



### **Executive Summary**

The Coalition will have two top-level strategic focus areas over the next 12 months. These are:

- Greater business transparency and accountability, and
- Emergent risks and opportunities for investors.

These are in turn broken down into sub-focus areas. For <u>Greater business transparency and accountability</u>, these are: the implementation of the mandatory reporting and target setting on healthiness of sales commitment by the UK government and continued advocacy on wider sustainability and sustainable diet metrics; UK international commitments and alignment/interoperability with international reporting initiatives, including advocating for mandatory scope 3 emissions reporting; fiscal interventions; and transparency around corporate lobbying on health / food policy. This work will centre around continued engagement with the Food Strategy process, and will also likely feed into a Food Foundation policy ask for a *Great British Food and Farming Act*, focused on creating a clearer future regulatory agenda to build greater certainty into new economic opportunities, levelling the playing field with mandatory disclosures and target-setting, and building the resilience of British food supply chains.

For Emergent risks and opportunities for investors, the Coalition's Advisory Group has recently decided to establish a Risks & Opportunities Panel of Experts (ROPE), who will help the Coalition and Secretariat think through some knottier areas or issues of the food system that are of relevance to investors. Some of the topics it might be called upon to provide advice on could include: making the case for responsible, long-term growth in the food industry; regenerative agriculture; the increasing use of AI for mandatory business reporting or other tech innovations in the food space; nature-based solutions; strengthening the framing for the investment case/materiality for the Coalition's policy asks; providing case studies of how risks have materialised for, or how opportunities have been capitalised on by, a specific company or financial institution. This focus area will also maintain a watching brief on two sub-focus areas: the transition towards plant-based proteins; and Ultra Processed Foods (UPFs).

The priority areas where most of the emphasis will be placed will be under focus area 1.

The rationale, ask(s), proposed methods and outputs, and timeframes for each sub-focus area are detailed below. The work will continue throughout 2026 and timelines will adapt as needed.





## 1. Greater Business Transparency and Accountability

A. Implementation of the mandatory reporting and target setting on healthiness of sales commitment by the UK government; continued advocacy on sustainability metrics (priority area)



This work will build on the Coalition's work to drive continued momentum for mandatory reporting, highlighting corporate

disclosure as an enabler of stronger and better growth, improved business resilience and facilitating investor funding allocation decisions, and policy development. The Coalition will advocate for the consistent set of reporting metrics for health shortlisted by the FDTP Health working group in addition to metrics on sales of fruit and vegetables and protein sales by source to move forward, and push for scope 3 emissions reporting to also be placed on a mandatory footing.

#### Asks by the Investor Coalition:

- Continue to press for agreement on a standardised set of health and diet metrics, with swift and robust implementation of mandatory reporting requirements with appropriate enforcement
- Continue to advocate for scope 3
   emissions reporting to be placed on a
   mandatory footing, and for well-designed
   wider environmental (e.g.
   nature/biodiversity) metrics to be
   developed and implemented
- Develop joint investor-business support for improved corporate disclosure and mandatory reporting of the agreed health and sustainability metrics
- Capitalise on new policy opportunities as they develop, including via the Food Strategy process

#### Proposed outputs and methods:

By the Investor Coalition:

- Continued engagement with DHSC on the healthy sales metrics and healthy food standard policy development process
- Continued advocacy with UK policymakers for the Coalition's asks on the mandatory reporting, including Coalition submissions to government consultations on UK SRS and the Health and Social Care Select Committee inquiry
- Opportunities to feed into parliamentary engagement on the issues using a variety of methods, including strategic communications in a range of media
- Investors speaking at Food Foundation (FF) parliamentary and other events, including those arranged by partner organisations on an ad hoc basis, on the need for mandatory reporting
- By the Food Foundation: Continued engagement in the FDTP eco / Food Strategy process, including holding a roundtable with DBT/HMT

By the Food Foundation:

Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: Throughout 2026; ongoing depending on FDTP and government priorities e.g. the Food Strategy process.





## B. Other internationally-focused reporting initiatives (priority area)

Given the global, interconnected nature of food systems, legislation and other reporting requirements internationally will likely have an impact - directly or indirectly - on UK-operating businesses. Therefore, interoperability, streamlining and alignment is key to reducing the reporting burden and for investors to have comparable data. This is particularly important in relation to how the UK's ISSB endorsement and implementation could impact food businesses, given the disproportionate role scope 3 emissions play in their overall emissions.

#### Asks by the Investor Coalition:

- The UK government to ensure interoperability, streamlining, and alignment with other reporting requirements
- The UK to endorse and implement the ISSB standards in full, and with a doublemateriality approach.

#### Proposed outputs and methods:

By the Investor Coalition:

- Advocacy with UK policymakers for the Coalition's asks on the topic, including the Coalition's submission to government consultation on UK SRS.
- Opportunities to feed into parliamentary engagement on the issue using a variety of methods, including strategic communications in a range of media
- Investors speaking at Food Foundation (FF) parliamentary and other events, including those arranged by partner organisations on an ad hoc basis, on the need for mandatory reporting and alignment/interoperability

By the Food Foundation:

• Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: Throughout 2026 as the need and opportunity arises





#### C. Fiscal measures

Fiscal interventions are one tool at governments' disposal to reorientate food systems so that they better support public health, national GDP, and company returns in the long-term. In current food environments, energy-dense, nutrient-poor foods are readily available, heavily marketed and relatively cheap. Affordability of food is a key determinant of the food environment and changes in price influence consumer demand for many foods and beverages. Fiscal measures, including both taxation and subsidies have long been recognized as a viable policy option to promote healthy diets and the SDIL is widely recognised as a UK success story, reducing sugar consumption without impacting on company sales. Such interventions are required given the mounting economic costs of diet-related diseases generate risks which are material for company bottom lines. Thus, there is a case for investor policy engagement on this issue which is in line with investors' fiduciary duty as investors of clients' assets.

#### Asks by the Investor Coalition:

- Continued and enhanced support for well-designed fiscal measures to be developed, consulted on and implemented in a phased way as part of its policy engagement with government on mandatory levers that can help support a level playing field and reduce long-term risks associated with poor health outcomes. This will align significantly with the work being undertaken by the Recipe For Change coalition and look to build on the success of the Soft Drinks Industry Levy by introducing a new levy or expanding the SDIL to unhealthy foods.
- Support as relevant and appropriate –
  other civil society asks on subsidy
  reallocation towards healthier and
  sustainably-produced food, and away from
  health and environment harming foods
  and production processes.

#### Proposed outputs and methods:

By the Investor Coalition:

- Continued advocacy with UK policymakers for the Coalition's ask on fiscal measures
- Opportunities to feed into parliamentary engagement on the issues using a variety of methods, including strategic communications in a range of media
- Investors speaking at Food Foundation (FF) parliamentary and other events, including those arranged by partner organisations on an ad hoc basis, on the need for well-designed fiscal measures

By the Food Foundation:

• Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: Throughout 2026; ongoing depending on government priorities e.g. the Food Strategy process, and the Recipe for Change coalition's work.





## D. Corporate lobbying transparency (priority area)



Corporate lobbying and conflicts of interest play a part in dissuading or watering down food policy

interventions. Investors need to understand which conflicts of interest are at play and which companies/bodies are actively lobbying against legislation and regulation that would support a shift toward food system transformation (risk) and increased transparency, and help to identify strategic misalignment. There is increasing scrutiny of climate lobbying and therefore an opportunity to do the same for food.

#### Ask by the Investor Coalition:

 UK government to update their transparency processes/register in line with the EU/other countries like Ireland/Canada, and in line with the Responsible Lobbying Framework.

#### Proposed outputs and methods:

By the Investor Coalition:

- Continued advocacy with UK policymakers for the Coalition's ask to strengthen corporate lobbying/conflicts of interest transparency, for example via engagement with the Public Administration and Constitutional Affairs Committee.
- Opportunities to feed into parliamentary engagement on the issue using a variety of methods, including strategic communications in a range of media
- Investors speaking at Food Foundation (FF) parliamentary and other events, including those arranged by partner organisations on an ad hoc basis, on the topic

By the Food Foundation:

- Food Foundation to continue to build on the corporate lobbying pilot study to better understand the scale and impact of corporate lobbying on the UK food system, including producing a relevant briefing to support the Coalition's ask.
- Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: Throughout 2026, including further research and advocacy building on the pilot work.





# E. UK international climate and nature commitments include food systems transformation

Food systems and their health and environmental impacts are rapidly rising up the international environmental bodies' and investors' agendas. COP28 saw the UK becoming a signatory to both the COP28 UAE Declaration on Sustainable Agriculture, Resilient Food Systems, and Climate Action, and the COP28 UAE Declaration on Climate and Health. The Food Declaration requires the signatories to build the commitments into their National Adaptation Plans, Nationally Determined Contributions, long-term strategies, National Biodiversity Strategies and Action Plans, and other related strategies before COP30 (2025). The Health Declaration requires the signatories to build the commitments into Paris Agreement and UNFCCC processes, National Adaptation Plans, Nationally Determined Contributions, and low Greenhouse Gas emissions strategies. Progress will be reviewed at future COPs, so there is now an additional imperative for the government to implement reporting requirements that will facilitate its own progress on, and monitoring of, its international commitments.

#### Ask by the Investor Coalition:

 Predominantly a watching brief, capitalising on opportunities as they arise. UK to ensure that its international commitments around food systems — such as the COP28 UAE Declaration on Sustainable Agriculture, Resilient Food Systems, and Climate Action and the COP28 UAE Declaration on Climate and Health — are reflected as required by the text of the declarations in the UK's NDC and NBSAP associated plans and strategies.

#### Proposed outputs and methods:

By the Investor Coalition:

 Continued advocacy with UK policymakers for the Coalition's ask on this topic

By the Food Foundation:

 Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: As relevant and around major international environmental conferences.





## 2. Emergent Risks and Opportunities for Investors

The ROPE group will assist the Coalition in developing its outputs for this focus area, such as briefings, case studies, evidence and speaking points on specific subjects, and any relevant policy asks. In addition to the kinds of topics referenced above that the ROPE group could be called on to help think through, this focus area will also maintain a watching brief on two sub-focus areas:

## A. The transition towards plant-based proteins

The plant-based and alternative protein sector is continuing to receive significant research funding and there is increasing focus on the need for dietary change and a protein transition in order to ensure that the food system's impact on climate change and biodiversity loss is lessened, with both the Biodiversity and UNFCCC COPs in recent years drawing more attention to food systems and dietary shifts. There are growing risks related to continued investment in industrialised livestock production and processing, and there are both risks and opportunities related to investment in plant-based protein. All of these elements make the case for the Investor Coalition to have a focus on this topic. Investors can highlight the need to ensure health remains central in the move towards plant-based proteins. This could include investors supporting a Food Foundation policy ask around increasing beans in diets, and the associated opportunities for growth in the UK horticulture sector.

#### Asks by the Investor Coalition:

- Government to facilitate R&D and investment into plant-based proteins, in line with the NFS recommendations
- Investors to ensure that health remains a central part of the conversation around plant-based proteins. The majority of plantbased proteins have lower environmental impacts relative to meat products, but there is a wide variation in terms of nutrition profile

#### Proposed outputs and methods:

By the Investor Coalition:

Opportunity to feed into a Food
 Foundation policy ask around increasing beans in diets, and the associated opportunities for growth in the UK horticulture sector

By the Food Foundation:

 Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: Throughout 2026.





## B. Ultra Processed Foods (UPFs)



UPFs are dominating media nutrition and health discourse, with a growing lobby advocating for the need to regulate. Most large food

businesses have portfolios that are very exposed to UPFs (even where they are non HFSS). There is an increasing political will to legislate (e.g. Chile, Brazil, Colombia) and the UK House of Lords committee on Food, Diet and Obesity report in Q4 2024 recommended further research into public health effects of UPFs. There is a risk that food policy will become stuck while competing interests debate UPF vs. HFSS regulatory models despite the opportunity to use citizen interest in UPFs to push for policy that promotes access to healthier foods and restricts the marketing and promotion of less healthy foods (both UPFs and HFSS).

#### Asks by the Investor Coalition:

- In line with the asks around mandatory reporting, continue to ask Government to legislate to make healthier and more sustainable minimally processed foods the easier, cheaper, and more available options, and continue to implement HFSS regulation
- Push for businesses and government strategies to shift to more minimally processed foods

#### Proposed outputs and methods:

By the Investor Coalition: Continue to advocate for healthier, more sustainable and more minimally-processed diets to be the norm By the Food Foundation:

- Maintaining a watching brief / providing information to interested Coalition members as requested
- Content and logistics support to unpin the Investor Coalition's asks and work



Timeframe: Throughout 2026.



