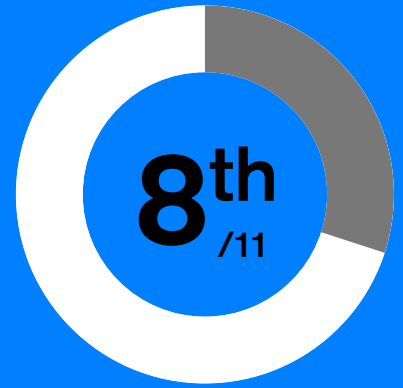




Waitrose



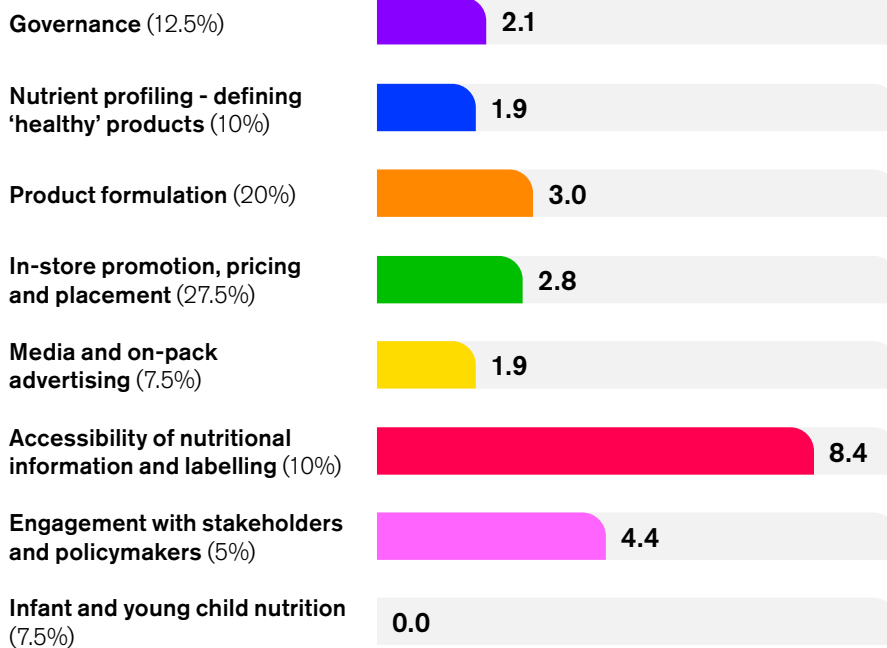
Estimated UK grocery retail value
(£ billion, 2021) 6.7

Number of employees
80,000

Headquarters
UK

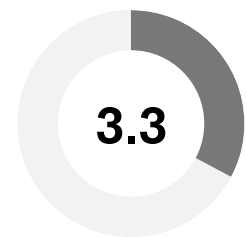
Type of ownership
Employee co-ownership model

Score 3.0/10

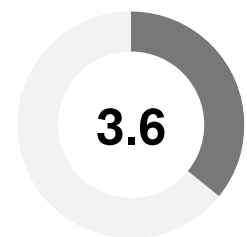


(%) Weight of a topic

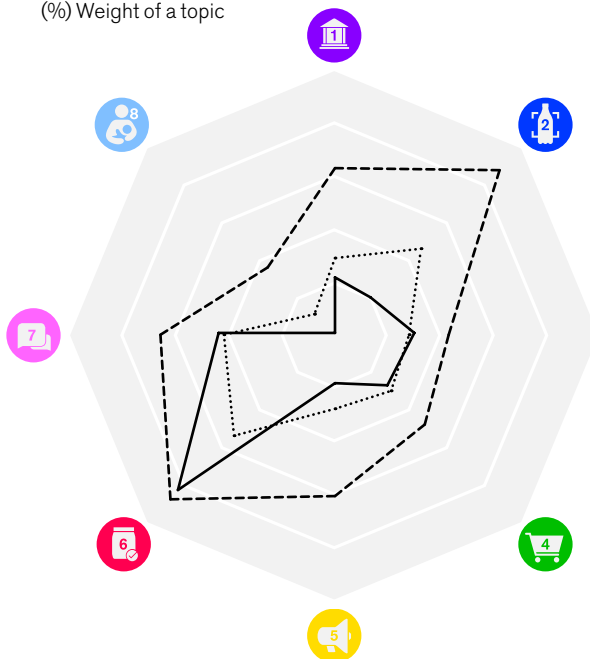
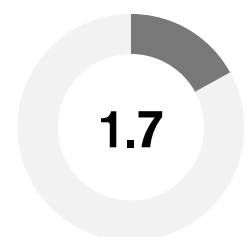
Commitment



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.

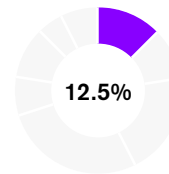


Scores and ranks

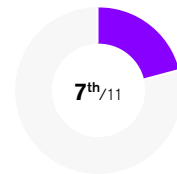
- Waitrose ranks eighth on the UK Retailer Index with a score of 3.0 out of 10 (the average across all retailers is 3.3).
- Waitrose performs best in Accessibility of nutritional information and labelling, where it ranks second with a score of 8.4 out of 10. The company has a clear approach to back-of-pack (BOP) and front-of-pack (FOP) labelling and commits to displaying nutritional information both on-pack and online.
- Waitrose has significant scope for improvement in Nutrient profiling - defining 'healthy' products, Media and on-pack advertising and Infant and young child nutrition. For example, Waitrose could improve its performance in the Index by developing a responsible marketing policy covering all consumers including children up to the age of 18, and by adopting the UK Food Standards Agency (FSA) 2004/5 nutrient profiling model (NPM) to measure product healthiness and to inform product (re)formulation, promotions and placement.



Governance



Topic weight



Score 2.1/10
Topic average 2.9

- Waitrose has a strategy to grow through a focus on nutrition and health in the UK, and has a specific focus on helping customers to reach the UK dietary guidelines.
- Waitrose provided evidence of having increased sales of healthy packaged products, indicating that in 2016/17 healthier products accounted for 56% of sales and in 2020/21 accounted for 61% of sales.

Areas of improvement

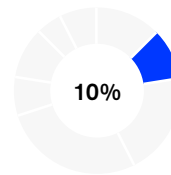
- It is recommended that Waitrose further integrate nutrition considerations into its commercial business functions by publishing a comprehensive and multi-year plan for delivery of its nutrition strategy, including specific objectives and activities to improve nutrition and address malnutrition in all its forms, applicable across the whole company, including all store formats and online.
- Although Waitrose has a generic commitment to increase sales of healthy products, the company is advised to enhance this by ensuring it has a clear and timebound commitment and target that can be tracked over time (as some of its peers have done), and by specifically including fruit and vegetables as well as healthy packaged products.



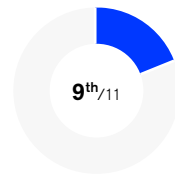
- Accountability for Waitrose's nutrition strategy currently rests with the Ethics and Sustainability Committee, which reports to the Partnership Board. Waitrose is encouraged to establish leadership and accountability for nutrition and health at the top of the organisation (at executive or Board level), ensuring that nutrition and health are prioritised.
- Waitrose is encouraged to reference business risks explicitly linked to rising rates of obesity and diet-related diseases in its publicly available risk register.
- Waitrose is encouraged to improve transparency by providing reporting for the last financial year on:
 - the percentage of products in its portfolio that are healthy;
 - the percentage of sales generated by healthy products with respect to its overall sales;
 - the percentage of sales generated by fruit and vegetables;
 - the ratio of sales growth of healthy products versus overall sales growth;
 - the ratio of sales growth of fruit and vegetables versus overall sales growth; and
 - the percentage of sales volume or value subject to the Soft Drinks Industry Levy (SDIL).
- It is not clear whether the percentage of sales volumes of soft drinks (both own-brand and manufacturer-brand) subject to the SDIL decreased or not in the last financial year. Waitrose is encouraged to publicly report on percentage of sales volume and value of soft drinks that are subject to the SDIL.
- Waitrose should aim to use independent research to deliver on its nutrition strategy, specifically addressing the nutrition needs of priority population groups at higher risk of diet-related disease or food insecurity.



Nutrient profiling - defining 'healthy' products



Topic weight



Score 1.9/10
Topic average 4.6

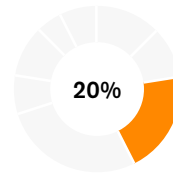
- Waitrose has taken a first step in nutrient profiling by using the 2016 Which? Model, that defines a product as healthier by a pass or fail based on traffic-light labels.

Areas of improvement

- Waitrose's transparency in this area is very limited. Waitrose is encouraged to publish its precursor to a nutrient profiling model (NPM) in full on its website, including scoring, criteria and how and when it is used.
- Waitrose does not currently use the FSA 2004/5 NPM, although it shared with ATNI its intention to start using the model in the coming months. Waitrose is encouraged to adopt the FSA 2004/5 NPM, which generates an overall healthiness score on a sliding scale, and to apply this NPM to all products and product categories, including for both own-brand and manufacturer-brand products.
- Waitrose is encouraged to use the FSA 2004/5 NPM to inform new product development as well as product reformulation, and to guide decisions on the stocking, pricing, positioning, promotion, marketing and labelling of healthy products.



Product formulation



Topic weight



Score 3.0/10
Topic average 2.8

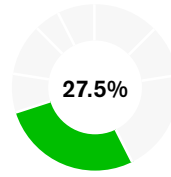
- Waitrose set a number of targets in 2016 for a 10% reduction of saturated fats, calories and sugar in its own-brand products over a five-year period and reported that 70% of this target had been met in 2020 and that reformulation efforts continue.
- Through its Peas Please pledge, Waitrose commits to monitor and report on the percentage of fruit, vegetables, nuts and wholegrains in its own-brand prepared products. Waitrose also commits to increase the amount of vegetables in its customers' baskets by 2024 through product development, marketing inspiration and customer education.

Areas of improvement

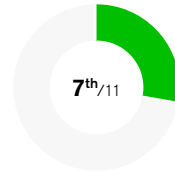
- Waitrose is advised to fully align to the government's latest sugar reduction programme.
- Waitrose is encouraged to set a new target for saturated fat reduction in its own-brand products, following the achievements of its earlier target.
- Waitrose does not permit the use of industrial trans fatty acids (iTFA) in its own-brand products, but it does not have an ongoing commitment in this area. Waitrose is advised to explicitly commit to and follow the recommendations by the World Health Organization (WHO) that iTFA should be less than 2g per 100g of fats/oils.
- Waitrose 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.
- Although Waitrose reports some progress on reformulation, this reporting is often not linked to a specific target. The company should 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.
- Waitrose shows evidence of some initial engagement with brand manufacturers on product reformulation. The company is advised to adopt a structured approach and extend this engagement and to report publicly on these efforts.



In-store promotion, pricing and placement



Topic weight



- Waitrose has a broad price promise that 'Healthier versions of everyday foods are priced in line with the standard product.'
- The company has committed both to increasing the number/percentage of healthy products in more prominent locations relative to less healthy products, and to remove some less healthy items – notably sweets and confectionery – from checkouts. Waitrose is encouraged to extend the latter commitment to all less healthy product categories and all prominent locations.
- Waitrose has committed to use its own simple system for nutrient profiling to guide product positioning in store.
- Waitrose has committed to use in-store promotional campaigns/activities directed at children to promote healthy products – for example, the company's 152 Healthy Eating specialists give store tours to children, which focus on healthy diets. Waitrose provides free fruit to children in store and commits not to run any in-store promotional campaigns/activities directed at children that involve any less healthy products.
- Waitrose has committed to use pricing and price promotions to drive the sales of healthy products, indicating that health is one of the factors considered when selecting products for inclusion in promotional events.
- Waitrose has also committed to using marketing and other promotional techniques to drive the sales of healthy products. For instance, Waitrose publishes the Waitrose Health Magazine, freely available to customers in deliveries and online, which provides recipes based on 'healthy every day foods' exhibiting the Good Health logo.

Areas of improvement

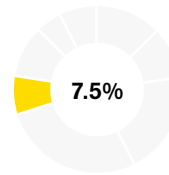
- Although Waitrose has a generic commitment to address the affordability of its healthy products through the 'Essential Waitrose & Partners' range for the general consumer, the company is advised to extend this commitment to include considerations specifically for low-income groups, to make the commitment more specific, and to regularly report on implementation and impact.
- Waitrose is encouraged to be transparent about its price promise, to explicitly extend it to all products and product categories, and to report on its implementation and impact.
- Waitrose is encouraged to commit to removing all less healthy items from prominent locations; currently the company has committed to remove some products only (sweets and confectionery) from checkout areas in its stores.



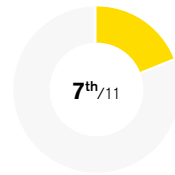
- Waitrose is encouraged to commit to stocking healthier variants for all products and with as many facings as the original products. Waitrose could also ensure that healthy products are prominently displayed in-store as well as in online retail environments and with increased use of product cues. Waitrose is encouraged to publish information about how it guides product positioning of both own-brand and manufacturer-brand products.
- Waitrose could improve transparency in this area by publicly disclosing its commitment not to run any in-store promotional campaigns/activities directed at children that involve any less healthy products and by detailing the impact of the Healthy Eating specialists.
- Waitrose indicates that it partners with Vitality insurance on a reward mechanism to incentivise the sale of healthy products. However, this scheme is only available to Waitrose customers who have purchased health or life insurance with Vitality. The company is advised to use loyalty schemes to encourage healthier purchases by all its customers.
- Waitrose is encouraged to extend its commitment to end sales of energy drinks from children under the age of 16 to children under the age of 18, and to provide evidence of having implemented this, for instance by indicating that Waitrose staff receive training on the issue.



Media and on-pack advertising



Topic weight



Score 1.9/10

Topic average 2.8

- Waitrose has not published a responsible marketing/advertising policy for all consumers including children.
- Waitrose is one of two retailers to go beyond the UK Code of Non-Broadcast Advertising & Direct & Promotional Marketing (CAP Code) by committing not to use any child-oriented characters on any products on any forms of media.
- Waitrose's Peas Please pledge commits the company to advertise more fruit and vegetables by committing to 'champion veg and plant-based meals through our publications, events, Cookery School and in store activities'.
- Waitrose, along with the other retailers, provided examples of sponsoring initiatives promoting children and/or adults' healthy eating. Waitrose 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. Additionally, the company supported the development of a six-part series of children's books for online library The Social Book Club. This series launched in October 2020 and teaches primary-school aged readers about healthy food choices, based on the UK Government's Eatwell Guide recommendations.

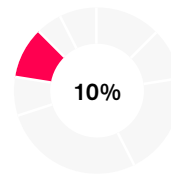


Areas of improvement

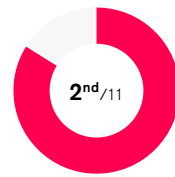
- Waitrose is strongly encouraged to develop and publish a clearly articulated responsible marketing/advertising policy, covering all consumers including children (defined as being those aged under 18), including all marketing communication channels, and applied to all products and all stores.
- The 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.
- Waitrose is encouraged to report on the impact of the initiatives it sponsors.
- Waitrose is encouraged to commit to market its products using appropriate portions, as specified in products' on-pack nutritional information.
- Waitrose 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.



Accessibility of nutrition information and labelling



Topic weight



Score 8.4/10

Topic average 5.4

- Waitrose has a clear approach to labelling and commits to displaying nutritional information both on-pack and online. The company provides evidence of a comprehensive labelling policy with evidence of using the energy + 4 labels (i.e., energy, sugar, salt, fat and saturated fat), reference intake information, energy per 100g/100ml and using FSA/DHSC traffic light colour coding – and Waitrose also provides evidence of using colour-coded front-of-pack (FOP) labels on all relevant products.
- Back-of-pack (BOP) and FOP nutritional information is provided for all relevant products online and is clearly visible on the Waitrose website. Waitrose provides FOP labels for products alongside the product picture on each product's landing page, to make nutrition information as accessible online as it is in store. The company commits to placing health or nutrition claims/logos only on products that do not have any red traffic lights (in the FOP labels), with the exception of products that carry a red traffic light for total fats but a green traffic light for saturated fat (i.e., these products can carry a health or nutrition claim according to the company's policy).
- Several nutrient-based filters can be found on the company's online shopping platform, which, for example, guide shoppers towards products with 'high fibre' or products that carry the company's healthy logo.

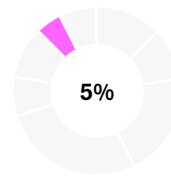


Areas of improvement

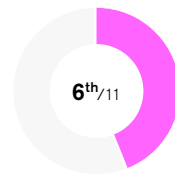
- Waitrose is encouraged to fully apply Institute of Grocery Distribution (IGD) guidance on gold standards labels to FOP labelling.
- Waitrose is encouraged to disclose online which proportion of products are compliant with its approach to FOP labelling and the rationale for any exemptions.
- Waitrose is advised to publicly commit to not placing health claims (including logos) on a product unless it is explicitly defined as healthy under the FSA 2004/05 NPM.



Engagement with stakeholders and policymakers



Topic weight



Score 4.4/10

Topic average 4.2

- Waitrose has an anti-bribery and corruption policy, which states: 'John Lewis & Partners is committed to applying the highest standards of ethics and honesty in its business activities in the UK and overseas and we operate a zero-tolerance approach to bribery and corruption. The giving and receiving of bribes, and any other form of corrupt payment involving the Partnership is absolutely unacceptable.'
- Waitrose engages with several initiatives that aim to address nutrition challenges in the UK, including the government's Change4Life campaign, a pledge to the Food Foundation's Peas Please initiative and the Veg Power 'Eat them to defeat them' campaign, as well as the British Nutrition Foundation's Healthy Eating Week. Waitrose is also committed to increase the value of Healthy Start Vouchers across its stores by £1.50, taking it to £5.75 a week.

Areas of improvement

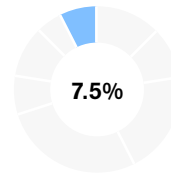
- Waitrose should extend its current policy to be a clear and comprehensive lobbying policy in line with the [Responsible Lobbying Framework](#), in which it commits to:
 - only engage with government, political parties, policymakers and policymaking bodies in support of measures to improve health and 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.
- The company could improve engagement with policymakers by publicly stating whether it welcomes or opposes regulatory measures to address diet-related health issues in the UK and to publicly disclose company positions on the measures. Waitrose states that it takes part in government consultations, indicating that it is 'committed to working with the Government to support their Obesity Strategy and in the prevention of diet related diseases', but the retailer is encouraged to link to these submissions to consultations from its website.



- It is recommended that Waitrose 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.
- Waitrose is also encouraged to engage with stakeholders (including nutrition experts) in developing its nutrition policies/programmes and to disclose the consequences of this engagement for company strategy.



Infant and young child nutrition



Topic weight



Score 0.0/10
Topic average 1.1

- Waitrose confirmed to ATNI that it does not manufacture own-brand breast-milk substitutes (BMS: infant and follow-on formula and growing-up milk, also known as toddler milk) or complementary foods for infants and young children under three years, meaning that many of the indicators referring to improving the nutritional quality of complementary food products are not applicable. However, the company sells both BMS and complementary foods, but Waitrose has not published any policies in this area.

Areas of improvement

- Waitrose 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 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).
- Waitrose 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 infants and young children aged under three years.

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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