

Food Data Transparency Partnership

Health Working Group

Meeting 2 – summary

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| Date | 18 September 2023 |
| Time | 10:00-15:00 |
| Venue | Sainsbury's Head Offices, Holborn, London |

Attendees

HWG Co-chairs:

Susan Barratt, Non-Executive; Jonathan Marron, DHSC

HWG Members:

Bettina Abruzzese, Danone; Paul Bedford, Deliveroo; Josephine Blundy, Pilgrims Food Masters; Rachel Bradford, YUM (KFC); Sarah Healey, Mitchells and Butlers; Nicky Martin, Compass Group; Ruth McDonald, Morrisons; Karen Poole, Tesco; Belinda Quick, General Mills; Nilani Sritharan, Sainsbury's; Lauren Woodley, Nomad Foods; Liz Read, Nestlé.

DHSC and HWG Secretariat:

Tazeem Bhatia, DHSC and members of the HWG Secretariat and DWG Secretariat.

Apologies:

Anita Kinsey, Pret A Manger; Koen ter Mors, Mars Wrigley; Alissa Wilson, PepsiCo; Natasha Burgon, DHSC; Sean Povey, DHSC; member of the Eco Secretariat.

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| Item | Discussion |
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| 1. | <p>Welcome & Introductions</p> <ul style="list-style-type: none"> • Attendees were welcomed to the second meeting of the FDTP Health Working Group (HWG). • Members were reminded that representatives from the Data and Eco Working Groups will attend all HWG meetings going forward to support join up between the Groups. • Members were thanked for their engagement with the homework tasks. Where homework deadlines prove challenging, members were reminded to notify the HWG secretariat in advance to support wider planning. • Members were reminded that the priority focus of the HWG between now and the end of the year is to develop a long and then short list of health metric options – HWG meeting 2 marks the start of this process. The list of metric options will be developed with input and feedback from non-HWG members, including investor groups and NGOs, via a wider programme of stakeholder engagement. Conversations on the technical aspects of data and reporting will commence in the New Year. |
| 2. | <p>Session 1 – current disclosure landscape</p> <ul style="list-style-type: none"> • The HWG secretariat set out the purpose of session 1 – to build a common understanding amongst members of the current disclosure landscape. This discussion is intended to inform, but not limit the work of the HWG. • Members discussed the reasons for and the differences in the current disclosure of information. • Members noted legislative obligations and voluntary programmes, the importance of investor interest, NGO reporting asks and supply chain pressures as some of the key reasons for voluntary disclosure. Some members also noted the role of data in providing better capability for evaluation of wider initiatives, leading to business efficiencies and the celebration of progress as other motivating factors for disclosure. • Members recognised that diversity in reporting sector-wide reflects the fact that not all sectors are subject to the same legislative requirements and so the data held and systems in place vary from business to business. This is particularly so for the Out of Home (OOH) sector. • Members agreed that whilst having high data standards and consistency of definitions is important, identifying data that is good enough should be a key driver for this work. • Members sighted cost and resource as barriers to reporting, as well as the additional and at times competing reporting asks from the international level which adds pressure to internal teams. • Members discussed the impact employees have on an organisation’s decision to disclosure performance against health and sustainability goals to demonstrate progress. The increased importance and focus on sustainability reporting was also noted as a potential opportunity for reporting on health. |
| 3. | <p>Session 2 – draft criteria for shortlisting health metrics</p> <ul style="list-style-type: none"> • The HWG secretariat presented a first draft of a proposed set of criteria to support the shortlisting of health metrics. The draft set of criteria was developed with consideration of the ambition and objectives of the FDTP health strand. It also accounts for the challenges members and other stakeholders have raised when discussing health metric options. • The HWG secretariat confirmed several areas where further discussion and decisions are required, including the weighting of criteria, how many metrics |

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| | <p>are required and whether metrics are required to fulfil all parts of the criteria, and the extent to which metrics are relevant for categories and sectors.</p> <ul style="list-style-type: none"> • The HWG secretariat also confirmed that the draft criteria will be tested with non-HWG members, including representatives from civil society, before being finalised ahead of HWG meeting 3. • Members agreed on the importance of agreeing a short list of criteria to ensure objectivity of evaluation. • Members discussed that draft criteria and made the following points: <ul style="list-style-type: none"> ○ Agreed that the criteria should reflect the needs of industry, investors and NGOs, as the key targets for this work. ○ Agreed that the ability of a metric to demonstrate progress, both across time and across businesses, is a key criteria. ○ However, also agreed that the criteria should ensure fairness and flexibility in how you achieve progress against a metric, to reflect that range of portfolios and differing business level objectives. Contextualising progress against past success as well as the wider context should also be considered. ○ Agreed on having criteria focused on ensuring metrics are clear and simple so the data can be more easily understood. ○ Agreed that consistency of definitions, and ensuring these are rooted in science, is essential. ○ Agreed on including criteria around the ease of implementation, and the importance of balancing what data can be accessed against cost and resource requirements. Alignment with wider reporting asks should also be taken into consideration. ○ Agreed on the importance of testing metrics for unintended consequences and missed opportunities. ○ Agreed on the importance of having criteria that accessed a metric as part of a suite of other metrics, to minimise any potential contradictions. • Members discussed the draft criteria set out below, subject to further feedback from HWG members following the meeting, feedback from non-HWG members and subsequent refinement: <ol style="list-style-type: none"> 1. <i>Does this metric provide flexibility in how business can deliver progress towards increasing the proportion of healthier sales?</i> 2. <i>Does this metric have a clear role in driving progress and enable businesses to demonstrate progress over time?</i> 3. <i>Does this metric incentivise progress which aligns with current dietary guidelines and is based on science?</i> 4. <i>Can this metric be publicly reported fairly and consistently across the full food and drink sector? If not, can it be publicly reported fairly and consistently across businesses in the same sector?</i> 5. <i>Can businesses in all sectors reasonably access the data they would need to report against this metric?</i> 6. <i>Does this metric align with existing legislation, reporting requirements and wider commitments?</i> 7. <i>Could this metric cause any unintended consequences?</i> 8. <i>Can this metric be gamed?</i> |
| <p>4.</p> | <p>Session 3 – Early thinking on health metric options</p> <ul style="list-style-type: none"> • The HWG secretariat reminded members that the focus of this session is to discuss early thoughts on potential metric options. This marks the first of many conversations around metric options and no decisions at this point will be made on which metrics are taken forward. A similar exercise will be |

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| | <p>undertaken with non-HWG members to ensure a diversity of viewpoints. The aim is to compile all viewpoints for discussion at HWG meeting 3.</p> <ul style="list-style-type: none">• Members were reminded that the definition of 'healthier' falls outside the remit of the FDTP. A more detailed conversation on scope at a product or category level will follow once a shortlist of metric options has been identified.• Members were also reminded that the FDTP will not prescribe specific business level objectives or the mechanism to achieve healthier sales (i.e. reformulation, investment in new product development etc). But a key part of the process will be understanding how different metrics might incentivise different behaviour at a business level. <p><i>Members were divided into 3 breakout groups, assigned a theme and asked to discuss potential metric options. Each breakout fed back, and this was followed by a full group discussion.</i></p> <ul style="list-style-type: none">• Group 1 focused on composite scores i.e. Nutrient Profiling Model (NPM)/ products high in fat, salt and sugar (HFSS) based metrics.<ul style="list-style-type: none">○ Members discussed the benefits of using the current UK NPM given the application and familiarity of this tool across most businesses/ sectors. There was recognition of its use in current and upcoming policy thereby providing a legally agreed definition.○ Recognition was also given to the limitations of the NPM model and the challenge this could present to smaller businesses, especially in the OOH sector.○ Members discussed the importance of considering metric options that are accessible now such as % volume sales HFSS/non- HFSS at portfolio level.○ Members recognised the binary nature of an NPM and discussed whether a potential metric based on a company average NPM score based on volume sales could be a complementary measure to demonstrate progress. It was felt this could enable businesses to demonstrate improvements in products/ categories unlikely to become non-HFSS.• Group 2 focused on individual macro and micronutrient scores.<ul style="list-style-type: none">○ Members acknowledged that most businesses should be able to report on individual nutrients per total tonnage and as a sales weighted average (SWA). Members agreed on the importance of reporting on both positive (i.e. fibre) and negative nutrients to demonstrate that a business' progress for positive nutrients has not led to increases in negative nutrients. However, clarity on what the metric is intending to demonstrate is essential.○ Members noted that data on calories is common across most businesses. However, it was noted that shifts in calories may not capture all the changes made to products/ categories and so it would need to be accompanied by other metrics.○ Members agreed that not all businesses across all sectors of the food industry hold micronutrient data, therefore a metric relating to this would be challenging.○ Members discussed combining this with reporting against food groups (i.e. fruit and veg, fibre rich carbohydrates), potentially using the Public Health England reduction and reformulation categories as a baseline, as this may be more accessible to certain businesses. |
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| | <ul style="list-style-type: none"> ○ Members also discussed using procurement of ingredients in tonnage as another measure of change to demonstrate overall change even if this is not seen at the category or product level. ○ Members discussed the challenge of having a metric linked to wholegrain given the lack of an agreed definition. They also discussed the option of a metric focused on protein, broken down by animal or plant source. ○ Members noted the potential for market trends to impact data, for example, warmer temperatures leading to increased ice cream sales. ● Group 3 were tasked with considering any other possible metric options. <ul style="list-style-type: none"> ○ Members discussed potential metrics to drive increased sales of various food groups; for example, fruit, vegetables, nuts, legumes and wholegrains. Members noted that various drivers could achieve this, such as through marketing and advertising or increasing proportions in products. ○ Members also explored whether a metric to promote the use of other Government initiatives, such as the Eatwell Guide, could be incorporated. Members noted the importance of alignment with regulatory ambitions. ○ Members discussed that metrics within this theme could supplement NPM/HFSS based metrics and nutrient based metrics, as opposed to being standalone metrics. ○ Members discussed the possibility of tracking new product development as an absolute value. ● Members debated the importance of category level reporting to demonstrate progress, especially where products are unlikely to ever shift from HFSS to non-HFSS designations. Members also noted that external reporting at a portfolio level can mask progress at a product/ category level. ● Members discussed the importance of portion size and opportunities around capturing portion size in health metrics. However, members also noted the challenges around portion size, including the lack of definition, as well as consideration of the impact of cooking/ preparation in certain categories. From an OOH perspective, members also noted that reporting on what is procured, rather than what is sold, is often easier given the turnover in recipe/ menu options. ● Members agreed on the importance of sales volume over sales value, given that volume ensures focus on the aspect that impacts a population's health. But members also recognised that interest in sales volume and sales value will vary depending on the audience of the data. ● Members discussed the positives and negatives of using SWAs and whether the data produced would provide internal teams with the direction needed to meet health-related objectives. Members noted that SWA may not apply to composite scores and that % volume sales may be sufficient. |
| <p>5.</p> | <p>Next Steps</p> <ul style="list-style-type: none"> ● The HWG secretariat confirmed that the draft criteria and themes discussed as part of session 3 would be tested with non-HWG members for input and feedback. ● Members were updated on the FDTP health team's wider programme of stakeholder engagement, including engagement with NGOs, investors and the wider FDTP governance groups. ● Members were reminded that homework will be set between each meeting. Homework 2 will include a series of bilateral engagements between HWG |

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| | members and the HWG secretariat to continue discussions around potential metric options. These meetings will be held between now and the end of October. |
| 6. | AOB <ul style="list-style-type: none">• Date of next meeting: w/c 27 November.• Attendees thanked Sainsbury's for hosting the meeting.• HWG secretariat to arrange pre-meets with HWG members ahead of the third meeting, where needed. |