

Inside our Food and Beverage Manufacturers

Australia 2018

Assessment of company
policies and commitments
related to **obesity prevention**
and **nutrition**

insideourfoodcompanies.com.au

Inside our Food and Beverage Manufacturers

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The project forms part of INFORMAS (International Network for Food and Obesity/NCDs Research, Monitoring and Action Support), a global network of public-interest organisations and researchers that seek to monitor and benchmark public and private sector actions to create healthy food environments and reduce obesity and non-communicable diseases (NCDs) globally. Prof Boyd Swinburn, Dr Lana Vanderlee, Dr Stefanie Vandevijvere, Prof Anna Peeters, Dr Adrian Cameron and several other researchers provided guidance to the project as part of INFORMAS and GLOBE. The project team would like to thank the many company representatives that provided data and helpful suggestions to support this project.

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Unhealthy diets are creating a public health crisis in Australia.

Along with obesity, they are leading contributors to poor health.¹ This has a high cost to the economy, including large impacts on the health care system and productivity.²

Unhealthy food environments are the major drivers of obesity and related non-communicable diseases (NCDs). Actions from the government, the food industry and the broader community all contribute to the healthiness of food environments.

Food and beverage manufacturers have an important role to play in creating healthier food environments and contributing to efforts to improve population diets.

IN AUSTRALIA,
2 OUT OF EVERY 3
ADULTS ARE
OVERWEIGHT
OR OBESE³



1 IN 4 CHILDREN
ARE OVERWEIGHT
OR OBESE³



Benchmarking company nutrition policies and commitments

This study assessed, for the first time, the largest Australian food and non-alcoholic beverage manufacturers (food and beverage manufacturers) on their policies and commitments related to obesity prevention and nutrition. The objective was to highlight where Australian food and beverage companies are demonstrating leadership in relation to obesity prevention and nutrition, identify good practice examples, and make specific recommendations for improvement.

Globally-developed assessment methods, tailored to the Australian context

Company policies and commitments related to obesity prevention and nutrition were assessed using the BIA-Obesity (Business Impact Assessment - Obesity and population nutrition) tool developed by INFORMAS, a global network of public health researchers that monitors food environments in >30 countries worldwide.⁴ The methods were adapted from the Access to Nutrition Index (ATNI) that benchmarks food company policies at the global level.⁵

The BIA-Obesity tool assesses company policies and commitments across six key domains related to obesity prevention and improving population nutrition. These include: corporate strategy, product formulation, nutrition labelling, promotion to children and adolescents, product accessibility, and relationships with external groups. Each domain includes a number of indicators, with assessment based on the **transparency, comprehensiveness** and **specificity** of each company's policies and commitments.

Process of assessment

The largest food and beverage companies (n=19) in Australia were selected for assessment. For each company, publicly available information on their policies and commitments was collected up to the end of 2017. The project team liaised with company representatives to validate and supplement publicly available information. Companies were assessed across all the domains of the BIA-Obesity tool, with scores combined across domains to derive an overall score out of 100.

¹ Australian Institute of Health and Welfare 2016. Australian Burden of Disease Study (2011)

² Colagiuri S, et al. The cost of overweight and obesity in Australia. MJA 2010; 192 (5):260-264

³ Australian Institute of Health and Welfare (AIHW). Overweight and obesity. 2017. AIHW: Canberra

⁴ www.informas.org

⁵ www.accessstonutrition.org

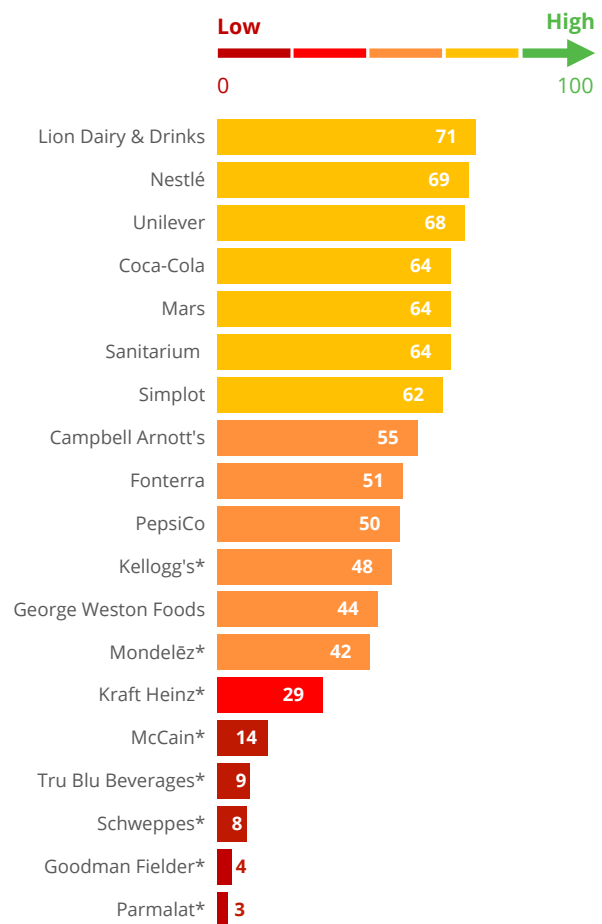
Most of the largest Australian food and beverage manufacturers have **some stated commitment** to addressing obesity and population nutrition issues, but **companies varied substantially** in the transparency, comprehensiveness and specificity of their policies and commitments.

- Company scores ranged from 3/100 to 71/100, with a **median score of 50/100**
- Over half (11/19) of the companies selected for assessment fully engaged with the research process by providing data and feedback at multiple steps of the process. Company scores significantly improved after engagement with the process. The average score of companies that did engage was substantially higher than companies that did not engage. This points to the need for greater transparency and public disclosure from all companies
- The best performing domain was *corporate strategy* while the worst performing domain was *product accessibility*

Areas in which a number of Australian food and beverage manufacturers have shown progress include:

- **Corporate strategy:** Acknowledging their responsibility for addressing obesity and population nutrition issues, by incorporating obesity prevention and/or population nutrition into the corporate strategy to some extent (16 out of 19 companies)
- **Product formulation:** Reporting some action / making commitments to reformulate products to reduce levels of nutrients of concern (16 out of 19 companies)
- **Nutrition labelling:** Committing to implement the Australian government-endorsed Health Star Rating system (11 out of 19 companies)

Assessment of food and beverage manufacturer policies and commitments related to obesity prevention and nutrition – Australia 2018



* Assessment based on publicly available information only

There is **considerable room for improvement** for all companies. The conversion of policies and commitments into practice, and the impact of these policies on the healthiness of food environments needs further evaluation.

Key recommendations for food and beverage manufacturers

- 1| **Corporate strategy:** Prioritise obesity prevention and population nutrition as part of the overall company strategy, and align the company's obesity prevention and nutrition-related policies with global health and sustainability goals
- 2| **Product formulation:** Set measurable targets and timelines to reduce sodium, free sugars, saturated fat, and artificially produced trans fat, in conjunction with government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 3| **Nutrition labelling:** All companies to commit to implement the Australian government-endorsed Health Star Rating system across all relevant products in their portfolios
- 4| **Promotion to children and adolescents:** Implement a policy on marketing to children that effectively restricts the exposure of children and adolescents (up to the age of 18) to the promotion of 'less healthy' products and brands
- 5| **Product accessibility:** Commit to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 6| **Relationships with external groups:** Publish all relationships (including funding and support) with external groups (e.g., professional associations, research organisations, community and industry groups) related to health and nutrition

Conclusion and implications

- Australian food and beverage manufacturers have **acknowledged their responsibility** for being part of efforts to prevent obesity and improve population diets, and have some related policies and commitments in place. However, companies varied substantially in their policies and commitments, and there is **considerable room for improvement** for all companies.
- Food and beverage manufacturers need to **implement a broad range of actions** to contribute to societal efforts to create healthier food environments in Australia. Industry associations, such as the Australian Food and Grocery Council (AFGC) and the Australian Beverages Council, can support individual companies to adopt this report's recommendations and coordinate company action across the sector.
- Governments need to closely **monitor the implementation of company policies and commitments** related to obesity prevention and nutrition, and consider stronger policy intervention where voluntary company actions are insufficient. Other stakeholder groups, including investors, need to monitor company progress, particularly as part of evaluation of company contributions to the United Nations Sustainable Development Goals.

Unhealthy diets and obesity are leading contributors to poor health in Australia¹

Obesity and diet-related disease are major public health problems in Australia. Less than 7% of Australians consume diets that are consistent with the Australian Dietary Guidelines. At least 35% of the energy intake of adults and up to 41% of the energy intake of children comes from 'less healthy' food and drinks.² Two in three Australian adults and one in four children are now overweight or obese.³ Overweight and obesity contribute significantly to rates of disease (cancers, diabetes, cardiovascular disease, strokes) and death. This has a high cost to the economy, including large impacts on the health care system and productivity.⁴



Improved diets are critical for sustainable development

The United Nations (UN) Sustainable Development Goals (SDGs) and associated targets present an agenda for all parts of society, including the corporate sector, to work towards improved economic prosperity, and the health and wellbeing of people and the planet.⁵ Internationally, many large companies and financial investors are now increasingly focusing on monitoring and evaluating their contributions to the SDGs.⁶

Improving population nutrition represents an important step in achieving the SDGs. Nutrition is considered a component of all 17 SDGs⁷, and is part of, or linked to, performance targets of several SDG's including:

- **SDG 2** Zero hunger
- **SDG 3** Good health and wellbeing
- **SDG 12** Responsible consumption and production



The food industry has an important role to play in addressing obesity and improving population diets

Tackling obesity and improving population diets requires a comprehensive societal response, including government policies, community support, and wide-scale action from the food industry. Australian food and non-alcoholic beverage manufacturers (food and beverage manufacturers) have a major influence over the way packaged food and beverage products are produced, sold and promoted. There is significant potential for these companies to contribute to efforts to create healthier food environments and improve population diets.

The World Health Organization (WHO) has identified a number of actions that the food industry can take to improve population nutrition and create healthier food environments,⁸ including:

- Limiting the levels of salt, free sugars⁹, saturated fat and trans fat in products
- Ensuring that healthy and nutritious choices are available and affordable to all consumers
- Practicing responsible marketing of foods high in salt, free sugars, and unhealthy fats, especially to children
- Providing consumers with clear, easily understood, and evidence-based nutrition information on food labels.

¹ Australian Institute of Health and Welfare 2016. Australian Burden of Disease Study (2011)

² Australian Bureau of Statistics (ABS). Australian health survey: first results, 2011–12

³ Australian Institute of Health and Welfare (AIHW). Overweight and obesity. 2017. AIHW: Canberra

⁴ Colagiuri S, et al. The cost of overweight and obesity in Australia. MJA. 2010;192(5):260–264

⁵ <http://www.un.org/sustainabledevelopment/sustainable-development-goals>

⁶ Hellström E, et al. Towards a Sustainable Well-Being Society. From Principles to Applications. 2015. Sitra Working Paper 14. Available from: https://media.sitra.fi/2017/02/23221124/Towards_a_Sustainable_Wellbeing_Society_2.pdf

⁷ Global Nutrition Report 2017: Nourishing the SDGs. Bristol, UK: Development Initiatives

⁸ World Health Organization. Global Strategy on Diet, Physical activity and Health, 2004

⁹ Defined by the WHO as all sugars added to foods, plus sugars naturally present in honey, syrups, and fruit juices

Supporting food companies to improve their commitments on nutrition

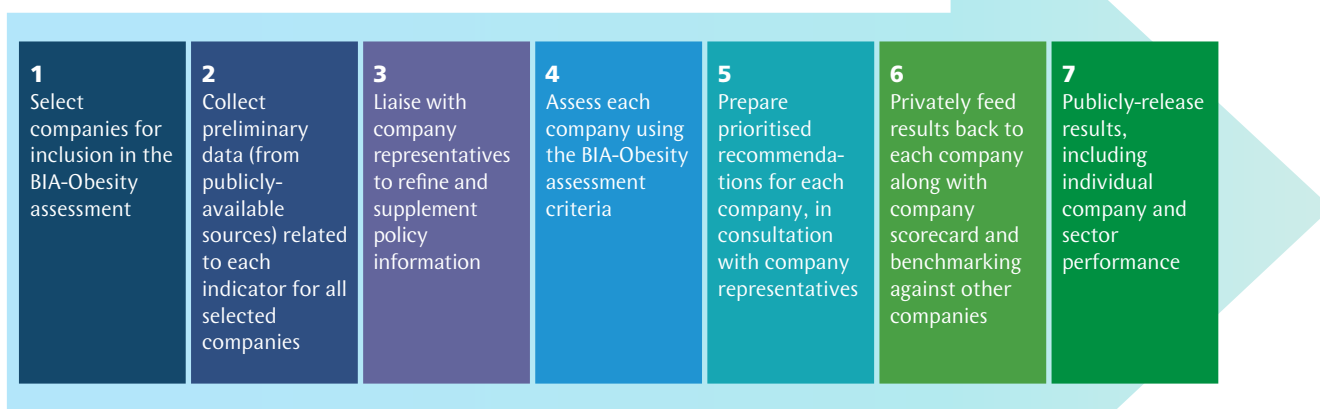
The goal of this study was to support Australian food and beverage manufacturers to improve their policies and commitments related to obesity prevention and population nutrition. The objective was to highlight where Australian food and beverage manufacturers are demonstrating leadership in relation to obesity prevention and nutrition, identify good practice examples, and make specific recommendations for improvement. Similar initiatives (e.g., the Access to Nutrition Index¹, Oxfam Behind the Brands²) have shown the effectiveness of this approach.

The study forms part of a broader initiative to assess company policies and performance across different sectors of the food industry, also including supermarkets and quick service restaurants (fast-food outlets). While this study focused on policies and commitments, future phases of the initiative will investigate the performance of companies (e.g., extent and nature of food marketing to children, healthiness of overall product portfolio) and compliance with commitments made.

Assessment tool

Company policies and commitments (up to 31 December 2017) related to obesity prevention and nutrition were assessed using the BIA-Obesity (Business Impact Assessment - Obesity and population nutrition) tool developed by INFORMAS, a global network of public health researchers that monitors food environments in >30 countries worldwide.³ These methods were adapted from the Access to Nutrition Index that benchmarks the nutrition-related commitments, performance and disclosure practices of global food and beverage manufacturers. The BIA-Obesity tool includes sector specific indicators, that were tailored to the Australian context.⁴

Process for conducting the BIA-Obesity assessment



¹ www.accessstonutrition.org

² www.behindthebrands.org

³ www.informas.org

⁴ Details of the BIA-Obesity tool are available at: www.insideourfoodcompanies.com.au

Companies selected for inclusion

Sector	Market share included	Companies included (in order of market share) ¹
Packaged food manufacturers	53%	Lion Dairy & Drinks, Mondelēz, Parmalat, Simplot, Mars, Nestlé, Campbell Arnott's, Goodman Fielder, Unilever, PepsiCo, George Weston Foods, McCain, Kraft Heinz, Fonterra, Kellogg's, Sanitarium ²
Non-alcoholic beverage manufacturers	72%	Coca-Cola, PepsiCo, Schweppes, Tru Blu Beverages

Domains assessed

The BIA-Obesity tool considers company policies and commitments across six key domains related to obesity prevention and nutrition. In each domain, a number of indicators were assessed based on the **transparency, comprehensiveness** and **specificity** of policies and commitments. Scores were combined across domains to derive an overall score out of 100 for each company.

Domain	Policy area	Key indicator categories	Weighting (out of 100) ³
A Corporate strategy	Overarching policies and commitments to addressing obesity and improving population nutrition	<ul style="list-style-type: none"> ✓ Commitment to nutrition and health in corporate strategy ✓ Reporting against nutrition and health objectives and targets ✓ Key Performance Indicators (KPIs) of senior management linked to nutrition and health-related targets 	10
B Product formulation	Policies and commitments regarding product development and reformulation to reduce nutrients of concern (i.e., sodium, free sugars, saturated fat, trans fat) and energy content	<ul style="list-style-type: none"> ✓ Targets and actions related to reduction of sodium, free sugars, saturated fat, trans fat, and portion size/energy content where relevant across the portfolio ✓ Engagement with government initiatives related to product formulation (e.g., the Healthy Food Partnership) 	30
C Nutrition labelling	Policies and commitments regarding disclosure and presentation of nutrition information on product packaging and online	<ul style="list-style-type: none"> ✓ Commitment to implement the Health Star Rating system ✓ Online nutrition information ✓ Use of nutrition and health claims 	20
D Promotion to children and adolescents	Policies and commitments for reducing the exposure of children and adolescents (aged <18) to promotion of 'less healthy' foods/brands	<ul style="list-style-type: none"> ✓ Broadcast and non-broadcast media policy ✓ Use of marketing techniques that appeal to children and adolescents 	30
E Product accessibility	Policies and commitments related to the availability and affordability of healthy products compared to 'less healthy' foods	<ul style="list-style-type: none"> ✓ Increasing proportion of healthy products across portfolio ✓ Increasing availability of healthy products ✓ Supporting a tax on sugar-sweetened beverages, in line with the WHO position 	5
F Relationships with external groups	Policies and commitments related to support provided to external groups (e.g., professional associations, research organisations, community and industry groups) related to health and nutrition, with a focus on transparency	<ul style="list-style-type: none"> ✓ Disclosure and transparency of relevant relationships ✓ Accessibility of relevant information 	5

¹ Based on Euromonitor 2016 data for Australia (as at 30 March 2017) for each sector, based on retail value

² Three supermarkets (Aldi, Woolworths and Coles) were classified as having the largest market share amongst food manufacturers. They were also assessed, but using a methodology adapted for supermarkets – refer to insideourfoodcompanies.com.au/supermarkets

³ Weighting based on the relative importance of company policies in each domain, as derived from discussions with international food policy experts within INFORMAS

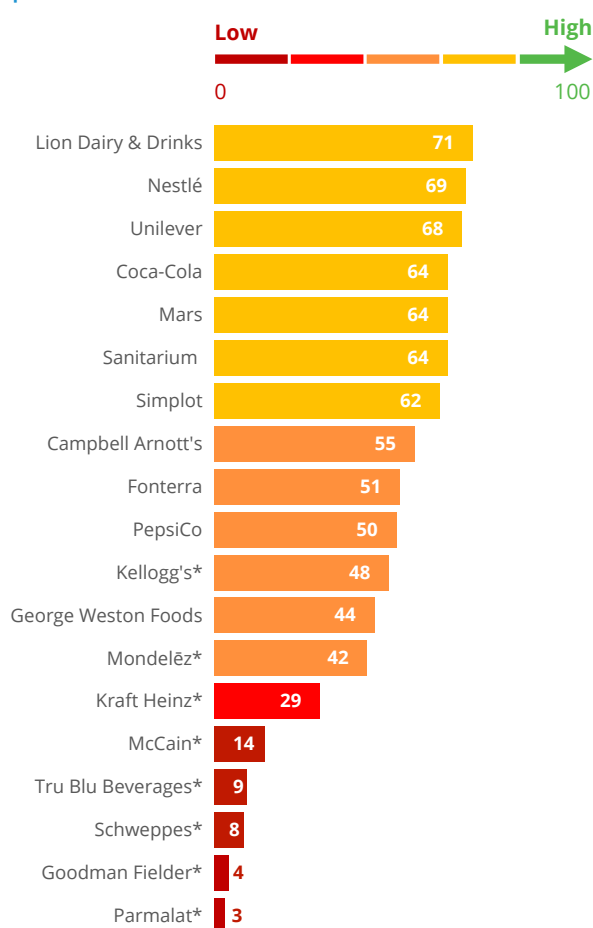
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A] Corporate strategy

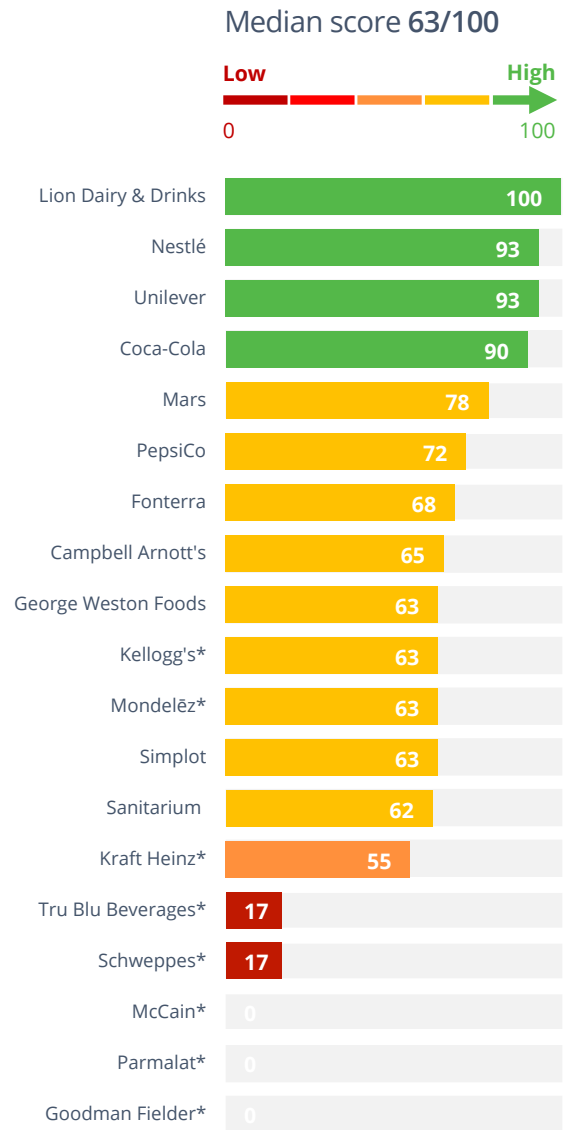
Good practice statement

The company has a strategic document or collection of documents that outline the company's overarching commitment to population nutrition and health, with relevant objectives and targets that are prioritised as part of the overall corporate strategy. These policies are publicly available, reference relevant international and national priorities, and apply to the national context.

Key findings

The majority of companies identified nutrition and health-related issues in corporate reporting; however, few highlighted population nutrition as a key priority

- Lion Dairy & Drinks, Nestlé and Unilever had made a strong commitment to addressing nutrition and health-related issues, and highlighted this as a focus for the business
- Top performers aligned their nutrition and health approach with the UN SDGs and/or priorities set out by the WHO
- Several transnational companies, including Fonterra, Kellogg's and Mondelēz, disclosed their approach to nutrition and health at the global level, but did not clearly articulate how this applied in the Australian context
- Lower performing companies mentioned nutrition and/or health issues but had limited disclosure of specific progress in meeting nutrition and health-related objectives and targets
- The lowest performers, McCain, Parmalat and Goodman Fielder, made little or no mention of nutrition or health-related issues in corporate reporting
- Eight companies reported that they linked the KPIs of senior managers to nutrition and health-related targets



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Identify** population nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing
- **Refer** to relevant international priorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan) within the corporate strategy
- **Report** progress against specific nutrition and health-related targets and objectives on a regular basis
- **Link** the KPIs of senior managers to nutrition and health-related targets in the corporate strategy

B| Product formulation

Good practice statement

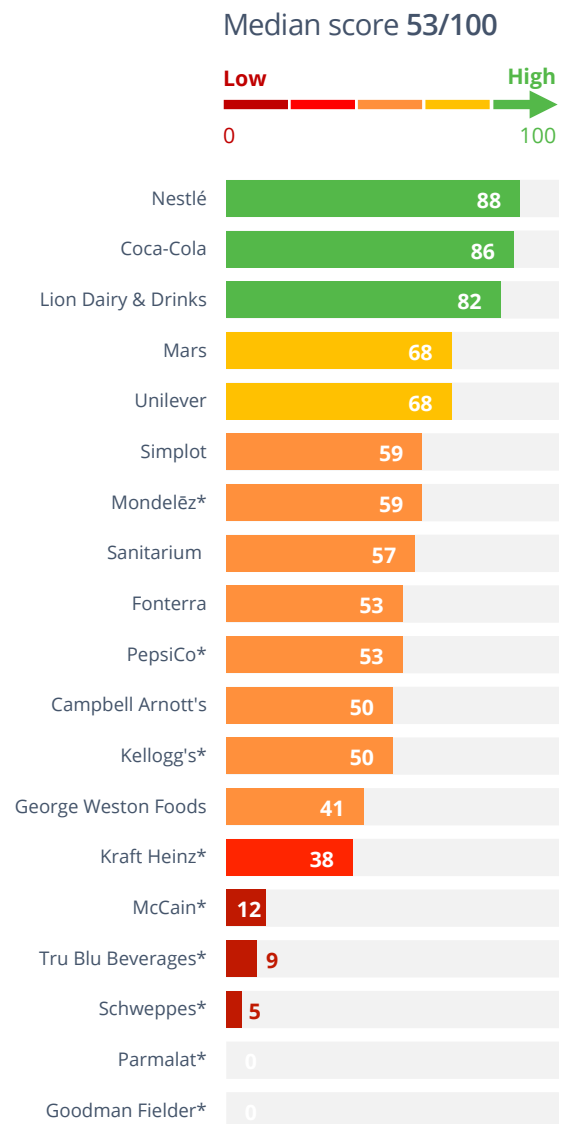
The company has a set of product formulation commitments relating to new product development and reformulation of existing products to limit or reduce nutrients of concern (including sodium, free sugars, saturated fat, and trans fat), whilst increasing desirable nutrients. In relevant product categories (e.g., single-serve snacks), the company commits to reduce energy content per serving/provide smaller package sizes. Progress is routinely reported against.

Key findings

Most companies stated that they were taking action to reformulate products; however, specific reporting on reformulation progress was often limited

- Nestlé, Coca-Cola, Lion Dairy & Drinks, Mars and Unilever all made a comprehensive commitment to reduce levels of nutrients of concern across their product portfolios. They had set specific, time-bound targets for the reduction of sodium, saturated fat and added sugars (where relevant to portfolio), and reported having taken steps to reduce portion size/energy content of single-serve products
- The most common areas in which companies had set targets for reduction were sodium and saturated fat (8 out of 16 companies¹), followed by trans fat (7 out of 16 companies¹), sugar and portion size of single-serve products (6 out of 19 companies)
- Nestlé, Lion Dairy & Drinks, Mars and Unilever had a commitment to not use any artificially produced trans fats in products and/or had reported complete removal across their portfolios
- Several companies, including Nestlé, Coca-Cola, Lion Dairy & Drinks, Simplot, Sanitarium, Fonterra, PepsiCo and Campbell Arnott's, were nominated participants of the Australian government's Healthy Food Partnership

¹ Does not include companies (e.g., beverage manufacturers) for which this is not relevant



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugars, saturated fat, and artificially produced trans fat) across the portfolio, where relevant. Routinely report on progress in achieving reformulation targets
- **Limit** or reduce energy content per serving/provide smaller package sizes in relevant product categories (e.g., single-serve snacks)
- **Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply

CJ Nutrition labelling

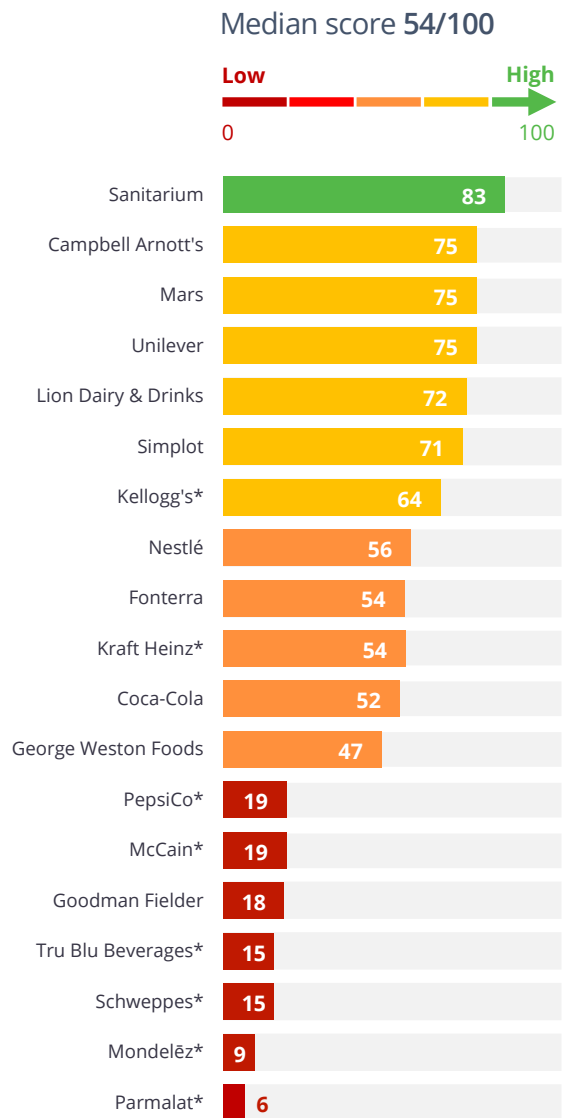
Good practice statement

The company has a set of published commitments relating to nutrition labelling that are designed to inform consumers about the nutrient composition of products, including implementation of interpretive front-of-pack labelling, responsible use of nutrition content claims, and the provision of comprehensive online nutrition information.

Key findings

Leading companies demonstrated clear commitments in the area of nutrition labelling, including implementation of the government-endorsed Health Star Rating (HSR) system and provision of product nutrition information online

- Ten out of 19 companies (Sanitarium, Campbell Arnott's, Mars, Unilever, Lion Dairy & Drinks, Simplot, Kellogg's, Nestlé, Kraft Heinz and Coca-Cola), had made a public commitment to implement the HSR system across their portfolios. George Weston Foods committed to implement the HSR system across a portion of its portfolio. However, as part of their commitment, some companies (Mars, Coca-Cola and Nestlé) only committed to implement the energy icon across portions of their portfolio, rather than Health Stars
- No companies had a specific published commitments to only make nutrition content claims on products that are classified as 'healthy'
- No companies routinely labelled added/free sugars or artificially produced trans fats on products
- All companies provided some online nutrition information for products; however, only 12 out of 19 provided comprehensive nutrition information for all products



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Commit** to full implementation of the HSR system across all relevant products, with specific roll-out plan
- **Introduce** a policy to only make nutrition content claims (e.g., "99% fat free") on products that are classified as 'healthy' (using government standards for classifying the healthiness of foods in relation to health claims)
- **Provide** comprehensive online nutrition information for all products
- **Support** the development of 'free sugar' labelling regulations, e.g., through public in-principle support for 'free sugar' labelling and commitment to implement 'free sugar' labelling once defined
- **Commit** to label artificially produced trans fat on all relevant products

DJ Promotion to children and adolescents

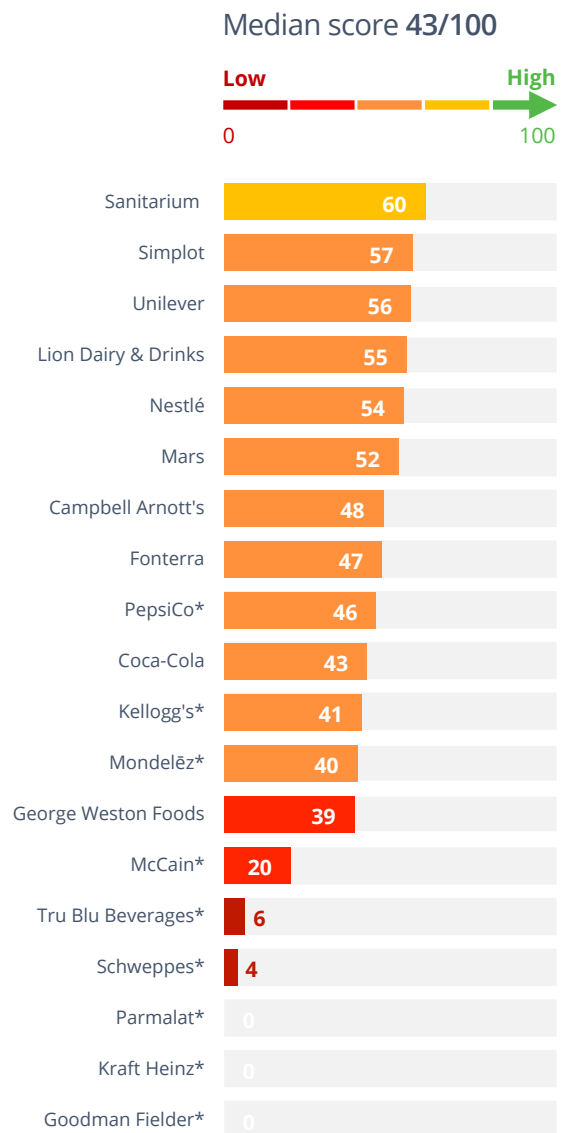
Good practice statement

The company has a comprehensive policy/commitment to reduce the exposure of children and adolescents (aged <=18) to 'less healthy' food/brand marketing. This policy includes eliminating use of marketing techniques that strongly appeal to children, applies across all media channels, uses government guidelines for classifying the healthiness of foods, and includes all times/events when a large number of children/adolescents are likely to be exposed. Compliance with this policy is audited by a third party.

Key findings

Despite most companies (14 out of 19) having some policies/commitments in this area, none of the policies/commitments were likely to effectively restrict the exposure of both children and adolescents to 'less healthy' food/brand promotion

- Thirteen of the companies had voluntarily signed on to the Australian Food and Grocery Council's Responsible Children's Marketing Initiative (RCMI)
- All companies with a commitment in the area specified that they would not directly target children up to **age 12** for promotion of 'less healthy' products. None of these commitments explicitly restricted promotion of 'less healthy' products/brands during all times/events when a large number of children are likely to be exposed
- Several companies, including Sanitarium, Simplot, Unilever and Lion Dairy & Drinks, used government guidelines for classifying the healthiness of products
- Few companies had a specific commitment to not sponsor children's sporting events using 'less healthy' products/brands
- Thirteen companies committed to not use marketing techniques that appeal to children in relation to 'less healthy' products; however, this often did not include product packaging and/or only applied to those marketing techniques that appeal *specifically* to children



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Implement** a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' products/brands that applies across all media channels, using government guidelines for classifying the healthiness of foods, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy
- **Eliminate** use of promotion techniques (e.g., cartoon characters, interactive games) with strong appeal to children in relation to 'less healthy' products and brands, including on product packaging
- **Commit** to not sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands

E] Product accessibility

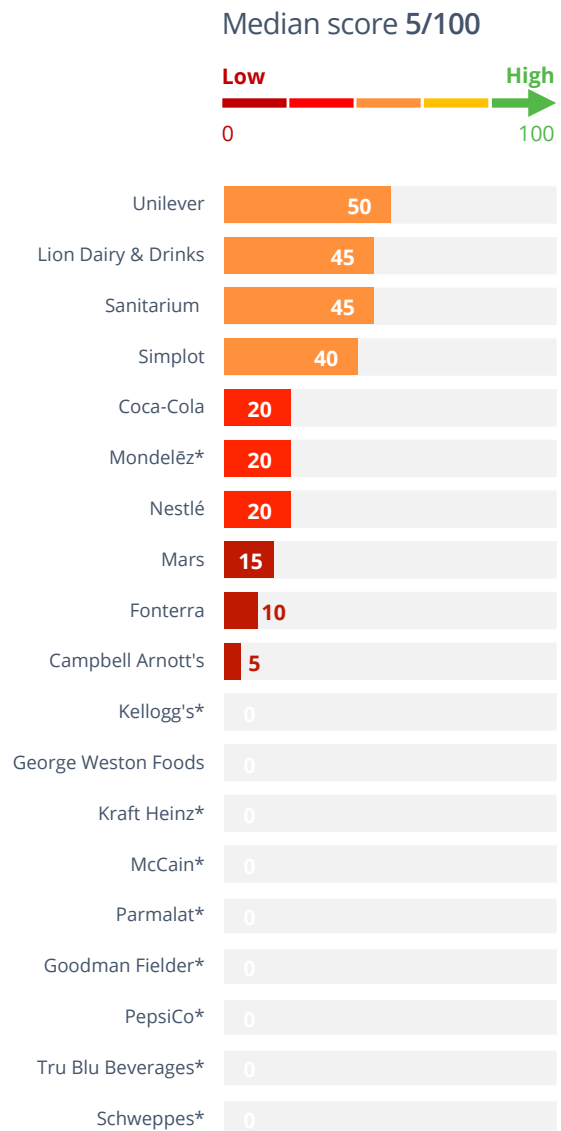
Good practice statement

The company has a commitment to address the availability and affordability of healthy products relative to 'less healthy' products. This includes commitments related to increasing the availability of healthy compared to 'less healthy' products across the portfolio or in certain areas (e.g., schools, low-income communities). The company actively works with retailers to promote a healthier selection of products through product placement and other marketing strategies. The company publicly supports the position of the WHO on fiscal policies to make healthier foods relatively cheaper and 'less healthy' foods relatively more expensive.

Key findings

Companies had few commitments to restrict accessibility of 'less healthy' foods and improve accessibility of healthy foods

- Product accessibility was the worst performing domain, with few clear commitments to address the accessibility of healthy compared to 'less healthy' products. Almost half (9 out of 19) of the companies did not have any commitments in this domain
- Unilever clearly identified availability and affordability of healthy products as a key part of its business strategy. The company made a clear commitment to increase the availability of its healthy products, and had set a time-bound target to double the number of products by volume that meet its highest nutritional standards. Lion Dairy & Drinks and Simplot also committed to transition a portion of the company's portfolio into a healthier product category. Sanitarium committed to offer healthy nutritious products through its portfolio range
- Lion Dairy & Drinks was the only company to publicly commit to work with retailers to position healthier products at the front of store, where they are more accessible
- No companies publicly supported taxes on sugar-sweetened beverages, while four companies publicly opposed them (either through public statements or those of their industry associations)



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Commit** to increase the number/proportion of healthy products in the company's portfolio
- **Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- **Support** the position of the WHO on fiscal policies to make healthier foods relatively cheaper and 'less healthy' foods relatively more expensive, and make the company's position public

F] Relationships with external groups

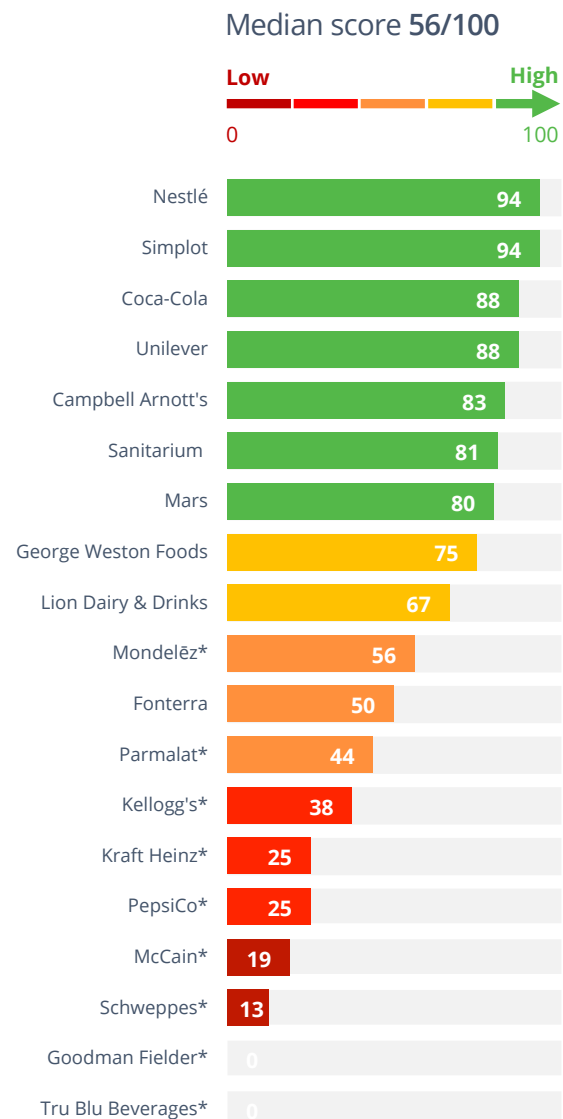
Good practice statement

The company has a policy or document(s) that outlines the types of relationships with external organisations in which the company will engage. The company adopts full transparency regarding the amount and type of support provided to external organisations. This assists all stakeholders in understanding the relationships between different groups, the nature of lobbying activities, sponsorships arrangements, and potential sources of bias in research activities.

Key findings

Most companies have adopted some transparency around their relationships with external groups

- Top performing companies in this domain declared most external relationships and support for research (if any)
- Coca-Cola was the only company to disclose, at the national level, funding amounts provided to external groups, including for research, and updated this information on an annual basis
- Several companies (5 out of 19), including Nestlé, Unilever, Campbell Arnott's, Mars and George Weston Foods, had formal policies that prohibited political donations
- Many companies did not disclose information in a consolidated and easily accessible format



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Publish** all relationships (including funding and support) with external groups (e.g., professional associations, research organisations, community and industry groups) related to health and nutrition
- **Disclose** all political donations in real time, or **commit** to not make political donations

SUMMARY OF RECOMMENDED ACTIONS FOR COMPANIES

Domain	Recommendation actions	Examples of best available company commitments
A Corporate strategy	<ol style="list-style-type: none"> 1 Identify population nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing 2 Refer to relevant international priorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan) within the corporate strategy 3 Report progress against specific nutrition and health-related targets and objectives on a regular basis 4 Link the KPIs of senior managers to nutrition and health-related targets in the corporate strategy 	<p>Unilever has made a strong commitment to nutrition and health at the global level, and highlights health as one of three key pillars that make up the company's Sustainable Living Plan. It sets out specific, time-bound nutrition and health targets and objectives that are routinely reported against. It aligns its approach with priorities set out by the WHO and the UN Sustainable Development Goals.</p> <p>Nestlé and Lion Dairy & Drinks publish annual national reports detailing their progress against their objectives and targets related to nutrition, and demonstrate that Key Performance Indicators of senior managers are linked to their nutrition strategy.</p>
B Product formulation	<ol style="list-style-type: none"> 5 Develop specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugars, saturated fat, artificially produced trans fat) across the portfolio, where relevant. Routinely report on progress in achieving reformulation targets 6 Limit or reduce energy content per serving/ provide smaller package sizes in relevant product categories (e.g., single-serve snacks) 7 Participate in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply 	<p>Nestlé has set specific, time-bound reformulation targets for the reduction of saturated fat, salt and added sugar across the company's global portfolio, and has reported removal of all artificially produced trans fats in its products. Compliance with reformulation targets is audited and publicly disclosed on a regular basis.</p>
C Nutrition labelling	<ol style="list-style-type: none"> 8 Commit to full implementation of the Australian government-endorsed Health Star Rating system across all relevant products, with specific roll-out plan 9 Introduce a policy to only make nutrition content claims (e.g., "99% fat free") on products that are classified as 'healthy' (using government standards for classifying the healthiness of foods in relation to health claims) 10 Provide comprehensive online nutrition information for all products 11 Support the development of 'free sugar' labelling regulations, e.g., through public in-principle support for 'free sugar' labelling and commitment to implement 'free sugar' labelling once defined 12 Commit to label artificially produced trans fat on all relevant products 	<p>Sanitarium has a commitment to implement the Australian government-endorsed Health Star Rating system across all products in its portfolio, and provides comprehensive online nutrition information for all products (per serve, per 100g and HSR).</p> <p>Coles (supermarket) has a clear system for determining whether nutrition content claims are made in a responsible way on own-brand products e.g., only making claims of "99% fat free" on products considered 'healthy' overall</p>

SUMMARY OF RECOMMENDED ACTIONS FOR COMPANIES

Domain	Recommendation actions	Examples of best available company commitments
D Promotion practices	<p>13 Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' products/brands that applies across all media channels, using government guidelines* for classifying the healthiness of foods, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy</p> <p>14 Eliminate use of promotion techniques (e.g., cartoon characters, interactive games) with strong appeal to children in relation to 'less healthy' products and brands, including on product packaging</p> <p>15 Commit to not sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands</p>	<p>Danone implements a marketing to children policy (applying to children under 12 years) that covers broadcast and non-broadcast media. It commits to not use promotional techniques that appeal to children, and does not market in the vicinity of schools, in secondary schools, or in places where children gather (e.g., day care centres, activity centres). It makes a global commitment to not use messaging that encourages a 'less healthy' lifestyle or overconsumption of any of its products. Danone reports compliance with its policies, and discloses and audits its marketing spending on healthy products, with a view to increase marketing spending on these products over time.</p>
E Product accessibility	<p>16 Commit to increase the number/proportion of healthy products in the company's portfolio</p> <p>17 Commit to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues</p> <p>18 Support the position of the WHO on fiscal policies to make healthier foods relatively cheaper and 'less healthy' foods relatively more expensive, and make the company's position public</p>	<p>Unilever has set a clear, time-bound target to transition a portion of its portfolio into a healthier product category. The company makes a commitment to increase the affordability and availability of 'healthy' products across its global markets, and identifies accessibility issues as a key part of its business strategy, aligning with the UN's Sustainable Development Goals.</p> <p>Coca-Cola New Zealand commits to not directly supply any school in New Zealand with full sugar carbonated beverages or energy drinks.</p>
F Relationships with external groups	<p>19 Disclose relationships (including funding and support) with external groups (e.g., professional associations, research organisations, community and industry groups) related to health and/or nutrition</p> <p>20 Disclose all political donations in real time, or commit to not make political donations</p>	<p>Coca-Cola International publishes a list of the external groups it funds/supports, including details of the nature, date and amount of support/funding given to research institutions, health professionals, scientific experts, professional associations and partnerships related to health and nutrition. They disclose all nutrition and active lifestyle programs with which they are affiliated, and all information is updated annually.</p>

* Primarily the Australian Dietary Guidelines. This could be supplemented by other Australian government-endorsed criteria (e.g., the Health Star Rating system, and the nutrient profiling criteria used to assess eligibility for health claims) for classifying the healthiness of food.

This study assessed, for the first time, the policies and commitments of the largest food and beverage manufacturers in Australia related to obesity prevention and nutrition. The findings show that there is a large variation in the policies and commitments of companies (overall scores ranged from 3/100 to 71/100), and there is considerable room for improvement for all companies.



This study offers key insights into areas where companies are doing well and areas where improvements are needed, especially compared to other companies in Australia. For the most part, Australian food and beverage manufacturers have acknowledged their responsibility for being part of efforts to prevent obesity and improve population diets, and have some related policies and commitments in place. Across the sector, companies need to implement a broad range of actions to contribute to societal efforts to create healthier food environments in Australia. Industry associations, such as the Australian Food and Grocery Council (AFGC) and the Australian Beverages Council, can support individual companies to adopt this report's recommendations and coordinate company action across the sector. The intention is for this assessment to be repeated over time so that progress can be tracked.



About half of the companies fully engaged in the assessment. Companies who engaged in the assessment were able to significantly improve their scores, and the average score of companies that fully engaged was significantly higher than companies that did not fully engage with the process. This reflects the need for increased transparency and public disclosure from all companies.



This study has assessed company **policies/commitments** and **transparency**. It is important to note that **performance** of companies, for example, in relation to the healthiness of the company's product portfolio, or the extent and nature of 'less healthy' food marketing, **was not assessed** in this study. Those aspects will be investigated in future phases of the initiative. As part of future phases, it will be important see whether better policies and commitments also lead to better performance.



Governments need to closely monitor the policies and commitments of food companies, the extent to which they are implemented, and the healthiness of Australian food environments. They need to consider stronger policy intervention where voluntary company actions are insufficient, as part of a broad strategy to improve population nutrition and address obesity. Other stakeholder groups, including investors, also need to monitor company progress, particularly as part of evaluation of company contributions to the UN Sustainable Development Goals.

Lion Dairy & Drinks

1st

OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

71

OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	100
B Product formulation	30%	82
C Nutrition labelling	20%	72
D Promotion to children and adolescents	30%	55
E Product accessibility	5%	45
F External relationships	5%	67

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- A| Corporate strategy** - Lion Dairy & Drinks highlights nutrition and health as a key focus area for the company, and aligns their approach with Australian government guidelines and priorities set out by the WHO. The company reports annually against nutrition and health objectives at the national level
- B| Product formulation** - Lion Dairy & Drinks has set clear, time-bound reformulation targets for the reduction of sodium, added sugars, fat and kilojoule content across the majority of its portfolio, and has set specific reformulation targets for children’s products. The company commits not to use any artificially produced trans fats in its products. Lion Dairy & Drinks is a participant in the Australian government’s Healthy Food Partnership
- C| Nutrition labelling** - Lion Dairy & Drinks commits to implement the Australian government-endorsed HSR system across all products in the company’s portfolio, and provides comprehensive online nutrition information for the majority of its products
- E| Product accessibility** - Lion Dairy & Drinks commits to transition a portion of its portfolio into a ‘healthier’ product category, and to work with retailers to position healthier products at the front of the store

Prioritised recommended actions for Lion Dairy & Drinks

- 1| Implement** a strengthened policy for reducing promotion of ‘less healthy’ products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Continue using government guidelines for classifying the healthiness of foods, and routinely report on compliance with the policy
- 2| Commit** not to sponsor sporting and community events that are popular with children/families using ‘less healthy’ products and brands
- 3| Limit** or reduce energy content per serving in relevant product categories (e.g., single-serve snacks/drinks)
- 4| Publicly** commit to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as ‘healthy’ (using government standards for classifying the healthiness of foods in relation to health claims)
- 5| Strengthen** the company’s commitment to work with retailers to increase the prominence of healthier products relative to ‘less healthy’ products in-store, by expanding scope to include product placement throughout the store, and promotion in catalogues

Nestlé

2nd OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

69 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	93
B Product formulation	30%	88
C Nutrition labelling	20%	56
D Promotion to children and adolescents	30%	54
E Product accessibility	5%	20
F External relationships	5%	94

0 20 40 60 80 100

■ Company score ■ Highest sector score

Areas of strength

- A| Corporate strategy** - Nestlé identifies nutrition and health as a priority focus area for the company, setting clear nutrition objectives and targets. The company reports against its nutrition and health commitments annually at both the national and global level
- B| Product formulation** - Nestlé has developed specific, time-bound targets for the reduction of sodium, added sugar and saturated fat across all products in its portfolio, and has reported the complete removal of artificially produced trans fats. The company operates transparently in its approach to reformulation, tracking and disclosing progress in achieving targets on an annual basis. Nestlé is a participant in the Australian government’s Healthy Food Partnership
- C| Nutrition labelling** - Nestlé commits to implement the Australian government-endorsed HSR system across the company’s portfolio, and provides comprehensive online nutrition information for some of its products
- F| Relationships with external groups** - Nestlé adopts good disclosure of its support for external groups related to nutrition and health, and implements a global policy that prohibits political donations

Prioritised recommended actions for Nestlé

- 1| Implement** a strengthened policy for reducing promotion of ‘less healthy’ products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 2| Commit** not to sponsor sporting and community events that are popular with children/families using ‘less healthy’ products and brands
- 3| Extend** commitment to eliminate use of promotion techniques with strong appeal to children in relation to ‘less healthy’ products and brands, by ensuring commitment applies also to product packaging
- 4| Publicly** commit to only make nutrition content claims (e.g., “99% fat free”) on products that are classified as ‘healthy’ (using government standards for classifying the healthiness of foods in relation to health claims)
- 5| Commit** to work with retailers to increase the prominence of healthier products relative to ‘less healthy’ products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 6| Support** the development of ‘free sugar’ labelling regulations

Unilever

3rd OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

68 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	93
B Product formulation	30%	68
C Nutrition labelling	20%	75
D Promotion to children and adolescents	30%	56
E Product accessibility	5%	50
F External relationships	5%	88

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- A| Corporate strategy** - Unilever identifies nutrition and health as a priority focus area for the company, communicated through national and global company reporting. The company aligns its nutrition and health agenda with priorities laid out by the WHO and UN Sustainable Development Goals, and regularly reports its progress in achieving specific nutrition and health objectives
- B| Product formulation** - Unilever has set specific, time-bound targets for the reduction of added sugars, saturated fat, sodium and kilojoules across portions of the company's portfolio, and has reported removal of all artificially produced trans fat from its products
- C| Nutrition labelling** - Unilever commits to full implementation of the Australian government-endorsed Health Star Rating system across its food and beverage portfolio
- E| Product Accessibility** - Unilever has set clear, time-bound targets to increase the healthiness of a portion of its portfolio, and commits to address the affordability and availability of its healthy products across the markets in which it operates

Prioritised recommended actions for Unilever

- 1| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 2| Communicate** specific, time-bound targets for the reduction of nutrients of concern and energy content across all relevant products in the company's portfolio
- 3| Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Commit** not to sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands
- 5| Extend** commitment to eliminate use of promotion techniques with strong appeal to children in relation to 'less healthy' products and brands, by ensuring commitment applies also to product packaging
- 6| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

Coca-Cola

4th

OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

64

OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	90
B Product formulation	30%	86
C Nutrition labelling	20%	52
D Promotion to children and adolescents	30%	43
E Product accessibility	5%	20
F External relationships	5%	88

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- A| Corporate strategy** - Coca-Cola identifies nutrition and health as a focus area for the company, and reports annually against progress in achieving its nutrition and health objectives at the national level
- B| Product formulation** - Coca-Cola has set specific, time-bound targets for the reduction of added sugars and kilojoule content across the company's portfolio, and commits to offer smaller pack sizes across the portfolio
- E| Product accessibility** - Coca-Cola Australia has set a clear target that all new product innovations will be low or no sugar options
- F| External relationships** - Coca-Cola discloses a list of the external groups, organisations and research it supports at the national and global level, including funding amounts. Details are available in a consolidated and accessible format, and updated annually

Prioritised recommended actions for Coca-Cola

- 1| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 2| Commit** not to sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands
- 3| Eliminate** use of promotion techniques (e.g., cartoon characters, interactive games) with strong appeal to children in relation to 'less healthy' products and brands
- 4| Commit** to implement interpretive HSR labelling (use of Health Stars, rather than just the energy icon) across all relevant products
- 5| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 6| Commit** to not directly supply any school in Australia with full sugar carbonated beverages

Mars

4th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

64 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	78
B Product formulation	30%	68
C Nutrition labelling	20%	75
D Promotion to children and adolescents	30%	52
E Product accessibility	5%	15
F External relationships	5%	80

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- A| Corporate strategy** - Mars highlights nutrition and health as a priority focus area in company reporting. At the global level, the company provides detail on its progress in achieving nutrition and health objectives, and references priorities laid out by the WHO
- B| Product formulation** - Mars has set specific, time-bound targets for the reduction of saturated fat, sodium and kilojoule content across portions of its portfolio. Across its confectionery business unit, the company commits to increase the number of single serve products and move away from 'king size'
- C| Nutrition labelling** - Mars commits to implement the Australian government-endorsed Health Star Rating system across its food and confectionery range
- E| Product accessibility** - Mars makes a clear commitment to increase the number of 'healthy' products in the food segment of its portfolio

Prioritised recommended actions for Mars

- 1| Introduce** national-level reporting against specific nutrition and health targets and objectives
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3| Develop** specific, time-bound targets for the reduction of saturated fat and free sugars across all relevant segments of the product portfolio
- 4| Commit** not to sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands
- 5| Extend** commitment to eliminate use of promotion techniques with strong appeal to children in relation to 'less healthy' products and brands, by ensuring commitment applies also to product packaging
- 6| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

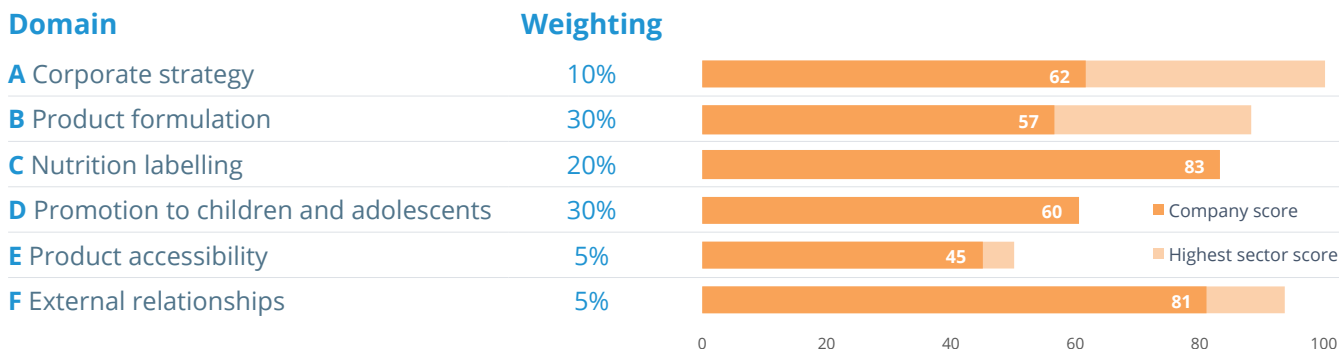
Sanitarium

4th

OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

64

OVERALL SCORE (OUT OF 100)



Areas of strength

- A| Corporate strategy** - Sanitarium clearly communicates its commitment to nutrition and health through the company's overarching mission statement, and highlights nutrition and health-related issues as a key priority within the business
- C| Nutrition labelling** - Sanitarium outlines its support for the Australian government-endorsed Health Star Rating system, and commits to full implementation of HSR labelling across all products in its portfolio. Sanitarium provides comprehensive online nutrition information for all its products, including per serve, per 100g and HSR
- D| Promotion to children and adolescents** - Sanitarium identifies responsible marketing to children as a company priority and commits to only market 'healthy' foods to children
- E| Product accessibility** - Sanitarium has a broad commitment to encourage healthy eating and provide healthy and nutritious products to all consumers

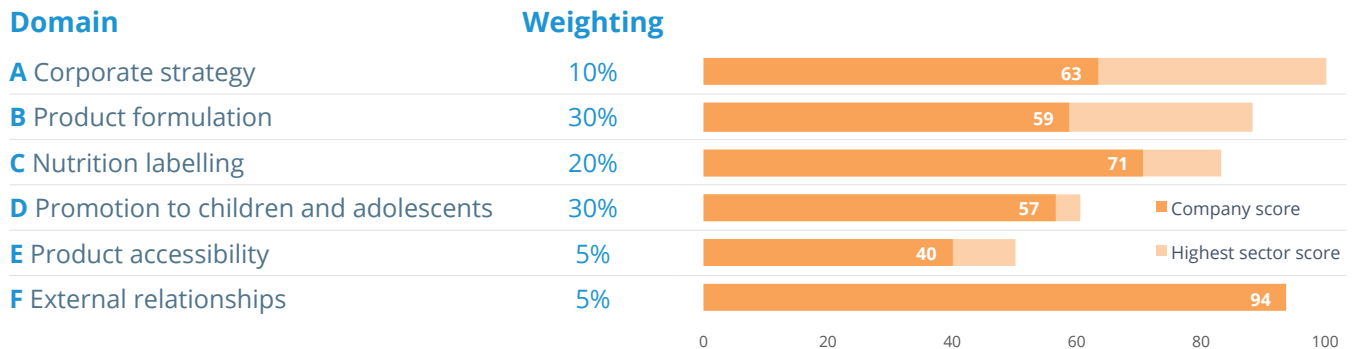
Prioritised recommended actions for Sanitarium

- 1| Report** progress against specific nutrition and health objectives at the national level on a regular basis
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Continue using government guidelines for classifying the healthiness of foods
- 3| Develop** and publicise specific, time-bound targets for the reduction of sodium, free sugar and saturated fat across the product portfolio, and commit to reducing the kilojoule content of single-serve products. Routinely report on progress in achieving reformulation targets
- 4| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 5| Support** the development of 'free sugar' labelling regulations

Simplot

7th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

62 OVERALL SCORE (OUT OF 100)



Areas of strength

- A| Corporate strategy** - Simplot identifies nutrition and health as an area of focus for the company, and reports against some of its progress in achieving nutrition and health objectives
- B| Product formulation** - Simplot has set internal reformulation targets for the reduction of nutrients of concern across the portfolio
- C| Nutrition labelling** - Simplot commits to full implementation of the Australian government-endorsed Health Star Rating system across all products in its portfolio, and reports on implementation of HSR labelling on its website
- E| Product accessibility** - Simplot has set a clear, time-bound target to transition a portion of its portfolio into a 'healthier' category

Prioritised recommended actions for Simplot

- 1| Communicate** Simplot's approach to nutrition and health-related issues in corporate reporting, and report progress against specific nutrition and health objectives on a regular basis
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Continue using government guidelines for classifying the healthiness of foods
- 3| Publicise** specific, time-bound targets for the reduction of nutrients of concern across the portfolio, and routinely report against progress in achieving reformulation targets
- 4| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 5| Support** the development of 'free sugar' labelling regulations

Campbell Arnott's

8th

OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

55

OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	65
B Product formulation	30%	50
C Nutrition labelling	20%	75
D Promotion to children and adolescents	30%	48
E Product accessibility	5%	5
F External relationships	5%	83

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- A| Corporate strategy** - Campbell Arnott's identifies nutrition as an area of focus for the company, and reports against some of its progress in achieving nutrition targets on its website and through global corporate social responsibility reports
- B| Product formulation** - Campbell Arnott's has set internal reformulation targets across portions of its portfolio, and is a participant in the Australian government's Healthy Food Partnership
- C| Nutrition labelling** - Campbell Arnott's commits to full implementation of the Australian government-endorsed Health Star Rating system across the company's portfolio, and provides comprehensive online nutrition information for its products, both per serve and per 100g
- F| External relationships** - Campbell Arnott's publishes its support for professional associations related to nutrition and health

Prioritised recommended actions for Campbell Arnott's

- 1| Elevate** nutrition and health to a higher priority focus area within the business, with appropriate resourcing, objectives and targets
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3| Develop** and publicise specific, time-bound targets for the reduction of sodium, free sugar, saturated fat, and artificially produced trans fat across the product portfolio. Routinely report on progress in achieving reformulation targets
- 4| Eliminate** use of promotion techniques (e.g., cartoon characters, interactive games) with strong appeal to children in relation to 'less healthy' products and brands
- 5| Publicly** commit to only make nutrition content claims (e.g., "99% fat free") on products that are classified as 'healthy' (using government standards for classifying the healthiness of foods in relation to health claims)
- 6| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

Fonterra

9th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

51 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	68
B Product formulation	30%	53
C Nutrition labelling	20%	54
D Promotion to children and adolescents	30%	47
E Product accessibility	5%	10
F External relationships	5%	50

0 20 40 60 80 100

■ Company score ■ Highest sector score

Areas of strength

- A| Corporate strategy** - Fonterra highlights nutrition as an area of focus for the company through global sustainability reporting. The company references priorities laid out by the WHO and the UN Sustainable Development Goals
- B| Product formulation** – Fonterra commits to reduce levels of added sugars, sodium and total fat across portions of its global portfolio
- C| Nutrition labelling** - Fonterra provides comprehensive online nutrition information for its products, both per serve and per 100g

Prioritised recommended actions for Fonterra

- 1| Establish** national reporting (e.g., in annual review, on website) of progress against specific Australian nutrition and health objectives and targets
- 2| Develop** and publicise specific, time-bound targets for the reduction of sodium, free sugar, saturated fat and kilojoule content, across the Australian product portfolio. Routinely report on and externally audit progress in achieving reformulation targets
- 3| Publicly commit** to implement the Health Star Rating system across all products in the Australian product portfolio, with specific roll-out plan
- 4| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 5| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

PepsiCo

10th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

50 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Company score	Highest sector score
A Corporate strategy	10%	72	80
B Product formulation	30%	53	75
C Nutrition labelling	20%	19	70
D Promotion to children and adolescents	30%	46	60
E Product accessibility	5%	0	40
F External relationships	5%	25	80

Areas of strength

- A| Corporate strategy** - PepsiCo Australia makes a commitment to nutrition and health through the company's website and in global corporate reporting
- B| Product formulation** - PepsiCo Australia reports reductions in levels of saturated fat, artificially produced trans fat and sodium across its snack portfolio. At the global level, PepsiCo has set specific, time-bound targets to reduce sodium, artificially produced trans fat, saturated fat and added sugars across portions of its portfolio
- C| Nutrition labelling** - PepsiCo Australia provides comprehensive online nutrition information for all of its products (per serve and per 100g) and includes Health Star Ratings for products online

Prioritised recommended actions for PepsiCo

- 1| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 2| Commit** not to sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands
- 3| Publicly commit** to full implementation of the Health Star Rating system across all relevant products, with specific roll-out plan. As part of this commitment, implement interpretive HSR labelling (use of Health Stars, rather than just the energy icon)
- 4| Develop** specific, time-bound targets for the reduction of sodium, free sugar, saturated fat and kilojoule content across the Australian snacks and beverages portfolio (where relevant to product category). Routinely report on progress in achieving reformulation targets
- 5| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 6| Commit** to not directly supply any school in Australia with full sugar carbonated beverages or energy drinks

Kellogg's*

11th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

48 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Company score	Highest sector score
A Corporate strategy	10%	63	~90
B Product formulation	30%	38	~85
C Nutrition labelling	20%	64	~80
D Promotion to children and adolescents	30%	41	~75
E Product accessibility	5%	0	~60
F External relationships	5%	38	~85

Areas of strength

- A| Corporate strategy** - At the global level, Kellogg's identifies nutrition and health as an area of focus for the company and references priorities laid out by the UN Sustainable Development Goals
- B| Product formulation** - Kellogg's Australia commits to providing healthier options through reformulation of its portfolio. Globally, the company reports on some of its progress in reformulating products to reduce levels of sodium, artificially produced trans fat and sugars
- C| Nutrition labelling** - Kellogg's Australia commits to implement the government-endorsed Health Star Rating system across all products in the company's portfolio, with a specific roll out plan. Kellogg's Australia provides comprehensive nutrition information online for its products

Prioritised recommended actions for Kellogg's

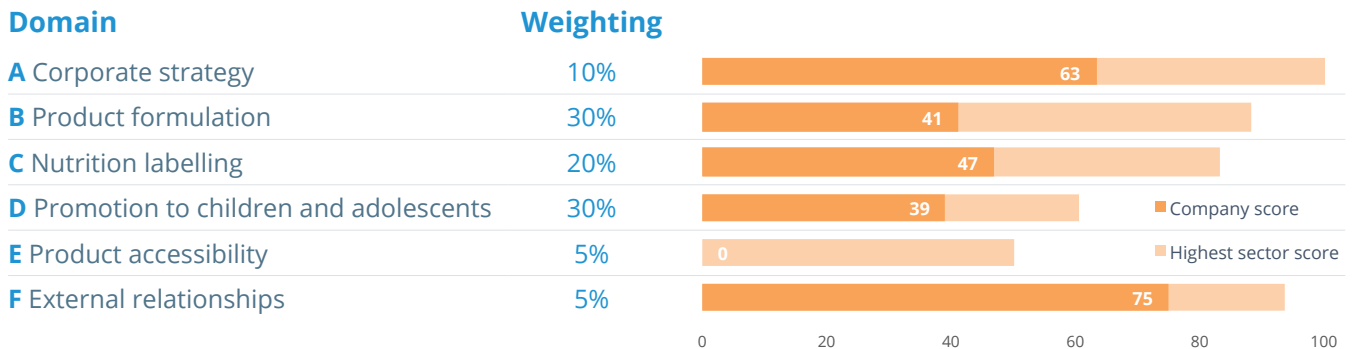
- 1| Identify** nutrition and health as a priority focus area for the company at the national level, and develop specific objectives that are reported against at the national level
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3| Publicly commit** to Australia-specific, time-bound targets for the reduction of sodium, free sugar, saturated fat and artificially produced trans fat as well as portion size/energy content across the product portfolio. Routinely report on progress in achieving reformulation targets
- 4| Commit** not to sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands
- 5| Extend** commitment to eliminate use of promotion techniques with strong appeal to children in relation to 'less healthy' products and brands, by ensuring commitment applies also to product packaging
- 6| Publicly** commit to only make nutrition content claims (e.g., "99% fat free") on products that are classified as 'healthy' (using government standards for classifying the healthiness of foods in relation to health claims)
- 7| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

*Assessment based on publicly available information only

George Weston Foods

12th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

44 OVERALL SCORE (OUT OF 100)



Areas of strength

- A| Corporate strategy** - George Weston Foods makes some commitment to nutrition through national and global corporate reporting
- B| Product formulation** - George Weston Foods commits to reduce sodium across its product portfolio
- C| Nutrition labelling** - George Weston Foods commits to implementing the Australian government-endorsed Health Star Rating system across a portion of its portfolio, and provides comprehensive online nutrition information for its products

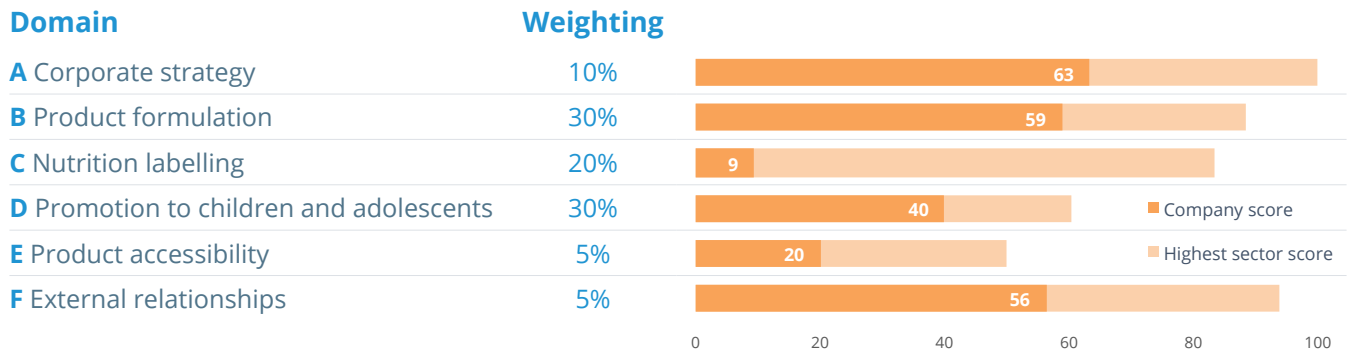
Prioritised recommended actions for George Weston Foods

- 1| Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health targets and objectives at the national level
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children /adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3| Develop** specific, time-bound targets for the reduction of sodium, free sugar and saturated fat across the product portfolio. Routinely report on progress in achieving reformulation targets
- 4| Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 5| Commit** to implement the Health Star Rating system across products from all divisions of the business, with specific roll-out plan

Mondelēz*

13th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

42 OVERALL SCORE (OUT OF 100)



Areas of strength

- A| Corporate strategy** - Mondelēz identifies nutrition and health as an area of focus for the company at the global level. Globally, it reports against some of its nutrition and health objectives and references priorities laid out by the WHO
- B| Product formulation** - Mondelēz has set global reformulation targets to reduce levels of sodium, artificially produced trans fat and saturated across the company's portfolio
- E| Product accessibility** - Mondelēz makes a commitment that 25% of its revenue will come from its 'healthier' product range by 2020

Prioritised recommended actions for Mondelēz

- 1| Elevate** nutrition and health as a priority focus area within the business at the national level, and report on progress against Australia-specific health and nutrition objectives
- 2| Implement** a strengthened policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children /adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3| Develop** and publicise specific, time-bound reformulation targets for the reduction of free sugars across the company's portfolio
- 4| Commit** to full implementation of the Health Star Rating system across all relevant products, with specific roll-out plan
- 5| Provide** comprehensive online information for all products in the company's portfolio
- 6| Commit** not to sponsor sporting and community events that are popular with children/families using 'less healthy' products and brands
- 7| Eliminate** use of promotion techniques (e.g., cartoon characters, interactive games) with strong appeal to children in relation to 'less healthy' products and brands
- 8| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

*Assessment based on publicly available information only

Kraft Heinz*

14th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

29 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	55
B Product formulation	30%	38
C Nutrition labelling	20%	54
D Promotion to children and adolescents	30%	0
E Product accessibility	5%	0
F External relationships	5%	25

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- A| Corporate strategy** - Kraft Heinz identifies nutrition and health as an area of focus for the company at the national level, and reports against some of its progress in achieving its nutrition and health objectives
- B| Product formulation** – Kraft Heinz reports against progress in achieving sodium and sugar reductions across its portfolio
- C| Nutrition labelling** – Kraft Heinz commits to implement the Australian government-endorsed Health Star Rating system across a number of products in its portfolio, and provides comprehensive online nutrition information for products

Prioritised recommended actions for Kraft Heinz

- 1| Elevate** nutrition and health to a priority focus within the business, with appropriate resourcing, and relevant objectives and targets
- 2| Implement** a policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3| Develop** and publicise specific, time-bound targets for the reduction of saturated fat, artificially produced trans fat and kilojoule content across the product portfolio. Develop targets for the reduction of sodium and free sugars for products that do not already meet the company's healthy standard. Routinely report on progress in achieving reformulation targets
- 4| Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 5| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues
- 6| Publicly** commit to only make nutrition content claims (e.g., "99% fat free") on products that are classified as 'healthy' (using government standards for classifying the healthiness of foods in relation to health claims)

*Assessment based on publicly available information only

McCain*

15th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

14 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	0
B Product formulation	30%	12
C Nutrition labelling	20%	19
D Promotion to children and adolescents	30%	20
E Product accessibility	5%	0
F External relationships	5%	19

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- B | Product formulation** – McCain makes a general commitment at the global level to reduce use of sugar, salt and fat in its products
- C | Nutrition labelling** - McCain provides comprehensive nutrition information online for its products, both per serve and per 100g

McCain had little disclosure of its approach to nutrition and health at the national level. As such no further areas of strength were identified.

*Assessment based on publicly available information only

Prioritised recommended actions for McCain

- 1 | Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives at the national level
- 2 | Implement** a policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children /adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 3 | Develop** specific, time-bound targets for the reduction of sodium, free sugar, saturated fat, artificially produced trans fat and kilojoule content across the portfolio. Routinely report on progress in achieving reformulation targets
- 4 | Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 5 | Commit** to full implementation of the Australian government-endorsed Health Star Rating system across all relevant products, with specific roll-out plan
- 6 | Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

Tru Blu Beverages*

16th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

9 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	17
B Product formulation	30%	9
C Nutrition labelling	20%	15
D Promotion to children and adolescents	30%	6
E Product accessibility	5%	0
F External relationships	5%	0

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

- B | Product formulation** - Tru Blu Beverages makes some commitment to reduce sugar in its products
- C | Nutrition labelling** - Tru Blu Beverages provides comprehensive nutrition information online for its products, both per serve and per 100g

Tru Blu Beverages had little disclosure of its approach to nutrition and health. As such no further areas of strength were identified.

Prioritised recommended actions for Tru Blu Beverages

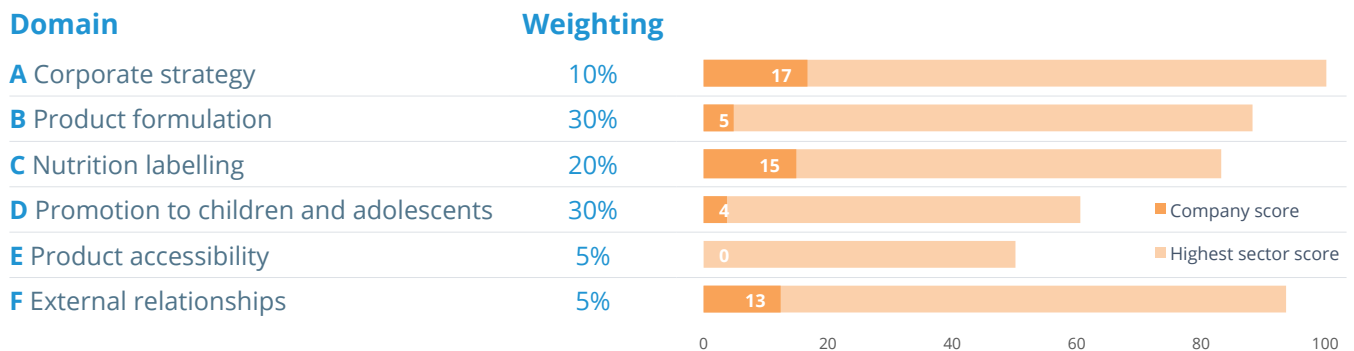
- 1 | Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives
- 2 | Develop** specific, time-bound targets for the reduction of free sugar and kilojoule content across the product portfolio. Routinely report on progress in achieving reformulation targets
- 3 | Publicly commit** to full implementation of the Health Star Rating system across all relevant products, with specific roll-out plan. As part of this commitment, implement interpretive HSR labelling (use of Health Stars, rather than just the energy icon)
- 4 | Develop** a strategy to increase the proportion of 'healthy' products in the company's portfolio
- 5 | Commit** to not directly supply any school in Australia with full sugar carbonated beverages or energy drinks
- 6 | Implement** a policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children /adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods

*Assessment based on publicly available information only

Schweppes*

17th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

8 OVERALL SCORE (OUT OF 100)



Areas of strength

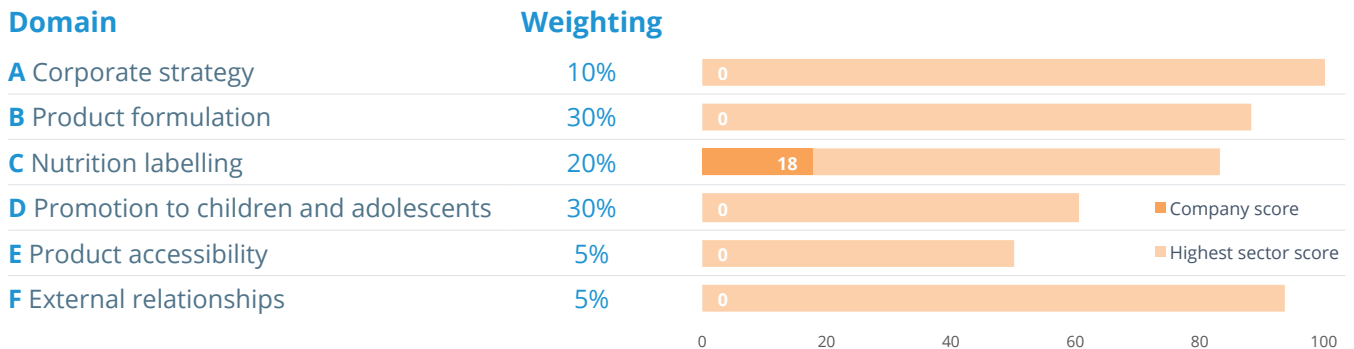
- B | Product formulation** - Schweppes makes some commitment to reduce sugar in its products at the global level
- C | Nutrition labelling** - Schweppes provides comprehensive nutrition information online for its products, both per serve and per 100g

Schweppes had little disclosure of its approach to nutrition and health. As such no further areas of strength were identified.

Prioritised recommended actions for Schweppes

- 1 | Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives
- 2 | Develop** specific, time-bound targets for the reduction of free sugar and kilojoule content across the product portfolio. Routinely report on progress in achieving reformulation targets
- 3 | Publicly commit** to full implementation of the Health Star Rating system across all relevant products, with specific roll-out plan. As part of this commitment, implement interpretive HSR labelling (use of Health Stars, rather than just the energy icon)
- 4 | Develop** a strategy to increase the proportion of 'healthy' products in the company's portfolio
- 5 | Commit** to not directly supply any school in Australia with full sugar carbonated beverages or energy drinks
- 6 | Implement** a policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children /adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 7 | Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

*Assessment based on publicly available information only



Areas of strength

- C) Nutrition labelling** - Goodman Fielder provides comprehensive nutrition information online for the majority of its products, both per serve and per 100g

Goodman Fielder had little disclosure of its approach to nutrition and health. As such no further areas of strength were identified.

Prioritised recommended actions for Goodman Fielder

- 1| Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing
- 2| Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat, and artificially produced trans fat) across the product portfolio. Routinely report on progress in achieving reformulation targets
- 3| Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Commit** to full implementation of the Australian government-endorsed Health Star Rating system across all relevant products, with specific roll-out plan
- 5| Implement** a policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 6| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

*Assessment based on publicly available information only

Parmalat*

19th OUT OF 19 FOOD AND BEVERAGE MANUFACTURERS

3 OVERALL SCORE (OUT OF 100)

Domain	Weighting	Score
A Corporate strategy	10%	0
B Product formulation	30%	0
C Nutrition labelling	20%	6
D Promotion to children and adolescents	30%	0
E Product accessibility	5%	0
F External relationships	5%	44

0 20 40 60 80 100

■ Company score
■ Highest sector score

Areas of strength

Parmalat had little disclosure of its approach to nutrition and health. As such, no clear areas of strength were identified.

Prioritised recommended actions for Parmalat

- 1| Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing
- 2| Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat, and artificially produced trans fat) across the product portfolio. Routinely report on progress in achieving reformulation targets
- 3| Participate** in / implement a strategy to adopt relevant recommendations from government-led programs (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Commit** to full implementation of the Australian government-endorsed Health Star Rating system across all relevant products, with specific roll-out plan
- 5| Implement** a policy for reducing promotion of 'less healthy' products/brands that applies to children and adolescents (**up to the age of 18**), across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt government guidelines for classifying the healthiness of foods
- 6| Commit** to work with retailers to increase the prominence of healthier products relative to 'less healthy' products in-store (e.g., through shelf space and strategic placement) and in promotional catalogues

*Assessment based on publicly available information only

