



THE STATE OF THE NATION'S FOOD INDUSTRY

2025

Which UK food businesses are supporting the transition to more healthy and sustainable diets and what needs to happen next?

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 policymakers (parliamentarians. civil servants, local authorities, business leaders and investors) we use a wide range of approaches to make change happen including events, publications, media stories, social media campaigns and multistakeholder 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.

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Introduction

We all eat. And so food, and those who produce our food, matters to us all. Yet although our food system has the potential to support good health, economic growth and bring communities together, it is currently wreaking havoc on both the nation's health and the planet.

Good food remains unaffordable for far too many along the supply chain. Growing numbers of British farmers are struggling to make a living, while companies trying to change are facing commercial risks when investing in healthier and more sustainable portfolios, and some three years after the cost-of-living crisis 6 million households are still living in food poverty (The Food Foundation, 2025b). Meanwhile rising food prices, increasingly driven by the effects of climate change (Financial Times, 2025), are once again back in the news and likely to only further widen the glaring dietary inequalities that exist between high and low income households. With many currently betting on GLP-1s (weight loss drugs) to fix the problem, it's vital that we don't confuse treatment with prevention. If we do, we will be treating citizens simply to then send them straight back to a food environment where weight often rapidly rebounds as soon as individuals come off medication (Wilding et al, 2022).

Fixing the system so that it better serves both people and planet needs bold and urgent action from businesses but also, crucially, the government, who are ultimately responsible for setting the parameters within which businesses operate. Yet for too long there

has been no long-term vision for the UK's food system and the constellation of businesses operating within it, with a striking lack of commercial incentives for businesses to produce and sell us good food. The government's work on a new food strategy is an encouraging sign and has the potential to shift this — with ten outcome measures focused on creating a Good Food Cycle aiming to support health, protect the environment, strengthen the economy and celebrate British food traditions. This begins to set out a clear direction of travel for the future of the UK's food system.

While the past year has seen an encouraging and welcome spate of new commitments from the government that aim to fix our food system – from the expansion of Free School Meals, to mandatory reporting for all large food businesses – the food strategy has the potential to hold it all together and ensure food policy intervention is joined-up and cohesive rather than piecemeal. And certainly, a food strategy with political buy-in is urgently needed.

Time and time again voluntary action has been shown to be ineffective, with only the most ambitious businesses supporting a shift towards healthier and more sustainable diets in the absence of a level playing field. Meanwhile mandated policies intended to tackle the challenges facing our food system have often been unambitious, stuck in a cycle of weak and repetitive design with initial policy proposals often watered down through rounds of industry consultation and lobbying. The forthcoming



restrictions on advertising unhealthy foods, for example, have taken five years to get over the line and are now riddled with loopholes. To truly solve the multiple problems with the food system, we need a long-term, joined-up programme of policy intervention which lasts beyond an electoral cycle. Put simply, food policymaking is too important to be subject to the vagaries of a five-year political cycle.

A Food Bill – focused on ensuring that affordable, nutritious food is a mainstay of living in Britain now and in the future, and locking in improved national food security – would provide a mechanism for ensuring the transition towards a Good Food Cycle that is so urgently needed. The recent surge in food prices has tested our social and economic resilience; repeating that mistake would be a failure of foresight. A Food Bill would provide the legislative underpinning of



a food strategy and ensure continued progress into the future. Crucially, it would also help to create greater certainty for investors and companies, sending important market signals on the direction of travel for UK food businesses.

As Defra continues to develop the food strategy, we would strongly urge the government to seize the current window of opportunity to ensure the future of our food system with a Food Bill. Food companies who want to lock in long-term financial sustainability should support the government in this endeavour. If food system risks remain unchecked, individual firms stand to lose up to 26% of their value (Planet Tracker, 2023). While the window to act is narrowing, it is not yet too late to work together to deliver a food system that works for the next generations.

SECTORS



Retailers



Wholesalers



Out of Home (OOH)



DIET FOCUS



Health



At a glance – key findings

STANDARDS

- None of the 16 Out of Home businesses we assessed has a salesbased target for increasing sales of healthy food, highlighting the urgent need for swift implementation of mandatory reporting to ensure an industry-wide shift.
- In contrast, all of the UK's 11 major supermarkets now have a target or commitment to increase sales of healthy food.
- Just one major food business (Lidl GB) has an animal/plant protein split target and discloses data on their progress, despite this being crucial for meeting Net Zero targets and achieving sustainable diets.
- The number of food industry meetings with ministers dwarfs the number of meetings with NGOs, with ten times as many meetings for industry. Over three quarters of industry meetings with Defra were with trade associations.
- While all major food businesses have set Net Zero targets, only two thirds (68%) have a target and disclose data on Scope 3 emissions, and just one third (32%) have a transition plan for a 1.5°C world.

AVAILABILITY

- Overall, 69% of train station food outlets visited offered no fruit at all and 85% no veg snacks. Less healthy snacks were much more readily available than fruit and veg — a third (33%) of outlets stocked over 20 different types of chocolate, crisps and sweets.
- Just 6% of ready meals and 7% of restaurant menu options contain pulses.
- Restaurants, pubs and bars have the most calorific menus in the Out of Home sector, with dishes averaging 726 calories. There is huge variation across businesses – the average calorie count for an item on the menu at Stonehouse Pizza & Carvery is 1,015 calories, compared to just 406 calories at Nando's.

AFFORDABILITY

- 1.4 million (nearly half 43.5%)
 food sector workers are paid below
 the Real Living Wage. They are 2.5 times
 more likely to be earning below the Real
 Living Wage than workers across the
 economy as a whole.
- On average, a week's worth of healthy lunchbox items for children from UK supermarkets costs 26% more than a week's worth of unhealthy lunchbox items.

APPEAL

- Outdoor advertising spend by food companies increased by 28% between 2021 and 2024 in the years following the government's announcement in July 2020 of a forthcoming ban on TV and online advertising. McDonald's increased outdoor advertising spend by 71% between 2021 and 2024.
- Over two thirds (71%) of food marketing cues on the world's most popular videogame livestreaming platform are for unhealthy High in Fat, Salt, or Sugar (HFSS) food and drinks, with 77% of branded cues for energy drinks and soft drinks, and a fifth of branded cues (20%) for the Out of Home sector.



Standards to drive greater transparency

Standards for the food industry ought to be an established level of performance that all companies adhere to. They are key for setting out what the minimum baseline ought to be to ensure companies are supporting rather than harming people and planet. In order for standards to be effective, companies also need to be transparent on their progress to meeting targets. There are a growing number of businesses who recognise the importance of target setting and transparency and, in the absence of government regulation, are setting their own standards. However, the food industry urgently needs a level playing field so that first movers are not penalised commercially and that the entire market moves in the right direction.

While the government's commitment to mandatory reporting on healthy food sales in July was a huge and welcome step forward, the government must now move swiftly to publish a clear timeline that sets out how implementation will be achieved over the coming years — and agree on a robust and comparable set of metrics for reporting that measures the right things to incentivise change.



This section covers three metrics:

METRIC 1 BUSINESS TRANSPARENCY ON OUR THREE KEY METRICS

METRIC 2 CORPORATE LOBBYING

METRIC 3 BUSINESS TRANSPARENCY ON NET ZERO

















Business transparency on healthy and sustainable diets

- None of the 16 Out of Home businesses we assessed has a sales-based target for increasing sales of healthy food, highlighting the urgent need for swift implementation of mandatory reporting to ensure an industry-wide shift.
- In contrast, all of the UK's 11 major supermarkets now have a target or commitment for increasing sales of healthy food.
- Just one major food business (Lidl GB) has an animal/plant protein split target and discloses data on their progress, despite this being crucial for supporting the transition towards healthy and environmentally sustainable diets.

WHY IT MATTERS

Good data drives good decision making. Public reporting by all large food businesses both provides vital insight that can inform action by all major food system stakeholders (from businesses to investors and policymakers) and significantly increases transparency in the food system. Having clear sales data in place can unlock efficiencies for businesses and is a foundational first step for enabling target setting, which, alongside disclosure, can drive meaningful change within companies. As Plating Up Progress (PUP) has demonstrated over the past five years, in the absence of clear government direction and regulation an increasing number of far-sighted companies having been independently moving to disclose sales data (and set SMART targets) for healthy and sustainable diets on a voluntary basis. While this has been encouraging, there are widening gaps between the progress being made by different sectors — and, as Tables 1—3 demonstrate, the

concerning lack of consistency in the metrics being used makes comparing companies challenging. Public reporting against a core set of healthy and sustainable diet metrics must be placed on a mandatory footing in order to ensure consistent and comparable reporting and, crucially, a level playing field to ensure that all businesses are moving in the right direction. As this year's PUP analysis shows, the Out of Home sector is once again lagging far behind in this respect.

While it was incredibly welcome in July of this year to see the government committing to implementing mandatory healthy sales reporting for all large food businesses by the end of this term of government, with a second commitment to following this with mandatory targets for healthy sales (DHSC, 2025), what follows will be critical. The government must move swiftly to publish a clear timeline that sets out how implementation will be achieved over the coming years, agree on a robust and

comparable set of metrics for reporting that incentivises change, and establish a comprehensive enforcement framework overseen by a designated independent regulatory body.

Additionally, the government's commitment to mandatory reporting in the NHS ten-year plan was focused around healthy sales reporting, but for businesses to truly shift towards portfolios that are both healthy and sustainable, a wider set of metrics ought to be considered (healthy sales, sales of fruit and vegetables, and the proportion of protein sales coming from animal versus plant proteins). This would drive dietary change while also reducing food businesses' Scope 3 emissions, which is critical for meeting Net Zero. Without this wider focus there is a risk that reporting limited to 'healthy food sales' simply leaves room for industry to manipulate their reporting. For example, companies may be able to increase their sales of healthy (non-HFSS) foods or improve their sales weighted average score simply by increasing sales of diet soft drinks, bottled water or reformulated chocolate breakfast cereals rather than boosting sales of fresh produce. While this is in line with how the Nutrient Profiling Model categorises foods that are healthy versus less healthy, we perhaps need to ask ourselves exactly what diet shifts we are trying to encourage.

WHAT WE DID

For this section, we focused on the three key metrics from The Food Foundation's PUP benchmark that provide an indication of how healthy and sustainable a company's portfolio is, looking at whether companies disclose and have targets for:

- Healthy sales; using either a sales weighted average or % of sales of high fat, salt and sugar (HFSS) foods
- % of sales that are fruit and vegetables
- % of total protein sales by source (animal versus plant)

PUP assesses 37 major UK operating food businesses including 11 retailers, seven manufactures, six quick service restaurants, five contract caterers, five casual diners and three wholesalers. This metric measures the progress of these 37 businesses.

The gold standard for targets and data disclosure are those which are sales-based and reported in volume (tonnage), as this provides the clearest link to consumption. Sales data based on value (£) rather than the volume of food sold can be vulnerable to the impacts of inflation and market volatility. Margins also vary between categories and so sales value cannot be used as a proxy for the total volume of different categories sold as it is not a true reflection of consumer purchases.

WHAT WE FOUND

- > 13 (35%) of the 37 businesses have a sales-based target and disclose data for sales of healthy foods vs. less healthy foods, compared to nine last year. A further five have a target and report data but not based on sales by tonnage; one reports in revenue, whereas the other four report on the proportion of their range/menu.
- This year for the first time all of the major supermarkets now have healthy sales targets or commitments, with the OOH sector continuing to lag far behind.
- Just eight (22%) businesses have a sales-based target and disclose data for fruit and veg. A further three (8%) businesses disclose data on sales of fruit and veg but lack a target.
- Only one business (Lidl GB) has a proportional sales-based target for increasing sales of plant protein and discloses data on both animal and plant protein sales. Compass Group UK&I are the only other business to have a target, aiming to switch from animal protein to 40% plant protein by 2030, but they do not currently disclose any sales data.
- The UK is now lagging far behind other European countries in terms of retail and business commitments to shift sales of protein towards plant protein sources, despite the majority of companies having set ambitious Scope 3 emission reduction targets.

WHAT'S CHANGED OVERALL SINCE LAST YEAR?

Since last year's analysis **seven companies** (five retailers and two manufacturers) have set new targets and/or moved to disclose data on sales against our three key metrics, with five companies making progress on the sale of healthy products. While this is positive, the progress has been driven by the retail and manufacturing sectors, with the Out of Home sector having made little to no progress towards increased transparency.



Retailers

As in previous years, retailers (with 11 companies assessed) lead the way in setting targets and disclosing data in each of our

three key metrics. This year Iceland, Morrisons and Coop have set new SMART targets and report data on the proportion of their sales coming from healthy (non-HFSS) food and drink, while Ocado and Asda have targets (albeit, these are not SMART). Lidl GB remains the leading retailer in our benchmark with sales-based targets and public reporting against all three of our key metrics.

Elsewhere we see other examples of positive retail action. Ocado has moved to disclose data on sales of fruit and veg, with Morrisons also moving to disclose data on sales of fruit and veg and Aldi having renewed their target to increase portions sold by 14% by 2027.

We have seen little progress from retailers in reporting on sales of protein by source and setting targets to shift the balance of sales from animal to plant protein, with the UK retail sector now lagging far behind other European



countries such as the Netherlands, where such targets are now the norm (Vegconomist, 2024). The only retailers to have moved on this metric in the last year are Co-op, who now disclose sales-based data on their protein split, and Aldi and Iceland, who now report data on their sales of plant protein with Iceland also moving to set a new target to increase sales of plant based protein by 10% by the end of 2026/7. However, no new retailers have moved to set targets for the ratio of plant to animal protein sales.



Out of Home

The Out of Home (OOH) sector businesses we analysed include five contract caterers, five casual dining and six quick service or

fast food restaurants (QSR). Compass Group UK&I have made positive progress since last year and now disclose data and have a target for increasing procurement of fruit and veg, while also maintaining their target to switch 25% of animal to plant-based protein by 2025 and a

40% switch by 2030, positioning them as leaders in the OOH sector.

In terms of the protein split metric, while not a sales-based target, JD Wetherspoon have nonetheless very positively moved to set targets and disclose data on the proportion of their menus that have vegan and vegetarian options. Meanwhile, Wagamama (part of The Restaurant Group) has maintained a 50% plant based menu (defined as half of the dishes on the menu being vegan or vegetarian) since 2021.

No shifts were seen within QSR, making this subsector the worst performing overall in terms of transparent reporting and target setting.



Wholesalers

This year we included a new wholesaler, Bestway (with 15% of the wholesaler market). This increased the number of wholesalers

assessed to three and provides a clearer picture of the sector. However, no new commitments to increasing sales of healthy and sustainable foods or disclosure of sales data were identified for our key metrics, with **Bidfood** remaining the clear leader in the wholesale sector and the only wholesaler transparently reporting on sales.



Manufacturers

The manufacturing sector, consisting of seven companies¹, comes a close second to retail in terms of progress on

transparent public reporting and target setting. All manufacturers analysed within PUP have now set targets on sales of healthy food, although only three businesses disclose both sales-based data (volume) and have set a target. Greencore and Samworth Brothers now disclose sales-based data and have targets for increasing healthy sales. Nestlé and Premier Foods continue to disclose data on healthy sales, albeit by value rather than volume, while Mars now have a commitment to increasing the number of healthy meals sold. Nomad Foods disclose sales data and have a healthy sales target although this is not currently a SMART target.

Although not sales-based, it's also encouraging to see progress being made on fruit and veg. Samworth Brothers now report on the percentage of ready meals containing a portion of fruit and veg, and Nomad Foods disclose the tonnage of extra veg added to their Steamfresh meals, Birds Eye and Aunt Bessie's veg-based products. Samworth Brothers also now report on their sales of animal and plant proteins, making them the leaders within the sector.

OVERALL

While a great deal of progress has been made over the last year in major food companies moving to set targets and disclose data (with the notable exception of the QSR – fast food – sector) there is still a huge amount of inconsistency in how data is disclosed, as the following tables demonstrate. The government must ensure they are setting standardised metrics for all large food companies to report against when implementing mandatory reporting.



¹Unilever have been removed from the Plating Up Progress benchmark this year as their portfolio now mainly consists of personal care products rather than food. Danone are included in this year's analysis for the first time, due to their size and market share.

KEY

TYPE OF TARGET AND DATA

Sales-based	1 Volume (tonnage)
No commitment or target	2 Unit
Not Sales-based	3 Revenue
Not smart*	4 Procurement

* Commitment includes other ingredients

SCOPE OF TARGET AND DATA

A	Branded and own-brand products in scope. The gold standard, covering the entire portfolio (applicable for retailers only)
В	Own-brand products in scope only (applicable for retailers only)
С	Range specific (e.g. menus or ready meals)

TABLE 1 Companies with a sales-based target and/or disclosing data for sales of healthy/HFSS food.

	Company	Target	Data
	Aldi	1B	1B
	Asda	1A	С
	Со-ор	1B	1B
	Iceland	1B	1B
RETAILERS	Lidl GB	1B	1B
ETAI	M&S	1B	1B
<u> </u>	Morrisons	1B	1B
	Ocado		1A
	Sainsbury's	1A	1A
	Tesco	2A	2A
	Waitrose	1B	1B

	Company	Target	Data
WHOLE— SALERS	Bidfood		1
	Brakes		
	Bestway		

	Company	Target	Data
CASUAL DINING	JD Wetherspoon		
	Mitchells & Butlers		
	Nando's		
	The Restaurant Group		
	Whitbread		

	Company	Target	Data
	Burger King		
	Domino's		
QSR	Greggs	С	С
	KFC	С	С
	McDonald's		
	SSP		

SS	Company	Target	Data
CATERERS	Aramark		
	Compass Group UK&I		
CONTRACT	Elior		
	ISS		
	Sodexo		

	Company	Target	Data
	Danone	1	1
RERS	Greencore	1	1
CTUF	Mars	С	С
MANUFACTURERS	Nestlé		3
	Nomad Foods		1
	Premier Foods	3	3
	Samworth Brothers	1	1

^{*}A SMART target is a goal that follows a framework of five criteria: Specific, Measurable, Achievable, Relevant, and Time-bound.

TABLE 2 Companies with a sales-based target and/or disclosing data for sales of fruit and veg.

	Company	Target	Data
	Aldi	1B	1B
	Asda		
	Со-ор		1B
	Iceland	1B	1B
RETAILERS	Lidl GB	2A	2A
ETAI	M&S	1B*	1B*
E	Morrisons		1B
	Ocado	1B	1B
	Sainsbury's	1A	1A
	Tesco		С
	Waitrose	1B*	1B*
	Company	Target	Data

	Company	Target	Data
WHOLE— SALERS	Bidfood		1
	Brakes		
	Bestway		

	Company	Target	Data
S S	JD Wetherspoon		
N	Mitchells & Butlers		
CASUAL DINING	Nando's		
	The Restaurant Group		
	Whitbread		

	Company	Target	Data
	Burger King		
	Domino's		
QSR	Greggs	С	С
	KFC		
	McDonald's		
	SSP		

SS	Company	Target	Data
EREF	Aramark		
CAT	Compass Group UK&I	4	4
CONTRACT CATERERS	Elior	3*	3*
	ISS		
ö	Sodexo		

	Company	Target	Data
	Danone		
RERS	Greencore		
MANUFACTURERS	Mars	С	С
IUFA	Nestlé		
MAN	Nomad Foods		С
	Premier Foods		С
	Samworth Brothers		С



TABLE 3 Companies with a sales-based target and/or disclosing data for sales of animal vs. plant protein.

	Commonwe	An	imal	Plant		
	Company	Target	Data	Target	Data	
	Aldi				1B	
	Asda			1B	1B	
	Со-ор		1B		1B	
RS	Iceland			1A	1A	
RETAILERS	Lidl GB	1A	1A	1A	1A	
RET	M&S			1B*	1B*	
	Morrisons		1B	С	1B	
	Ocado		1A		1A	
	Sainsbury's		1A		1A	
	Tesco		1A	O	1A	
	Waitrose		1A	1A*	1A	
	Company	Ani	Animal		Plant	
.l. თ	Company	Target	Data	Target	Data	
WHOLE— SALERS	Bidfood		1		1	
₹ ÿ	Brakes					
	Bestway					
	Company	Ani	mal	Pla	Plant	
υ	Company	Target	Data	Target	Data	
	ID W-4					

	Bestway				
		Animal		Plant	
,	Company	Target	Data	Target	Data
CASUAL DINING	JD Wetherspoon			С	С
	Mitchells & Butlers				
	Nando's				
	The Restaurant Group			С	С
	Whitbread				
CASUAL DIN	Mitchells & Butlers Nando's The Restaurant Group			C	

	Company	Animal		Plant	
	Company	Target	Data	Target	Data
	Burger King			С	С
6	Domino's				
QSR	Greggs		4		
	KFC				
	McDonald's				
	SSP			С	С

	Company	Ani	mal	Plant	
CATERERS	Company	Target	Data	Target	Data
ATER	Aramark			С	О
CONTRACT C	Compass Group UK&I				С
	Elior				С
	ISS			С	
	Sodexo			С	С

	Commons	Animal		Plant	
	Company	Target	Data	Target	Data
တ္သ	Danone		3*		3*
MANUFACTURERS	Greencore		4		4
ACTI	Mars				
N	Nestlé				
Σ	Nomad Foods		4		4
	Premier Foods			3C	3C
	Samworth Brothers		1		1

If businesses were more like...

Samworth Brothers have made significant progress this year across all three metrics by setting a target for healthy food sales and moving to disclose fruit and veg data as well as both animal and plant-based protein sales.

Ocado have also made progress in moving to publicly report data and set targets across our three key metrics. Lidl GB remain the only company with a target for increasing sales of plant proteins as a proportion of overall protein sales. This remains a blind spot for UK companies given that emissions from livestock contribute almost half of retail Scope 3 emissions (Madre Brava, 2024).

What can businesses do...

Set healthier and more sustainable sales-based targets and publicly disclose performance annually against these targets.

2 Speak publicly about the need for the government to provide businesses with a clear long-term direction of travel through a food strategy whitepaper or Food Bill.







Corporate lobbying

The number of food industry meetings with ministers dwarfs the number of meetings with NGOs, with **ten** times as many meetings for industry. Over **three quarters** of industry meetings with Defra were with trade associations.



WHY IT MATTERS

Lobbying is a key process through which corporations, organisations and citizens can make their views known to policymakers. It's an essential and legitimate part of an open and consultative policymaking process which, if done transparently and with integrity, can empower citizens to participate in the democratic process and level the playing field for stakeholders from different interest groups (Transparency International; OECD, 2024).

But when lobbying is done in an opaque and unregulated way, problems can arise. Corporate food systems are now shaping food policy because of their growing political influence, which is weakening democratic participation (UNOHCHR, 2025). Power imbalances around lobbying can also lead to governmental stasis and delays in implementing regulation that would support public health.

WHAT WE DID

This year's research built on the findings from previous research into ministerial meetings (The Food Foundation, 2024b; The Food Foundation, 2025a). We looked at the first 12 months of the new term of government (Q3–4 2024 and Q1–2 2025); potentially a window of opportunity for influencing, given that this is often a time when new policies are developed. We compared it to 12 months (Q1–4) in 2023 to track any changes over time and between governments. 2023 was selected as a comparator year given that preceding years are skewed by Brexit and Covid-19, and 2024 was the final year of the last government's term, with the general election happening mid-way through 2024. We conducted research and analysis of ministerial meetings with the UK food industry and their major trade associations² as documented on the 'Transparency and freedom of information releases' register on the UK government website. All lobbying activity across these departments was analysed by assessing 'gifts, hospitality, travel and meetings' documented between July 2024 and June 2025 for eight government departments^{3,4}.

²Trade associations are defined as an organisation of businesses in the same industry or with similar interests that work together to promote the industry and advance their members' interests. We have included membership bodies representing sector interests in our analysis.

The Department of Health and Social Care (DHSC); HM Treasury (HMT); the Department for Environment, Food and Rural Affairs (Defra); the Department for Business and Trade (DBT); the Department for Science, Innovation and Technology (DSIT); the Department for Energy Security and Net Zero (DESNZ); the Prime Minister's Office (PMO); and the Department for Culture, Media and Sport (DCMS).

⁴Our previous analysis was done by year rather than by quarter, and therefore we have used the full year (Qs 1–4) 2023 as a point of comparison. The exceptions are DSIT, DBT and DESNZ, which were created in February 2023 and therefore the comparison data for those departments runs from March 2023 to June 2024. This year's analysis covers Q3–4 2024 and Q1–2 2025, which is the latest available data.



We then identified meetings between ministers and pre-identified companies assessed in our PUP benchmarking analysis as well as the largest food and beverage trade associations in the UK⁵. Additional relevant companies and trade associations identified while searching the registers were also included in the final analysis. Finally, to compare the level of industry lobbying with lobbying by NGOs working in the food systems space, we also analysed the number of NGO meetings taking place in this period. Please refer to the <u>technical report</u> for the full methodology and the list of companies, trade associations and NGOs included.

WHAT WE FOUND

- Retailers have focused more efforts on meeting with the Department for Business and Trade (DBT) than with the Department for Environment, Food and Rural Affairs (Defra) since the new Labour government came to power.
- Trade associations made up the majority of the meetings with ministers (54%) across all departments analysed, followed by retailers (25%) (Figure 1).
- > Trade associations held 77% of the food industry meetings with Defra officials.

When we compared the first 12 months of Labour's term of government to the figures from 2023 under the Conservative government, we found there has been an approximately 20% decrease in the number of meetings between government and the food industry. While this can be seen as a positive, the number of food industry meetings continues to dwarf the number of meetings between government and food system NGOs: 286 for the food industry compared with 28 for NGOs. This is more than ten times as many meetings for industry as NGOs.

This overall drop in industry ministerial meetings in the first 12 months of the new government compared to 2023 could be driven by fewer opportunities for meetings in the first six months of the new government (Q3–4 2024). It could also be that this government have developed different engagement strategies for industry stakeholders, such as the food strategy process, that have created alternative mechanisms for industry to make their views heard. A less positive take on these findings

⁵Based on our previous research, we pre-identified the following trade associations most relevant to the UK: Food and Drink Federation (FDF); British Retail Consortium (BRC); The Agriculture and Horticulture Development Board (AHDB); National Farmers' Union (NFU); Dairy UK; Hybu Cig Cymru/Meat Promotion Wales; The Institute of Grocery Distribution (IGD); Country Land and Business Association (CLBA).

could suggest that there might be interactions happening that do not have to be recorded: for instance, from our previous research we know that current transparency rules only apply to meetings that take place within ministries or departments; meetings held outside government buildings (e.g. at conferences) are not logged. Unfortunately, the new government have not yet strengthened the rules to address this transparency gap.

What's interesting to see, however, is the steady uptick in the number of food industry meetings as time has gone on, with 37 in Q3 2024, 54 in Q4 2024, 70 in Q1 2025 and rising to 125 in Q2 2025. This suggests that lobbying has increased as the government have moved to introduce policies impacting on the food industry.

Of the departments we looked at this year, DBT and Defra were again the two departments that the food industry engaged most with. Across all departments, food companies focused on DBT (55%) followed by Defra (24%), then the Department for Energy Security and Net Zero (DESNZ) and HM Treasury (10% and 7% respectively) (Figure 2). Trade associations engaged most with Defra (70%), followed by DBT (19%). Interestingly, there were almost no relevant meetings (only three interactions) recorded between the food industry and ministers at the Department of Health and Social Care (DHSC) between Q3 2024 and Q2 2025. While this is positive given that there is less reason for the food industry to engage with DHSC unless to make specific points around health policymaking, it could be inferred that the food industry are aligning their lobbying efforts with the Labour government's growth mission rather than health.

When we looked in more detail at Defra, it was interesting to note that retailers engaged significantly less with Defra

in 2024-2025 than in 2023. The vast majority (77%) of Defra industry meetings were with trade associations. predominantly the NFU (n = 40), BRC (n = 12), FDF (n = 1= 11) and CLBA (n = 9). Previously, the engagement with Defra was more evenly split between trade associations and food businesses (54% and 46% respectively in 2023).

Our research was significantly limited by the lack of information available on public registers documenting interactions between food industry representatives and policymakers. There is a lack of disclosure about meetings with senior civil servants and Special Advisors (SpAds) who are important conduits for policy influence - emails and phone calls, or meetings taking place outside of government premises. These disclosure limitations mean that it is still very hard to know how much lobbying is actually taking place.

Corporate political activity can take multiple forms. In addition to ministerial meetings, we looked at the composition of the boards and committees for

the UK government departments listed above to see whether any of the members had current or previous links to the food industry. DHSC's board includes a former Sainsbury's executive (UK Government, a); Defra's board includes the current General Counsel & Company Secretary at M&S, who also chairs the

What can government and businesses do...

Government regulation mandating greater disclosure of corporate political activity is needed. This should include a comprehensive, user-friendly, accessible, searchable register with a clear template of accurate summary information (Thieme, 2019). Canada, Ireland and Washington State offer examples of more robust lobby registers (Boucher and Cooper, 2022; The Food Foundation, 2025a).

Businesses should review their trade association memberships to assess and address any strategic misalignment between the trade associations' and the company's own positions. They should also align their lobbying activities with the Responsible Lobbying Framework.

Remuneration Committee of Ocado Retail Ltd (UK Government, b); and until recently, the Defra board also included a non-executive director whose previous roles involved working for Mars and Nestlé (UK Government, c). While this is not necessarily a cause for concern, especially if principles of transparency and good governance are followed (UK government, 1995), it is still important to be aware of the perspectives these members are likely to bring to discussions and the influence this could have on policymaking.

FIGURE 1 The proportion of food industry meetings by sector across all government departments analysed, July 2024 to June 2025.

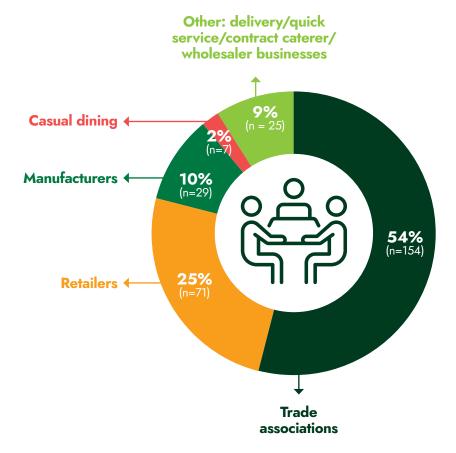
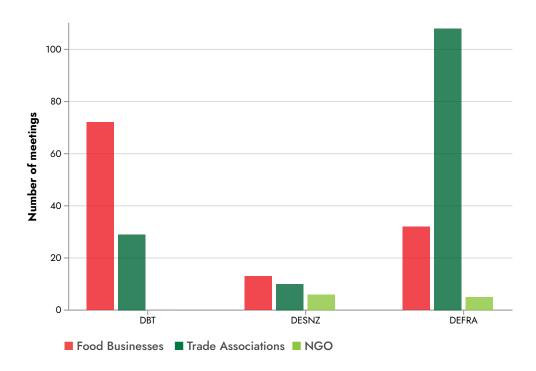


FIGURE 2 The departments meeting most frequently with food industry and NGOs during the first 12 months of the Labour government.



















Business transparency on Net Zero

While all major food businesses have set Net Zero targets, only two thirds (68%) have a target and disclose data on Scope 3 emissions, and just one third (32%) have a credible transition plan for a 1.5°C world.



The world experienced record-breaking heat once again in 2024, with average temperatures for the year exceeding a 1.5°C rise for the first time (a limit set by the Paris Agreement to reduce the most extreme impacts of climate change). Meanwhile the UK has just had its second worst harvest on record (Independent, 2025). While wider weather patterns such as El Niño may have contributed to this, at current levels of emissions it is increasingly likely that the long-term 1.5°C threshold will be crossed in the coming years if action is not taken. Global records were broken for greenhouse gases (GHGs) and both air and sea surface temperatures, which have all contributed to extreme events including heatwaves, floods and widespread wildfires (Copernicus, 2024). The impacts of climate change on food security and supply chains are now being felt by citizens, with recent food price inflation driven in part by climateflation (Energy and Climate Intelligence Unit, 2023).



It's now more important than ever for companies to not only set targets for Net Zero, but to back them up with credible climate transition plans for shifting business operations, models and sales accordingly.

For food businesses to get to grips with their carbon emissions, it will not be enough to simply set topline, media-friendly Net Zero targets. Targets ought to be backed by transition plans and include a focus on tackling Scope 3 emissions, which account for around 90% of food businesses' carbon footprints (WRAP, 2022). This will have to include reducing the amount of meat and dairy sold given the large carbon footprints associated with livestock production and consumption. For food retailers, meat and dairy make up 47% of Scope 3 emissions (Madre Brava, 2024).

What is a credible climate transition plan?

The Climate Disclosure Project (CDP) defines a credible climate transition plan as one that is time-bound, with detail on how it will shift the whole business (including assets and operations) to be aligned with the latest and most ambitious environmental science recommendations. These recommend that businesses develop models whereby:

- 1. The global average temperature increase is limited to no more than 1.5°C above pre-industrial levels.
- 2. The integrity, resilience and ecological function of ecosystems is restored.
- 3. A thriving economy that works for people and planet in the long term is enabled (CDP, 2025).

What is SBTi and FLAG?

The Science Based Targets initiative (SBTi) provides a framework and tools for companies and financial institutions to set GHG emission reduction targets in line with reaching Net Zero by 2050. Companies with SBTi-approved targets show commitment towards meaningful and measurable reductions in GHGs. SBTi's FLAG guidance provides specific guidance for companies within the Forest, Land and Agriculture (FLAG) sector to set science-based targets for their land use emissions, as the sector produces 22% of global GHG emissions (SBTi, 2025).

WHAT WE DID

As part of PUP analysis, we captured whether the 37 companies assessed have Net Zero and Scope 3 targets, and which of these are SBTi accredited. This year we have also included data kindly provided by CDP Worldwide to see which of the companies also have credible transition plans. As CDP's data was released in 2024, businesses may have published transition plans after CDP's data collection. We found that 78% (29) of companies in our



PUP benchmark are assessed by CDP Worldwide (although this number could be higher given that not all companies allow CDP Worldwide to publish their scores).

WHAT WE FOUND

- Only 59% of major food businesses have Net Zero targets approved by the SBTi. While all companies assessed in PUP have made some form of Net Zero commitment, this shows that many targets still lack formal validation.
- Similarly, although most of the 37 companies (86%) have Scope 3 targets, only 78% of these are SBTi approved — a warning sign that many businesses still lack credible, science-aligned pathways to deliver on their Net Zero goals.
- Moreover, there is a lack of transparency when it comes to disclosing data on Scope 3 emissions to track progress against targets. While 86% of businesses have Scope 3 targets, only two thirds of companies (68%) have both a target and disclose data.

- > Even fewer just 32% of PUP companies according to CDP disclosures have a transition plan that aligns with a 1.5°C world, with a further 14% committing to create a transition plan in the next 2 years.
- More dishearteningly, only 11% of companies received an A or A-CDP score — which indicate leadership level of climate transparency and action (see Table 4).
- Furthermore, just one company (and none of the companies with credible transition plans) has set targets to increase the sale of plant proteins as a proportion of total protein sales, relative to sales of animal protein. This is despite emissions from the livestock sector driving a large proportion of Scope 3 emissions, bringing into question exactly how many businesses plan to meet Net Zero targets.
- Only 19% (7) of companies have a FLAG target and are disclosing progress against it; however, given that none of these companies have set protein split targets, achieving their FLAG targets will likely remain difficult. An additional 30% (11) have set a FLAG target, with one company currently in the process of developing one. The SBTi previously asked companies to set FLAG targets to commit to halt deforestation across all emission scopes (direct and indirect by the end of December 2025. As the deadline rapidly approaches and with progress halting, the SBTi have recently launched a consultation proposing that companies meet meet their target date within two years of submission for validation, which can be no later than 2030 (SBTi, 2025).

What can businesses do...

- Set SBTi accredited targets for Net Zero and Scope 3 emissions and disclose data on progress annually against a baseline year.
- 2 Develop credible climate transition plans with a clear strategy for reducing GHG emissions.
- 3 Set sales-based targets for increasing the proportion of plant protein sales as a proportion of total protein sales.



Regenerative agriculture and Scope 3

Regenerative agriculture (RA) aims to generate farming systems that support the environment, working with nature to achieve a number of goals — including improved soil health, increased biodiversity and sequestering carbon — using practices such as cover crops, crop rotations, minimal tillage, agroforestry and crop-livestock integration. However, there is no agreed definition of RA, and different stakeholders with various sets of goals and agendas interpret it differently.

RA could offer opportunities to connect food and wider agri-environmental goals. However, the many narratives around RA and the differing levels of evidence for RA outcomes pose risks. RA has become increasingly dominant in food companies' sustainability and resilience plans, with projects being undertaken by Nestlé, Burger King, Unilever, PepsiCo and Mondelez among others. Some companies are relying on practices such as regenerative grazing to meet their near-term Scope 3 targets, instead of setting targets to reduce sales of animal protein or reduce livestock numbers. More research is needed to determine RA's contribution to companies' emissions reductions, but currently, despite the many benefits of more sustainable production practices, the evidence is not conclusive enough to support it being used as the sole solution for reducing Scope 3 emissions.



Target and data Target only Data only SBTi approved * Committed

CDP SCORE KEY

SCORE	LABEL	DESCRIPTION
Α	Leadership	A company is implementing current best practices on environmental management. Companies on the A List are demonstrating environmental leadership through transparency, ambitious targets, policies and verified action.
A-	Leadership	A company is implementing current best practices on environmental management, but with minor gaps compared with performance of the A List.
В	Management	A company is taking coordinated action on climate issues.
В-	Management	A company is taking coordinated action on climate issues, but may have limited scope or consistency across operations.
С	Awareness	A company has started to identify how environmental issues affect its business.
C-	Awareness	A company has started to identify how environmental issues affect its business.
D	Disclosure	A company is transparent about its environmental impact and is disclosing through CDP.
D-	Disclosure	A company is transparent about its environmental impact and is disclosing through CDP.

TABLE 4
Major food companies' transparency against Net Zero commitments.

Compa	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	2024 CDP* score	Transition plan for a 1.5°C world, according to 2024 CDP disclosure	Protein spli sales-based in tonnage
Aldi		V	~	~	Not assessed by CDP		
Asda					Failure to respond		
Со-ор		~	V	~	Not assessed by CDP		
Iceland	d				Not assessed by CDP		
Lidl GE	В	*	V	V	Not assessed by CDP		
M&S		V	V	V	В	Yes, have a climate transition plan which aligns with a 1.5°C world	
Morris	sons		V		В	No, but developing a climate transition plan within the next two years	
Ocado)	V	V	V	С	No, but developing a climate transition plan within the next two years	
Sainsb	oury's	V	V	V	A	Yes, have a climate transition plan which aligns with a 1.5°C world	
Tesco		V	V	V	С	Yes, have a climate transition plan which aligns with a 1.5°C world	
Waitro	se	~	V	V	Failure to respond		
Compa Bidfoo Brakes	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	CDP score	Transition plan for a 1.5°C world, according to CDP disclosure	Protein spli sales-based in tonnage
Bidfoo	nd		ana aara,	una aaia,	Not assessed by CDP		iii ioiiiiage
Brakes					Not assessed by CDP		
Bestwa		*			Failure to respond		
Besiwa	ч у				Tunare to respond		
Compa	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	CDP score	Transition plan for a 1.5°C world, according to CDP disclosure	Protein spli sales-based in tonnage
JD Wet	therspoon	V	~		Failure to respond		
JD Wet Mitche Butlers Nando		V	~		В	Yes, have a climate transition plan which aligns with a 1.5°C world	
Nando	o's		V		Not assessed by CDP		
	estaurant)				Failure to respond		
Whitbr	read	~	V	~	В	Not disclosed	
Compa	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	CDP score	Transition plan for a 1.5°C world, according to CDP disclosure	Protein spli sales-based in tonnage
Burger	r King		V		В	Yes, have a climate transition plan which aligns with a 1.5°C world	
Domin	ıo's	V	V		В	Yes, have a climate transition plan which aligns with a 1.5°C world	
Gregg	ıs		V		Failure to respond		
KFC					В	Yes, have a climate transition plan which aligns with a 1.5°C world	
McDon	nald's	V	V	V	Failure to respond		
SSP		V	~	in progress	Failure to respond		
Compa	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	CDP score	Transition plan for a 1.5°C world, according to CDP disclosure	Protein spl sales-based in tonnage
Aramai	rk	~	V		В	No, but developing a climate transition plan within the next two years	
Compa UK&I	ass Group		~	~	В	No, but developing a climate transition plan within the next two years	
					_	V	
Elior ISS			~		C Not assessed by CDP	Yes, have a climate transition plan which aligns with a 1.5°C world	
Elior ISS Sodexo	0	V	V	V		Yes, have a climate transition plan which aligns with a 1.5°C world	
ISS		V Net Zero		FLAG (Target and data)	Not assessed by CDP		Protein spli sales-based in tonnage
Sodexo Compa Danono	any		Scope 3 (Target	FLAG (Target	Not assessed by CDP A-	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure	
Sodexo Compa	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	Not assessed by CDP A- CDP score	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure Yes, have a climate transition plan which aligns with a 1.5°C world	sales-based
Sodexo Compa Danono	any	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	Not assessed by CDP A- CDP score A D	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure Yes, have a climate transition plan which aligns with a 1.5°C world No, but developing a climate transition plan within the next two years	sales-based
Sodexo Compa	any ne core	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	Not assessed by CDP A- CDP score A D B	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure Yes, have a climate transition plan which aligns with a 1.5°C world No, but developing a climate transition plan within the next two years Yes, have a climate transition plan which aligns with a 1.5°C world	sales-based
Compa Danone Greene Mars Nestlé	any ne core	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	Not assessed by CDP A- CDP score A D B A-	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure Yes, have a climate transition plan which aligns with a 1.5°C world No, but developing a climate transition plan within the next two years	sales-base
Compa Danone Greene Mars Nestlé Nomac	core d Foods	Net Zero V V	Scope 3 (Target and data)	FLAG (Target and data)	Not assessed by CDP A- CDP score A D B A- Failure to respond	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure Yes, have a climate transition plan which aligns with a 1.5°C world No, but developing a climate transition plan within the next two years Yes, have a climate transition plan which aligns with a 1.5°C world Yes, have a climate transition plan which aligns with a 1.5°C world	sales-base
Compa Danone Greene Mars Nestlé Nomac	core d Foods	Net Zero	Scope 3 (Target and data)	FLAG (Target and data)	Not assessed by CDP A- CDP score A D B A-	Yes, have a climate transition plan which aligns with a 1.5°C world Transition plan for a 1.5°C world, according to CDP disclosure Yes, have a climate transition plan which aligns with a 1.5°C world No, but developing a climate transition plan within the next two years Yes, have a climate transition plan which aligns with a 1.5°C world	sales-based

^{*&#}x27;Failure to respond' refers to companies who are assessed by CDP but have not disclosed information whereas some companies are not assessed by CDP and therefore marked as 'Not assessed by CDP'.



Food businesses are simultaneously some of the largest employers in the UK, and the main channel through which most people in the UK buy their food. They therefore play a critical role in helping people to afford healthy and sustainable food, and in reducing the health inequalities we see in our society because of poor diets. Over the past year up until September food price inflation has risen by 4.5%, and outpaced general inflation since May 2025, making it more critical than ever that businesses are playing their part in supporting access to healthy and sustainable food.

This section covers two metrics:

METRIC 1 WAGES IN THE FOOD SYSTEM

METRIC 2 COST OF HEALTHY LUNCHBOXES











DIET FOCUS







Wages in the food system

1.4 million (nearly half – 43.5%) food sector workers are paid below the Real Living Wage. They are nearly **2.5 times** more likely to be earning below the Real Living Wage than workers across the economy as a whole.



WHY IT MATTERS

There is widespread low pay among food sector workers, many of whom are very likely to be among the almost 6 million adults (11.3% of households) experiencing food insecurity (The Food Foundation, 2025b).

Amid inflationary turbulence in recent years, however, most of the biggest UK food companies have continued to record healthy profits, with some executives receiving bumper pay outs this financial year (Grocery Gazette, 2025a; ibid., 2025b).

While it's not all been plain sailing for food businesses — with changes to workers' rights last year, such as the minimum wage increase leading to cutbacks in hiring and calls for National Insurance contributions relief by some retailers (BBC News, 2025; The Grocer, 2025a) — paying adequate wages should be a top priority for all employers.

WHAT WE DID

We analysed ONS data (kindly provided by the <u>Resolution Foundation</u>) to find out how the food sector is doing when it comes to paying adequate wages which take into account the cost of living.

FIGURE 3

Levels of different wage types (as described by The Living Wage Foundation, 2025).

THE MINIMUM WAGE

is the statutory minimum pay per hour for under-21-year-olds.

This is £10 across UK across the UK, as of April 2025.

THE NATIONAL LIVING WAGE

is the statutory minimum pay for over-21-year-olds.

Across the UK it is currently £12.21, as of April 2025.

THE REAL LIVING WAGE

is a **voluntary** wage rate based on the cost of living for workers aged **18 and over**.

In October 2025 this was set at £13.85 across the UK and £14.80 in London.

WHAT WE FOUND

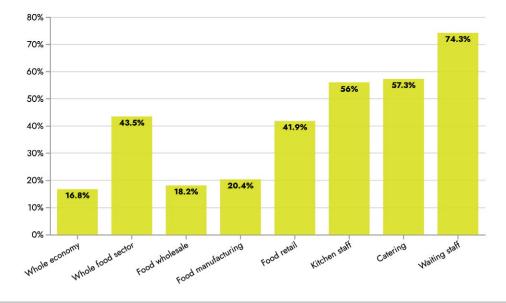
The percentage of workers across the whole economy in Great Britain below the Real Living Wage has increased by 2.6% between 2023 and 2024. The increase has been even higher in the food sector, with a 4.3% increase in the percentage of workers paid below the Real Living Wage.

Figure 4 shows that the percentage of food sector workers earning below the Real Living Wage is nearly three times higher than workers across the economy as a whole. Within the food sector, the percentage of workers paid below the Real Living Wage is highest for waiting staff (who are likely to be working in hospitality and the OOH sector), and lowest for food manufacturing and wholesale.

Lidl GB, JD Wetherspoon, Aramark and Elior were all named by the government this year as major food businesses among a <u>list of employers failing to pay minimum wage</u> between 2015 and 2022. It lists Lidl GB in sixth place for the largest amount underpaid to workers, falling short by £286,437 across 3,423 employees.

While most of the biggest retailers are now paying living wage rates (The Grocer, 2025b), none are formally accredited as Living Wage Employers, committed to paying the Real Living Wage. Waitrose, Morrisons and Iceland are still paying below living wage rates to employees (The Grocer, 2025b); The Grocer, 2025c).

FIGURE 4
The proportion of food sector workers paid below the Real Living Wage by sector in 2024.
Based on Resolution Foundation analysis of ONS Annual Survey of Hours and Earnings 2023–2024.



If businesses were more like...

Of the 37 companies assessed in Plating Up Progress, only two (**Nestlé** and **Danone**), hold Living Wage accreditation.

What can businesses do...

Gain Living Wage Employer accreditation, committing to pay the Real Living Wage. The government have shown that they are cracking down on businesses underpaying workers. Businesses can show leadership by accrediting as Real Living Wage Employers, ensuring that all their staff (including third-party contractors) are guaranteed a wage which takes cost of living into account.











DIET FOCUS





Cost of healthy lunchboxes

On average, a week's worth of healthy lunchbox items for children from UK supermarkets costs **26%** more than a week's worth of unhealthy lunchbox items.



Photos are indicative of healthier versus less healthy lunchboxes, based on products included in our analysis.

WHY IT MATTERS

To be fuelled for the school day and be set up to do their best in school, children need to be well fed. Although Free School Meals (FSMs) are set to be extended to all those children in England in families on Universal Credit from September 2026, many low income families who are not yet eligible for FSMs struggle to afford a school meal and many choose to send their children to school with a packed lunch. Yet less than 2% of packed lunches meet the School Food Standards (University of Leeds, 2016) and so offer a far less nutritious option than school meals that follow the standards. We know that many parents want to send their children off to school with a healthy and tasty packed lunch but often this is not always the cheapest or most convenient option.

WHAT WE DID

For this metric we analysed a list of products that were available online at seven major retailers. These products have been taken as indicative items that can form part of both a healthy and an unhealthy packed lunch (e.g. plain yogurt pots vs. sweetened yogurt pots). We have previously looked at the cost of unhealthy and healthy lunchboxes as part of our <u>Kids Food Guarantee</u> programme. For this analysis we updated the list of items in both lunchboxes with any products at a lower price point that have launched since we first started tracking

prices in August 2023. For the first time we also looked at Ocado and Iceland in addition to Tesco, Sainsbury's, Asda, Morrisons and Aldi. The price of the lunchbox per week given is for the proportion of the item needed for the portion sizes required, not the full cost of the item. Data was collected in July 2025.

WHAT WE FOUND

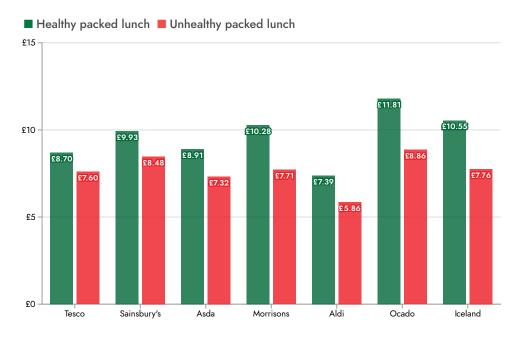
Of the seven retailers we found that:

- The average cost of a week's worth of healthy lunchbox items was 26% higher than for a week's worth of unhealthy lunchbox items. For families on tight budgets the sensible economic choice is therefore not the healthy, nutritious option. This demonstrates the impossible barriers many families face in feeding their children well and the role of our food environment in exacerbating diet-related health inequalities.
- The cost of a week's worth of healthy packed lunches varied notably across the retailers, ranging from £7.39 at Aldi to £11.81 at Ocado, a difference of 46%.
- The cost of a week's worth of unhealthy packed lunchbox items varied more across retailers, ranging from £5.86 at Aldi to £8.86 at Ocado, a difference of 51%.
- > For all seven retailers the cost of a healthy lunchbox was more expensive than the unhealthy lunchbox. Tesco had the smallest difference in price between their healthy and unhealthy lunchboxes (£1.10) while Iceland and Ocado had the largest gaps (£2.79 and £2.95 respectively).

If businesses were more like...

Aldi have had consistently low prices for the items in a healthy lunchbox over the past two years, with one of the smallest gaps of all retailers between the cost of items in a healthy lunchbox and those in an unhealthy lunchbox.

FIGURE 5
Price comparison between a healthy and unhealthy packed lunch per week.



What can businesses do...

Retailers ought to offer packed lunch items that are compliant with current School Food Standards, make up five lunches and can be bought at an affordable price point, for example through a multibuy deal. No retailer currently has such a meal deal, but this would go a long way to helping time-poor families on tight budgets to provide their children with a healthy packed lunch during term-time and holidays.



Availability

What food is available to people when shopping for their groceries or eating out of the home plays a key role in shaping people's diets. If we are to have any chance of hitting health and environmental objectives, healthy and sustainable food needs to be not just more readily available, but available in a higher proportion than unhealthy and unsustainable food.

This section covers two metrics:

METRIC 1 HEALTHY FOOD ON THE GO

METRIC 2 BEANS ON THE MENU AND IN READY MEALS

METRIC 3 **HEALTHY MENUS**









O., O., O. O. DIET FOCUS





Healthy food on the go

Overall, **69%** of train station food outlets visited offered no fruit at all and **85%** no veg snacks. Less healthy snacks were much more readily available than fruit and veg — **a third** (33%) of outlets stocked **over 20 different types** of chocolate, crisps and sweets.



WHY IT MATTERS

What we eat is strongly influenced by what is available and convenient to us, and so what food is available to us when on the go and out and about matters. Despite many people travelling regularly for both business and pleasure, the food available in places like train stations is often overlooked. Yet in the year ending March 2025, there were 1.73 billion passenger journeys on National Rail services in Great Britain, a 7% increase on the preceding year (Office of Rail and Road, 2025).

WHAT WE DID

The Food Foundation created a survey which was shared with our network to assess the availability of healthy snacks at train stations across the UK. As a proxy for assessing the healthiness and unhealthiness of the food on offer, survey participants were asked to look in different outlets for the availability and count of fresh fruit and veg (including crudites, loose fruit or fruit pots) and chocolate, crisps and sweets. While fruit and veg should be the cornerstone of a healthy diet, discretionary foods like chocolate, crisps and sweets should be eaten in much smaller amounts. An open comment section was also provided in the survey to allow participants to share additional observations beyond the questions.

A total of 25 volunteers participated, visiting 21 different train stations and 41 different food businesses (covering

100 individual food outlets in total). Supermarkets in train stations and pubs and bars were excluded, as the focus was businesses from the Out of Home sector offering 'grab and go' options. Most of the train stations visited were located in England, with a broad geographical spread ranging from Newcastle to Bath and London. All the stations visited were large stations as they all had over 0.25 million passenger trips per year (Office of Rail and Road, 2024; Network Rail, 2022). The full list can be found in our technical report.

WHAT WE FOUND

While a third of the 100 outlets had fresh fruit available (31%), in contrast veg options were much more limited, with only 15% of the outlets having any fresh veg available. Overall, 69% of outlets visited therefore offered no fruit at all and 85% no veg. Less healthy snacks were much more readily available than fruit and veg — a third (33%) of outlets stocked over 20 different types of chocolate, crisps and sweets.

Table 5 analyses the options available at those food companies with the greatest presence at the train stations visited. These were defined as companies with outlets visited three or more times by survey participants. The results show a wide variation in terms of healthy snacks available at the most frequently visited outlets. Just five of the most commonly visited outlets offer any type of veg snack, although fruit snacks fare better, with two thirds

(8) of the most frequently visited outlets offering fruit. Only five outlets stocked both fruit and veg snacks. While more companies stocked fruit than veg, there were inconsistencies in availability ranging from 25% of outlets offering fruit (The Pastry Shop) to 100% (Pret). Pret, Caffè Nero and Starbucks have the best fruit and veg snack offer overall.

Yet despite the presence of outlets offering a fruit or veg snack, we found an imbalance in terms of the number of options offered, with train station food environments skewed towards less healthy snack options. Seven outlets offered over 20 types of chocolate, crisps and sweets, with a majority of WHSmith, Café local, and Costa Coffee outlets visited offering this very wide range of unhealthy snack options.

In the qualitative section of the survey participants reported having to plan their meals in advance if they wanted to eat healthily while travelling via train due to the lack of options, or because healthy options sold out faster due to limited quantity. There were also several comments on healthy options being more expensive than unhealthy options, although our survey did not assess price. While not visited as part of this survey, it is also worth noting that small and medium-sized stations would likely have even fewer outlets offering healthy snacks. One participant noted that in the two small local stations near to them (Blyth and Seaton Delaval — not visited in this survey) only vending machines with crisps, chocolate and fizzy drinks are available.

While these findings are not representative of what is available at train stations across the UK, they provide us with a snapshot. Although none of the stations visited were fruit and veg deserts, fresh fruit and veg were neither as widely available nor accessible as chocolate, crisp and sweets.

TABLE 5
Top visited outlets in our survey and the proportion of outlets visited which had fresh fruit, veg and chocolate, crisps and sweets available.

		Total number of outlets visited	% of outlets with any loose fruit or pots of fresh fruit available	% of outlets with any fresh veg such as crudites available	% of outlets with more than 20 different types of chocolate, crisps and sweets
WHSmith EST 1792	WHSmith	11	27%	18%	100%
	Starbucks	10	30%	30%	0%
COSTA	Costa	9	67%	0%	67%
CAFÉ LOCAL	Café local	8	50%	0%	75%
BURGER	Burger King	5	0%	0%	0%
NERO	Caffè Nero	4	50%	25%	25%
* PR[T*	Pret	4	100%	75%	25%
PASSA	The Pasty Shop	4	25%	0%	25%
panopolis	Panopolis	3	0%	0%	33%
LEON	Leon	3	0%	33%	0%
# GREGGS	Greggs	3	33%	0%	0%
crust	Upper crust	3	0%	0%	0%

If businesses were more like...

Pret... While they offer over 20 types of chocolate, crisps and sweets, they also have good availability of both fresh fruit and vegetable snacks across all outlets visited.

What can businesses do...

In high footfall environments, such as train stations where convenience food dominates, businesses ought to better promote and increase their healthy food offerings by increasing the availability of fresh fruit and vegetables as snacks throughout the day and reducing the amount of chocolate, crisps and sweets available at train station outlets.











DIET FOCUS







Beans on the menu and in ready meals

- Just 18% of ready meals and 14% of restaurant menu options contain beans, pulses and other legumes.
- When we looked only at pulses (like chickpeas and lentils) included in supermarket ready meals, we found that just 6% of meals contained pulses. On restaurant menus, only 7% contained pulses.



WHY IT MATTERS

In the UK, emissions from the food system account for 19% of our GHG emissions and must be reduced if we are to be able to hit the UK's Net Zero goal (National Food Strategy, 2021). For food businesses, Scope 3 emissions must be tackled if they are to make good on their climate commitments; for retailers, meat and dairy make up an estimated 47% of all Scope 3 emissions (Madre Brava, 2024).

Beans, pulses and other legumes offer a positive route to reducing diet-related GHG emissions and are a winwin for climate, nature, health and affordability. They are also enjoyed by a wide range of different cultures and communities and used in many diverse global cuisines.

Businesses can play a key role in boosting the uptake of beans in our diets; however, they need to be made more available in grocery stores and in restaurants and canteens, as well as being made more appealing through better marketing and promotion. We wanted to get a snapshot of the current availability of beans, pulses and other legumes being sold in meals by large food businesses to see which companies are currently leading the way, and where there are opportunities to improve companies' offerings.

* See the technical report for results on branded ready meals.

WHAT WE DID

We looked at the availability of beans, legumes and pulses in a) own-brand ready meals sold online by large food retailers, and b) in dishes on restaurant menus in all main meals and sides, including kids' meals. We used data from the websites of those retailers, casual dining and quick service restaurants included in <u>Plating Up Progress</u> analysis.

For this research we included all beans, pulses and other legumes. Pulses are a specific type of legume — the dried edible seeds of leguminous plants, such as lentils, chickpeas and kidney beans — while legumes encompass a broader category that includes components of the entire plant, for example fresh green peas and soybeans. We included products made from legumes (e.g. tofu and tempeh) but excluded sauces or oils (e.g. soy sauce). We also included soy and pea isolates. We excluded peanuts, given their nutrient profile is more in keeping with the nut category where they are typically categorised. See the technical report for more detail on exclusions.

We gathered the data from seven of the biggest retailers and 21 restaurant chains (15 casual dining and six quick service restaurants).

For the retailers, we looked at all own-brand ready meals displayed on supermarket websites and branded ready meals* produced by those manufacturers included in PUP.

WHAT WE FOUND

Of the retailers assessed, only 18% of all own-brand ready meals contained beans, legumes and pulses. Of the ready meals which contained beans, 81% were main meals and 19% were sides. The most common variety of beans found in ready meals were from the fresh green peas/mangetout category, which comprised 37% of beans used in ready meals (see Figure 6). While fresh green peas and mangetout beans are technically both legumes, many people would consider these more as vegetables. When we looked only at pulses (like chickpeas and lentils) included in own-brand ready meals, we found that just 6% of meals contained pulses, the highest category being kidney beans (20% of the total).

Of the restaurants included in our analysis we found that only 14% of dishes on menus contained beans, legumes and pulses. Of the dishes that contained beans, 77% were main meals and only 4% were sides. Similarly to those beans found in retailer ready meals, the fresh green pea/mangetout category was the most common in dishes on restaurant menus, making up almost half (47%) of beans on the menu (see Figure 7). When we looked only at pulses (like chickpeas and lentils) in dishes on menus, we found that only 7% contained pulses, with baked beans contributing 53% of the total.

This demonstrates the opportunities for both retailers and restaurants to explore using a broader variety of beans in their offering.

Tesco offered the highest number of ready meals containing beans, legumes or pulses, 28% of their offering (Table 6). Of the restaurants assessed, Wagamama offered

the highest percentage of dishes containing beans, making up over half of their menu (51%), as shown in Table 7. About half of their dishes with beans contained soybeans, and half contained peas or green beans. When we looked only at pulses, Wagamama did not offer any dishes on their menu with pulses, as shown in Table 7.

Although McDonald's ranked the highest of the quick service restaurants assessed, the percentage was still low, with only 7% of dishes on their menu containing beans, legumes or pulses (see Table 7). When we looked at just pulses, McDonald's also ranked highest, with 5% — they offered the largest number of veggie/vegan options, all of which contained either yellow split peas or pea protein.

TABLE 6
Beans, legume or pulse availability in retailer ready meals.

Companies	(%) Containing beans, pulses or other legumes	(%) Containing only pulses
Tesco	28	9
Morrisons	24	6
Asda	22	13
Iceland	21	5
Ocado & M&S	18	6
Sainsbury's	12	4
Waitrose	8	4

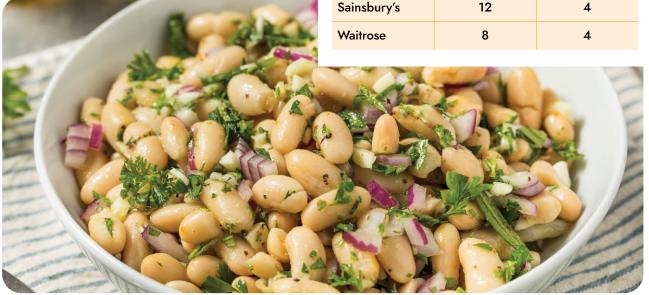


TABLE 7
Bean, legume or
pulse availability in
restaurant menus
(casual dining chains
and quick service
restaurants).

	Companies	Restaurant/sub-brand	(%) Containing beans, legumes or pulses	(%) Containing only pulses
	The Restaurant Group	Wagamama	51	0
	Mitchells & Butlers	Vintage Inns	30	19
	JD Wetherspoon	JD Wetherspoon	25	20
CASUAL DINNG	Whitbread	Brewers Fayre	24	5
	Whitbread	Table Table	24	5
	Mitchells & Butlers	Harvester	23	13
	Mitchells & Butlers	Sizzling Pubs	21	8
	Mitchells & Butlers	Ember Inns	16	16
	Nando's	Nando's	14	9
	Mitchells & Butlers	All Bar One	13	4
	Whitbread	Beefeater	13	1
	Mitchells & Butlers	Miller & Carter	10	10
	Whitbread	Bar + Block	8	3
	Mitchells & Butlers	Stonehouse Pizza & Carvery	4	0
	Mitchells & Butlers	Toby Carvery	0	0

	Companies	(%) Containing beans, legumes or pulses	(%) Containing only pulses
	McDonald's	7	5
~	Upper Crust	5	1
QSR	Burger King	4	0
	Greggs	2	2
	KFC	2	2
	Domino's	0	0



FIGURE 6 Types of beans, legumes and pulses in retailer ready meals.

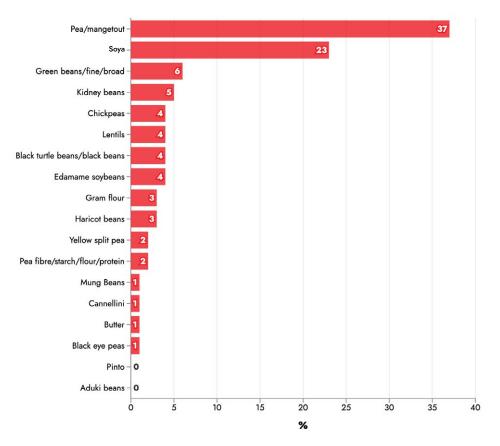
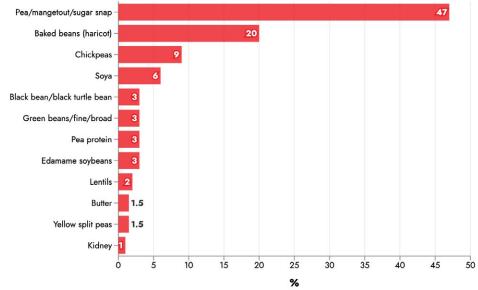


FIGURE 7
Types of beans, legumes and pulses on restaurant menus.





What can businesses do...

- Become Keen Bean Pledgers! As part of our campaign to double UK bean consumption by 2028, we're looking for businesses to set SMART targets in line with our Commitment Framework for increasing sales and servings of beans. We'll be tracking business progress and highlighting leadership and case studies of bean innovation.
- Retailers can take actions such as substituting some of the animal protein or carbohydrate within ready meals for beans, pulses and legumes and increasing the number of bean and beancontaining options within Meal Deal and food on the go options (e.g. falafel wraps).
- Restaurants can take actions such as increasing the number of menu options containing beans, drawing on the WRI's Food Service Playbook for evidenced recommendations in changing customer behaviour (e.g. menu description updates).

TABLE 8 Which food companies have become Keen Bean Pledgers?

Companies		Pledge level	Promoter status
Bidfood Inspired by you	Bidfood	Gold	Increase volume sales for all bean products (incl. composites) by 30% by 2028
BRINDISA	Brindisa	Keen Bean	Increase category volume sales by 30% by 2028
COMPLEATFOOD	Compleat Foods	Keen Bean	We are committing to a 25% increase in sales of beans in year 1.
Harvester	Harvester	Gold	Increase volume of procured beans by 15% by 2028
(33)	ISS	Gold	Increase procurement of beans by 25% by 2028
L .DL	Lidl GB	Gold	Increase volume sales for all bean products (incl. composites) by 50% by 2028
M&S EST. 1884	M&S	Gold	Increase volume sales for all ambient bean products by 15% by 2028
MERCHANT GOURMET	Merchant Gourmet	Platinum	Double volume sales for all beans by 2028
ocado	Ocado		Pledge to be finalised
Sainsbury's	Sainsbury's		Aiming to increase sales tonnage for beans and pulses by 2028 (detail TBC)
Suma	Suma	Platinum	Double volume sales for all beans by 2028
Waitrose	Waitrose	Gold	To increase tonnes of beans sold by 25% by 2028 by driving sales of beans as well as sales of our products with beans in

Find more information for businesses <u>here</u> and look at the <u>Keen Bean Commitment Framework</u> for more actions for retailers, restaurants and other food sectors.









DIET FOCUS







Healthy menus

Restaurant, pubs and bars have the most calorific menus, with dishes averaging 726 calories. There is huge variation across businesses - the average calorie count Stonehouse Pizza & Carvery is 1,015 calories, compared to just 406 calories at Nando's.



WHY IT MATTERS

A guarter of adults in the UK are now living with obesity (The Food Foundation, 2023) and the OOH sector is a key contributor to the obesity challenge. Eating out has gone from being an occasional treat to a weekly or - in some cases daily occurrence for much of the population.

But although we are eating out regularly, the way we are doing this has changed. The traditional image of dining at a restaurant has been superseded by meal deals for lunch and chips on the way home from school. In the latest National Diet and Nutrition Survey (NDNS) consumer survey, 23% of adults report buying food from fast food or takeaway outlets on a weekly basis (NDNS, 2025). The other major change is the continued rise of the delivery apps. Although their popularity has waned slightly since Covid-19, in 2024 the UK's online food delivery market reached a value of \$48.21 billion and is expected to keep climbing, with a predicted annual growth rate of 8.49% until 2028 (Deliverect, 2025). Ironically, ordering in is the new eating out. The problem is that food delivery apps are not under the same levels of scrutiny as other parts of the food industry and remain largely unregulated.

Our appetite for eating out comes with potential health implications, given that food eaten out of the home is on average 21% more calorie dense than home-cooked food (Nesta, 2023). While calories are a crude measure of nutrition, they are nevertheless a useful proxy for assessing the healthiness of food given the direct link between overconsumption of calories and weight gain.

WHAT WE DID

This metric assesses the healthfulness of the major QSR and casual dining chains in the UK by looking at the average number of calories across their menu items. Using data kindly provided by the London School of Hygiene & Tropical Medicine (LSHTM) from October 2023, we looked at the number of calories for all food items on the menus of selected chains to ascertain how healthy or unhealthy their food offering is.

Research included all food items - excluding drinks, condiments, toppings or extras, and items that were sharers for two or more people. All other items, such as sides and smaller plates, have been included in the analysis alongside mains. This means that the subsequent summary measures are very likely underestimating what people order and shouldn't be interpreted as such rather, they provide a picture of the average calorie density of menus across the different OOH companies and business types.

We distinguished chains based on their subsectors within the OOH sector as we recognise that a café or bakery has a different food offer to pubs. Chains have been ranked from unhealthiest to healthiest.

The availability of restaurants, and calorie labels, in the least and most deprived neighbourhoods

Using all available food delivery data, LSHTM research (Kalbus et al, 2025) also looked at the availability of restaurants on delivery apps in low versus high income areas, and the prevalence of calorie labelling in those restaurants. Their research showed that the most deprived areas had almost ten times more restaurants available for delivery, but of these, the relatively lowest percentage of restaurants that showed calories. This suggests many of the outlets on delivery apps in most deprived areas may be small, independent and less regulated restaurants — such as fried chicken shops — and thus out of scope of calorie labelling regulation.

That there are significantly more restaurants on meal delivery apps in the most deprived areas demonstrates how easy it is to buy convenient, often calorie-dense foods in low income areas, potentially contributing to the already severe dietary inequalities we see across our society.

TABLE 9 Number of restaurants showing calorie labels based on area deprivation quantile.

Area deprivation quintile	Total number of restaurants available for delivery	% of restaurants on delivery apps with calorie labelling
1 – most deprived 20%	820	8.9
2	257	11.8
3	167	13.0
4	117	13.7
5 – least deprived 20%	84	14.4

WHAT WE FOUND

Looking at the casual dining companies (restaurants and pubs), we found a large variance between the least and most healthy menus, with casual dining chains having both the healthiest food chain and the least healthy food chain. The average calorie count for an item on the menu at Stonehouse Pizza & Carvery is 1,015 calories, compared to just 406 calories at Nando's.

Interestingly, there is also a surprising variance between the calorie content of menu items within the QSR restaurants. McDonald's have a relatively healthier menu of 352 calories which is 38% less calorific than an equivalent offering at their main competitor, Burger King, at 572 calories. What is missing from this piece of analysis is sales data, as although the average calorie content is lower at McDonald's, it may be that people are buying two burgers or multiple sides at McDonald's but fewer items from Burger King.

In some cases, notably at Greggs, the median number of calories is significantly lower than the average, showing that a few very high-calorie items can skew the distribution and pull the mean up. Stonehouse Pizza & Carvery has the

highest number of calories across both the mean and median values.

Restaurants were the most calorific OOH subsector overall, with the top three unhealthiest menus all coming from restaurants (Stonehouse Pizza & Carvery, Harvester and Miller & Carter). Conversely and perhaps surprisingly, fast food and takeaway outlets were the subsector with the least calorific menus.

One possible reason for the difference in calorie content between casual dining and QSR's menus is their different menu structure. Casual dining restaurants typically serve complete meals and have larger portion sizes and



£1.50

freshly baked products

therefore more calories in comparison to the QSR chains who also offer single serving options alongside main meals. Typically, if someone orders a burger at a pub it is going to come with chips, but if someone orders a burger at a fast food chain they also need to order chips separately.

Another possible reason for the difference in calorie content could be due to large QSR chains having been early adopters of calorie labelling, often before the legislation was introduced. As a result, they've had more time to reformulate recipes and introduce lower-calorie options. Casual dining chains, which have more diverse and less standardised menus, may find it harder to reformulate or consistently display calories across all items.

"we found a large difference between the least and most healthy menus"

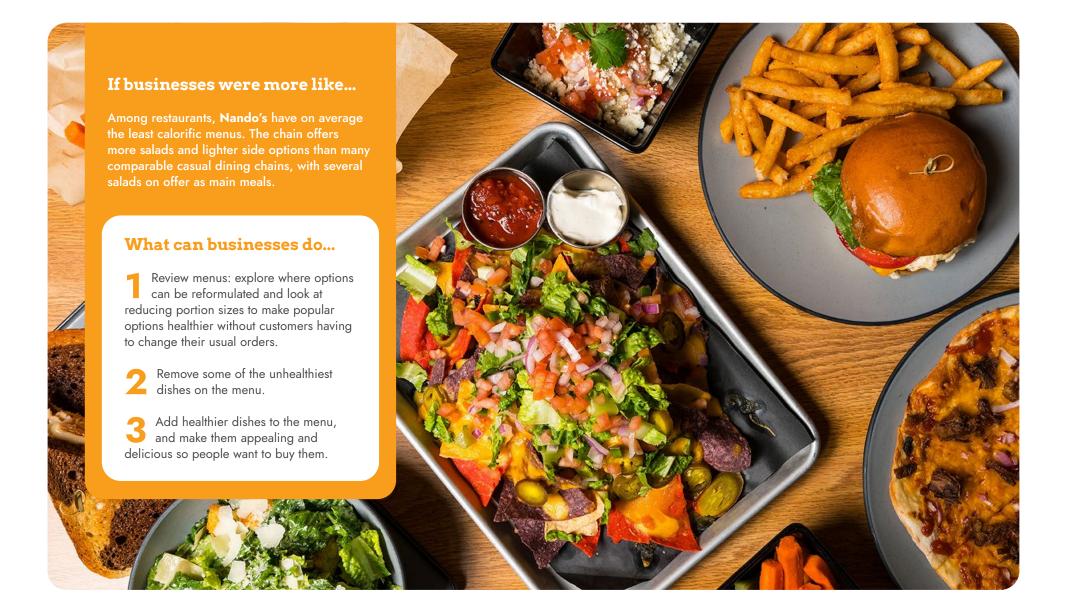
TABLE 10 List of QSR restaurants from highest to lowest mean calorie content per menu item, as of October 2023.

Business	Subsector	Mean kcal of food items on the menu	Median kcal of food items on the menu
Burger King	Fast food & Takeaway	572	571
Upper Crust	Cafes & Bakeries	524	438
Bar Burrito	Fast food & Takeaway	511	539
Greggs	Cafes & Bakeries	434	438
KFC	Fast food & Takeaway	339	330
McDonald's	Fast food & Takeaway	352	321
Subsector average	Fast food & Takeaway	443	434
Subsector average	Cafes & Bakeries	404	438
Sector average	Overall	427	438

TABLE 11 List of casual dining restaurants from highest to lowest mean calorie content per menu item, as of October 2023.

Business	Subsector	Mean kcal of food items on the menu	Median kcal of food items on the menu
Stonehouse Pizza & Carvery	Restaurants	1,015	936
Harvester	Restaurants	963	785
Miller & Carter	Restaurants	803	696
O'Neill's	Pubs & Bars	796	655
Ember Inns	Pubs & Bars	753	701
Vintage Inns	Pubs & Bars	751	735
Nicholson's	Pubs & Bars	747	677
Premium Country Pubs	Pubs & Bars	733	614
Sizzling Pubs	Pubs & Bars	667	646
Toby Carvery	Restaurants	664	556
Browns	Restaurants	661	577
All Bar One	Pubs & Bars	623	626
Wagamama	Restaurants	579	504
Nando's	Restaurants	406	367
Subsector average	Restaurants	727	577
Subsector average	Pubs & Bars	724	655
Sector average	Overall	726	650

AVAILABILITY MENUS





When it comes to food and drink, what we see in front of us — whether it's the way a dish has been described on a menu, or the advert we see at the bus stop on the way into work — impacts our purchasing habits. Advertising, marketing and promotion are the cultural wallpaper that form the backdrop to our cultural, social and individual attitudes towards food, yet this is currently heavily skewed towards promoting less healthy and less sustainable food.

This section covers two metrics:

METRIC 1 OUTDOOR ADVERTISING

METRIC 2 GAMING



2023. Provided by Impact on U



Outdoor advertising

Outdoor advertising spend by food companies increased by **28%** between 2021 and 2024 in the years following the government's announcement in July 2020 of a forthcoming ban on TV and online advertising. McDonald's increased outdoor advertising spend by **71%** between 2021 and 2024.



WHY IT MATTERS

Although the UK government are due to implement advertising legislation in January 2026 that will ban TV and online HFSS food and drink advertising, outdoor advertising is exempt from the forthcoming restrictions. This loophole risks businesses simply shifting spend on HFSS food and drink from online, radio and TV into outdoor advertising, a tactic which appears to be accelerating ahead of the forthcoming ban. Some councils (namely Bristol, Barnsley, York, Luton, Haringey, Merton, Southwark and Tower Hamlets) have taken the move to ban outdoor advertising of HFSS foods, demonstrating the consensus around the negative impact these kinds of adverts have on our health.

Outdoor (or 'out of home') advertising formats include billboards, buses, bus shelters, train station advertising, shopping outlets and taxis. It is a powerful way of reaching a wide and diverse audience with 98% of the UK population seeing at least one outdoor ad each week (Seixas, 2025). For children, outdoor advertising provides the second largest source of exposure to food advertising (30.3%) after television advertising, and accounts for the largest source of HFSS food advertising (40.0%) (NIHR, 2024)6.

⁶These figures exclude digital advertising.

WHAT WE DID

For this metric we looked at data published by Outsmart, the UK's trade body for the outdoor (OOH) advertising industry. This data details the biggest spenders within outdoor advertising, broken down by the type of advertising environment (roadside, transport, and retail & leisure), industry category, and ranks spend by individual organisations annually over the period 2021 to 2024.

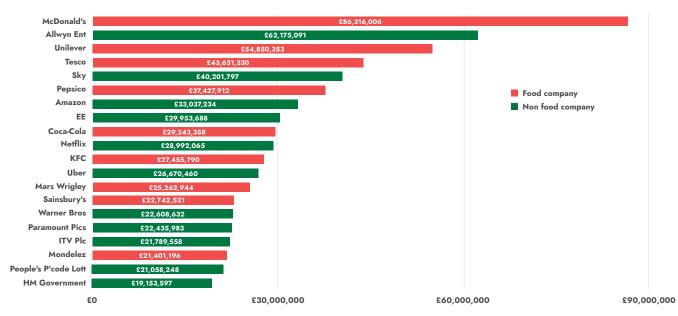
WHAT WE FOUND

- Outdoor advertising for food appears to be increasing ahead of the forthcoming ban on TV and online, with advertising by food businesses 12.2% of total outdoor advertising in 2024, up from 9.5% in 2021. When drink is included, spend on food and drink combined rises to over a fifth of all outdoor advertising (21%) in 2024.
- As a proportion of total outdoor advertising spend, this means food business have increased their spend on outdoor advertising by over a quarter (28%) between 2021 and 2024.
- Of the top 20 outdoor advertisers by spend in 2024, almost half (45%) were food companies, with two retailers, two fast food outlets and five manufacturers featuring in the top 20 biggest spenders (see Figure 8).

McDonald's is by far the largest spender on outdoor advertising, spending a total of £86 million in 2024, an increase of 71% between 2024 and 2021. This is three times more spend on outdoor advertising than KFC, and four times more than Mondelez.



FIGURE 8 Top 20 advertisers 2024.



What can businesses do...

Although outdoor advertising is exempt from the forthcoming advertising restrictions, responsible businesses (particularly those with responsible marketing policies targeted towards children) should follow the spirit of the law in the absence of government policy and ensure that they are advertising healthier products across all media channels.

2 Collaborate and learn from the 24 English Councils plus the Transport for London (TfL) network which have HFSS bans or healthier ad frameworks to promote healthy products. Evidence from TfL has shown that banning HFSS products from outdoor settings has led to a number of positive health outcomes, particularly for those from more deprived areas (Thomas, et al 2022).

Advertising agencies and businesses should shift promotional spend and creative towards minimally processed foods.







DIET FOCUS



"Three quarters of **UK** adolescents

use videogame





Over two thirds (71%) of food marketing cues on the world's most popular videogame livestreaming platform are for unhealthy (HFSS) food and drinks, with 77% of branded cues for energy drinks and soft drinks, and a fifth of branded cues (20%) for the Out of Home sector.



WHY IT MATTERS

Although the UK government are due to implement advertising legislation that will ban online HFSS food and drink marketing in January 2026, adverts for brands rather than specific products are exempt. Additionally, the focus of the restrictions for online advertising are for paid-for ads, yet it is not always possible to identify where ads online are paid, sponsored or gifted. HFSS marketing on videogame livestreaming platforms are frequently brand-only and blur the line between advertising and entertainment. Typically, the marketing is embedded directly within streamed content and is broadcast to global audiences simultaneously. Together, these features enable advertisers to exploit grey areas in the forthcoming regulations and complicate effective reinforcement. This potentially represents a notable and concerning area given the huge and growing influence of livestreaming gaming platforms on teenagers.

In the UK, the vast majority of adolescents (97–100%) have their own mobile phone, with three guarters (73-79%) using gaming apps or sites (Ofcom, 2022). As of January 2025, Twitch - the largest videogame livestreaming platform – was the 30th most visited website in the world (Wikipedia, 2025). Despite this, marketing restrictions typically focus on younger children aged under 13, even though adolescents are typically exposed to greater amounts of digital food marketing and are still at an impressionable stage of emotional development (Evans, 2024).

WHAT WE DID

livestreaming Videogame livestreaming apps or platforms can be accessed sites" via computers, tablets, mobile devices and consoles. They function as a type of social network for players, allowing users to watch livestreamed gaming content from influencers, and to interact with influencers and others in the community via a live chat.

Food marketing on videogame livestreaming platforms is insidious and can take multiple different forms. References by gamers to products as well as visual displays of brands are known as 'food cues' and can appear in the video stream as a physical item (i.e. shown by the gamer in the livestream itself), as an image overlaid on the streamed content, in the title of the stream, or in the streamer's 'about' section (see our technical report for further details).

Researchers at the University of Liverpool analysed visual food cues displayed during 52 hours of livestreamed gaming videos for Fortnite, uploaded by three popular gaming influencers on Twitch during October 2020-September 2021. Food cues were then categorised according to the WHO Nutrient Profiling Model (NPM). While the study is small, the sample size meets WHO guidelines and provides a useful snapshot of food marketing prevalence on gaming platforms.

APPEAL METRIC 2: GAMING

WHAT WE FOUND

Adverts for food and drink are endemic on videogame livestreaming platforms, with 94% of the footage analysed featuring a food or drink cue. Moreover, the vast majority (71%) of food cues were for unhealthy (HFSS) food and drink, with the non-HFSS products largely made up of adverts for a low sugar energy drink. Marketing cues for energy drinks, soft drinks⁷ and fast food restaurants dominated. Approximately 39% of food and drink cues featured brands rather than identifiable products and would therefore be out of scope of the forthcoming regulations. Additionally, in almost all food cues (98%) there was no indication or disclaimer that the streamer had been paid to feature the brand or product, making enforcement of advertising restrictions on such gaming platforms incredibly challenging.



⁷Soft drinks here includes all drinks that are not energy drinks.

TABLE 12
Food cue brand names ordered by frequency of appearance.

Brand name	Organisation/ product type	(%) of featured branded cues
Red Bull	Energy drink	43
GFUEL	Energy drink	14
XP Sports	Energy drink	14
Zaxby's	OOH – fast food restaurant	13
Postmates	OOH – online food delivery service	6.5
Coca-Cola	Manufacturer – soft drink	3
Gatorade/ PepsiCo	Manufacturer – sports drink	2
Takis	Manufacturer – crisps brand	2
Mountain Dew	Manufacturer – soft drink	1
Starbucks	OOH – coffee shop	1

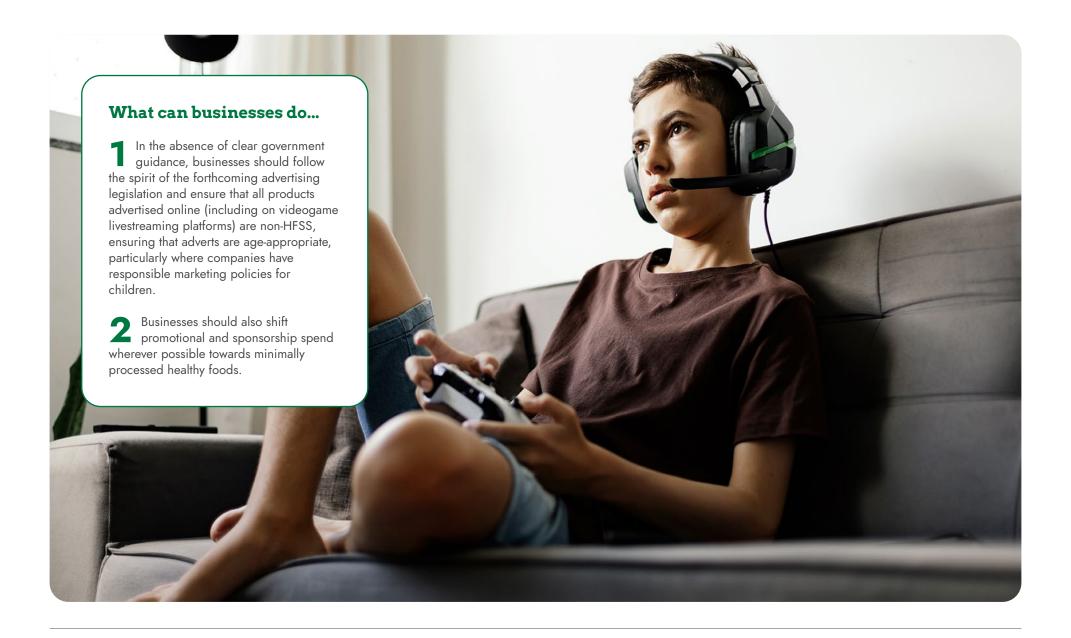
Although a number of the identified products were for American brands and companies, research suggests that advertising can affect children's food intake and preferences at a general level for types of food, not just the specific brand in question (Boyland et al, 2024). For example, while Zaxby's (a US chain of fast food outlets

selling fried chicken) does not operate in the UK, their brand marketing may still lead to teenagers craving similar food from British fast food outlets.

And indeed, another study exploring food marketing used on Twitch, the popular videogame livestreaming platform (looking only at marketing in stream titles) found that fast food restaurants were the second most frequently mentioned category of the six food and drink categories analysed. Additionally, all of the fast food outlets identified as the biggest marketers on Twitch operate in the UK (Table 13) (Edwards et al, 2025). Almost 1 in 10 (9%) of all marketing cues analysed were for fast food companies, with energy drink brands mentioned most frequently (a staggering 74% of all stream titles).

TABLE 13
The top five most frequently mentioned restaurant brands on Twitch (% of stream titles).

	Brand name		(%) of featured branded cues
1.	Uber Eats	Uber Eats	19%
2.	KFC	KFC	16%
3.	Chipotle		15%
4.	McDonald's	M	12%
5.	Taco Bell	TACO BELL	8%



Summary

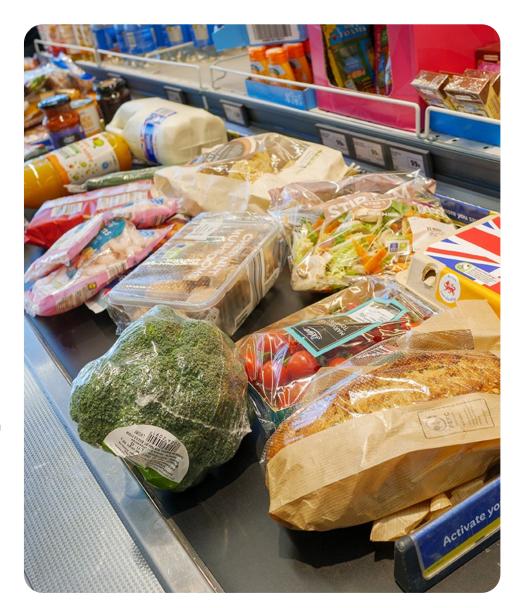
This year's SOFI report shows that we cannot continue to leave progress on healthy and sustainable sales to the market. Healthy and sustainable food remains unavailable and unaffordable for far too many. Commercial organisations, some acting in bad faith, continue to disproportionately influence food policymaking — creating an environment where fear of industry pushback has stymied the ambitious policymaking so urgently needed to reform our food system. In the absence of mandatory action from the government we see uneven progress towards healthy and sustainable diets, with

only the most progressive companies transparently

reporting and setting meaningful targets to drive change, and virtually no progress in the

We cannot continue to leave progress on healthy and sustainable sales to the

Out of Home sector. The government must seize on the opportunities presented by the development of a new food strategy to ensure the long-term sustainability of the UK's food system, one that delivers for both people and planet into the future. A Food Bill would be a good place to start.



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