Food Data Transparency Partnership
Health Working Group

Meeting 4 – summary

Date	Thursday 29 February 2024
Time	9:30am to 2:30pm
Venue	Broadway House, Conference Centre, London

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

Attendees: Nilani Sritharan, 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; Paul Bedford, Deliveroo; Anita Kinsey, Pret; Sarah Healey, Mitchells and Butlers; Koen ter Mors, Mars Wrigley.

FDTP officials: Tazeem Bhatia DHSC and members of the Health Working Group Secretariat and Data Working Group Secretariat.

Apologies: Alissa Wilson, PepsiCo; Nicky Martin, Compass Group; Eco Working Group Secretariat.

Discussion

1. Welcome and Introductions

- Attendees were welcomed to the fourth meeting of the FDTP Health Working Group (HWG).

- Members were reminded about Chatham House Rules for HWG discussions and that all members to engage in a competition compliant manner.

- The objectives for the meeting were introduced as:

  o To approve the longlist of metrics and product categories papers, ensuring they are sufficient to be able to move onto the next key objectives.

  o To discuss and agree a shorter list of metrics for testing providing a clear justification for the decisions made.

  o To discuss and agree a process for testing of metrics as part of the homework.

- o To discuss and agree the workplan, timelines and wider stakeholder engagement plans.

2. **Metrics Longlist and Product Categories Papers**

Please note: This document makes reference to "decisions". It is important to note that the HWG is intended to produce a recommendation for health metrics to use in the FDTP. References to "decisions" are describing the deciding of what may be and what may not be included in that recommendation. The HWG recommendation will integrate feedback from stakeholders beyond the HWG, and after it is finalised, it will still be subject to the FDTP governance structure and ultimately approval from ministers. As such, references to decisions are only in relation to the HWG recommendation, they are not decisions on what will become official policy. Please contact fdtp@dhsc.gov.uk if you have any questions.

Metrics

- An overview of the Metrics Longlist paper was presented to members, sharing initial thoughts on the strengths and limitations of the proposed longlist of metrics.

- Members were reminded that the aim of the HWG is to refine the longlist of metrics down over the next few months, with testing and modelling leading to a much more focused set of metrics viewed to be the most suitable.

- Members discussed their views on the longlist of metric options and raised the following points:

  - o The FDTP health strand provides an opportunity for companies to be able to voluntarily report on the healthiness of their sales in a consistent format, avoiding data being misrepresented due to inconsistency of reporting by external organisations.

  - o A shortlist of metrics should drive positive change with interested stakeholders being able to make sense of the data voluntarily reported.

  - o Concerns the reporting of data for specific metrics could, by proxy, lead to extrapolating data and the disclosure of commercially sensitive information. Members agreed that the voluntarily reporting of data should not allow for commercially sensitive data to be declared.

  - o Market dynamics such as economic trends, regulatory changes, or consumer preferences could have an impact on change across sectors. For example, a change in general fruit and vegetable sales due to the cost-of-living crisis. Members asked if DHSC could give a supporting view of market trends to support business disclosures

to avoid misinterpretations. DHSC acknowledged the issue and agreed to explore this further.

- o Whilst many businesses have available data to report on at a category level, some do not. Those companies whose systems and processes do not currently allow for a more granular level of reporting, may wish to consider a step-by-step approach in being able to disclose a full picture of the healthiness of their sales.

- o Members recognised that the recommended shortlist of metrics would need to work to complement each other. No one metric can give the full picture.

Categories

- An overview of the Product Categories paper was presented to members, explaining the metrics applied within product category systems currently in use, as well as across whole business portfolios. The strengths and limitations of the product category options in relation to the health strand were also emphasised.

- Members discussed their views on product categories and raised the following points:

  - o Additional product categories were suggested by some members, including plant-based categories.

  - o Some members raised concerns with being able to access third party data with whom they do business with. It was agreed that where data is available, businesses report on both branded and own-brand products.

  - o Double reporting was also flagged as a potential issue if, for example, sales of a product would be reported by both its manufacturer and its retailer. DHSC explained that there is no intention to group individual business reporting together in a way that would lead to double reporting of food product sales. This was acknowledged and accepted by members.

  - o Members discussed the level of granularity required to show change. Whilst reporting at business levels will show a more complete picture, some members mentioned that they may struggle to demonstrate clear changes. Being able to also report at product categories would allow businesses to clearly show where they have made changes.

  - o Members considered the value of limiting reporting to products that represent the top 90% of sales volume, so as to reduce the burden of the reporting and the analysis of low selling products. Members agreed to test whether omitting 10% of sales volume would enable businesses to sufficiently demonstrate confidence and accuracy in the data.

Refining metric options

- Members were divided into breakout groups and asked to agree a shorter list of metrics for further testing against the criteria. Each breakout fed back followed by a full group discussion.

- This initial discussion focused on metrics shown to be less impactful and less actionable accompanied by a clear justification for removal from the longlist of metric options. Please refer to Annex A: Decision log noting further details on the justifications for the metrics removed.

Testing and modelling of metric options

- The breakout groups were also asked to discuss the approach and process to undertake testing of remaining metrics using business level or third-party data. Each breakout fed back followed by a full group discussion.

- As part of the testing process, members agreed to investigate the data they can access within their own businesses as well as externally, noting the challenges in availability. Third parties may also hold relevant data, but there may be a time lag in being able to access. Members agreed that further engagement with the wider OOH sector would help to identify the challenges in the availability of data in this sector and across different business models.

- Members mentioned that sourcing data over the same period may be challenging as large food businesses tend to have different reporting periods. In addition, sourcing the same data from companies who do business together may also be difficult. To overcome this issue, the Data Working Group will consider methodological proposals to help ensure a standardised approach to data reporting. Members suggested that reporting to cover a 12-month period as good timeframe to show positive change.

- Members acknowledged that quality assurance is crucial to the process of recommending metric options, which will be discussed at a future HWG meeting.

3. **Workplan and wider engagement**

- Members were invited to review the workplan, to raise questions and provide comment. Members were reminded that the workplan is a live document subject to iterative changes as the work progresses.

- Members discussed the best time to engage with wider stakeholders, noting that engagement needs to be meaningful and shouldn't put additional burden on wider industry or other organisations. Wider industry engagement to continue via HWG members attendance at their respective trade association and representative groups. In addition, members agreed that the HWG Secretariat should engage with wider industry

when the list of metric options is shorter and to engage directly with NGOs and investors before the next meeting to measure the criteria against the shorter list of metric options.

4. **Next steps**

- HWG Secretariat to send out the summary note, decision log and revised workplan for members review in the week following this meeting.

- Members to understand the viability of metric options in advance of the next meeting as part of Homework 3. Members to also consider product categories in scope, and to provide a clear rationale on what metrics to model data. Bilaterals were offered as an option to discuss further.

5. **AOB**

- Date of next meeting: 24 April 2024.

Annex A: Decision Log. Rationale for streamlining health metrics

This is a form to be completed with decisions taken by the HWG along with their rationales. This will be filled in by the HWG Secretariat over the course of HWG meetings 4 to 6.

Metric	Meeting and Date	Decision	Status	Justification based on criteria
% of total product sales from HFSS products (revenue)	HWG4 29/02/2024	Removed	Removed	• Members rejected metrics based on revenue as it is weighted by product pricing rather than product nutritional content. This metric would incentivise businesses for making healthier food more expensive rather than making products healthier. • Members gave preference to metrics based on tonnage as this was more effectively linked to the volume of nutrients being provided, regardless of price point. • Furthermore, members expressed a general dislike of HFSS-based metrics as such metrics do not encourage improving products across the whole NPM range. Metrics based on HFSS encourage a binary approach to improving products in which businesses are only incentivised to invest in changing products that are above the HFSS threshold but still within a distance that reformulation could realistically achieve. There is no incentive to invest in changing products that are too far from the HFSS threshold to get under it, or to invest in improving products that are already under the threshold. This greatly reduces the effectiveness of the metric in improving the healthiness of most products. • However, members acknowledged that HFSS aligns with regulations and is a useful point of communication and engagement for many stakeholders.

Metric	Meeting and Date	Decision	Status	Justification based on criteria
Total calories procured (kcals)	HWG4 29/02/2024	Removed for retailers and manufacturers, kept for OOH where appropriate	Removed	• Some OOH members gave feedback that it would be easier for them to report on what food they procure rather than what they sell. This is because their products are assembled in store, often to customised recipes according to the customer's individual order, as opposed to retail and manufactured products which are mostly sold as individual trackable SKUs. Members suggested that wider discussions and testing with more OOH business models would be useful. • Retailers and manufacturers both gave feedback that procurement as a metric would be ineffective for them to report, as their systems are based on sales. This was also reflected by some OOH companies which reported the same. • As the FDTP is voluntary, the decision at this stage is to leave open the possibility of reporting by procurement for the minority of companies for whom procurement is more effective. This may lead to difficulties in comparing companies and will be explored more in depth in future meetings.
Total sugar sold by volume (tonnes)	HWG4 29/02/2024	Remove the metric requiring reporting the absolute value (i.e., 100 tonnes of sugar sold), and replace it with sales of sugar in tonnes as a % of overall sales in tonnes (i.e. 3% of overall	Removed	• Reporting absolute sales of sugar in tonnes was viewed as ineffective as it would be greatly influenced by the size of the company preventing meaningful comparison, and negatively present a company's growth in which absolute sugar may increase rather than efforts to reduce sugar as a %. • Absolute values can show where reductions in sugar content are being negated by higher increases in absolute sales of sugar. However, this is a problem for 'whole of market' analysis (see 2020 Sugar Progress Report) covering many companies. One company increasing its absolute sales of sugar does not necessarily mean overall population purchasing of sugar is increasing.

Metric	Meeting and Date	Decision	Status	Justification based on criteria
		sales in tonnes represented by sugar)		- As the FDTP is voluntary and only applicable to larger companies, it is not plausible that a sufficient proportion of all food businesses would report absolute sales of sugar in tonnes for that reporting data to be used for "whole of market" analysis. Other data sources would need to be used for such analysis such as third-party consumer panels, which negates the need for businesses to report absolute values via FDTP. - Furthermore, several companies highlighted that this metric would be viewed as commercially sensitive if reporting absolute values rather than % of total sales. - As such, its continued inclusion was seen as not effective or valid as it would be influenced by the size and growth of companies as much as changes in sugar content and may not be suitable for public disclosure in its absolute form. HWG members agreed the replacement for further consideration should be "sugar sales as a % of total sales in tonnes". - Please note that the currently nominated replacement metric – "sugar sales as a % of total sales in tonnes" produces the same number as the metric "sales-weighted average sugar content per 100g" although scaled to tonnes rather than 100g. This duplication will be resolved at HWG-5.
Total sugar procurement by volume (tonnes)	HWG4 29/02/2024	Removed for retailers and manufacturers, kept for OOH where appropriate	Removed	See rationale provided for "Total calories procured (kcals)"

Metric	Meeting and Date	Decision	Status	Justification based on criteria
Total salt sold by volume (tonnes)	HWG4 29/02/2024	Remove the metric requiring reporting the absolute value (i.e., 100 tonnes of salt sold), and replace it with sales of salt in tonnes as a % of overall sales in tonnes (i.e. 3% of overall sales in tonnes represented by salt).	Removed	See rationale provided for "Total sugar sold by volume (tonnes)"
Total salt procurement by volume (tonnes)	HWG4 29/02/2024	Removed for retailers and manufacturers, kept for OOH where appropriate.	Removed	See rationale provided for "Total calories procured (kcals)"
Total saturated fat sold by volume (tonnes)	HWG4 29/02/2024	Remove the metric requiring reporting the absolute value (i.e., 100 tonnes	Removed	See rationale provided for "Total sugar sold by volume (tonnes)"

Metric	Meeting and Date	Decision	Status	Justification based on criteria
		of saturated fat sold), and replace it with sales of saturated fat in tonnes as a % of overall sales in tonnes (i.e. 3% of overall sales in tonnes represented by saturated fat).		
Total saturated fat procurement by volume (tonnes)	HWG4 29/02/2024	Removed for retailers and manufacturers, kept for OOH where appropriate.	Removed	See rationale provided for "Total calories procured (kcals)"
Total fibre sold sales by volume (tonnes)	HWG4 29/02/2024	Remove the metric requiring reporting the absolute value (i.e., 100 tonnes of fibre sold), and replace it with sales of fibre in tonnes as a % of	Removed	See rationale provided for "Total sugar sold by volume (tonnes)"

Metric	Meeting and Date	Decision	Status	Justification based on criteria
		overall sales in tonnes (i.e. 3% of overall sales in tonnes represented by fibre).		
Total fibre procurement by volume (tonnes)	HWG4 29/02/2024	Removed for retailers and manufacturers, kept for OOH where appropriate.	Removed	See rationale provided for "Total calories procured (kcals)"
Total protein sold sales by volume (tonnes)	HWG4 29/02/2024	Remove the metric requiring reporting the absolute value (i.e., 100 tonnes of protein sold), and replace it with sales of protein in tonnes as a % of overall sales in tonnes (i.e. 3% of overall sales in tonnes	Removed	See rationale provided for "Total sugar sold by volume (tonnes)"

Metric	Meeting and Date	Decision	Status	Justification based on criteria
		represented by protein).		
Total protein procurement by volume (tonnes)	HWG4 29/02/2024	Removed for retailers and manufacturers, kept for OOH where appropriate.	Removed	See rationale provided for "Total calories procured (kcals)"
% of sales represented by fruit or vegetables or nuts (defined as per NPM) in tonnes	HWG4 29/02/2024	The specific use of FVN content as a % of products was removed, but the idea of % sales represented by whole food groups (i.e. whole fruit and vegetables) was kept.	Changed	• Members felt that the metric for %FVN content would overlap with other metrics (such as those focusing on increasing fibre). As such, members preferred the idea of having a metric based on sales in tonnes represented by key food groups, such as "fruit and vegetables" or "nuts and seeds". This would achieve greater alignment and longevity through supporting other health initiatives such as 5 a day and the Eatwell Guide.
% FVN of total procurement volume	HWG4 29/02/2024			• Removed – see rationale for 'Total calories procured (kcals)' and also rationale '% of sales represented by fruit or vegetables or nuts (defined as per NPM) in tonnes'.
% of marketing spend that	HWG4 29/02/2024		Removed	• Reporting on marketing spend that promotes HFSS products would be complex and difficult to fulfil due to the different channels used and products that might be included in different adverts (i.e.,

Metric	Meeting and Date	Decision	Status	Justification based on criteria
promotes HFSS products				promoting brand, product ranges, single products or other). With the HFSS advertising regulation coming into force, this metric was viewed to have very limited longevity. It was acknowledged that there might be other mechanisms for reporting on HFSS advertising spend, post-regulatory implementation e.g., by media advertisers. • As such, members rejected this marketing metric for now, especially given it is an input metric rather than an outcome-based one, but acknowledged it is an area of continuing interest for many food system stakeholders. They would be open to discussion of a more specific metric on marketing with a clearer means of calculation.
% of eligible products that carry multi-traffic-light (MTL) front of pack labelling	HWG4 29/02/2024	Metric was introduced for consideration but removed	Removed	• This metric was not included in the original paper but was proposed for consideration by members. The decision was to remove it, as it would only apply to products sold by retailers (and supplying manufacturers) and not to the OOH. Furthermore, it was agreed that the FDTP's emphasis should be on metrics that monitor the healthiness of sales rather than monitoring business inputs such as package labelling. This reduces the reporting burden on businesses and allows greater flexibility in achieving the desired outcomes which would be monitored by other metrics, whether achieved by MTL or other possible business actions.