

Food Data Transparency Partnership

Health Working Group

Meeting 3 – summary

Date	Friday 1 st December 2023
Time	09.30-13.30
Venue	Deliveroo Head Office, London

Chaired by: Natasha Burgon DHSC and Susan Barratt Non-Executive

Attendees: Rt Hon Andrea Leadsom MP, Parliamentary Under Secretary of State for Public Health, Start for Life and Primary Care; Nilani Sriharan, Sainsbury's; Ruth McDonald, Morrisons; Karen Poole, Tesco; Josephine Blundy, Pilgrims Food Masters; Zoe Ellis, Danone; Lauren Woodley, Nomad Foods; Belinda Quick, General Mills; Liz Read, Nestle; Rachel Bradford, YUM; Nicky Martin, Compass Group; Paul Bedford, Deliveroo; Alissa Wilson, PepsiCo; Anita Kinsey, Pret.

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

Apologies: Sarah Healey, Mitchells and Butlers; Koen ter Mors, Mars Wrigley.

Item	Discussion
1.	<p>Welcome & Introductions</p> <ul style="list-style-type: none"> • Attendees were welcomed to the third 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 following the second HWG meeting. The value and importance of engagement both with the HWG and through bilateral conversations cannot be overstated. • Members were reminded about Chatham House Rules for HWG discussions and that all members should engage in a competition compliant manner. • The objectives for the meeting were introduced as: <ul style="list-style-type: none"> • To introduce the newest members of the FDTP health team • To review and discuss initial views on metric options and next steps • To discuss and agree the FDTP health strand workplan, deliverables and requirements of HWG members for the next 6 months. • To discuss approaches to securing internal buy-in and consider lessons learnt. • The intended outcomes for the meeting were to get: <ol style="list-style-type: none"> 1. An understanding of the points of similarity and divergence on potential metric options across food system stakeholders. 2. Agreement on the decisions required to formulate an initial list of metric options. 3. Agreement on the FDTP health strand workplan and homework for the next 6 months. 4. An understanding of how to secure internal buy-in for health metric options. <p>Whilst no official homework will be set following this meeting, members were reminded of the importance of HWG members preparing internally for the work ahead.</p>
2.	<p>FDTP Health Team update</p> <ul style="list-style-type: none"> • Members were updated on changes in DHSC staff within the FDTP team including named points of contact. Leaving staff were thanked for their work in producing and running the programme so far. • It was reaffirmed that the FDTP remains a priority for the department.
3.	<p>Review of stakeholder feedback and HWG reflections on metric options</p> <ul style="list-style-type: none"> • Since HWG meeting 2 in September, an extensive programme of stakeholder engagement was undertaken to gather views on potential health metric options. • This engagement was summarised as very active and positive but also revealing of a wide range of views on the aims and outputs of the programme within different groups.

<ul style="list-style-type: none"> • Whilst hearing feedback on specific areas, members were asked to reflect and consider the commonalities and divergence in viewpoints and as a result, the decisions required prior to producing a proposed set of metrics. • Members were reminded that the FDTP programme is working with what is currently published in terms of nutritional definitions and models. • Similar to HWG3, the stakeholder engagement with wider industry as well as investors and NGOs, had been framed around three main themes: <ul style="list-style-type: none"> ○ Composite scores based on NPM scores or whether a product exceeds a composite score benchmark like HFSS. ○ Individual nutrients like salt, calories, sugar, fibre. ○ Other for example fruit & veg • The stakeholder feedback presented to members included several consistent areas of general agreement: <ul style="list-style-type: none"> ○ Use of a composite continuous metric based on UK NPM would encourage change across all products. More binary yes/no metrics based on HFSS can be useful for wider context but should not be the primary focus. ○ Use of positive and negative macronutrients – salt, sugar, calories, as well as fibre and protein can help highlight progress in specific areas where positive changes have been made but the change may not be able to significantly influence a composite score. ○ Output metrics were broadly agreed to be more useful than Input metrics although there was interest in both. Output metrics were viewed as giving businesses greater flexibility in how to achieve goals in healthier sales. ○ Alignment with existing guidance, regulations and programmes is critical. ○ Inclusion of sales in some form is necessary for demonstrating impact although it is not yet clear why. • The stakeholder feedback presented to members also included several consistent areas of general divergence: <ul style="list-style-type: none"> ○ It is not clear at what level metrics should focus – i.e. at portfolio covering whole businesses or within product categories similar to the reduction and reformulation programmes. ○ Businesses were concerned at releasing sales information that could be commercially sensitive even if it would be useful for investors. ○ NGOs and investors thought it may be useful to look at procurement volume rather than sales volume in the OOH, however this was not discussed by industry. ○ Both NGOs and investors were interested in metrics around marketing spend of foods, however most businesses felt this could be sensitive and the metric would be misleading and difficult to calculate. ○ Other metrics such as % fruit and vegetable content in grams often require data that is not readily available or routinely tracked as they are not normally on package labelling. • The divergences were summarised into a list of areas where consensus will need to be reached over time in order to progress forward, including justifications for why metrics have and have not been included.

<p>4.</p>	<p>Member discussion on stakeholder feedback and HWG reflections on metric options</p> <ul style="list-style-type: none"> • Members then discussed views on the identified areas and commonalities. • Members generally felt that existing categories used in legislation and reduction and reformulation programmes should be utilised to avoid the burden of recategorizing product portfolios. • Some members highlighted that if product categories are combined with composite scores based on NPM, it can be a fairer way of showing where products sit compared to competitors. • Members expressed doubt on the value around financial metrics exploring spending or revenue. Marketing spends on HFSS products in £ is similarly difficult to calculate and would struggle to reflect brand advertising which also influences sales. • Members raised concerns around internal data capacity in many areas of the food sector with inconsistent data platforms, particularly in the OOH but also in retail and manufacturing. • Some members reflected that input metrics can be preferable to output metrics because changes in output metrics can be dependent on factors outside of company control. Input metrics measuring investment in particular areas (such as healthy marketing) are easier for businesses to achieve and have confidence in communicating. • The potential for reporting burden was highlighted by several members. Metrics may cover thousands of products in larger portfolios, but also companies are engaged with many different nutritional models and definitions for the same products, particularly those operating in Europe or worldwide.
<p>5.</p>	<p>When & how to tackle divergences</p> <ul style="list-style-type: none"> • The divergences were listed alongside when decisions are expected to be made to resolve the divergence in one direction or another. More technical aspects of how businesses should report will be tackled after metrics have been shortlisted. • It was noted that where identified, the FDTP health team will come up with proposals but there is an important and direct role of members to play in terms of considering these proposals and identifying the appropriate way forward, taking a sector-wide view. • HWG members reflected that the purpose of this is not to rush into decisions - it is to ensure that the group understand what decisions need to be taken and at what point, to enable development of the initial list of metric options, backed by a clear rationale
<p>6.</p>	<p>FDTP Health Strand Workplan going forward</p> <ul style="list-style-type: none"> • An updated FDTP health strand workplan was shared to members in advance and group members were reminded that the workplan is a live document subject to iterative changes as the work progresses. • Members were invited to discuss the above plan and raise questions and comments.

	<ul style="list-style-type: none"> • The heterogenous nature of the OOH was raised as an area of concern in testing as the HWG may not represent all business models. There are a range of industry association groups within the OOH that the FDTP can engage with in order to bring wider companies into the process. • There was broad acknowledgement that this process will be necessarily pragmatic, and the results should aim to be clear about where and why compromises have been made. • Challenges in categorising were highlighted again, as member experience with the HFSS regulations (volume and location promotions, advertising) found that the most difficult part was categorising products according to the defined categories given in the regulations. • Members were asked what they felt was realistic in terms of timelines. Some companies raised that they have tens of thousands of products or recipes and that it would be difficult to test them all.
<p>7.</p>	<p>Session 4 – Discussion with Minister Leadsom and reflections on securing internal buy in</p> <ul style="list-style-type: none"> • Members were invited to give insight on how they have tried to secure internal buy in for health commitments within companies, as well as broader reflections about the food and health space and government’s role within it alongside industry. • A number of points were raised including: <ul style="list-style-type: none"> ○ The potential in combining health aims with wider objectives such as sustainability and waste reduction. ○ The usefulness of regulation as a tool for levelling the playing field between companies. ○ That food (both in and out of home) is a highly competitive market where customers can easily shift between companies. ○ Limited data capacity within many companies, both large businesses and within SMEs including in supply chains. ○ The long lead times for developing and launching new food products. ○ The importance of education and social media in influencing consumer demand for different food products.
<p>8.</p>	<p>Next Steps</p> <ul style="list-style-type: none"> • FDTP team to send out the summary note and revised workplan in the week following this meeting.
<p>9.</p>	<p>AOB</p> <ul style="list-style-type: none"> • Date of next meeting: February 2023 (precise date tbc). • Attendees thanked Paul Bedford and Deliveroo for hosting the meeting. • HWG secretariat to arrange pre-meets with HWG members ahead of the third meeting, where needed.