

Food Data Transparency Partnership

Health Working Group

Meeting 5 – summary

Date	Wednesday 24 April 2024
Time	09:30-14:30
Venue	Broadway House, Conference Centre, London

Chaired by: Susan Barratt Non-Executive and Natasha Burgon, Director of Health Improvement, DHSC.

Attendees: Zoe Ellis (Danone); Belinda Quick (General Mills); Koen ter Mors (Mars Wrigley); Sarah Healey and Tanya Hibberd (Mitchells and Butlers); Hayley Marson (Morrisons); Liz Read (Nestlé); Lauren Woodley (Nomad Foods); Alissa Wilson (PepsiCo); Josephine Blundy (Pilgrims Food Masters); Anita Kinsey (Pret); Nilani Sriitharan (Sainsbury's); Karen Poole (Tesco); Rachel Bradford (YUM).

FDTP officials: Tazeem Bhatia, Chief Nutritionist, DHSC and members of the Health Strand Secretariat, Eco Working Group Secretariat and Data Working Group Secretariat.

Apologies: Nicky Martin (Compass Group); Paul Bedford (Deliveroo).

Discussion

1. Welcome and Introductions

- Attendees were welcomed to the fifth meeting of the FDTP Health Working Group (HWG).
- Members were reminded about Chatham House Rules and that all members to engage in a competition compliant manner.
- The objectives for the meeting were introduced as:
 - To summarise feedback on testing¹ of metrics from HWG members (incorporating feedback from member's trade representative groups) and investors and non-government organisations (NGO's).
 - To discuss and agree an approach for modelling² of proposed metrics as part of homework.

¹ 'Testing': Discussing with internal teams the feasibility of different metrics to understand which metrics are most viable.

² 'Modelling': Taking the most viable metrics from testing and using real-life business data to generate model reports.

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

2. Results of HWG member's homework and wider stakeholder's written feedback

- An overview of the feedback from HWG members on testing metric options, and wider stakeholder views from trade representative groups, The Investor Coalition on Food Policy and NGOs was presented to members.
- This summary note builds on previous summary meeting notes, as HWG members explored further the metric options and how best they might be reported, raising the following points:
 - Consistency of reporting against a clear methodology was deemed essential and to be balanced against feasibility for businesses at different stages, in terms of data.
 - Concerns were raised around availability and quality of data due to different systems and contractual arrangements. Many businesses highlighted that they are, to varying extents, using data from third-party sources or from suppliers. There is inherently less control over quality and completeness from external sources compared to internal business data, leading to issues that can be difficult to fix. Similar issues arose with data being requested from franchises.
 - Where data is available, combining nutrition data and sales data can be resource and time intensive as it can affect many teams internally, requiring manually mapping nutrition information for each stock keeping unit (SKU) to sales volumes. This could become easier overtime with repeated reporting (where previous mapping could be largely reused) and the improvement of data systems.
 - Converting 'ml' to 'mg' for nutrient profiling model (NPM) score where the 1:1 water ratio is not appropriate (for example, beverages, yogurts and cooking oils), and identified as a point to clarify within health strand methodological guidance.
 - Members reflected further on reporting of products which represent the top ~90% of sales volume to reduce burden by not reporting on long 'tails' of low selling products. However, most members stated that they currently report 100% or as close to 100% as they can, and that doing so does not necessarily create significant extra burden.
 - Unlike other components of the NPM, protein is not a nutrient of concern at a population level in the UK, so reporting on protein-based metrics was discussed by members and whether including it for completeness would be helpful. In addition, the sustainability element of animal protein was acknowledged, to further discuss and potentially align with the FDTP's Eco Working Group in the next phase of the health strand work.

- Data capacity metrics were viewed as more relevant if this information was used to show a business working towards having data for 100% of its products. For example, Business A reports that they have complete data on 80% of their products, representing 95% of sales by tonnage. The following year, Business A reports that they have complete data on 90% of their products, representing 98% of sales by tonnage. This shows the business increasing the proportion of products for which it has complete data but also prioritising those products that represent more of its sales.
- It is important to note that the above example is not the same as the percentage of products included in metrics reporting – i.e. SWA calories per/100g for a company’s portfolio. This is because some businesses highlighted sensitivities with reporting the proportion of sales of its products if they only work with one or two partners in a narrow range of categories. This data could be used by those partners (or others) to estimate the business’s proportion of sales with different partners and therefore be commercially sensitive.

3. Further refinement of categories, scope and proposed metrics for modelling

- Members agreed to conduct a modelling exercise using the proposed set of metrics based on a draft methodology as a first step towards consistent reporting. **If businesses needed to diverge from this draft ‘gold standard’ approach, members were asked to write a commentary, clearly explaining the divergence.** Please see [Annex A](#) for the list of questions used to help members explain any divergencies as part of this modelling exercise.
- For example, tonnage is the draft methodology to measure sales instead of SKU count (sales of food in tonnes vs sales of units). However, if a member’s existing systems are set up for SKU count sales data and they cannot change them for the immediate report, then they may use SKU counts but write clearly that they have done so. This encourages businesses to work towards a preferred consistent standard but gives them a way to report in the short term with the transparency that allows fair interpretation.
- As businesses address data limitations to meet the draft approach, allowances are documented, acknowledging that in some instances data may not necessarily be available but would show transparency.

Categories

- Following the testing of metric options by members there was a difference of opinion in the use of categories. Members who preferred reporting on categories considered that in doing so progress could be more clearly demonstrated than reporting on portfolio-level figures, where progress could be obscured by the breadth of products included. Members agreed that modelling of data would be useful in showing how change can best be demonstrated.
- Product categories are to represent key categories of interest and are not a summation of all products included in a “whole of portfolio” metric and ideally

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includes all products considered in scope. Members highlighted that they would like to add more categories to this list as the sugar and calorie categories were categories of concern for childhood obesity, and more positive categories would be useful.

- For the modelling exercise, it was agreed by most members that product categories align with those covered within the existing calorie and sugar reduction and reformulation programme, plus several additional categories such as 'products containing '>80% fruit and vegetables'.
- The high fat sugar or salt (HFSS) promotion and placement categories were preferred by one or two members; however, these do not apply to the OOH sector and related manufacturers and were more limited in scope compared to the sugar and calorie categories. In addition, the categories for the salt reduction and reformulation programme were viewed by most as too expansive for the health strand modelling at this stage, as well as overly specific to salt rather than broader nutrition (for example, cured versus uncured meat). Therefore, members agreed that the sugar and calorie reduction categories with a few extra categories were the most preferred.
- It was agreed to separate reporting of food and drinks at the whole portfolio level (including water) to help address methodological issues with sales-weighting by tonnage. Sales weighting by tonnage can be skewed by the greater density found in drinks. Unsweetened juice and sweetened milk-based drinks, and drinks in scope of the Soft Drinks Industry Levy to be reported at category level.
- The results of the modelling exercise may help to understand further the extent to which metrics complement each other, such as SWA NPM score giving greater context to more communicable HFSS-based metrics.

Scope

- The scope for the modelling exercise should cover all human food and drink (as per NPM guidance), typically 'as sold' unless specifically defined in NPM guidance 'as consumed'. This should include all products sold by the business including branded and own brand goods.
- For the purposes of modelling, products out of scope were agreed with members as:
 - Baby food including breast milk substitutes, toddler milk and other such products. These products were noted as of significant public health interest by members and other stakeholders however it was agreed that they require further specific consideration around how to include them into broader food and drink metrics given that the current NPM is not appropriate for use in foods aimed at babies and infants.
 - Alcohol (beers, wines and spirits including 0% alcoholic drinks) was agreed as out of scope of FDTP as existing business reporting in this area excludes

- alcohol and would therefore create extra burden for businesses to report, reflecting industry engagement and HWG member representation.
- Clinical dietary meal replacements, such as those used in hospital settings; vitamins and dietary supplements, due to some of these products not being suitable for the general population or used as supplements to the diet.
 - Herbs, spices, gelatine, food dyes, as these ingredients do not contribute significantly to the amount of calories, salt, sugar, or saturated fat in food and drink.
- Several members enquired about lactose inclusion in definition of sugars. The NPM metrics are agreed to align with the NPM (2004/05) and the definition of total sugars which includes lactose. Members also highlighted that removing lactose from existing data for total sugars would be very burdensome.

Metrics

- Members agreed to prioritise modelling around the following three draft complementary metric options at portfolio and category levels as the metrics most stakeholders coalesced around and had the broadest support for:
 1. Sales weighted average (tonnes), nutrient profiling model (SWA NPM) score.

This metric takes the broadest view of the healthiness of a company's products and sales and was widely agreed by all stakeholders to be the most preferred as it encourages healthier practices across the entire product range. This metric was highlighted as potentially difficult to influence outside of categories as can be subject to changes in relative sales that may be outside of a company's control (for example, inflation, cooking oil accessibility).

It was also highlighted that this metric may be subject to data availability limitations and quality issues. For example, data on '% of fruit, vegetables and nuts (%FVN)' is often not available as it is not required on packaging. This can lead to use of proxies that may be inconsistent between companies (for example, zero values, average amounts for the product category). In addition, as NPM measures per 100g, this metric will not show changes in serving size more relevant to the OOH sector. However, some of these issues could be addressed through companies transparently showing what they did to resolve this, and a standard approach could be agreed.

2. % of total product sales (tonnage) from HFSS products.

This metric is a basis for the HFSS regulations and shows changes in consumer purchasing towards healthier products, as well as giving context to the SWA NPM score. The binary nature of the metric was highlighted as a significant limitation in encouraging healthier sales, however this limitation could be mitigated if reported alongside the other two metrics.
3. Sales-weighted calories content per/100g (calorie density).

This metric can capture changes in product calorie content and changes in consumer purchasing patterns as well as being associated with obesity

levels. It also represents a pathway for OOH companies to report where they may not yet have full NPM nutrient data (for example, fibre or protein) but will have calorie information due to regulation for large OOH companies required to show calories on their menus.

- Members also agreed to model additional metrics if they had capacity to do so or to highlight progress in specific areas relevant to their business portfolio.
- Further agreement was made to not set targets around the draft approach for SWA NPM score or % of total product sales from HFSS products. In addition, no interpretation will be made on what good progress might look like for these two metrics.
- It was suggested that the FDTP Data Working Group may be able to consider how to overcome some of the complexities of reporting regarding the availability and data quality to be able to support businesses achieve as close to the draft methodology as possible.

4. 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.
- It was agreed for the Health Strand Secretariat to attend upcoming trade representative group meetings alongside HWG members to highlight the progress made so far and to answer questions.
- Further engagement with Devolved Administrations, NGOs and the investor group will also be planned around the scheduling of HWG member bilateral meetings.

5. Next Steps

- The Health Strand Secretariat to send out the summary note of the meeting for members to review in the week following this meeting.
- Members to model priority metric options and other key metrics of interest against a draft methodology modelling template and guidance, ideally by mid-May, with some flexibility for members who need extra time to complete. Members feedback on the modelling will be discussed in the second part of HWG meeting 5, planned to be held early June.

Annex A: Draft methodology for modelling exercise

Below is a table of questions intended to provide both the preferred standard way to report and questions to help members describe their divergence from that preferred way if they need to.

This draft is only intended to support a short modelling exercise that aims to refine and improve the approach, as well as the underlying metrics, categories, and list of out of scope (OOS) products.

Members were fully informed that the modelling exercise is short term and DHSC do not expect to receive real-life business data. In addition, DHSC needn't receive a full report covering 12 months or to cover both branded and own brand goods if data was not fully available.

Reflections from this exercise will be useful in informing the next iteration of this approach.

1	12-month reporting period, compared with previous year	What period does this report cover? Is it compared to the previous 12-month reporting period? Is any baseline figure from an earlier year also covering the same 12-month period?
2	All food and drink data on products sold in the UK (even if sold to a wholesaler or retailer)	Does this only cover food and drink products sold in the UK? Are products produced for export excluded?
3	Product nutrition data as sold	Is nutrition data all reported in line with guidance in the 2004 Nutrient Profiling model including "as sold" unless a product specified to be reported "as consumed"?
4	Reflect all in-scope products sold by the reporting company that are included in end of year accounting	If a parent company, which companies does this cover and not cover? Does it include all franchises? Does it include all food and non-alcoholic drink brands? What significant areas are excluded?
5	Reporting should cover the whole portfolio	Does analysis cover both branded and own label? Does it cover all products, or does it only cover the top 90% by sales volume?
6	Excludes foods marked as OOS	In the "whole portfolio figures", have products listed above as "out of scope" been included? Are all other food and drink products included?
7	Sales or procurement	Are you calculating sales as "sales" or as an OOH company reporting by procurement instead of sales?
8	Sales is calculated by tonnage	Is sales volume calculated using tonnage? If not, what proxy was used? I.e. SKUs, revenue, etc
9	%FVN score is known or estimated consistently	When finding NPM scores, if any products were affected by missing %FVN data, what was your approach here? I.e. Zero value except where likely to be >80% content
10	Other missing data is also estimated consistently	What proportion of products were affected by missing or low-quality data? What was the general approach in addressing this (i.e. removed SKU from analysis, or included SKU with a category range average for the missing data point as a proxy)

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11	Loose products weight is estimated consistently	When estimating sales of loose products of varying weight (baked goods, fruit and veg, etc), did you use average weight estimates for each product? If not, how was this done? (i.e. for a broccoli, estimated weight 350g per SKU sale).
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