



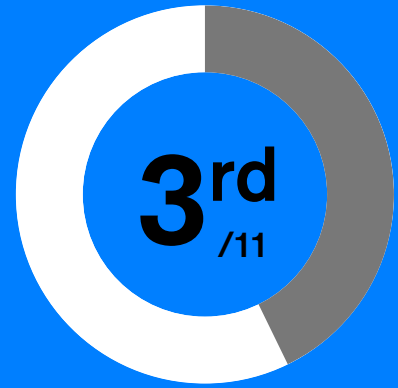
Aldi UK

Estimated UK grocery retail value
(£ billion, 2021) 13.8

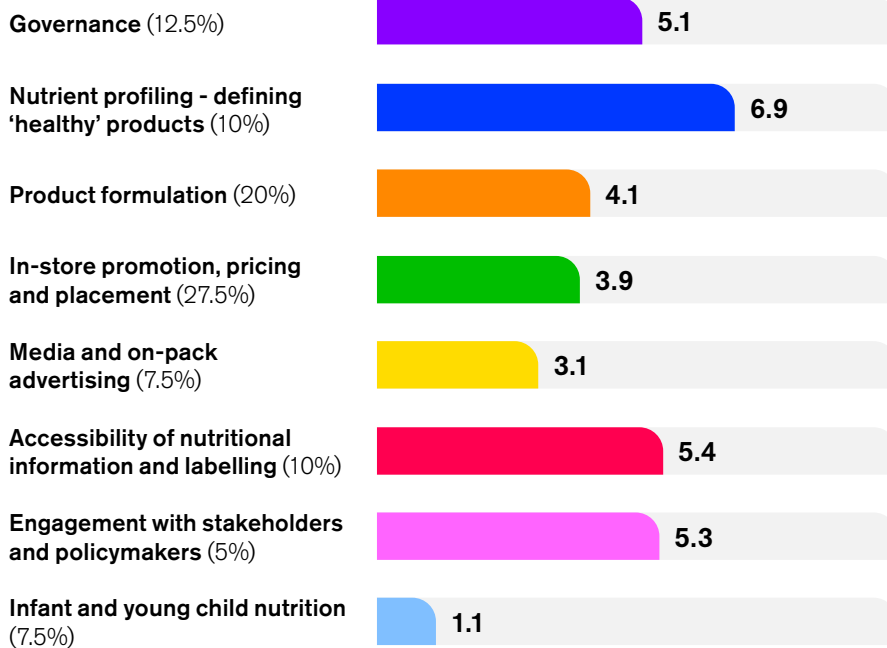
Number of employees
39,000

Headquarters
Austria

Type of ownership
Private

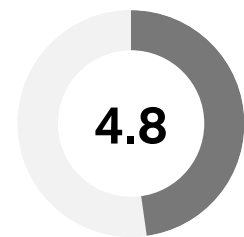


Score 4.3/10

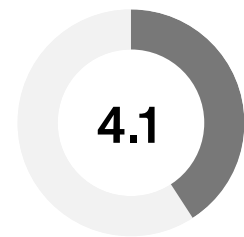


(%) Weight of a topic

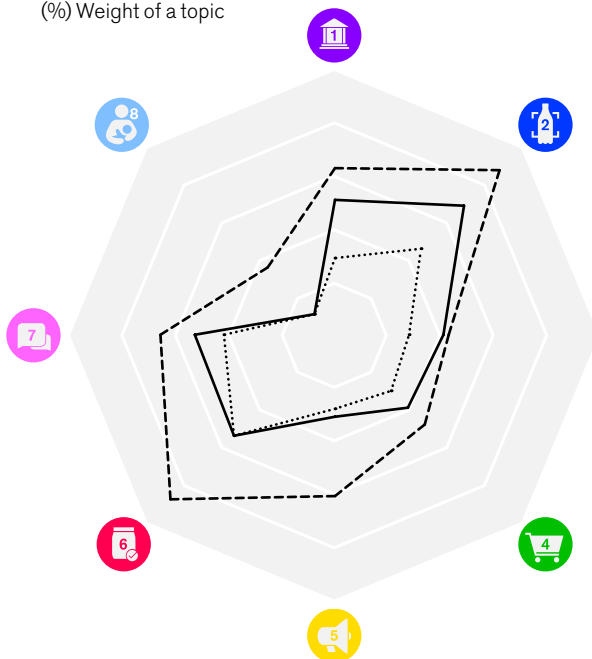
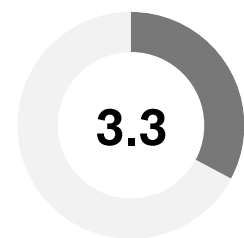
Commitment



Performance



Disclosure



- Company score
- ⋯ Average score
- ⦿ High score
- ⦿ Scale 0–10

The bar graph to the left shows company scores across the eight Index Topics and scores are shown for each Topic. The circles provide an alternate view on the company's overall results, showing the score per indicator type.

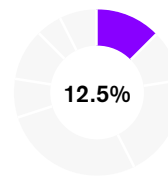


Scores and ranks

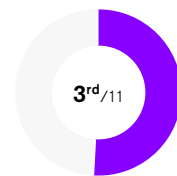
- Overall, Aldi UK (referred to throughout this scorecard as Aldi) ranks third, with a score of 4.3 out of 10 (the average across all 11 retailers is 3.3).
- Aldi achieves a top-three rank in Governance, Nutrient profiling, Product formulation and Engagement with stakeholders and policymakers. Aldi has shown significant improvement compared to the 2020 Supermarket Spotlight report, publishing more on its strategies and policies for nutrition. For Product formulation, Aldi was found to comprehensively and clearly report on progress on targets.
- Aldi is mid-ranking in In-store promotion, pricing and placement, Media and on-pack advertising, Accessibility of nutritional information and labelling and Infant and young child nutrition, where considerable improvements can be made – for example, by adopting and publishing a responsible marketing policy.



Governance



Topic weight



Score 5.1/10

Topic average 2.9

- Aldi has a strategy to grow through a focus on nutrition and health in the UK, as mentioned on the company's 'Tackling obesity' webpage and has a specific focus on helping customers to reach the UK dietary guidelines through work with the British Dietetic Association.
- Aldi has set a target to increase the sales of healthy products: to increase the proportion of healthier items to 70% of food and drink sales by 2025 (and the company indicates that in 2020, 66% of its own-brand sales were from healthy products).
- Aldi publishes the percentage of sales generated by healthy products with respect to overall sales for the latest financial year on which it has reported, indicating that 66% of own brand sales derived from healthy products in 2020, defining 'healthy' by using the Food Standards Agency (FSA) 2004/5 nutrient profiling model (NPM).
- Aldi was the first UK-wide retailer to set a SMART sales-based target to increase the percentage of vegetables portions sold across own-brand products by 2023, as part of its Peas Please pledge. The target percentage, however, has not been made public. Aldi has also reported some progress on its targets to increase sales of fruit and vegetables, demonstrated by an increase in sales of fruit and vegetables in 2020/21 compared to baseline of 2019/20.
- Aldi reduced the sugar content and reformulated all own-brand soft drinks to below the level at which the Soft Drinks Industry Levy (SDIL) is applied and therefore these products were not subject to the SDIL in the previous financial year.



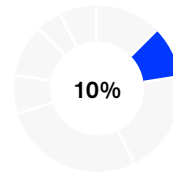
- Aldi is one of three retailers in this Index that provided evidence of having used research that addresses the specific nutrition needs of priority populations at higher risk of diet-related disease or food insecurity, through its research with the British Dietetic Association, which resulted in the design of affordable and nutritious shopping baskets.

Areas of improvement

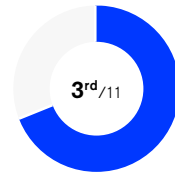
- It is recommended that Aldi further integrates nutrition considerations in its commercial business functions by developing and publishing a comprehensive multi-year plan for delivery of its nutrition strategy, including specific objectives and activities to improve nutrition and address malnutrition in all its forms, applicable across the whole company, including all store formats and online.
- A staff member two levels below executive level has formal accountability for the company's nutrition strategy. Aldi is encouraged to establish leadership and accountability for nutrition and health at the top of the organisation (at executive or Board level), ensuring that nutrition and health are prioritised.
- Aldi is encouraged to reference business risks explicitly linked to rising rates of obesity and diet-related diseases in its publicly available risk register.
- Aldi is advised to publish the percentage increase in vegetable portions sold across own-brand products, the target for which was set as part of the company's Peas Please pledge but which is not in the public domain.
- Aldi has indicated that it aims to start reporting on the sales of healthy packaged products relative to other products in the last financial year, and there is significant scope for Aldi to be more transparent in this area further reporting on:
 - the percentage of products in its portfolio that are healthy;
 - the ratio of sales growth of healthy products versus overall sales growth; and
 - the ratio of sales growth on fruit and vegetables versus overall sales growth.
- Aldi is advised to publish the percentage of sales volume and value subject to the SDIL in the latest financial year because although Aldi's own-brand products have been reformulated to ensure the levy is not applied to them, Aldi continues to sell manufacturer-brand products that are subject to the SDIL.



Nutrient profiling - defining 'healthy' products



Topic weight



Score 6.9/10
Topic average 4.6

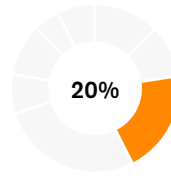
- Aldi indicates it uses the FSA 2004/5 nutrient profiling model (NPM), with an adaptation that allows the retailer to determine the nutritional content of smaller products at checkouts. Aldi has indicated that the adaptation to the model will be removed to be compliant with upcoming legislation and that the model will be used more widely.
- Aldi uses the adapted FSA 2004/5 NPM to ensure that only healthy products (products that score below 4 points) are positioned at its checkouts (both own-brand and manufacturer-brand products). The FSA 2004/5 NPM is also used without adaptations to assess proportion of sales from healthy products (own-brand products only).

Areas of improvement

- Aldi is advised to disclose its NPM in full, including any adaptation to the FSA 2004/5 NPM, on its website, including scoring, criteria and where and how it is applied.
- Aldi – at the time of the research – indicated that its NPM is used to guide product positioning at checkouts, and the company is encouraged to extend this commitment and use the NPM more broadly to inform new product development as well as product reformulation, and to guide decisions on the stocking, pricing, positioning, promotion, marketing and labelling of products.



Product formulation



Topic weight



Score 4.1/10
Topic average 2.8

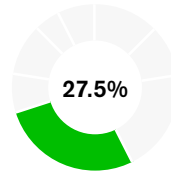
- Aldi commits to the government's targets for sugar, salt and calorie reduction in all relevant product categories. Of all the retailers assessed for this Index, Aldi was found most accessibly and comprehensively to report its progress towards all three of these targets, with its Product Reformulation webpage providing full and easy-to-read information for consumers:
 - Aldi commits to the government's 2024 ambition to reduce calories by 20% from a 2017 baseline in all categories outlined by the government that are relevant to its range, and states that 91% of its products meet maximum government calorie targets.
 - Aldi has made some explicit progress towards the government's 2020 sugar reduction target, reducing sugar by more than 9% across key categories.
 - Aldi indicates that 96% of its products comply with the government's 2017 salt targets, and the company has committed to continue its reformulation efforts in line with the government's current 2024 salt ambition.
- Aldi commits to an explicit limit of industrial trans fatty acids (iTfAs) to not exceed 2g per 100 grams of fats and oils, which is in line with EU regulatory requirements and World Health Organization (WHO) recommendations. Aldi also publicly reports on ongoing efforts to limit iTfAs and indicates that it has a mechanism to monitor this.
- Aldi addresses portion size as part of its calorie reduction efforts and reports on progress towards reducing the portion size of unhealthy products in this context.

Areas of improvement

- Aldi is advised to set targets to reduce levels of saturated fat in its own-brand products, to develop targets on increasing fruit, vegetables and wholegrains content in its own-brand packaged products, and to report regularly and comprehensively on progress towards these targets both online and in annual reports.
- Aldi is encouraged to make a commitment to offer smaller-sized portions on products that the company considers to be less healthy (according to its own definition of healthy) and to report on these efforts.
- Aldi is encouraged to engage in dialogue with brand manufacturers to increase the healthiness of products sold through its platforms, and publicly disclose a commentary on these efforts.



In-store promotion, pricing and placement



Topic weight



Topic average 3.0

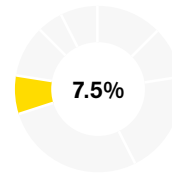
- Aldi has committed to increasing the number/percentage of healthy products in more prominent locations in store, by committing to removing or reducing less healthy items from checkouts, explicitly using the company's NPM to screen products suitable to be placed at checkouts. Aldi also indicated that it has increased the prominence of healthy fresh products in higher footfall parts of the store.
- Aldi commits to 'continue promoting vegetables through the Aldi Super 6 campaign, where fruit and vegetables will be available at a lower price to the standard retail'.
- Aldi commits to having a minimum number of fruit and vegetable promotions at any one time.

Areas of improvement

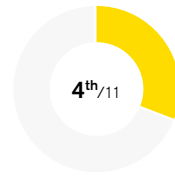
- Aldi is encouraged to make a commitment to address the affordability of healthy foods with specific reference to low-income groups and to publicly report on progress toward this.
- Aldi is advised to introduce a 'price promise' to ensure that healthy options will never be more expensive than less healthy options.
- Aldi is encouraged to commit to stocking healthier variants for all products for which such variants exist and with as many facings as the original products. Aldi could also ensure that healthy products are prominently displayed in-store in high-footfall areas, as well as in online retail environments and with increased use of product cues.
- Aldi currently uses the FSA 2004/5 NPM for their Healthier Checkouts Policy. Aldi is encouraged to use the NPM more widely to guide product positioning in its stores and to publish information about how it guides product positioning.
- Aldi could be more transparent on the impact of promotions and in-store campaigns, including regularly reporting on targets for the promotion of healthier products and providing data on the impact this has on prices and sales.
- Aldi is encouraged to improve its commitment to ban sales of energy drinks to children by extending the restriction from age 16 to age 18, and to provide evidence of having implemented this, for example by indicating that staff receive training.



Media and on-pack advertising



Topic weight



Score 3.1/10
Topic average 2.8

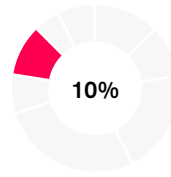
- Aldi indicates that it does not actively target children in its media buying and that digital media is targeted to audiences over 18 years of age, though the company does not have a clearly articulated responsible marketing policy.
- Aldi commits to align the portrayal of food in advertising with on-pack portion/serving size, by using the advice of a home economist to ensure that the portrayal of food portion size is realistic.
- Aldi has made some efforts to restrict the usage of child-oriented characters by removing cartoon characters from 10 categories of own-brand products, but there are exceptions for some 'Icons' that are 'deemed iconic to the Aldi brand' or where cartoon characters play 'an integral role in the design of the product'.
- Aldi commits to advertising more fruit and vegetables as part of its Peas Please pledge, including the use of social media, TV and radio to promote fruit and vegetable consumption.
- Aldi, along with the other retailers, provides evidence of sponsoring initiatives promoting children and/or adults' healthy eating, such as the Get Set to Eat Fresh initiative, a programme focused on educating children aged 5–14 on the importance of a balanced diet. It is also one of the retailers on the Child Food Poverty Task Force of the #EndChildFoodPoverty campaign started by British football player Marcus Rashford during the COVID-19 pandemic.

Areas of improvement

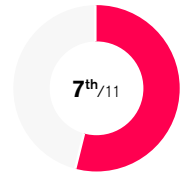
- Aldi is strongly encouraged to develop and publish a clearly articulated responsible marketing/advertising policy, covering all consumers including children (defined as being those aged under 18), including all marketing communication channels, and applied to all products and all stores.
- Aldi is advised to go beyond the UK Code of Broadcast Advertising (BCAP Code) by committing not to advertise HFSS products at all, on any form of media on which it markets to children.
- Aldi should publicly commit to go beyond the UK Code of Non-Broadcast Advertising and Direct & Promotional Marketing (CAP Code) by extending its commitment not to use child-oriented characters (which currently applies to 10 categories of own-brand products) to all HFSS products, either on-pack or in-store/online).
- Aldi is encouraged to commit not to sponsor materials, people or activities popular with children and/or adults unless in conjunction with healthy products or products low in sugar/calories/salt/fat.
- Aldi is encouraged to report on the impact of the initiatives it sponsors.
- Aldi is advised to commit to increase the proportion of advertising spend on healthy products relative to overall advertising spend and publish a commentary outlining the changes to the company's advertising spending in support of healthier eating.



Accessibility of nutrition information and labelling



Topic weight



Score 5.4/10
Topic average 5.4

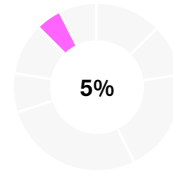
- Aldi fully applies the Institute of Grocery Distribution (IGD) guidance on 'gold standard' labels, including colour-coded grammes per serving and percentage reference intake for energy, fat, saturated fat, sugar and salt.
- Aldi provides both back-of-pack (BOP) and front-of-pack (FOP) nutrition information online for all products and clearly displays FOP labels together with product pictures online to make them as accessible as they are in-store.

Areas of improvement

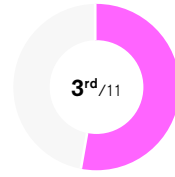
- There is scope for improvement in transparency in Aldi's nutrition labelling practice – for example, Aldi is encouraged to disclose the percentage of its portfolio that is compliant with its approach to FOP labelling, the rationale for any exemptions to FOP labelling, and accessibility of nutritional information online.
- Aldi could improve the accessibility of its online nutrition information by adding filter functionality (such as for healthy products or nutrient-based filters), which can signpost consumers towards healthier products and/or away from products with high levels of salt, sugar, fat or calories.
- Aldi is encouraged to commit to not placing a health claim on a product unless it is healthy, as defined by the FSA 2004/5 NPM.



Engagement with stakeholders and policymakers



Topic weight



Score 5.3/10
Topic average 4.2

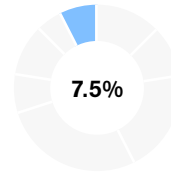
- Aldi's code of conduct include measures to prevent bribery and corruption in relations with public officials.
- Aldi engages with several initiatives that aim to address nutrition challenges in the UK including a pledge to the Food Foundation's Peas Please initiative and support for the Veg Power 'Eat them to defeat them' campaign. Aldi also works in partnership with Neighbourly to address food insecurity.
- Aldi discloses some trade association memberships such as the British Retail Consortium (BRC) and IGD, though it is not clear if this is a comprehensive list of its memberships.
- Aldi shows evidence of engaging with stakeholders in developing its nutrition policies, such as working with experts at the British Dietetic Association 'to develop a healthier and more sustainable shopping basket that meets healthy eating recommendations'.

Areas of improvement

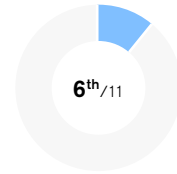
- Aldi should extend its current code of conduct to be a clear and comprehensive lobbying policy in line with the [Responsible Lobbying Framework](#), in which it commits to:
 - only engage with government, political parties, policymakers and policymaking bodies in support of measures to improve health and nutrition, aligned with public-health interest as identified by government;
 - only engage in lobbying activities that support an evidence-based approach to policymaking, with the emphasis on independent, peer-reviewed science; and
 - ensure that its lobbying activities respect UK public policy frameworks and standards.
- Aldi is encouraged to disclose its policy position on government consultations on issues relating to nutrition or to relevance to supermarkets, explicitly stating whether it would welcome (or not oppose) regulatory measures to address diet-related health issues in the UK.
- Aldi is advised to strengthen its transparency on lobbying practices by disclosing a comprehensive list of its membership of industry and trade associations, and its lobbying position on issues relating to nutrition or of relevance to supermarkets.



Infant and young child nutrition



Topic weight



Score 1.1/10
Topic average 1.1

- Aldi manufactures and sells complementary foods and breast-milk substitutes (BMS: infant and follow-on formula and growing-up milk, also known as toddler milk) for infants and young children under three years of age. The company has not published any policies in this area.
- Aldi has committed to improve the nutritional quality of its commercially produced complementary foods and has publicly disclosed progress in reducing the salt content of one of its products within the Mamia complementary foods range. The company noted, however, that it is awaiting forthcoming guidance from the government to be finalised before making any explicit commitments on formulation, and was not found to have any existing commitments or standards in place, not even for salt reduction (on which it has reported).

Areas of improvement

- Aldi should put policies and procedures in place that comply with WHO's International Code on the Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions, which also provide guidance on the marketing of complementary foods, going beyond national regulations covering the marketing of infant and follow-on formula (which include only the advertising, point-of-sale promotions and labelling of infant formula, and include some labelling requirements for follow-on formula).
- Aldi is advised to follow WHO guidance in restricting the marketing of all snacks high in sugar, sweets/confectionery, fruit drinks and juices, and sweetened milk to all children aged under three years. This should apply not only to own-brand products but also to those made by other companies and sold by Aldi.
- As a manufacturer of complementary foods, Aldi is encouraged rigorously to comply with government guidance at a minimum (including the forthcoming government guidance) but also strive to follow WHO/Europe recommendations relating to the nutritional composition and labelling requirements of foods aimed at older infants and young children. Aldi is also encouraged to commit to continuously improving the nutritional quality of its complementary foods, including explicitly limiting sugar and salt content, in line with the most updated and relevant guidance.

General disclaimer

This company scorecard has been based on research carried out by ATNI based on publicly available data and company engagement between March and August 2021. Any action taken by the retailer after 29 August 2021 has, therefore, not been included in the scoring. The findings of this Index regarding retailers' performance rely to a large extent on information shared by the companies themselves, additional to information available on the company's website. Several factors beyond the retailers' control (such as the COVID-19 pandemic) may have impacted their capacity to collate and share the information (publicly or directly with ATNI) that is needed for this Index. Particularly where retailers have been involved in only limited or no engagement, this Index may not represent the full extent of these companies' efforts.

As a multistakeholder, collaborative project, the findings, interpretations and conclusions expressed in the report may not necessarily reflect the views of the retailers, of members of the different stakeholder groups consulted for this research (including the Expert Group, industry associations and investors) or the organisations they represent, or of the funders of the project.

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