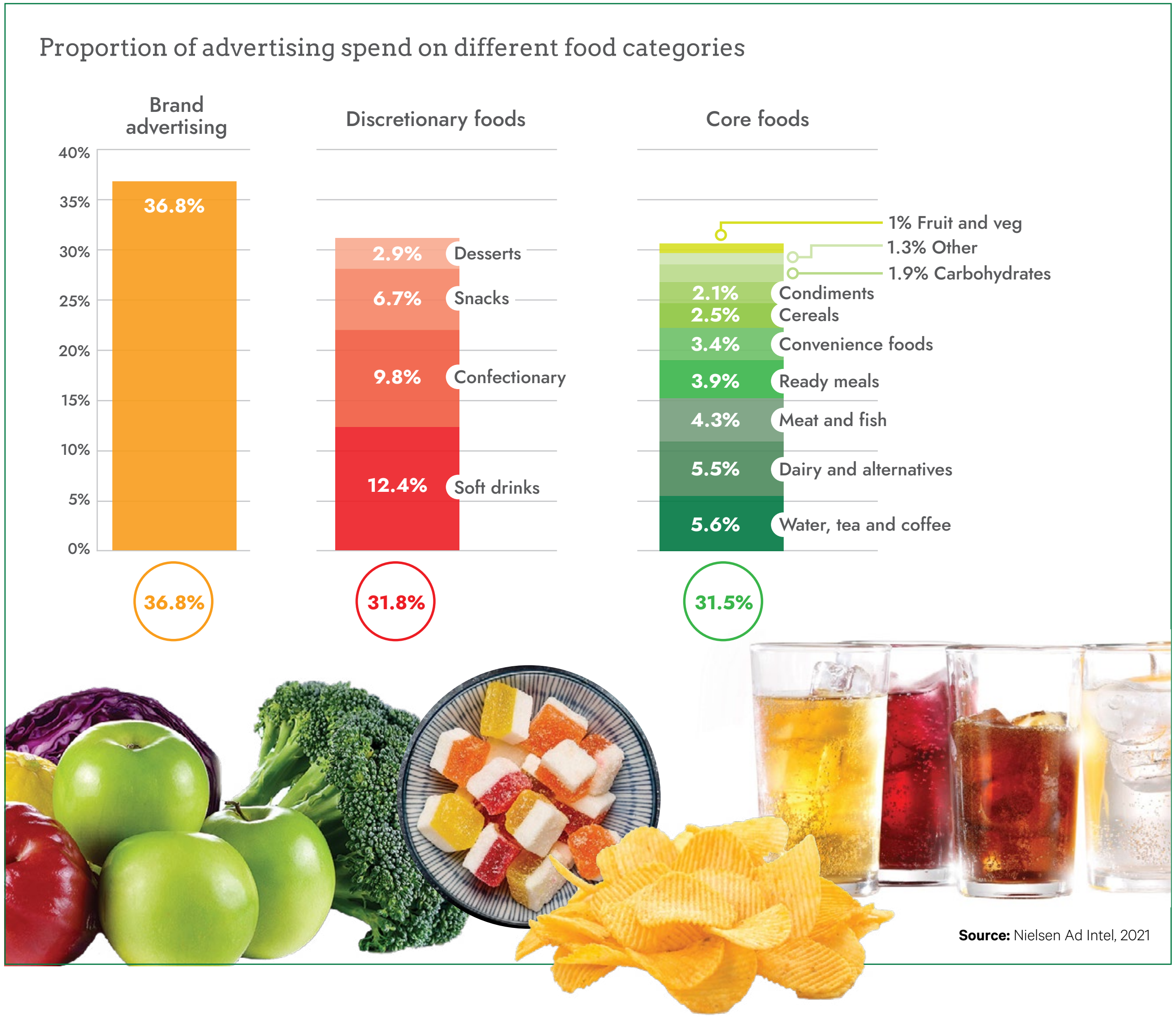
The advertising of specific foods is a tried and tested way of increasing sales. The problem is that advertising is now consistently skewed towards the promotion of less healthy foods. **Approximately a third (32%) of all food and soft drink advertising spend goes on discretionary foods, compared to just 1% for fruit and vegetables**[22]. Advertising for HFSS foods is correlated with higher consumption of these foods. However, campaigns like Veg Power and ITV's Eat Them to Defeat Them (ETTDT), an annual advertising campaign and schools programme run in partnership with a wide consortium of other media partners and food businesses, have shown that advertising healthier foods can have a positive effect on sales. An evaluation of the ETTDT advertising campaign in 2019 and 2020 saw an increase in veg sales of between 2-2.5% while the campaign was on air, with a sustained elevation of sales for many months after the campaign ended[23].

FIGURE 10: THE IMPACT OF EAT THEM TO DEFEAT THEM CAMPAIGNS ON SALES OF VEGETABLES (REPRODUCED FROM VEG POWER)



Source: Pearl Metrics modelling based on IRI sales data of Groc Mults.

FIGURE 11: ADVERTISING SPEND ON FOOD CATEGORIES (REPRODUCED FROM THE BROKEN PLATE REPORT)



Source: Nielsen Ad Intel, 2021

ADVERTS TO PROMOTE VEGETABLES AND PULSES ARE A GOOD WAY OF HITTING BOTH HEALTH AND SUSTAINABILITY TARGETS

Diets high in plants and low in animal-sourced and processed foods have the potential to confer both health and environmental benefits. One large systematic review reported positive health outcomes for the majority (87%) of studies looking at the impact of sustainable diets, with greenhouse gas emissions on average 25.8% lower for more sustainable diets compared to current consumption patterns[24]. Vegetables and pulses are foods where the health and environmental benefits of increased consumption are unequivocal. By rebalancing marketing spend in favour of vegetables and pulses, businesses could help to meet both health and sustainability targets.

DEEP DIVE: HOW BUSINESSES ARE SUPPORTING VEG PURCHASING

Although most people know we need to eat more vegetables, decades of public health messaging has failed to shift stubbornly low levels of veg consumption in the UK. Veg Power and Peas Please are two initiatives aiming to change this, with both having demonstrated how leveraging business support for healthier foods can tangibly impact on sales.

Veg Power uses creative advertising and communication to inspire children to adopt vegetable loving habits that they will keep for life, and in turn share with their children. Together with ITV, Veg Power's *Eat Them to Defeat Them* advertising campaign has attracted regular support from the following food businesses and demonstrated that by directing marketing and advertising budgets towards healthier foods it's possible to impact on sales.

TESCO Sainsbury's co op ASDA LIDL ALDI

Peas Please is the sister programme to Veg Power, focusing on improving the availability and accessibility of veg across the UK. Since Peas Please launched in 2018, 109 organisations have made commitments to increase their marketing and sales of veg. As of 2021 seven organisations had fully delivered on their pledge commitments, and since 2017 our community of pledgers have served or sold an additional 636 million portions of veg.

Although mandatory reporting, if delivered, would target larger businesses with over 250 employees, Peas Please has demonstrated the importance of creating a movement that successfully targets the food system as a whole. Smaller businesses have also made impactful commitments to focus on veg. For example, Swperbox, a recipe delivery and food box delivery company, have committed to all recipe boxes containing a minimum of two portions of veg.

Peas Please
Making a pledge for more veg

VEGPOWER

DEEP DIVE: SAINSBURY'S 'HELPING EVERYONE EAT BETTER' CAMPAIGN

Sainsbury's launched 'Helping Everyone Eat Better' as a way to communicate the link between planet, food and health. The ground-breaking campaign provided simple steps to eat better, providing recipes built around the principles of the Eatwell Guide and the link between achieving these recommendations and improving personal and planetary health.

The aims were to:

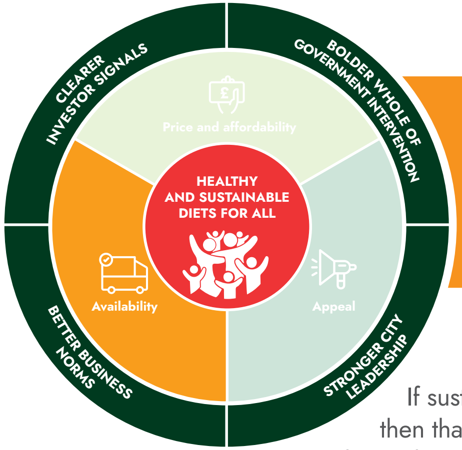
1. Educate customers on the link between what they eat and the impact on the environment
2. Share specific nutrition and environmental facts about fruit, vegetables and pulses and offer recipe inspiration

Launching with a bang, a TV ad voiced by Stephen Fry aired on prime time soap opera slots such as Coronation Street and Emmerdale, as well as during The Masked Singer. In addition, the campaign included billboard and other Out of Home banners, radio, social and digital advertising, emails to customers, and in-store activity such as signage and coupon-at-till with recipe inspiration.

At the same time Sainsbury's also ran a Nectar scheme to incentivise customers, the Great Big Fruit and Veg challenge, where customers were rewarded for buying more fruit and vegetables. Ads and recipes encouraged customers to embrace pulses by mixing half pulses with half meat in some of their favourite recipes. As with the launch the pulses TV ad was voiced by Stephen Fry and aired on prime TV slots. During that time Sainsbury's provided customers with tasty, easy to cook recipes and facts about why pulses are good for them and good for the planet.

Targeted and personalised marketing aimed to incentivise customers to make healthier and more sustainable switches. Sainsbury's ran a new playback email, individualised to customers and raising awareness of the power of pulses as well as sharing where customers ranked compared to other pulse purchasers. A soup campaign provided convenient and inspiring soup solutions which broke down some of the barriers to eating better. This campaign also included Out of Home banners, radio and print advertising including a recipe booklet featured in BBC Good Food, social media and influencers, and an email offering customers a soup recipe based on the products they bought.

These marketing and advertising campaigns tie into Sainsbury's healthy and sustainable diet target for at least 85% healthy and better for you sales tonnage by 2025.



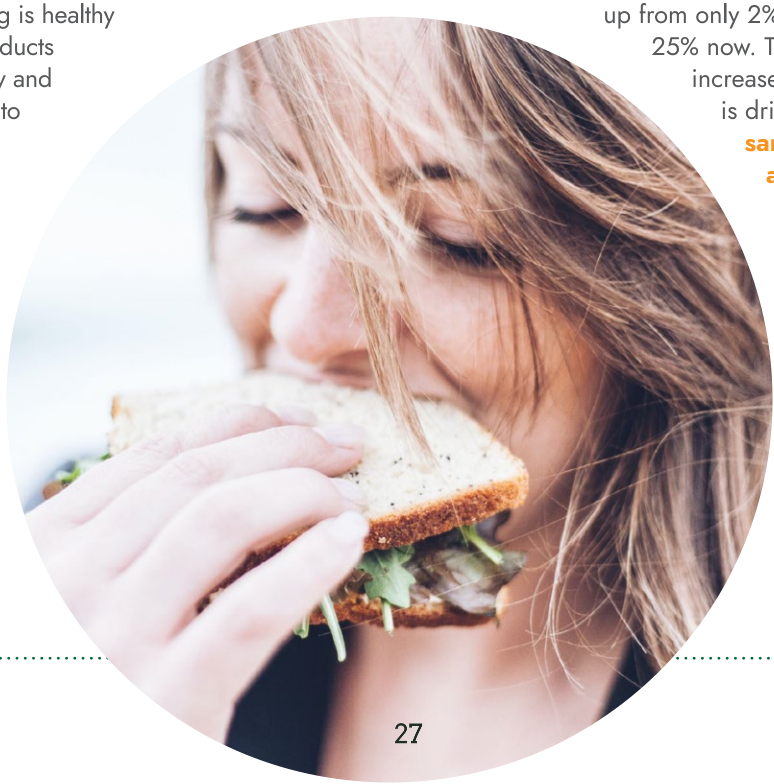
iii. Availability

Increasing the availability of healthier and more sustainable foods in all parts of the country would help to make these foods more accessible

If sustainable or healthy food options are not available, then that choice is removed for citizens. Trials have shown that changing the balance of a range so that there are more healthier options (and conversely less unhealthy options) encourages healthier eating[25]. **Yet products we routinely see on supermarket shelves and on menus in restaurants, cafes and takeaways are predominantly HFSS foods.** Measures like calorie and nutrition labelling can be helpful in some cases, but they put the onus squarely on individuals to decipher whether something is healthy or not. If manufacturers instead reformulated their products and businesses offered a greater proportion of healthy and sustainable options it would make it easier for people to truly have a choice.

CONSUMER DEMAND FOR VEGAN PRODUCTS HAS HELPED TO INCREASE AVAILABILITY OF PLANT-BASED FOODS

The growing trend for veganism, especially among 18-24-year-olds, has contributed to an increase in plant-based food availability in stores and restaurants. This year's Veganuary led to a record breaking 600,000 people to pledge to eat vegan food for the month of January and coincided with the launch of several plant-based ranges[26]. **M&S introduced 175 new products in their Plant Kitchen range** with Babybel, Starbucks and Burger King also releasing vegan products.



The growing consumer demand for plant-based alternatives is reflected in the increased availability of plant-based sandwiches, with alternative protein fillings shooting up from only 2% of the vegetarian and plant-based range in 2019 to 25% now. The Out of Home sector has moved very quickly to increase the number of meat-free sandwich options they sell and is driving change within the food industry. **A third of the sandwiches on offer within the Out of Home sector are meat-free with 50% or less being meat-based at Boots, Pret, Costa and Caffe Nero**[27].

It is important to note, however, that an increase in plant-based food does not automatically equate to more vegetable consumption. Although the numbers of people signing up to take part in Veganuary have increased, sales of vegetables sold pre-pandemic were down 6.5% between 2016 and 2020[28].

RETAILERS ARE PERFORMING WORSE THAN THE OUT OF HOME SECTOR IN MAKING SUSTAINABLE FOOD AVAILABLE...

Retailers aren't moving as fast as the Out of Home sector in offering plant based, more sustainable options, with some retailer offers having worsened. Tesco have shrunk their meat-free sandwich offer by 28% and Morrisons and Asda have removed plant-based options from their sandwich range entirely, down from an already low 4% and 3% respectively in 2019[29].

Although Tesco have regressed on their sandwiches they have made significant improvements in their ready meal range, increasing the amount of vegetarian or plant-based ready options by 103% from 2018 to 2021. Aldi's range has also gone up since 2018 by 175% while Co-op and Morrisons are both up by more than 60%. Despite the improvement, Morrisons and Aldi still have some of the meatiest ready meals at 70%, while Iceland is at the bottom of the table with 82% of its ready meals containing meat[30].

FIGURE 12: INVESTING IN PLANT-BASED: HOW UK SUPERMARKETS ARE PERFORMING

Within the Out of Home sector sustainable products are more readily available, with Wahaca leading the way by making 51% of their menu vegan or vegetarian. Chefs within the company are inspired to develop vegan and vegetarian dishes by sourcing quality ingredients from British producers, such as Hodmedods and Riverford. The importance of provenance and sourcing is reinforced in the company's 'food bible' for staff with the restaurant chain also offering in-house dairy alternatives for popular menu items.

....BUT THE OUT OF HOME SECTOR STILL HAS A LONG WAY TO GO IN MAKING HEALTHY FOOD MORE AVAILABLE

While the Out of Home sector is doing well when it comes to making vegetarian and plant-based foods more available, they are generally weaker on nutrition. The average calorie content of products on offer in the Out of Home sector is about double that of retail, and salt levels are also on average higher[31]. The most sugary item from a supermarket has less than a quarter of the amount of sugar than the least sugary item from the Out of Home sector, and we only get one portion of vegetable for every four meals eaten out of the home[32].

Casual dining, quick service restaurants and caterers can easily adjust portion sizes, refresh menus and introduce ethically sourced or more nutritious ingredients to make healthy food more available. A review of children's menus from the 20 top restaurant chains in the UK last year found **JD Wetherspoon, Wahaca, Zizzi and Wagamama are the best outlets for making healthy eating easy, and for providing food options that are sustainable and ethically sourced**[33]. McDonalds and Hungry Horse were among the lowest scorers, with Pizza Hut in last place, black marked for having nachos in the salad bar and over 46g of sugar (almost twice the NHS's recommended daily allowance for 7-10 year olds) in their typical children's portion of ice cream.

There is currently a glaring gap when it comes to data that would allow us to better understand the impact that food delivery and the growth of takeaways is having on diets. Despite delivery and takeaway sales accounting for 41% of the Out of Home sector's total sales in 2020[34], there is no way of knowing how they are performing from a health perspective. Large delivery and takeaway companies need to start providing data so their health and sustainability performance can be scrutinised.

The average calorie content of products on offer in the Out of Home sector is about double that of retail

WHAT CAN THE GOVERNMENT DO?

Product reformulation is a good option, but industry needs stronger intervention from Government. The Government's voluntary sugar reduction guidelines published in 2015 have had limited success. A survey carried out in 2019 on the sugar content in festive hot drinks showed that while Costa had clearly taken steps to reduce the sugar content of drinks, other companies had made no changes. Starbucks was the weakest performer. Its hot chocolate and seasonal latte were the most sugary drinks available: the Caramel Hot Chocolate with whipped cream containing over 23 teaspoons of sugar and 758 calories[35]. This lack of progress in reformulating sugary milk drinks clearly shows that voluntary reduction is ineffectual, particularly when compared to the progress made in removing sugar from fizzy drinks following the implementation of a mandatory sugar levy. Government needs to play a stronger role in requiring businesses to reformulate products so healthier options are available.

3 ACCOUNTABILITY AND LEADERSHIP

THERE IS A POSITIVE CORRELATION BETWEEN GOOD GOVERNANCE AND COMPANY PERFORMANCE

Ideally businesses who set targets also put in place internal accountability mechanisms to ensure targets are achieved. The Access to Nutrition Initiative's Index of UK Retailers demonstrated the positive correlation between performance and robust governance, with those who did well on governance also scoring highly in the overall Index[36]. Tesco, Lidl, Aldi and Sainsbury's (in that order) had the highest governance scores.

THE FOOD INDUSTRY NEEDS STRONGER ACCOUNTABILITY FOR HEALTH AND SUSTAINABILITY TARGETS.

Out of the 27 major UK retailers, contract caterers, casual dining and quick service restaurants, only nine of them report on their targets for sales of healthy food, fruit and vegetables and animal vs plant-based protein procurement in annual corporate or sustainability reports. These are: Compass Group, Sodexo, ISS, Greggs, Tesco, Sainsbury's, Lidl, Aldi and M&S[37] (Plating Up Progress). In ATNI's Index, supermarkets scored an average of 2.9 out of 10 on accountability, lower than the average performance across all other topics. **Lidl and Sainsbury's are the only two retailers where formal accountability for implementing the company's nutrition strategy lies with the CEO or a senior director**. For Asda, M&S, Morrisons, Tesco and Waitrose, accountability sits either with a committee that reports to the Board or with an executive manager.

Retailers are consistently falling short of their targets as far as accountability for sustainability goals is concerned. Retailers are failing to apply their climate commitments to the way they sell food to customers; Tesco, Asda, Lidl, Aldi and M&S are all guilty of using made up farm names in their branding when selling meat to customers[38]. **The Co-op and Tesco are the only retailers currently linking their sustainability commitments to top executives pay.**

RELIABLE DATA IS SCARCE, ESPECIALLY FOR THE OUT OF HOME SECTOR

Research so far on accountability and governance in the food industry has been focused on retailers with very little data available for the Out of Home sector. This means it is difficult to build a clear picture of what internal accountability mechanisms are in place for food businesses as publicly available information on company bonuses and staff KPIs is scarce.

There are some examples of good practice within the Out of Home sector:

- **BURGER KING**: Despite not having any transparency on their performance, Burger King have identified key ESG targets that link to their 'Burger King for Good' agenda. Achievement of these targets unlocks a proportion of the bonus payments available for all team members.
- **GREGGS**: Accountability for implementing the 'Greggs Pledge' described as ten things to make the world a better place by 2025, sits with the Company Secretary with annual management bonuses connected to targets laid out in the company's sustainability strategy. In 2020 – 2021 bonuses were connected to performance on reducing scope three emissions and the following year bonuses were connected to food waste and redistribution targets. The business currently has plans in place to build in long-term incentives for their targets at both Board and exec level.

Roisin Currie CEO
Greggs

“At Greggs, we know a sustainable business is a successful one and we are dedicated to doing good in both the communities we serve and around the world. We publish our ESG commitments in our annual sustainability report, The Greggs Pledge: 'ten things that we're doing to help make the world a better place by 2025'. Having an integrated approach to sustainability with published targets enables us to have clear strategic focus and impactful resource allocation. Senior leaders within the business are given responsibility for individual areas of the Greggs Pledge and it's great to see how passionate they and their teams are in driving this agenda forward. This drives action, innovation and, most importantly, ensures the successful delivery of Greggs sustainability commitments.”

In the absence of government regulation, business can still give a clear signal of their commitment to health and sustainability targets through their public actions and commitments.

Sainsbury's and Tesco both demonstrated their commitment to improving public health when they announced they would continue with their plans to ban multibuys on HFSS foods, despite the Government's delay in implementing the regulations on these and advertising restrictions for HFSS foods. Disappointingly, Morrisons announced that they would continue to offer multibuy promotions on such foods, a move that clearly demonstrates that **without a level playing field when it comes to regulation many companies will continue to prioritise profit over public health**.

PROGRESSIVE COMPANIES ARE PUSHING GOVERNMENT TO INTERVENE MORE AND HELP LEVEL THE PLAYING FIELD

In the run-up to the publication of the Government's Food Strategy, **16 food companies signed a joint statement calling for Government to make sales-based reporting of food mandatory**. These companies were:

1. **Aldi**
2. **Bidfood**
3. **Co-op**
4. **Compass Group UK & Ireland**
5. **Food4innov8ions Ltd**
6. **Greencore**
7. **Greggs**
8. **Lidl GB**
9. **Perfectly Fresh Ltd**
10. **Sainsbury's**
11. **Sodexo**
12. **Sysco GB**
13. **Tesco**
14. **Waitrose**
15. **Young's Seafood**
16. **M&S**

Since the announcement of the Food Data Transparency Partnership it has been encouraging to see Sodexo and Tesco reiterate their support for mandatory reporting and their commitment to working with Government and wider industry to ensure the right metrics and approach are put in place. However, more businesses should publicly challenge the Government to produce stronger policies. This will be crucial in ensuring that the sector as a whole moves towards embracing a business model that supports a healthier and more sustainable food system that works for everyone. Time is running out.

Simon Roberts
Sainsbury's CEO

"As part of our pledge to Help Everyone Eat Better, we've had a longstanding commitment to drive healthier sales. We know that by setting targets that our operating board is ultimately accountable for, we're able to embed our brand promise into the core of our business, from pricing, product range and pack size to reformulation and incentives, we're able to create the impact needed to shift customer behaviour towards healthier and more sustainable diets. We therefore support mandatory reporting on simple health and sustainability metrics. We believe that by collaborating and collectively identifying areas for growth across the industry, we'll be able to create long lasting change at the speed and scale needed."

Ken Murphy
Tesco CEO

"We know our customers want to lead healthier and more sustainable lives and they want us to help them do that. As the cost of living rises, we need to make sure that tighter budgets don't mean poorer diets and that everyone can shop in a way that's better for them, the planet and their pocket. We're already working hard on this – from our Better Baskets campaign, which removes some of the barriers to healthier and sustainable choices, to our reformulation programme which has already removed more than 50bn calories from products since 2018. But there's lots more we need to do. We have targets across all key areas, including increasing sales of healthy products as a proportion of total sales to 65% by 2025. Only by truly understanding where we are as an industry, can we start to make progress. It needs transparency, ambition and collaboration from all of us to drive the truly transformational change that is required."

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