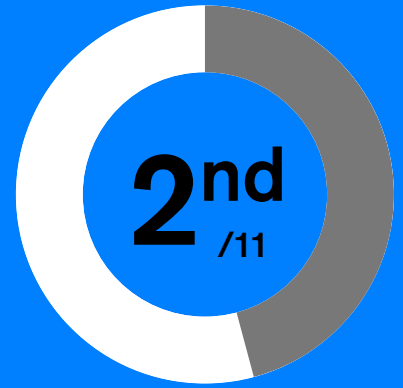




Sainsbury's



Estimated UK grocery retail value
(£ billion, 2021) 21.1

Number of employees
189,000

Headquarters
UK

Type of ownership
Public

Score 4.8/10

Governance (12.5%)



Nutrient profiling - defining 'healthy' products (10%)



Product formulation (20%)



In-store promotion, pricing and placement (27.5%)



Media and on-pack advertising (7.5%)



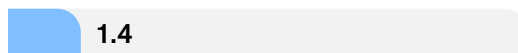
Accessibility of nutritional information and labelling (10%)



Engagement with stakeholders and policymakers (5%)

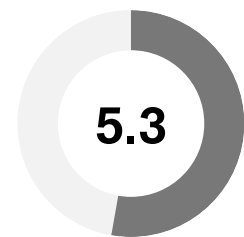


Infant and young child nutrition (7.5%)

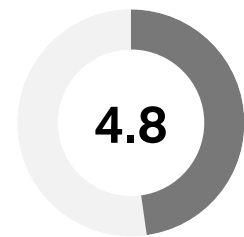


(%) Weight of a topic

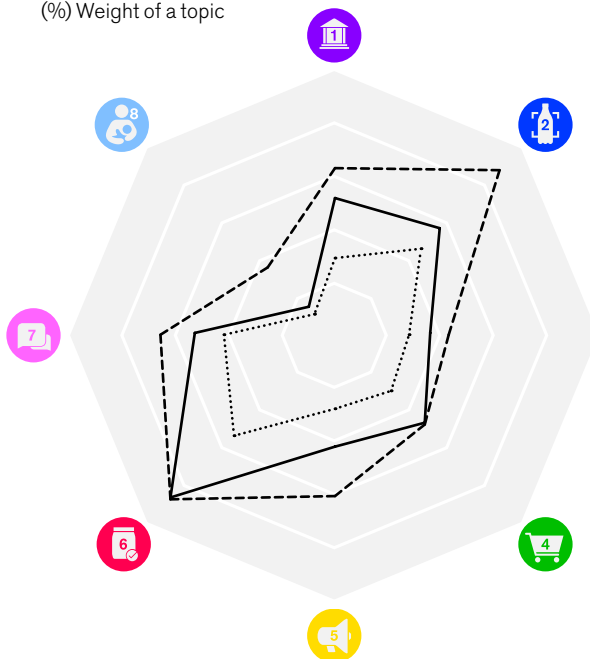
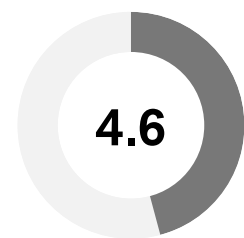
Commitment



Performance



Disclosure



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.

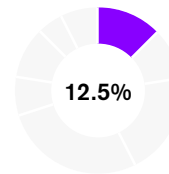


Scores and ranks

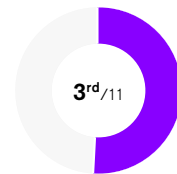
- Overall, Sainsbury's ranks second among the retailers in this Index – but with a score of 4.8 out of 10 (the average across all retailers is 3.3), there is clearly a need for continued progress towards achieving nutrition commitments by Sainsbury's and the other retailers.
- Sainsbury's performs best of all the retailers in Accessibility of nutrition information and labelling with a score of 8.8 out of 10. The company ranks in the top three in five of the eight Topics, with relatively strong reporting in these areas.
- The company has significant scope for improvement in Product reformulation as well as Infant and young child nutrition, for example by developing a comprehensive reformulation strategy, including clear and timebound targets for all key nutrients, and committing to comply with the World Health Organization's (WHO) International Code on the Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions.



Governance



Topic weight



Score 5.1/10
Topic average 2.9

- Sainsbury's has a strategy to grow through a focus on nutrition and health in the UK as highlighted in its Plan for Better strategy: 'Sainsbury's will develop and deliver healthy and sustainable diets for all.' Sainsbury's also formally reports on its efforts to contribute to healthier diets in the UK in its annual report as well as dedicated webpages.
- Sainsbury's has an explicit focus on helping customers to reach the UK dietary guidelines, including being the only retailer in this Index found to have a commitment to measure progress among average customer purchases towards the Eatwell Guide.
- The company assigns accountability for its nutrition strategy at the top of the organisation to its Chief Marketing Officer (CMO), who also jointly chairs the Plan for Better Steering Committee with the CEO, in which strategic decisions about the company's sustainability (and nutrition) approach are made.
- Sainsbury's sets clear and timebound targets to increase sales of healthy products – namely to reach 56.8% of total volumetric tonnage from Healthy sales by 2025/26 financial year from a baseline of 55.6% in 2019/20. The company also reports that 55.3% of total sales tonnage for 2020/21 was from healthy products.
- Sainsbury's has set a target to increase the sales of fresh fruit/vegetables: to increase the proportion of total sales tonnage that comes from vegetables by at least 1% (to 11.2%) by 2025/26. As part of its Peas Please commitment, Sainsbury's has indicated that it will report annually on progress – in 2019, 18.8% of the total own-brand food volume sold at Sainsbury's was vegetables.



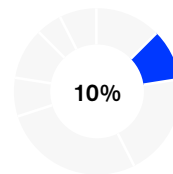
- Sainsbury's is one of three retailers in this Index that demonstrated extensive engagement with and use of research to address the nutrition needs of priority population groups who are at higher risk of diet-related disease or food insecurity. For example, the company has partnered with Oxford University, the Wellcome Trust and others on the LEAP (Livestock, Environment and People) research project, which aims to provide evidence and tools to promote healthy and sustainable diets.

Areas of improvement

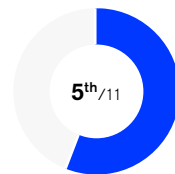
- Sainsbury's has shared some evidence of a plan to deliver its nutrition strategy, which is partly published on its 'Healthy and sustainable diets' webpage. The company is encouraged to publish a comprehensive and multi-year plan to deliver its nutrition strategy, including specific objectives and activities to improve nutrition and address malnutrition in all its forms.
- Sainsbury's is encouraged to reference business risks explicitly linked to rising rates of obesity and diet-related diseases in its publicly available risk register.
- Sainsbury's is encouraged to improve transparency on governance by providing reporting for the last financial year 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.
- It is not clear whether the percentage of sales volumes of soft drinks (both own-brand and manufacturer-brand) subject to the Soft Drinks Industry Levy (SDIL) decreased or not in the last financial year. Sainsbury's is encouraged to publicly report on percentage of sales volume and value of soft drinks that are subject to the SDIL.



Nutrient profiling - defining 'healthy' products



Topic weight



Score 5.6/10
Topic average 4.6

- Sainsbury's has, in collaboration with nutrition experts, developed the Sainsbury's Decision Tree model. The funnel model categorizes products as less healthy (one or two stars), Better for You (three stars) and Healthy (four or five stars).
- Sainsbury's Decision Tree model takes a category-specific approach based on existing and external nutrient criteria, including the number of red traffic lights in front-of-pack (FOP) labelling; the government's reformulation criteria for sugar and salt; portion size (where appropriate); regulated levels for certain nutrition claims; and products included in the Eatwell Guide.

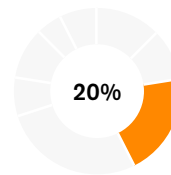


Areas of improvement

- Sainsbury's provides an overview of the Decision Tree model on its website, but is additionally encouraged to publish full scoring, criteria and how and where it is applied.
- Sainsbury's has indicated that it uses the Food Standards Agency's (FSA) 2004/5 nutrient profiling model (NPM) internally to assess the HFSS status of all products for internal use, and the company intends to start to publish on this. Sainsbury's is encouraged to adopt the FSA 2004/5 NPM more widely to inform its efforts to develop new healthy products, as well as to guide decisions on the stocking, pricing, positioning, promotion, marketing and labelling of healthy products.



Product formulation



Topic weight



Score 3.6/10

Topic average 2.8

- Sainsbury's commits to the government's current sugar, calorie and salt reduction reformulation targets across all products and product categories specified by the government, prioritising those that contribute most to consumers' baskets. The company reports on progress it has made towards these targets in a publicly available dashboard:
 - Sainsbury's indicates that it achieved a 20% reduction in sugar across five of the government categories by 2020.
 - Sainsbury's states that '93% of products included within the the government's calorie reformulation programme meet the max kcal per portion guidance'.

Areas of improvement

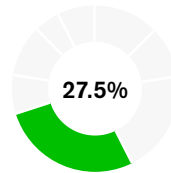
- Sainsbury's is encouraged to establish a specific commitment and set clear and timebound targets to reduce levels of saturated fats in its products.
- Sainsbury's is advised to develop a commitment/target to increase the amount of fruit and vegetables as well as wholegrains in its packaged products, and report on these as part of its reformulation strategy.
- Although Sainsbury's has indicated removal of industrial trans fatty acids (iTfAs) from its own-brand products in 2007, it does not have a clear target to uphold and monitor that commitment. Sainsbury's is encouraged to set a specific target in line with the WHO recommendation that iTfAs should be less than 2g per 100g of fats/oils.
- Sainsbury's is advised to develop standardised reporting frameworks for tracking progress on product (re)formulation efforts, including the percentage change in positive food components as well as negative nutrients added to or removed from products, and report regularly and comprehensively both online and in annual reporting.
- Sainsbury's is advised to commit to offer smaller-sized portions on products not meeting the company's healthy standards (i.e., products defined as 'healthy' by Sainsbury's Decision Tree model) and report on these efforts.



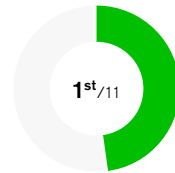
- Sainsbury's shows evidence of some initial engagement with its suppliers on product reformulation, although to a limited extent. The company is advised to extend the dialogue with brand manufacturers to increase the healthiness of products sold through retailers' platforms, and publicly disclose commentary on these efforts.



In-store promotion, pricing and placement



Topic weight



Score 4.8/10
Topic average 3.0

- Sainsbury's is 'striving to ensure that the healthier choices are never more expensive than the standard equivalent', which is applied to all product categories.
- Sainsbury's commits to use its Decision Tree model to guide the placement of in-store signs and product positioning campaigns.
- Sainsbury's commits to use marketing and other promotional techniques to drive the sale of healthy products, including examples of written encouragements to make healthy choices, vivid descriptions and attractive displays for healthy products and clear signage towards healthy products (such as recipes and banners) to promote fruit and vegetables as part of its Eat Better campaign to drive sales of healthy products.
- Since 2004, Sainsbury's has committed to remove confectionery from checkouts, and the company's efforts to restrict the sale of less healthy products is also evidenced by the discontinuation of volume-based promotions for less healthy products (the company was the first retailer to stop all multi-buy offers on food and soft drinks).
- The company has run in-store campaigns directed at children to promote healthy products. For example, in 2019, Sainsbury's partnered with Disney to run a national collectibles campaign to incentivise the purchase of healthier products: customers received a pack of Disney collectible cards with every £10 spent, and an additional set of cards when purchasing healthier items such as mini fruits.
- Sainsbury's incentivises the sale of healthy products through its rewards/membership scheme, including using Nectar card points as a reward for fruit and vegetable purchases, such as the Great Big Fruit and Veg challenge in 2020.

Areas of improvement

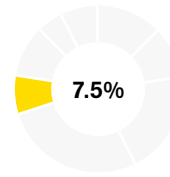
- Sainsbury's shared examples of actions to make products affordable to consumers and this is welcome – but the company is advised to establish a specific commitment to addressing the affordability of its healthy products for the general consumer and low-income groups in particular. Further, it is encouraged to provide evidence of this being carried out in its stores and online.
- Sainsbury's is encouraged to commit to removing all less healthy items from prominent locations; currently the company has committed to remove some products only (confectionery and sweets) from checkout areas in its stores.



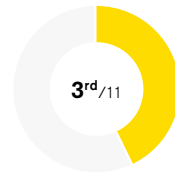
- Building on Sainsbury's discontinuation of multi-buy offers in 2016 on food and soft drinks, the company is encouraged to limit all promotions for less healthy products.
- Sainsbury's is encouraged to commit to stocking healthier variants for all products and with as many facings as the original products. Sainsbury's could also ensure that healthy products are prominently displayed in-store as well as in online retail environments and with increased use of product cues. Sainsbury's is encouraged to publish information about how it guides product positioning of both own-brand and manufacturer-brand products.
- The company is encouraged to use the FSA 2004/05 NPM to guide product positioning in its stores, and to engage with brand manufacturers on product positioning.
- Sainsbury's implements limited and occasional in-store campaigns and on-pack promotions to increase sales of healthy products. The company is encouraged to commit to greater use of marketing and promotions to encourage purchases of healthy products and should ensure increased transparency on progress against existing targets and the impact of promotions, trials and in-store campaigns, including regularly reporting on targets for the proportion of promotions for healthier products and providing data on the impact this has on prices and sales.
- Although Sainsbury's indicated that it does not use child-oriented characters and celebrity endorsements for in-store campaigns targeted at children that include HFSS products, the company makes exceptions for seasonal and specific treating occasion products such as birthday cakes and Christmas confectionery. Sainsbury's should commit not to run any in-store promotional campaigns/ activities directed at children (<18) that involve any HFSS products.
- Sainsbury's is encouraged to improve its commitment to ban sales of energy drinks to children by extending the restriction from age 16 to age 18. This would be a logical step for the company as its Policy on Marketing Communications already defines a child as any person under the age of 18. In addition, the company is urged to provide evidence of having implemented this, for example by indicating that Sainsbury's staff receive training on the issue.



Media and on-pack advertising



Topic weight



Score 4.3/10
Topic average 2.8

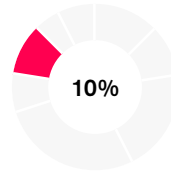
- Sainsbury's Policy on Marketing Communication, published in full in the public domain in 2021, includes a clearly articulated responsible marketing policy for all consumers, as well as children. The policy covers all broadcast media (i.e., TV and radio), all non-broadcast electronic and/or digital media (its own and third-party websites, social media, mobile and SMS marketing, native online marketing, games and apps, CDs/DVDs), sponsorship (including of sporting, entertainment or cultural events or activities), and all additional forms of marketing (cinema, outdoor, product placement in movies, TV shows, etc.). It does not extend to all types of print media.
- Sainsbury's only permits the use of child-oriented characters in its marketing to children on non-HFSS products and those that meet its Healthy and Better For You nutrition criteria (with some exceptions), as guided by its Decision Tree model. The company states that this 'extends to product packaging, product shapes and in store signs' – although exceptions are made for some seasonal holiday/specific product ranges.
- Sainsbury's policy goes beyond the CAP Codes (i.e., the UK Code of Broadcast Advertising and the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing) as it applies to all children up to the age of 18, whereas the CAP Codes apply to children only up to the age of 16. It is one of just four of the retailers to apply this higher age.
- Sainsbury's commits to market its products using appropriate portions, as specified in products' on-pack nutritional information.
- Sainsbury's, along with the other retailers, provides evidence of sponsoring initiatives promoting children and/or adults' healthy eating. For example, it is 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

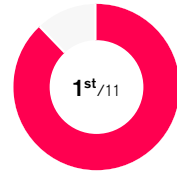
- The company is advised to establish a commitment to go beyond the UK Code of Broadcast Advertising (BCAP Code) in respect of the media on which it markets to children in relation to all HFSS products (without exceptions), and commit not to sponsor materials, people or activities popular with children and/or adults except in conjunction with healthy products/products low in sugar/calories/salt/fat.
- Sainsbury's is encouraged to report on the impact of the initiatives it sponsors.
- Sainsbury's is encouraged 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.
- The company is encouraged to commission a third-party organisation to audit company compliance with its Policy on Marketing Communication, and publicly disclose compliance levels, to ensure that all marketing conducted by the company aligns with the policy and to define corrective measures for instances of non-compliance.



Accessibility of nutrition information and labelling



Topic weight



Score 8.8/10
Topic average 5.4

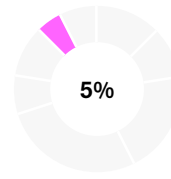
- Sainsbury's commits to using colour-coded labelling on front-of-pack (FOP) of all relevant own-brand products and publishes this commitment on its website. Exemptions are also mentioned, with these exemptions being explicitly noted as in line with Annex V of the EU Regulation on Food Information to Consumers.
- Sainsbury's applies the Institute of Grocery Distribution (IGD) guidance on 'gold standard' labels to its products, with one exception in that the words 'high', 'medium' or 'low' are not included on FOP labels where space limitations do not permit it.
- Sainsbury's is the only company to publicly disclose information on the percentage of products meeting the company's FOP commitment: 57.8% of own brand products have a full multiple traffic light FOP label, but 42% of own-brand products are exempt from labelling.
- Back- and front-of-pack nutritional information is provided for all relevant products online and can be seen clearly on Sainsbury's website. Sainsbury's displays FOP labels for products online either in the main information tab or a zoomed-in picture of the product label.
- There are three nutrient-based filters that can be applied on Sainsbury's online shopping platform, which guide shoppers towards products with no added salt, no added sugar or products low in salt.

Areas of improvement

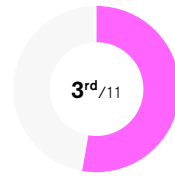
- Sainsbury's is encouraged to investigate whether more of the 42% of own-brand products that are currently exempt from FOP labelling could have this labelling added.
- Sainsbury's is encouraged to explicitly disclose its position on displaying nutritional information online and publish the percentage of its portfolio that is currently compliant with its approach to nutritional information online (the company already discloses this for FOP labelling).
- Sainsbury's currently commits to only placing a health or nutrition claim on a product that does not have any red traffic lights, following the government's FOP labelling guidelines, and it is recommended that the company uses the FSA 2004/5 NPM to guide such decisions.



Engagement with stakeholders and policymakers



Topic weight



Score 5.3/10
Topic average 4.2

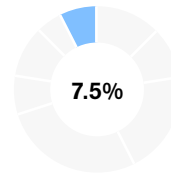
- Sainsbury's was the only retailer found to have a commitment to engage with governments, political parties, policymakers and policymaking bodies only in support of measures to improve health and nutrition, consistent with the public interest.
- Sainsbury's has an Anti-Bribery and Corruption Policy which provides guidance and expectations to prevent bribery and fraud.
- Sainsbury's is engaged with several initiatives that aim to address the nutrition challenges in the UK including a pledge to the Food Foundation's Peas Please initiative, the Consumer Goods Forum's Collaboration for Healthier Lives initiative and support for the Veg Power 'Eat them to defeat them' campaign. The company also committed to increasing the value of Healthy Start Vouchers in February 2021 by £2 in its stores for a 12-week period after the publication of the National Food Strategy Part 1.

Areas of improvement

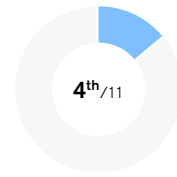
- Sainsbury's should publish a clear and comprehensive lobbying policy or code of conduct that aligns with the [Responsible Lobbying Framework](#), in which it commits to:
 - only engage in lobbying activities that support an evidence-based approach to policymaking, with the emphasis on independent, peer-reviewed science; and
 - ensure that its lobbying activities respect UK public policy frameworks and standards.
- Sainsbury's is encouraged to disclose its policy position on government consultations on issues relating to nutrition or of relevance to supermarkets and explicitly state that it would welcome (or not oppose) regulatory measure to address diet-related health issues in the UK.
- It is recommended that Sainsbury's strengthens its transparency on lobbying practices by disclosing a comprehensive list of its memberships of industry and trade associations and its lobbying positions on key nutrition topics.
- Sainsbury's is encouraged to engage with stakeholders (including nutrition experts) in developing its nutrition policies/programmes and disclose the consequences of this engagement for company strategy.



Infant and young child nutrition



Topic weight



Score 1.4/10
Topic average 1.1

- Sainsbury's manufactures and sells complementary foods and sells (but does not manufacture) breastmilk 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. Although during company engagement, Sainsbury's explicitly stated its compliance with UK regulations on infant and follow-on formula, it has not published any policies around the marketing of these products.
- Sainsbury's commits to continuous improvement of the nutritional quality of its Little Ones complementary foods range and ensures its standards are consistent with government guidance. Sainsbury's reports that it does not add refined sugar or salt to this range except for technological reasons, and that its baby meals contain at least one of the recommended five servings of fruit and vegetables a day.

Areas of improvement

- Sainsbury's should put policies and procedures in place that comply with the 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 formula¹).
- Although Sainsbury's does not develop any sweet snacks, juice drinks or biscuits aimed at children under one year old, the company is advised to restrict the marketing of such products, including sweets/confectionery and sweetened milk, to all children aged under three years, in line with WHO guidance. This should apply not only to own-brand products but also to those made by other companies and sold by Sainsbury's.
- As a manufacturer of complementary foods, Sainsbury's is encouraged to continue to comply with government guidance at a minimum (including 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. Sainsbury's is also encouraged to commit to continuously improving the nutritional quality of its complementary foods in line with the most updated and relevant guidance.

¹ Sainsbury's does not manufacture BMS products but should ensure that product it sells adhere to the requirements set by the Code and local regulations, either by selecting those brands that comply and/ or by engaging with manufacturers of branded products to align on labelling.

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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