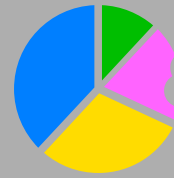


November 2022



ACCESS TO
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Eating Out of Home in the UK

Action Research paper
November 2022





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Abbreviations

BCAP	Code of Broadcast Advertising
BMI	body mass index
BOP	back-of-pack [labelling]
BRC	British Retail Consortium
CAP Code	Code of Non-broadcast Advertising and Direct & Promotions Marketing
FOP	front-of-pack [labelling]
FSA	Food Standards Agency
HFSS	high in fat, salt and sugar
ICC	International Chamber of Commerce
LIPH	Long-term Investors in People's Health
NPM	nutrient profiling model
Ofcom	Office of Communications
OHID	Office of Health Improvement and Disparities (the successor to PHE)
OOH	out of home [food sector]
PHE	Public Health England
SDIL	Soft Drinks Industry Levy
TfL	Transport for London



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Executive summary

UK diets are changing – and urgent action is needed

Dietary habits have changed significantly in the UK over recent decades. Most people eat too many foods high in fat, salt and sugar (HFSS) and too little in the way of fruit, vegetables, legumes (beans/pulses) and fibre compared with the UK government's guidelines – and this has been coupled with an increase in portion size. This is driving an increase in obesity among adults and children – almost a quarter of children leaving primary school suffer from obesity, with those from poorer households significantly more affected – and poor diet is also responsible for around one in seven of all deaths in the UK.

In addition to what we eat, where we eat has also changed. Around a quarter of energy intake now comes from food eaten out of the home, over half of which is purchased from the large chains – and meals eaten out of the home tend to be associated with higher energy, fat and salt intake. The current cost-of-living crisis is putting ever greater pressure on family budgets, with over a quarter of families with children experiencing food insecurity, according to statistics published in October 2022.

The out-of-home (OOH) food sector* has grown rapidly and makes a significant contribution to the economy – £52.7 billion prior to COVID-19 – with spending evenly split between small- and medium-sized enterprises and the larger chains. How this food is ordered is also changing, partly catalysed by the pandemic, with the use of food delivery aggregators (such as Deliveroo and Just Eat), websites and apps becoming commonplace, which gives companies another platform both for advertising and for providing nutrition information.

UK government policy has reacted to the nutrition crisis, both through legislation – for example, requiring compulsory calorie labelling by larger restaurant chains (both in-outlet and online) – and through the provision of voluntary guidelines to encourage the food industry, including the OOH food sector, to reduce salt, sugar and calories in their products.

Further urgent action is needed to reshape the UK's food system and address the mounting economic and societal repercussions of diet-related poor health – and, as eating out is so central to eating habits, the OOH food sector plays a vital role in ensuring that customers have affordable, appealing, healthier menu options.

The OOH Action Research





This Action Research assessed 10 of the largest publicly listed players in the OOH food sector in the UK, including well-known brands (burgers, bakery, pizzas and coffee) and, where applicable, their parent companies, but does not include the aggregators. It is the first time that the Access to Nutrition Initiative (ATNI) has researched the OOH food sector in any country in the world. The research looked across six nutrition-related Topics, developed in consultation with UK experts and adapted from the Categories used in ATNI's methodology for its Global Index and UK Retailer Index.⁺ The Topics are outlined in figure 1.

* For the purposes of this report, quick-service restaurants, full-service restaurants, coffee shops and bakery/sandwich shops are included (see box 2 for additional information).

+ ATNI's Global Index regularly assesses the world's major food manufacturers on how they address malnutrition in all its forms – both overweight/obesity and undernutrition.



Figure 1. Topics of analysis

Topic	Weighting as % of final score	Number of indicators
 Governance	10%	2
 Menu healthiness	30%	3
 Pricing and promotions	20%	2
 Responsible marketing	20%	2
 Accessibility of nutrition information and labelling	15%	3
 Engagement with stakeholders and policymakers	5%	3
Total	100%	15

The research took place in summer 2022 on 15 indicators, drawing solely on information in the public domain on the companies' websites. The results therefore indicate the extent to which the 10 companies are disclosing their activity or progress: it does not assess companies' actual performance, as any action that has not been disclosed publicly could not be included.* This light-touch approach is not comprehensive, but it is a useful first step in understanding the OOH food sector, and has identified some clear gaps in reporting (which are likely to reflect gaps in performance). It provides stakeholders – including government, investors and non-governmental organisations – with a better understanding of some of the largest players in the sector, and is a solid basis, should further, more exacting, research be undertaken.

Figure 1. Companies in the research

Parent company	Subsidiary brands
Coca-Cola	Costa Coffee
Domino's	n/a
Greggs	n/a
McDonald's	n/a
Restaurant Brands International	Burger King
Yum! Brands	KFC, Pizza Hut

* In this respect, the Action Research mirrors ATNI's 2020 UK Supermarket Spotlight, rather than the more detailed UK Retailer Index 2022 or the Global Indexes, as the latter also include information sourced directly from companies (often under non-disclosure agreement).



Main findings

The greatest disclosure was found in the Topic on **menu healthiness**, with all 10 companies reporting on at least one of the indicators, and all but one company scored in the Topic on **responsible marketing**. This suggests that most of the companies have recognised that they need to assess the healthiness of products (and report on this) and that they have responsibilities in marketing of products, particularly to children.

However, none of the companies scored in the Topic on **pricing and promotions**, which focuses on the extent to which companies promote healthier products at an affordable price. This is disappointing, particularly in the current context of a cost-of-living crisis.

Reporting on the remaining Topics – governance, labelling and engagement – is patchier, with two or three companies not scoring within each. In **governance**, although it is encouraging that several companies were found to have targets to increase number of healthier products, 'healthier' is defined by the companies rather than using a government-endorsed nutrient profiling model. There are opportunities for companies to do much more in clear **labelling** (for example, using the traffic-light system), as well as in **engagement** with stakeholders, particularly improving transparency around lobbying on health and nutrition issues.

Overall, where A represents best reporting (scoring above 80%) and E representing the lowest level of reporting (under 20%), no company received more than a C grade (achieved by Greggs and McDonald's) for its reporting. The majority of the companies received a D grade, with Coca-Cola and RBI having the most to do to improve their disclosure, receiving E grades.

Recommendations

The companies were assessed only on their disclosure for this Action Research, but the recommendations go beyond disclosure to suggest actions that companies can take to improve overall performance. There are three overarching recommendations: on working with aggregators, adapting best practice from company actions in other markets, and (for parent companies) ensuring that the commitments of the parent company are applied to subsidiary brands. There are then a further 23 Topic-specific recommendations. Together, these provide a clear indication of ATNI's understanding of areas of interest to stakeholders (including investors).

ATNI recommends not only that companies, but also all parties that influence them – including policymakers, investors, non-governmental organizations and customers – engage with the findings of this research to leverage change in the OOH food sector in the UK.

Conclusions

There are strong imperatives from government, investors and the public for the OOH food sector companies to report comprehensively on how they are helping to address the UK's diet-related health challenges, particularly at a time of a cost-of-living crisis. This Action Research provides an insight into formal reporting and wider communications, as well as providing some indication of the companies' actions in the nutrition space.

The findings of the Action Research suggest that the companies assessed do recognise that they have a role to play. However, it also found a clear need for the OOH food sector to provide more structured and comprehensive reporting on all aspects of their efforts on governance, reformulation, marketing, labelling and engagement with stakeholders to help their customers in the UK to eat healthier diets – and identified the need for greater action.



More extensive and comprehensive research, assessing a larger number of companies, would be welcomed in the future, particularly a deeper dive that goes beyond public disclosure, and beyond the UK market, as this would enable a more comprehensive assessment of companies' commitments, targets and actions.



Context – eating habits, the OOH sector, and the policy landscape in the UK

Eating habits

The UK's nutrition-related health crisis

The nutrition-related health crisis in the UK is well documented. Five of the top seven risk factors for disease in the UK in 2019 were linked to what we eat: high blood glucose, high body-mass index (BMI), high blood pressure, high LDL cholesterol, and other dietary risks such as diets low in fruit and vegetables.¹ **Poor diet is responsible for an estimated one in seven deaths in the UK,**² impacting on prevalence of diseases including cardiovascular disease (heart disease and stroke), many cancers (including colon and breast cancer) and type 2 diabetes. Diet-related diseases also impact on quality of life through increased disability: for example, the number of diabetes-related amputations has been steadily increasing, up from just over 8,000 per year in the UK during the period 2012/13–2014/5 to almost 9,900 in 2017/18–2019/20.³

The high prevalence of overweight and obesity is a clear sign of the shortfall in the healthiness of UK diets. Adult obesity has increased from 13% among men and 16% among women in 1993 to 27% and 29% respectively by 2019.⁴ Severe obesity (defined as a BMI of 40 or over) has risen steeply between 1993/5 and 2017/19, going up seven-fold for adult men (from 0.3% to 2.2%) and tripling for women (from 1.5% to 4.5%).⁵

Particularly concerning was a **sharp increase in child obesity** during the first year of the COVID-19 epidemic and, although prevalence has since slightly fallen, it remains at a level above that of 2019: 21.0% of children in the last year of primary school (ages 10–11) had obesity prior to the epidemic, 25.5% in 2020/1⁶ and 23.5% in 2021/2.⁷

There is also significant discrepancy between the UK government's recommended healthy diet (as summarised in the Eatwell Guide⁸) and the average diet: most people eat too many foods high in fat, salt and sugar (HFSS) and too little in the way of fruit, vegetables, legumes (beans/pulses) and fibre.

Box 1: The cost-of-living crisis and food insecurity

Throughout 2022, the cost of living has been increasing rapidly, and this is having severe implications for food security, which was already under strain. In October, The Food Foundation published data suggesting that **food insecurity levels in the UK increased dramatically between January and September 2022, from 9.6% of households with children to 25.6%:** that is 4 million children currently experiencing food insecurity. This also has implications for food quality: the same Food Foundation research suggests that, among those experiencing food insecurity, 58% said they were buying less fruit and 48% that were buying fewer vegetables.⁹ In October 2022, the Trussell Trust launched an emergency appeal,¹⁰ as – for the first time – demand for its food parcels has outstripped supply, with more than 2 million people skipping meals in August to keep up with other essential costs.¹¹



What we eat out

In 2016, the UK government's 'One You' campaign provided adults with a '400/600/600' tip to 'help them make healthier choices while out and about': aim for 400 calories for breakfast, 600 for lunch and 600 for dinner, plus a couple of healthier snacks and drinks.¹² However, **studies suggest that food eaten out of home is likely to contain significantly more calories (often much larger portions) and contain more sugar, salt and fat than home-cooked food or products bought from retailers:** takeaway meals, for example, contain an average of twice the calories of an equivalent meal from retailers.¹³ Around a quarter of energy intake (20–25%) now comes from food eaten out of the home, over half of which is purchased from the large chains.¹⁴

The amount and quality of food eaten out of home is of concern.¹⁵ A global scoping review published in 2022 found that a high rate of eating out of home among adults led to poorer quality of diet, particularly higher intakes of energy (calories), total and saturated fats, sugar and salt, and lower intake of fibre, fruit and vegetables and micronutrients.¹⁶ A systematic review of 26 studies published in 2021 suggests that 'Higher consumption of foods purchased outside home increased intakes of energy and nutrients of public health concern, particularly in males and younger adults ... [and] foods prepared outside of home are associated with poorer diets.'¹⁷ Generally, younger people tend to eat out more than older adults in the UK,¹⁸ and a study in 2017 of consumption of takeaways by 11–18-year-olds found that 'frequent consumption of takeaway meals may have a negative impact on adolescents' diet quality' and called for policies to reduce takeaway consumption in this age group.¹⁹ A further 2017 study of data from the UK's NDNS showed that higher 'habitual' consumption of out-of-home meals is associated with greater mean daily energy intake (adults eating meals out at least weekly had a higher mean daily energy intake 75–104 kcal more per day than those who only rarely ate these meals). A 2019 study of the calorie content of over 1,000 starters, sides and desserts found that over a fifth contained more than 600 kcal – and that is without the main dish.²⁰ This was reiterated in a study published in 2022 that suggests that, among the large chains, almost a quarter of the individual menu items assessed exceeded 600 kcal.²¹

There are also **differences according to socioeconomic status**. Local authorities with higher levels of deprivation have greater density of fast-food outlets.²² More frequent takeaway meal consumption in adults and children is generally associated with greater daily energy intake, and this effect is particularly pronounced in children from less affluent households.²³ Obesity itself is also correlated with deprivation: among the most deprived groups in England in 2019, 39.5% of women and 30.2% of men had obesity, compared with 22.4% and 21.9% in the least deprived groups,²⁴ and in 2020/1 (since which obesity rates have slightly dropped on average), 33.8% of year 6 schoolchildren had obesity in the most deprived areas compared to 14.3% in the least deprived.

The increased frequency with which people in the UK eat out – often consuming well in excess of the government's 400/600/600 healthy-eating recommendation – coupled with what can be the poor nutritional quality of those meals, can contribute to poor diets in the UK. There is very significant concern about the role of poor diet on health in the UK, which has, in recent years, encouraged the UK government to begin to make policy changes – particularly following the COVID-19 crisis in 2020. The current cost-of-living crisis is also now impacting on eating habits,²⁵ the full health implications of which will become clear in the coming months and years.

How often we eat out

Almost everyone in the UK – 98.5% of the population – eats out at least once a year,²⁶ with research from 2018 suggesting that the average Briton ate out 199 times per year.²⁷ Average spend per head on takeaway alone rose from £452 in 2019 to £641 in 2021, although this varies significantly by age with an average weekly spend of £8.50 among the under 30s to £1.30 among the over 75s.²⁸ **On average, about 30% of spend on food in 2019/20 was on food eaten out of the home.**²⁹



The increasing convenience of food bought out of the home has led to significant growth in the food sector, with economies of scale making it possible for delivery companies to be able to deliver lunch and snacks as well as larger meals. Even among poorer households, eating out is often no longer a treat. Time and financial pressure leads to what can be termed a 'scarcity mindset' – a reduction in mental bandwidth for parents to plan ahead – with pre-prepared convenience food and takeaways becoming the simplest solution to providing a quick, relatively affordable and safe meal.³⁰ COVID-19 also had a significant impact on OOH eating habits, as severe restrictions were brought in on eating out, leading to a sharp fall in eating in-restaurant and an increase in takeaway: over half of consumers in October 2020 said that they would continue to use these services at least as much in the future.³¹ (See 'The out-of-home food sector', below, for more on the response of the food sector to COVID-19.)

This growth, however, does not translate into consumer confidence: the Food Standards Agency's 2021 *Food and You* report noted 86% consumer confidence that food bought in shops and supermarkets will be safe to eat and 75% for restaurants – but this falls to 51% for takeaways and just 39% for food delivery services.³²

The out-of-home food sector

The OOH food sector in the UK is a well-developed market that makes a very significant contribution to the economy: the food sector was worth £52.7 billion prior to COVID-19.³³ The market size of the fast-food and takeaway food sector alone was £18.9 billion in 2021 (down from £21.0 billion in 2020) and is likely to rebound to £20.6 billion in 2022.³⁴ The distribution in terms of spend is fast-food (21%), pubs/bars (14%), full-service (13%) and bakery/sandwich (11%),³⁵ with pizza takeaway and delivery alone expected to total £3.4 billion in 2022.³⁶ Spending is evenly split between small- and medium-sized enterprises and the larger chains.³⁷ 70% of takeaways employ fewer than 10 staff.³⁸

Box 2: Defining the OOH food sector

Definitions of the OOH food sector vary, which can make comparisons challenging³⁹ – but, for the purposes of this report, the OOH food sector is defined as incorporating quick-service restaurants (in which customers usually order and pay at a counter or drive-through – often referred to as fast-food restaurants), full-service restaurants (where table service is offered), coffee shops and bakery/sandwich shops. Of these categories, the largest proportion is quick-service restaurants: the Food Foundation's *The Broken Plate* research in 2022 found that the proportion of all food outlets that are fast-food outlets rose from 25.4% in 2019 to 26.2% in 2021 – with a significant difference between the most well-off areas (22%) and the most deprived (31%).⁴⁰

The start of the COVID-19 pandemic in 2020 was a uniquely challenging time for the OOH food industry, forcing the temporary closure of all eat-in food establishments. However, this provided an opportunity to pivot towards takeaway – an opportunity that was seized by many of the companies, removing much of the distinction between 'restaurants' and 'takeaways'. **Delivery channels – both branded delivery services and aggregators (see box 3) – increased significantly during lockdown:** delivery accounted for 41% of total OOH food value in summer 2020⁴¹ and their use has remained high. In 2021, takeaway delivery was estimated as being worth £10.5 billion, with a projection of £13.3 billion for 2022.⁴²

Technology is playing an increasing role, with many consumers now relying on apps and websites, rather than telephone or in-person, to order takeaways: a survey in 2021 found that 39% of consumers prefer



to order through mobile apps and 24% through websites.⁴³ Ordering takes place both through aggregators that enable customers to choose from many different brands (see box 3), or directly with the companies: several chains have recently developed their own apps. Dominos, for example, which claims to have the largest share of the UK takeaway market at 6.8%, relaunched its delivery app in 2021 and now states that it has 2.6 million monthly app users in the UK, with a 21% increase in app downloads since the previous year.⁴⁴ The UK's food delivery app market is notably well developed: one estimate places delivery-app revenue at \$6.7 billion in the UK in 2021, with the rest of Europe accounting for \$9.2 billion.⁴⁵ It is also suggested that delivery apps and websites may encourage sedentary behaviour because food is delivered directly – but there are relatively few peer-reviewed studies available on the implications of use of the apps.⁴⁶

Box 3: Aggregators

Traditionally, food delivery was direct from the restaurant or fast-food outlet to the customer, but increasingly aggregators are being used. **Aggregators act as a middleman, enabling customers to choose from a range of local food outlets, placing and paying for their orders on an online platform or mobile app.** The orders are then collected by the aggregator and passed on to the restaurant, and the meals are delivered to private homes and offices. In 2021, the largest aggregators in the UK were Just Eat (with 45% of market share), Uber Eats (27%) and Deliveroo (26%).⁴⁷

The way in which different products are presented on the aggregator app or website can influence decisions, nudging customers towards particular choices.⁴⁸ Marketing by the aggregators is largely outside the control of the food outlets/chains – although McDonald's does not permit aggregators on which its products are sold to deliver to schools. Aggregators are constantly growing and evolving, which makes their impact on diet and health particularly challenging to assess, but also makes them important to include in regulation applied to other parts of the OOH food sector, as they have such an influence on what many in the UK eat. The government's guidance on calorie labelling states:

*'The requirement extends to food that is sold on a website or mobile application, including third party delivery apps. Where food in scope of the Regulations is sold on a website or mobile application, the business responsible for that website or mobile application... irrespective of the size of their business, is required to display the calorie information of food offered for sale by any qualifying business...'*⁴⁹

The increased demand for delivery has led to the expansion of ghost kitchens: professional cooking facilities that exist to prepare delivery-only meals, often for several different restaurant brands. They do not have a 'shop front' or seating, so restaurants can increase the number of meals they can produce and expand delivery in new areas, without the cost of setting up a new eat-in or takeaway restaurant.

COVID-19 has not been the only uncertainty facing the OOH food sector. As noted in 'The policy landscape', below, **the food sector has been under increased pressure from government to be part of efforts to tackle childhood obesity** (notably the salt/sugar/calorie-reduction programmes – to which there has been some limited response – see, for example, box 4 on a voluntary industry Code of Practice). In addition, labour costs have risen and higher food costs and disruption to supply chains have followed Russia's invasion of Ukraine.



These pressures are also manifested in the current cost-of-living crisis (see box 1), with families' budgets stretched to the limit. It has never been more important to ensure that healthy food can be accessed easily and cheaply by all, and both government and the food industry – including the OOH food sector – play a key role.

Box 4: OOH Code of Practice

A short voluntary Code of Practice was adopted in 2018 by a group of companies (described as an 'Out-of-home Food Alliance'⁵⁰) including four assessed in this report: Costa, Greggs, McDonald's and Pizza Hut Delivery. Reportedly reviewed by the British Nutrition Foundation,⁵¹ the Code includes commitments to the government's salt/sugar/calorie-reduction programmes, ensuring the availability of fruit, vegetables or salad, and that there are 'credible healthier choices', adherence to the Codes of Broadcast Advertising (BCAP) and Non-broadcast Advertising and Direct & Promotions Marketing (CAP Code), and providing calorie information in-restaurant and further nutrition information online, and notes that the companies support the UK government's 400/600/600 campaign.

Pizza Hut does not appear to have the Code on its website, and although it is on Costa, Greggs and McDonald's websites,⁵² it is not prominent. There was no timeline for delivery in the Code and it is not clear whether or not many of the commitments have been followed by action by the companies. No evidence was found that the Code of Practice has led directly and explicitly to clear, concrete, reported-on changes within the companies.

Policy landscape

The UK nutrition policy landscape has changed significantly over the last few years, beginning with the UK government's Childhood Obesity Plan in 2016. The recognition of the links between obesity and more severe COVID-19 outcomes galvanised further efforts on obesity. However, some of the steps taken by the government have now been delayed and there is a suggestion that others may be under threat.⁵³

Over the last few years, the UK government (initially Public Health England and now the Office for Health Improvement and Disparities – OHID) has been **encouraging the food industry to work towards meeting a voluntary set of guidelines to reduce salt, sugar and calories in their products**. These are applicable to the OOH food sector as well as to manufacturers (branded) and retailers (own-brand):

- **Salt:** The latest salt reduction targets are to be achieved by 2024 and are aligned with the government's ambition to reduce the population salt intake to 7g per day.⁵⁴ The OOH food sector targets are across food categories based on the 10 most popular food groups purchased in the eating out, takeaway and delivery food sector, plus a specific target for children's meals. They fall into two categories: dish targets (items that can be served as a meal or on their own) and meal targets (based around a specific dish, but including sides such as salad or garlic bread).⁵⁵ A 2020 progress report on the salt targets that were to have been achieved by 2017 notes that 'it is clear that greater progress needs to be made by the eating out of home food sector'.⁵⁶



- **Sugar:** In 2016, the government announced a voluntary ambition that challenged all food sectors of the food industry – including the OOH food sector – to reduce sugar by 20% by 2020 in the categories of food that contribute most sugar to children's diets. The most recent report on progress was published in October 2020,⁵⁷ showing mixed progress across businesses, brands, categories and food sectors. Data for three companies included in this Action Research is included, with Costa Coffee and Greggs showing reductions in sugar per 100g and McDonald's showing a slight increase.⁵⁸ A particular challenge in the OOH food sector, however, is that portion size is often much larger than for equivalent products sold by retailers, and has increased over time.⁵⁹ The final report on progress on sugar reduction was due to publish in 2021, but it is currently (October 2022) still forthcoming.
- **Calories:** The sugar reduction programme also set calorie reduction guidelines for sweet products for both the retail and OOH food sectors, and a 2020 report on progress on sugar reduction makes clear that, although OOH food businesses had delivered more on calorie reduction than on sugar, 'the simple average calories per single serve remains higher [in the OOH food sector] than for retailers and manufacturer branded products'.⁶⁰ The most recent voluntary ambition is for the food industry (including the OOH food sector) 'to achieve a 20% reduction in calories by 2024 in product categories that contribute substantially to children's calorie intakes (up to the age of 18 years) and where there is scope for substantial reformulation and/or portion size reduction'. There is also a maximum guideline for products likely to be consumed in a single occasion (calories per portion) across all categories (including pizzas, sandwiches etc.).⁶¹ Portion size is particularly important, as there is often a substantial difference in portion size offered in OOH settings and the same products offered by retailers. It is notable that a full 20% calorie reduction is being sought by OHID for the OOH food sector because calories in meals eaten out of home are so often high – although even this 20% reduction would still leave calories well above the government's healthy eating guide of 600kcal a serving for lunch/dinner meals. The first progress report for the calorie reduction programme is anticipated in 2023.

Appendix 2 to this report provides more detail on these three voluntary programmes.

An additional new step taken by the government in England has been the **requirement for restaurant chains with more than 250 outlets to include calorie labelling, both in restaurants and online** (see also box 5).⁶² This labelling is also required of the large OOH food brands that appear on aggregator websites⁶³ – but smaller companies (either in-restaurant, online or on aggregators) do not have to provide calorie information. New marketing restrictions, to be brought in in 2024, introducing a 9pm watershed on TV and a ban on paid-for digital marketing for unhealthy foods, will apply to the OOH sector as well. This online ban includes, for example, ads on Facebook, paid-search results on Google, text-message promotions, and paid activity on Instagram, Twitter, etc. However, new obesity policy interventions aimed at retailers, such as restrictions on price promotions for unhealthy products, are not applicable to the OOH food sector, so promotions such as 'kids eat free' fall outside the new restrictions.

Box 5: Calorie labelling across the nations of the UK

Policy action and legislation on the food sector varies between the four nations of the UK. Calorie labelling on food bought from larger chains, as in England, is currently being considered (including for the OOH food sector) in Scotland⁶⁴ and Wales⁶⁵ – consultations are happening in both countries – and is encouraged in Northern Ireland.⁶⁶



The UK's Nutrient Profiling Model (referred to in this report as the FSA 2004/5 NPM) was developed by the Food Standards Agency (FSA) as a tool to enable the Office of Communications (Ofcom), the UK broadcast regulator, to identify 'less healthy' foods and drinks that were to be subject to restrictions during children's television programming. This NPM has been under review since 2016 to ensure that it reflects updated UK dietary guidelines,⁶⁷ including guidance on fibre and free sugars – but an updated version of the model has not yet (October 2022) been published.

Box 6: Action at local level

At a local level, there is guidance to support local councils and independent food businesses to help children and families to choose healthier food.⁶⁸ Some local authorities have also been taking zoning action to restrict the opening of new fast-food outlets near schools, but initial research over a three-year period has suggested that the effectiveness of this approach to change the local food environment is unclear, suggesting that complementary further strategies are also needed.⁶⁹

Several local councils – Barnsley, Bristol, Greenwich, Haringey, Merton and Southwark⁷⁰ – have been taking action to ban advertisements for HFSS foods on council-owned sites, including parks, green spaces, bus shelters and hoardings, and others (Cambridgeshire⁷¹ and Brighton & Hove⁷²) are considering similar action.

In London, from February 2019 advertisements for HFSS products as defined by the FSA 2004/5 NPM (including takeaways and delivery services) were banned on Transport for London,⁷³ with the companies only able to place adverts promoting healthier products – a move supported by more than four out of five of Londoners.⁷⁴ Research published in 2022 suggests that this may have led to significant falls in consumption.⁷⁵

Also in London, the Healthier Catering Commitment is a scheme launched in 2011 and run by the London boroughs with support from the Mayor of London and the Association of Environmental Health Managers. It 'recognises businesses in London that demonstrate a commitment to reducing the levels of saturated fat, salt and sugar in the food sold in their premises, and to make smaller portions available on request'.⁷⁶

That relatively little research has been done in this space is also indicative of a broader lack of data on the OOH food sector, which this Action Research by ATNI is beginning to address: this is an opaque but also fast-growing area, with many new players, business models and marketing techniques.

What is clear, however, is that although there is no silver bullet to reducing consumption of unhealthy food out of the home, there is a range of policy tools available to government including strengthening advertising restrictions and stronger zoning restrictions. Taking action across the food system – including the OOH food sector – is a key part of policy action on obesity and unhealthy diet, which has the potential to reduce health inequalities. The UK government has been at the forefront of these actions – and with the devolved nations now also taking action (see box 5) – and ATNI hopes that it will continue to be so. Additionally (and whether or not there is legislation), the OOH food sector needs to take responsibility for its impact on public health, responding to public concern about the impacts of poor diet.⁷⁷



Box 7: Non-governmental initiatives in the OOH food sector

Concerns about the healthiness of UK diets are reflected in action by non-governmental organisations:

- The **Soil Association's Out to Lunch campaign** in 2021 sent 'secret diner families' to assess children's food in 20 of the UK's most popular chain restaurants. Two of the companies assessed by ATNI also appear in this research: McDonald's and Pizza Hut.⁷⁸
- **The Food Foundation's annual Plating Up Progress initiative** assesses progress being made by major UK food businesses including restaurant chains, across key themes relating to the transition to a healthy and sustainable food system, based on information in the public domain. This includes 'casual dining and restaurant chains' (none of which are included in the ATNI research) and 'quick service restaurants' (which includes Burger King, Domino's, Greggs, KFC and McDonald's).⁷⁹ The Food Foundation also launched **Peas Please** in 2017: all sectors of the food system – from farmers and retailers, to restaurant chains, caterers and manufacturers – can pledge to this initiative and be involved in taking action to encourage more vegetables to be consumed (see Topic 6).⁸⁰
- **Action on Salt** has assessed the amount of salt in children's food in 15 restaurant chains and found that 43% of meals exceeded the maximum target of 1.71g salt. It also noted that 'the voluntary system has resulted in an uneven playing field, with some companies performing much better than others'.⁸¹ The three companies assessed that are also included in the ATNI research – Burger King, McDonald's and Pizza Hut – all had average meal salt levels below the 1.71g target.
- This Action Research from ATNI will contribute to the pool of knowledge on the OOH food sector in the UK and to provide the basis for further action. This work is supported by **ShareAction's Long-term Investors in People's Health (LIPH) programme**.⁸²



About the OOH food sector Action Research

Scope and aim: what this report is and isn't doing

There is growing awareness of the role of the out-of-home food sector in the UK's diet – not least among the public, as calorie labelling (see Topic 5) makes clear to consumers what is often a high level of calories in products in the OOH food sector compared to products sold in the supermarkets. However, there has, to date, been relatively little comparative research into the extent of the commitments, targets and ambitions of the major players in this food sector.

This report begins to address this gap in the evidence on UK diets, building on ATNI's previous work of assessing the food manufacturing food sector and, more recently, the UK food retail sector. Research was undertaken across six Topics that reflect the areas addressed by ATNI in its other Indexes, taking the form of a gap-and-opportunity analysis rather than a fully comprehensive approach. It adapts the approach used by ATNI in work in the UK retail food sector and the global food manufacturing food sector; however, it is Action Research, not a full, detailed Index.

In particular, it is important to note that a difference between this Action Research and ATNI Indexes is that it is based solely on information that is available in the public domain.^{1*}

The aim of this report is to capture the current state-of-play and any nutrition and health ambitions of some of the major OOH food companies and brands in the UK, providing a solid basis for future longer-term and more exacting research. It is hoped that it can be used as a baseline, with the potential to be developed into a tool that can track progress against a wider set of indicators and recommendations.

The methodology

The methodology for this Action Research is set out in full in Appendix 3. It was designed to assess the extent of disclosure by companies in the OOH food sector on business activities that influence customers' purchasing decisions and therefore their diets and health. It links to areas such as sugar and calorie reduction that are already a focus of UK government action.

Scoping for the methodology included consultation with experts through interviews (see box 8), desk research and mapping.

¹ In this respect, the research is similar to the 2020 UK Supermarket Spotlight report. That Spotlight was then developed in 2022 into the UK Retailer Index, which includes information provided to ATNI by the retailers themselves.



Box 8: Consultation

ATNI consulted with several independent experts with knowledge of the UK OOH food sector, seeking advice on development of the report methodology, on choice of company, on up-to-date insights into the food sector, and for comment on the research itself. This included drawing on the expertise of Professor Gary Sacks (Global Centre for Preventive Health and Nutrition, Deakin University), whose 2018 research on the quick-service restaurants in Australia itself used a methodology adapted from ATNI's Global Index. Among others consulted were the Office for Health Improvement and Disparities (OHID – the successor organisation to Public Health England), Victoria Hodson (non-executive director and chair, Simply Get Results), Chris Holmes, Katharine Jenner (Queen Mary University, London), Will Nicholson (project lead, Plating Up Progress, The Food Foundation) and Matt Towner (portfolio manager, Impact on Urban Health).







Topics, indicators and scoring

In total, 15 indicators were assessed across six Topics (see figure 3), each of which is reported on separately in this report, using information drawn from the public domain on the companies' websites and in annual reports. The indicators each have a number of predefined answers (scoring 0, 2, 2.5, 5 or 10) and cover both commitments/targets and reported performance. Following consultation with experts, each Topic was weighted according to its importance in fostering the consumption of a healthy diet.

Note that, due to the relatively small number of indicators (maximum of three) in each Topic, the scores within each Topic have not been included in this report, as the low granularity would be misleading. Instead, qualitative description of the reporting of each company has been included, and a simple grading of the companies, which combines each company's score across the Topics.



Figure 2. Topics, Weighting and Indicators

Topic	Weighting as % of final score	Number of indicators
 Governance	10%	2
 Menu healthiness	30%	3
 Pricing and promotions	20%	2
 Responsible marketing	20%	2
 Accessibility of nutrition information and labelling	15%	3
 Engagement with stakeholders and policymakers	5%	3
Total	100%	15

Company selection

10 of the largest UK OOH food chains were selected for inclusion, chosen to cover a range of food offerings (burgers, bakery, pizza and coffee). All are publicly listed, so some popular brands that are not publicly listed, such as Nando's, are excluded despite having revenues comparable to those selected for inclusion. Chinese and Indian food – the most popular takeaway cuisines in the UK⁸³ – are also not included because there are no national chains in these cuisines.

Four of the companies – **Costa Coffee, Burger King and KFC/Pizza Hut** – are well-known brands in the UK, and their parent companies – **Coca-Cola, RBI and Yum! Brands** respectively – are also assessed. (See box 9 for the way in which these two different categories of company have been assessed.) The remaining three companies are **Domino's, Greggs and McDonald's**. Figure 4 provides further information on the 10 companies selected.



Box 9: A note on brands and parent companies

Some of the most well-known brands in the UK out-of-home food sector are owned by parent companies headquartered outside the UK: Coca-Cola owns Costa Coffee, RBI owns Burger King, and Yum! Brands owns KFC and Pizza Hut. The research found some of the brands in the UK to be making commitments beyond the broad, globally applicable commitments made by the parent company and/or are contextualising to the UK (for example, acknowledging the UK government's efforts on obesity). Assessing the parent company and the brands separately was therefore felt to be the most fair and representative way to look at these brands, which are household names in the UK. Where appropriate, this has meant that the brands have been awarded credit for the commitments of the parent company additional to any brand-specific commitments. A table of these differences is presented in Appendix 1.





Figure 3. The companies assessed in this Action Research

	Main food category	HQ*	Business model	Sales 2021 (£million)	Market share	No. of outlets	Delivery channels
Burger King	Burgers	London; Miami, FL (global HQ)	Franchise	£500–750	1–1.5%	541	Deliveroo, Just Eat, Uber Eats. Developing own click and collect system
Coca-Cola**	[See Costa]	London; Atlanta, GA, (global HQ)	n/a	n/a	n/a	n/a	n/a
Costa Coffee	Coffee / bakery	Dunstable, Bedfordshire	Franchise	£750–900	1.5–2%	2,792	Costa Coffee Club (app), Just Eat, Deliveroo, Uber Eats
Domino's Pizza Group plc	Pizza	Milton Keynes; Ann Arbor, MI (global HQ)	Franchise	£1,250–1,500	2.5–3%	Over 1,200	Just Eat Domino's app
Gregg's	Bakery	Newcastle Upon Tyne	Franchise	£1,000–1,250	1.5–2%	2,181	Greggs app, Just Eat
Kentucky Fried Chicken (Great Britain) Ltd	Chicken	Woking; Louisville, KY (global HQ)	Franchise	£1,000–1,250	2–2.5%	Over 900	KFC App, Just Eat, Deliveroo, Uber Eats
McDonald's	Burgers	London; Chicago, IL (global HQ)	Franchise	£2,500–2,750	4.5–5%	1,334 (2020)	My McDonalds app, UberEats, Just Eat
Pizza Hut Restaurants UK Ltd and Pizza Hut Delivery (reg as Yum! III (UK)) Ltd	Pizza	Borehamwood; Plano, TX (global HQ)	Franchise	£250–500	0.5–1%	260+ restaurants in UK	Pizza Hut app, Just Eat, Uber Eats, Deliveroo
Restaurant Brands International	Various	Toronto, Canada	Franchise	n/a	n/a	Globally: 29,000	n/a
YUM! Brands, Inc.	Various	Woking; Louisville, KY	Franchise	n/a	n/a	Globally: 53,424	n/a

* UK and parent/global, if relevant

** Coca-Cola is being assessed for its commitments specifically to its out-of-home chain in the UK (Costa Coffee): any commitments referring to its soft-drink products are not included unless explicitly also applicable to this OOH aspect of its portfolio (see also box 9).

The Action Research

Research process

The research process was based on ATNI's experience of producing its Global Index of food manufacturers and its UK Retail Index that assessed UK supermarkets. Once the methodology (above) had been developed, research for the report was fully desk-based. ATNI undertook searches of the companies' websites to identify all relevant sources of information at both global level (where appropriate) and at UK-specific level. These include sustainability/CSR reports, annual reports, and any further publications aimed at investors, as well as press releases and web pages.

ATNI presented the research to a Nutrition Working Group meeting of the British Retail Consortium (BRC), and the BRC confirmed that all companies in this assessment are BRC members. ATNI did not manage to get in touch directly with Pizza Hut, Domino's or KFC.



The 10 companies were researched by ATNI analysts, who then discussed each company to ensure consistency. Each Topic was then assessed by a single analyst to ensure a fair and consistent analysis across the different companies, with cross-checks and discussion by the full team, to ensure that the research is complete and the scoring accurate. The analyst who undertook the Topic analysis then wrote that Topic's chapter, followed by a final in-house cross-check and edit.

Limitations

As the Action Research is based solely on information in the public domain, it is possible that many of the companies are doing and planning more than they currently publicly report in the UK. These results may, therefore, not be fully representative of their true performance on the issues assessed. Were a full OOH food sector Index to be published in future, ATNI's standard approach would be used: the extent to which companies' commitments, action and disclosure align with best practice would all be scored, and confidential/unpublished material would be requested under a non-disclosure agreement from the companies themselves. Such an approach would give a more complete picture of the companies' performance.

For consistency, **the only sources used for this Action Research were those made available in the public domain by the companies themselves** (both brand websites and, where appropriate, those of the parent company). The analysis is not based on information contained in third-party publications such as government consultations, trade magazines or the broader news media because these sources do not provide consistent information for all companies and so cannot be included.

This Action Research follows ATNI's other indexes in **not including indicators on legal compliance** (such as calorie labelling), as it is assumed that all retailers comply with the law and it is the role of government to monitor compliance.

As noted in box 2, 'the OOH food sector' can be defined as covering many different aspects of eating out of home, not all of which are included in this Action Research. This research excludes some out-of-home eating opportunities, such as workplace/school catering (school catering is separately legislated⁸⁴) or OOH food chains that are primarily pubs/bars (because ATNI does not include alcoholic beverages within its current portfolio of work).

This report also does not address environmental concerns or other social benchmarks – although these are, of course, an important part of business decision-making – as these are well covered by other organisations such as The Food Foundation's Plating Up Progress. In addition, as the scope of the research is the UK market only, this report does not shine a light on action taken by companies either globally (except as applied in the UK) or in other markets.

Alcoholic beverages were not included in the assessment. Their consumption is an important health concern in the UK but is outside the scope of this initiative.

The research did not address the health of employees (for example, provision of meals at work), because nutrition falls into the consumer health (rather than worker health) pillar of ShareAction's Long-term Investors in People's Health initiative.

Challenges

- Choosing the 10 companies to include in this assessment was challenging – not least because of the lack of agreed definition of the OOH food sector (box 2). It was important to choose from the companies that account for the greatest consumption, but ATNI could not assess simply the 10 largest brands in the UK as other factors also had to be taken into account. Choices were made to ensure that a range of food sectors were covered (fast-food, coffee chains etc.), and



both parent company and individual brand were included where relevant. All had to be publicly listed companies, given ShareAction's focus on the role of investors in driving change.

- Compared to many companies in the manufacturer and retail sectors, there is often little information available in the public domain, and **finding sufficient information online to make comparisons was problematic**. In some cases, there is a passing mention of a commitment to nutrition, but no further detail is provided – so it was not possible to assess whether these are being delivered, and they are not scored.

Box 10: Disclaimer

This Action Research has been centred on research carried out by ATNI in August 2022, based on publicly available data: any action taken by any of the companies after August 2022 has, therefore, not been included in the scoring. The findings rely entirely on information that is in the public domain on the companies' websites.

As a multistakeholder, collaborative project, the findings, interpretations and conclusions expressed in the report may not necessarily reflect the views 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.

This report is intended to be for informational purposes only and is not intended as promotional material in any respect. This report is not intended to provide accounting, legal or tax advice or investment recommendations. Although it is based on information that ATNI believes to be reliable, no guarantee can be given that it is accurate or complete.



Results and recommendations

Results

Many of the 10 companies in the out-of-home food sector assessed in this Action Research appear to **recognise that they have a role to play in addressing the UK's diet and health challenges**. However, their disclosure is, in most cases, very limited, with less information provided to customers than in the supermarket food sector (see the ATNI UK Retailer Index 2022⁸⁵), so stakeholders are not able to gain a full understanding of the extent of the companies' efforts to improve diets in the UK.*

All companies have scope to explain more fully the extent of the action they are taking, across all the Topics assessed. Current reporting gives the impression that nutrition and health are not at the centre of governance and action of the companies, despite the increasingly central role that the sector plays in the UK's diet (see the Context chapter). This is reflected in the scoring, with no companies achieving grades A or B in ATNI's categorisation – which indicates that no company is doing well across all the Topics.

Figure 4. Companies and grades

Company	Grade	% of points	Rank
None	A		
None	B		
McDonald's	C	52%	1
Greggs	C	49%	2
Costa Coffee	D	32%	3
Burger King	D	27%	4
Pizza Hut	D	22%	5
KFC	D	21%	6
Yum! Brands	D	20%	7
Domino's	D	20%	7
Coca-Cola	E	11%	9
Restaurant Brands International	E	8%	10

Note: Grade A indicates a reporting score of 80–100%; Grade B = 60–79%; Grade C = 40–59%; Grade D = 20–39%; Grade E <20%

The reporting of McDonald's and Greggs were found to be the most extensive, with scores of 52% and 49% respectively. They have both been awarded a C grade. Coca-Cola and RBI have the most to do to improve their disclosure, each receiving an E grade. All the other companies are awarded a D. The average score across all companies was just 26%.

The greatest disclosure was in the Topics of **menu healthiness** (with all companies scoring on at least one indicator) and **responsible marketing** (where only one company did not score). This is encouraging as it demonstrates that companies recognise that they need to assess healthiness of products and that they do have responsibilities in marketing their products, particularly to children – although the extent to which these are actioned in practice is crucial, and not assessed in this Action Research.



No information was found for the Topic on **pricing and promotions**. No company scored at all in this Topic, which suggests that the companies have significant opportunities to do more to promote healthier products at an affordable price to their customers. Five companies – Burger King, Domino's, Greggs, KFC and McDonald's – scored on at least one indicator in all five other Topics.

Reporting on the remaining Topics – governance, labelling and engagement – was patchier, with two or three companies not scoring within each. In **governance**, several companies were found to have targets to increase sales of healthier products – but 'healthier' is defined by the companies, rather than using a government-endorsed nutrient profiling model. There are also opportunities for companies to do more to improve **labelling** to assist consumers – for example, using interpretive traffic-light labelling, both online and in-outlet, and to include more nutrient/health filters on their websites and apps. Finally, transparency around **engagement** with stakeholders would be welcomed, particularly improving reporting on lobbying on health and nutrition issues, including publishing policy positions taken on government consultations.

It is evident from the Action Research that **greater reporting is needed if investors and other stakeholders are to differentiate the companies that are best addressing the risks and opportunities associated with the health and nutrition challenges facing the UK**. It is not evident which of the 10 companies assessed are making clear strategic shifts towards a business model that prioritises higher sales of healthier products.

Topic results in brief



Governance

Greggs, KFC, McDonald's and Yum! Brands scored on both the two indicators in this Topic: all four have at least a brief public commitment to health or nutrition, as well as a target to increase number of healthier products. Four other companies scored in one of the two indicators: Burger King, Domino's and RBI were found to have a public commitment to health or nutrition, and Pizza Hut has a sales target for healthier products. However, all the commitments could be made stronger, and the sales targets for 'healthy' products all use the companies' own definitions of healthy, rather than the government-endorsed nutrient profiling model.



Menu Healthiness

Results in this Topic were mixed: all companies were awarded a score above zero, and those that report having an NPM tended to score more highly than those not disclosing information about the company's nutrition criteria. Seven companies scored on all three indicators (the others – Coca-Cola, Domino's and RBI – scored on one or two of the indicators). No company reported using the full FSA 2004/5 NPM, although four use the traffic-light system. A focus was found on reducing negative nutrients (such as sugar and calories), but none of the companies were found to have a corresponding commitment to increasing fruit, vegetables or whole grain.



Pricing and promotions

None of the companies scored in this Topic. No evidence was found in the public domain of committing to address price and affordability of healthier products relative to less healthy products, and no commitment was found not to use price promotions to encourage customers to purchase larger portions of less healthy products or meals. This is disappointing, as the pricing of healthier products is particularly important during a cost-of-living crisis when food inflation overall is high.



Responsible marketing

Most of the companies (all but Costa) have at least a generic statement about the importance of responsible marketing, particularly to children. Burger King, Coca-Cola, Greggs and McDonald's have a responsible marketing policy, with three of the four stating that it applies across all media channels, and with McDonald's additionally including marketing restrictions within 200 metres of schools and Burger King committing to display 'moderate' portion sizes in advertising (although without a definition of 'moderate'). All the companies could do more to codify their responsibilities to children up to the age of 18.



Labelling

Eight companies (all but RBI and Yum! Brands) disclose information on at least one of the indicators in this Topic, and Greggs and McDonald's report on all three indicators. The most reported-on indicator was the provision of full nutritional information for at least some products – although this should be supplied for all products. Only three companies reported on the nutritional information available to customers purchasing in-store or in-restaurant. Four companies have at least one nutrient-based filter on their websites to guide purchasing and McDonald's website includes a nutrition calculator.



Engagement

All companies could do more to improve transparency of their engagement with stakeholders. Six – all but Costa, KFC, Pizza Hut and Burger King – scored in this Topic. All six have some form of anti-bribery and corruption policy in the public domain, but the applicability of these to subsidiary brands is not clearly set out. None had a lobbying policy or commitment to engage with stakeholders (including government) **only** in support of measures to improve health and nutrition. Greggs is the only company to provide a list of its membership of UK trade associations (although the list is not comprehensive), and the only one that has made a Peas Please pledge.

Recommendations

Although the companies were assessed only on their disclosure for this Action Research, these recommendations go beyond disclosure to suggest actions that companies can take to improve their overall performance.

There are three overarching recommendations, along with the 23 Topic-specific recommendations that also appear in the report within each Topic chapter: these recommendations are reproduced here in full. ATNI has chosen to highlight all the recommendations prominently, as following these will enable the OOH food sector companies to align more closely with the actions that ATNI recommends for retailers and manufacturers. The recommendations provide a clear indication of ATNI's understanding of areas of interest to stakeholders (including investors) and would form the basis of any future ATNI Index of the OOH food sector.

Overarching recommendations

Companies in the OOH food sector are encouraged to:

- work with the aggregators to ensure that all products are responsibly marketed (particularly to children) with clear nutrition labelling of all the companies' products and
- where appropriate, take best practice from the company's actions in other countries' markets and report on how this is applied to the UK.



In addition, the parent companies (in this research, Coca-Cola, RBI and Yum! Brands) are encouraged to:

- take a strong lead across all Topics, contextualising the parent-company commitments to different markets and to ensure that subsidiary brands report on action taken to meet these commitments.

Topic-specific recommendations



Governance

Companies in the OOH food sector are encouraged to take steps to embed and prioritise improved nutrition and health for all within the governance structures of the company in the UK, by:

- committing, at Board level, to address nutrition and health for all, explicitly coupling growth of the company with expansion of healthier offerings;
- developing a multi-year strategy and a detailed plan that will put the commitment on nutrition and health into practice – across all outlets, online and across delivery channels (including aggregators) – clearly indicating where responsibility and accountability for delivery lie within the organisation;
- set a clear, timebound target to increase number or (preferably) the sales of products or meals that are healthy, taking as its definition of ‘healthy’ the Food Standards Agency’s 2004/5 nutrient profiling model, and report regularly on progress towards this target; and
- publishing strategy, plan and targets and results in a consistent form in the public domain, enabling stakeholders – policymakers, investors, NGOs and customers themselves – to hold the company to its commitments over time and compare it with others in the sector.



Menu healthiness

Companies in the OOH food sector are encouraged to improve and accelerate efforts to offer healthier alternatives and support healthy diets in the UK by:

- publicly disclosing specific, timebound targets both for nutrients of concern and positive nutrients/ingredients, aligned with government guidelines;
- global companies in the OOH food sector are strongly encouraged to disclose UK-specific progress against any global (re)formulation targets;
- adopting a nutrient profiling model (NPM) applicable to all products and meals sold, that aligns with the government-endorsed FSA 2004/5 NPM (and the new UK NPM as/when it is published), beyond or in addition to the traffic-light system; and
- ensuring all outlets offer appropriate portion sizes, healthier alternatives and side options (e.g. salads), with healthier products as default options in meal deals and placed prominently at the top of menus.



Pricing and promotions

Companies in the OOH food sector are encouraged to improve and accelerate efforts to ensure greater availability and affordability of healthy products to customers in the UK (particularly important during a cost-of-living crisis) by:

- refraining from using price promotions to encourage consumers to purchase larger portion sizes of less healthy products and/or meals;



- developing commercial strategies to address the price and affordability of healthy/healthier products relative to unhealthy/less healthy products (according to an external definition of healthy or at least to each company's own definition of healthy); and
- ensuring that nutrition and health are prioritised within their approach to pricing and promotions, also by disclosing whether and how the healthiness of products and meals is a factor in selecting products for pricing decisions and promotional campaigns.



Responsible marketing

Companies in the OOH food sector are encouraged to improve and accelerate efforts to ensure that all marketing to all consumers (and particularly to children) in the UK prioritises healthier products, by:

- laying out a clearly articulated responsible marketing policy for all audiences, including children under the age of 18, which applies to all forms of advertising and marketing communications across all media channels;
- applying the government-endorsed FSA 2004/5 NPM to underpin efforts to prioritise the marketing of healthier products and substantiate health and nutrition claims;
- publishing a commitment to market products in a manner than supports public health, including displaying accurate and moderate portion sizes; and
- explicitly and publicly committing to adhere to the BCAP and CAP Codes.



Labelling

Companies in the OOH food sector are encouraged to improve and accelerate efforts to increase the accessibility of nutrition information in the UK by:

- ensuring that nutritional information (both comprehensive and interpretive) is available in all outlets. Where possible this should be on-shelf or on menus, and should always be available on request;
- displaying nutritional information alongside individual product images online and in apps. This information should include:
 - nutritional information for 100g and per serving/portion for all products (not only pre-packed products) and
 - interpretive colour-coded nutrition information (traffic-light labelling);
- making it easy for customers to work out the full nutrition profile of a whole meal (for example, through providing a nutrition calculator); and
- ensuring websites, own apps and third-party apps have nutrient (or food component)-based filter(s).



Engagement

Companies in the OOH food sector are encouraged to improve and accelerate efforts to increase transparency of stakeholder engagement in the UK by:

- publishing a clear and comprehensive lobbying policy or code of conduct that aligns with the Responsible Lobbying Framework, in which it commits to:
 - only engaging with government, political parties, policymakers and policymaking bodies in support of measures to improve health and nutrition, consistent with the public interest;



- only engaging 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;
- publishing a full and comprehensive list of industry and trade association memberships;
- disclosing policy positions on government consultations on issues relating to nutrition or of relevance to the OOH food sector (including linking to its submissions to government consultations from its website); and
- engaging with third-party initiatives that address the UK's nutrition challenges, and fully disclose the extent and impact of involvement, such as progress towards pledges.



Topic 1: Governance

Activities related to nutrition and health are more likely to be prioritised, sustained and scaled up within a company when health and nutrition form core strands of its commercial strategy, so the Governance topic is presented first in all ATNI's company research. This Action Research assesses companies' public commitments to health and nutrition and whether each report on a key financial metric on healthier products within their portfolios.

This Topic consists of two indicators and carries 10% of the weight of this research.

To perform well in this Topic, a company must provide evidence in the public domain of:

- a clearly articulated commitment in its business strategy that explicitly links company growth with improving health and nutrition for all in the UK and
- a clear, timebound target to increase sales or number of products or meals that are healthier, relative to overall sales or portfolio.

Context

As the Context chapter (see above) makes clear, current diets in the UK do not align with government recommendations for a healthy and balanced diet. Research and the companies' own nutritional information suggest that many products contain levels of calories and negative nutrients (salt, sugar and saturated fat) above those recommended for good health. Government is taking action through setting of voluntary targets, and the food industry itself can and should play a key role in ensuring not only that these targets are reached but that everyone – including people from more socially disadvantaged backgrounds – can access affordable, healthy food at their restaurants of choice. At the time of writing, in summer/autumn 2022, the cost-of-living crisis is making this even more pressing: business strategy should be prioritising health and nutrition to protect the most vulnerable.

Headline results

Four companies – Greggs, KFC, McDonald's and Yum! Brands – scored on both indicators in this Topic, indicating both that they have least a brief public commitment to health or nutrition and that they have a target to increase sales of healthier products. However, all could have stronger commitments, and their targets are limited through the use of the companies' own definitions of 'healthy', rather than a government-endorsed definition.

Four other companies scored in one of the two indicators, demonstrating either some level of public commitment to health (Burger King, Domino's and RBL) or a sales target using the company's own definition of healthy (Pizza Hut).

The remaining two companies (Coca-Cola and Costa Coffee) did not score, as no evidence was found in the public domain about their approach to these important aspects of governance.

Detailed findings

Do the companies publicly commit to growing the business through improved health and nutrition?

If nutrition and health is to be embedded and rolled out throughout a company, **a clearly articulated commitment to growing the business through improved nutrition and health for all is an essential**



first step, clearly embedded within business strategy. A generic commitment to health and nutrition is a weaker statement of intent than a commitment to growth.

Of the 10 companies, the strongest expression of this commitment was found to be that of Yum! Brands.^{2*} Its global ESG strategy, Recipe for Good, includes a 'Food' pillar that references 'improving the nutritional value of our menu items', and the company formally integrated Recipe for Good into its 'Recipe for Growth' business strategy in 2020. The CEO's statement in the 2021 Global Citizenship & Sustainability Report notes specifically that 'a focus on environmental, social and governance (ESG) issues is not incidental to growth, but rather, an enabler of it'. Even this statement, however, would benefit from significantly greater emphasis on explicit coupling of improved nutrition of the company's offering and the company's future growth.

The majority of the remaining companies have more general public statements about nutrition, but do not include the explicit link to growth, for example:

- KFC UK & Ireland states that its commitments to align with UK government ambitions on calorie reduction and only to serve low- or zero-calorie soft drinks are 'the latest phase of KFC's long-term nutrition strategy' – but more details on this 'nutrition strategy' are not available in the public domain.
- McDonald's includes 'great food' as one of four aspects of its Plan for Change strategy, alongside 'great restaurants', 'planet positive' and 'people positive'. There are three broad goals within 'great food': to undertake behaviour change research, to improve labelling, and to create a new set of nutrition standards (due in 2022, developed with advice from the British Nutrition Foundation 'in line with recognised guidelines', although it is not yet clear what these 'guidelines' are). However, these are not linked explicitly to 'health', instead focusing on customer 'choice'.

Burger King, Domino's, Greggs and RBL have broad statements mentioning nutrition and (in the case of Burger King and Greggs) a mention of tackling obesity, but none are explicitly linked to action or to a company-wide plan.

No information was found in the public domain as to whether the remaining three companies – Coca-Cola (with reference to its OOH offering), Costa Coffee and Pizza Hut – have any form of commitment in their business strategy to address health and nutrition.

This suggests that there is plenty of scope for companies to take much stronger steps, embedding improved nutrition – and long-term health – for all customers firmly and publicly at the heart of their business strategies, and (for parent companies) explicitly across all brands and markets.

* For this indicator, Yum! Brands' statement has not been taken as covering either KFC or Pizza Hut, because a commitment to nutrition within the specific UK context by well-known brands was felt to be particularly important, given the UK government's emphasis on improving nutrition.



Box 11: Publishing information on health and nutrition

Where on their websites information about nutrition and health is published is important for transparency and accountability of companies. Nutrition should be at the heart of business strategy and be referenced as such in annual reporting as well as in corporate social responsibility documentation. Formal reports of this kind are available in perpetuity and cannot (unlike individual webpages, blogs or press releases) be updated or deleted, so it is possible to track progress over time. Many OOH companies were found not to provide much detail on health and nutrition progress in their formal reports, indicating that there is significant space for improvement.

Do the companies have targets on increasing healthy products?

Targets on healthy/healthier products – both sales targets and targets on the number of products/meals that are categorised as healthy/healthier, relative to overall sales or portfolio – enable the companies and other stakeholders (including NGOs, government and investors) to assess and track progress over time. This allows for much better comparison between companies' portfolios and sales within the food sector, as well as with retailers and manufacturers of food products. Best practice is always to use an official, government-endorsed definition of 'healthy', which in the UK is the Food Standards Agency's 2004/5 nutrient profiling model.

Figure 6 sets out which companies were found to have targets in the public domain and which do not. Half – Greggs, McDonald's and Yum! Brands (which includes KFC and Pizza Hut within its portfolio) – have **clear, timebound targets for the percentage of their portfolio that is considered to be healthier**. However, it is notable that **none of these commitments explicitly use the FSA 2004/5 nutrient profiling model** (see Topic 2) to define 'healthy' or 'healthier'. Instead, they rely on their own definitions, which are not consistent across the companies, meaning that it is not possible accurately to compare the targets or progress. Even when companies use the FSA 2004/5 NPM definition of healthy to inform their responsible marketing policies (Burger King and McDonald's), they use different criteria to set targets on increasing healthy products. The remaining companies give no indication as to whether they have any form of target to drive sales of healthier options within their portfolio. In addition, the targets are all around the number of healthy products provided, which may not be reflected in actual purchasing by customers: a target on sales would provide a better reflection of the proportion of purchases (and, therefore consumption) by customers of the healthier menu items and meals.



Figure 6: Healthy product targets

	Sales or product target?	Own definition or government-endorsed definition of 'healthier'?	Target	Progress reported
Coca-Cola	None found	-	-	-
Costa	None found	-	-	-
Domino's	None found	-	-	-
Greggs	Product target	Own definition: Fewer than 400 calories and scoring no 'reds' for fat/salt/sugar in the FSA traffic-light system).	By 2025, that '30% of the items on our shelves will be healthier choices'.	Already been surpassed, according to the company, with 32% of products meeting its criteria
McDonald's	Product target	Nutrition criteria due in 2022 but not yet published, so not known	By 2026, a minimum of 50% of its products will meet its nutrition criteria	Not yet reported
RBI	None found	-	-	-
Burger King	None found	-	-	-
Yum! Brands*	Product target	Own definition, with 'nutrition criteria' restricted only to calories (not to other nutrients): Side menu items of a maximum of 200kcal, main menu items a maximum of 400kcal or fewer and combo/main meal items a maximum of 750kcal.	By 2030, 50% of meal items consistent with the company's global nutrition criteria.	The company's 2021 Global Citizenship & Sustainability Report notes that its brands were '64% of the way there' and that 32% of meal options were consistent with our global nutrition criteria'.
KFC	Product target	Own definition, with Yum! Brands' 'nutrition criteria' restricted only to calories (not to other nutrients): Side menu items of a maximum of 200kcal, main menu items a maximum of 400kcal or fewer and combo/main meal items a maximum of 750kcal.	Yum! Brands: By 2030, 50% of meal items consistent with the company's global nutrition criteria.	No brand-level reporting so progress for KFC in the UK towards this target is not known
Pizza Hut	Product target	Own definition, with Yum! Brands' 'nutrition criteria' restricted only to calories (not to other nutrients): Side menu items of a maximum of 200kcal, main menu items a maximum of 400kcal or fewer and combo/main meal items a maximum of 750kcal.	Yum! Brands: By 2030, 50% of meal items consistent with the company's global nutrition criteria.	No brand-level reporting so progress for Pizza Hut in the UK towards this target is not known

* Note: That the Yum! Brands global commitment is not clearly rearticulated on the KFC and Pizza Hut websites is a concern: any such commitment should be specified in all markets and for all brands.



Box 12: Where is responsibility for nutrition housed?

Along with the need for nutrition to be firmly and publicly embedded within business strategy, strong leadership in nutrition is essential. For best practice, this would be a senior Board member with specific responsibility for driving the health and nutrition agenda. However, the research revealed that responsibility for nutrition sits at different points in different companies, often housed with broader corporate responsibility. Some examples are as follows:

- Domino's reports that it has a 'health working group', but no information was found on the structure or responsibilities of this group. The company states that there is a new Sustainability Steering Group, chaired by the chief executive, with additional oversight from a Board Sustainability Committee – although it is not clear to what extent this includes nutrition or what the implications of the establishment of the Steering Group will be in practice.
- McDonald's notes that a new Nutrition Innovation Council will be launched in 2022 'to create recipe reformulations and innovations that support more balanced options' – but no other information was available as to the structure or responsibilities of this Council at the time the research was undertaken (August 2022). It is not clear where responsibility for nutrition in the UK sits within the organisation.
- RBI reports that its ESG accountability is overseen by the Board of Directors, with the chief corporate officer and global head of supply chain being jointly accountable for the sustainability framework and strategy. However, 'Managing sustainability is a division between corporate and brand-led initiatives': it is not clear where responsibility for nutrition and health sit within this framework, either between brands (who has responsibility within Burger King, for example) or where responsibility sits for ensuring that UK-specific public-health concerns are addressed.

Note that companies were not, on this occasion, scored on this issue for this research, but it is an important part of driving change and commitments both to improved nutrition and to the provision and sale of healthier options.

Recommendations

Companies in the OOH food sector are encouraged to take steps to embed and prioritise improved nutrition and health for all within the governance structures of the company in the UK, by:

- committing, at Board level, to address nutrition and health for all, explicitly coupling growth of the company with expansion of healthier offerings;
- developing a multi-year strategy and a detailed plan that will put the commitment on nutrition and health into practice – across all outlets, online and across delivery channels (including aggregators) – clearly indicating where responsibility and accountability for delivery lie within the organisation;
- set a clear, timebound target (covering all products and meals) to increase the number or (preferably) the sales of products or meals that are healthy, taking as its definition of 'healthy' the FSA 2004/5 nutrient profiling model, and report regularly on progress towards this target; and



- publishing strategy, plan and targets and results in a consistent form in the public domain, enabling stakeholders – policymakers, investors, NGOs and customers themselves – to hold the company to its commitments over time and compare it with others in the sector.



Topic 2: Menu healthiness

Companies in the OOH food sector can help their customers in the UK access healthier options by improving the nutritional quality of food products and meals available through their restaurants, outlets and delivery channels. To achieve this, companies should prioritise nutrition in the development of new products through (re)formulation and/or through meal planning and development. A nutrient profiling model (NPM) is an important tool that companies can use to guide their (re)formulation strategies, and any NPM used by companies should make use of or align to the existing government-endorsed NPM: the Food Standards Agency's 2004/5 NPM. This Topic assessed the disclosure of the existence and use of an NPM within each company.

This Topic consists of three indicators and carries 30% of the weight of this research.

To perform well in this Topic, a company must provide evidence in the public domain of:

- a public commitment to reduce levels of nutrients of public health concern (e.g. salt and sugar) and increasing positive nutrients/ingredients in products and meals;
- adopting an NPM and using it to determine product healthiness and guide (re)formulation/menu planning strategies; and
- having a programme in place to introduce and/or expand healthier choices across all UK outlets – for example, offering calorie-capped meals or products, healthier product versions, or healthy side choices in meal deals (e.g. salads).

Context

The FSA 2004/5 NPM for the UK (also known as the Ofcom model) was developed in 2004–5 to differentiate foods on the basis of their nutritional composition for the purpose of regulating advertising to children. The FSA also developed the traffic-light front-of-pack labelling system, which clearly sets out the nutritional value of packaged foods (energy, fat, saturated fat, sugars and salt) to help consumers make healthier choices (see box 17, Topic 5). This is widely used by manufacturers and retailers – but, unlike the FSA 2004/5 NPM, the traffic-light system does not score or rank products in order to evaluate their overall nutritional composition, focusing only on negative nutrients and not on whether products also include fruit, vegetables and whole grain. As a result, using only the traffic-light system can make it more difficult to track overall improvements in product/meal composition over time.

The UK FSA 2004/5 NPM has been under review since 2016 to ensure that it reflects updated UK dietary guidelines, including guidance on fibre and free sugars.⁸⁶ An updated version of the model has been expected for some time but has not yet (as of October 2022) been published.

Headline results

Seven companies scored to a limited extent on all three indicators in this Topic. The remaining three companies – Coca-Cola, Domino's and RBI – scored on one or two of indicators.

Overall, results in this Topic were mixed, with companies that have used or adopted an NPM tending to score more highly than those that do not disclose information about the criteria they use to define healthier products. Four companies – Burger King, Costa, Greggs and McDonald's – report using or having used the traffic-light system in the past.



No company reports using the full FSA 2004/5 NPM to guide their product/meal (re)formulation strategies or to track sales or the number of products/meals that are healthier, relative to overall sales or portfolio (see Topic 1). In addition, **none of the companies were found to have a clear commitment to increase positive ingredients such as fruits, vegetables and whole grains in their products or meals.**

Detailed findings

Do companies report an overarching commitment to improving the nutritional quality of their offers?

Most companies focus their (re)formulation commitments on negative nutrients (salt, added sugar, and fat), as shown in figure 7. For example:

- The Greggs Pledge includes a commitment that 30% of items on its shelves will be healthier choices by 2025, where 'healthier choices' are defined by the company as products containing fewer than 400 kcal and with no reds for fat, salt or sugar under the FSA traffic-light system. Greggs reports having already exceeded this target, with 32% of items on its shelves classified as healthier choices.
- Yum! Brands has a quantitative (re)formulation target that 50% of all menu items will be consistent with its global nutrition criteria by 2030. However, these criteria are narrowly focused, addressing calories only.^{3*} The company reports that in 2021, 32% of the meal options offered by their subsidiary brands were consistent with these criteria. However, **no UK-specific disclosure against this target was found in the public domain, nor is there a breakdown by individual brands (KFC and Pizza Hut) in the UK.**
- As part of the 'great food' pillar within McDonald's business and sustainability strategy 'Plan for Change,' the company has set the goal to establish a Nutrition Innovation Council by 2022, which will 'create recipe reformulations and innovations that support more balanced choices that taste delicious'.⁺

What seems to be the strongest example of timebound targets is that of McDonalds, which has committed to a minimum of 50% of products available across all restaurants to meet the company's nutrition criteria by 2026 (although it will exclude promotional products). However, these nutrition criteria (on which the company states that it is working with the British Nutrition Foundation and nutrition experts) have not yet been released.

Figure 7. Companies' (re)formulation commitments and use of NPM

	Statement	Uses NPM
Burger King	We will gradually adapt the recipes on our most popular menu items to reduce salt, sugar, fat and calories without compromising on taste or quality. Kids' products will contain no more than a third of the recommended daily intake of salt, added sugar and saturated fat.	No red traffic lights (for Kids' products)

* To be consistent with the criteria, side menu items must be 200 calories or less, main menu items 400 calories or less and combo/meal menu items 750 calories or less.

+ According to McDonalds, between 2015 and 2020 1,200 tonnes of fat, 512 tonnes of saturated fat, 83.7 tonnes of salt and 2,545 tonnes of sugar were removed from its menu – but no indication is given as to the proportion of the total that this constitutes.



Coca-Cola	Continue to use reformulations, smaller packages and ongoing innovations, as well as responsible marketing, to help give consumers more choices.	No information
Costa Coffee	We're committed to providing credible healthier choices and have a long-term plan to improve the nutritional balance of our menu. Since 2015 we have supported Public Health England's (PHE) 20% by 2020 sugar reduction programme in food and the 20% by 2021 sugar reduction programme in milk-based drinks.	No red traffic lights (Healthier Choice range)
Domino's	Working on sugar reduction activities in line with recommendations in the Childhood Obesity Strategy. We continue to work with our suppliers to reduce the overall sugar content in our products. We're committed to meeting the Food Standards Agency salt targets on individual ingredients, as well as working towards Public Health England's out of home salt targets.	No information
Greggs	30% of all new products created will be healthier choices by 2025. This means product must contain fewer than 400 calories and score no reds in the Food Standards Agency traffic-light system for fat, salt and sugar.	No red traffic lights and using company-specific criteria (healthier choices)
KFC	We've been working hard to reduce the salt, fat, sugar and calories in our recipes for several years. This includes slashing salt by as much as 50% across our menu, reducing saturated fat levels in our frying oil by 10% and cutting calories in our drinks. And we're working towards a 20% reduction in calories per individual serving by 2025.	Company-specific (Yum! Brands criteria)
McDonald's	Reformulating certain products to reduce saturated fat, sugar and salt, while not compromising on flavour [is a core principle of its nutrition strategy]. By 2026, a minimum of 50% of our products available across the total of our restaurants, excluding promo products, will meet our nutrition criteria.	No red traffic lights and company-specific criteria by 2022
Pizza Hut	Pizza Hut is working to reduce sodium in its cheeses and is now using these cheeses in approximately 40% of international markets. Yum! Brands commits to achieving 50% of menu items to be consistent global nutrition criteria for meal options by 2030.	Company-specific (Yum! Brands criteria)
Restaurant Brands International	Working towards setting forward-looking targets across existing menu items at Burger King restaurants globally to expand our sodium reduction initiatives, as well as reduce the presence of other nutrients of concern, including fat and sugar.	No information
Yum! Brands	By 2030, 50% of our menu items will be consistent with our global nutrition criteria of side menu items being 200 calories or less, main menu items being 400 calories or less and combo/meal menu items being 750 calories or less.	Company-specific (Global Nutrition Criteria)



While all of the companies disclosed some level of commitment to product (re)formulation or healthier meal development, no explicit commitments or targets to increasing levels of positive nutrients, ingredients or food components such as whole grains and fruits and vegetables were found. The only reference to positive nutrition found was in the OOH Industry Code of Practice (see box 4 in the Context chapter). Costa, Greggs and McDonald's all publish the Code on their websites, and it states that signatories 'should also look at positive nutritional attributes such as protein, fibre, calcium and support for 5 a day' and that the companies have an intention to 'continue to ensure that fruit, vegetables or salads are available and appropriate to each meal occasion to support the "5 a day" message and that these are credible healthier choices e.g. served with healthier dressings or dressings on the side, pure fruit with no added sugar, more vegetarian and vegan products and dishes'. However, **there is no indication as to how these OOH Industry Code of Practice commitments are being brought into the individual companies' strategies and actions, and so has not been scored.**

Box 13: Meals versus products

Companies in the OOH business sell a variety of foods in their outlets, including:

- non-prepacked food or drink suitable for immediate consumption (e.g. a burger or pizza prepared in an OOH outlet);
- prepacked food and beverages (e.g. a snack bar or a can of a branded manufacturer soft drink); and
- meals, which consist of combinations of multiple food items, consumed on a single occasion. Meals can be pre-defined (e.g. a specific burger might be offered as a meal deal with a specific drink and a specific side dish) or be assembled by the customer.

While NPMs have primarily been designed for the purpose of analysing the nutritional composition of single foods, models can be applied to different food products combined constituting a meal. ATNI encourages companies in the OOH sector to apply their NPMs (or nutrition criteria) not only to non-prepacked food and drink and to packaged food and beverages, but also to the multitude of meals they offer. This is increasingly important as different outlets also offer foods and meals for different occasions, for example, for breakfast, lunch and dinner or foods offered as a snack.

Are companies using NPMs, or other criteria, to determine product healthiness?

A majority of the businesses assessed report that they use an NPM or other form of criteria to guide (re)formulation of products and/or menu-planning strategies. However, none of the companies disclose clear details of how those systems are being used – for example, to which products they are applicable, the scoring criteria, or how they are used for marketing, product placement and promotions. ATNI found four companies (Burger King, Costa, Greggs, and McDonalds) reporting on using or having used the FSA traffic-light system to some extent, sometimes in combination with their own thresholds.

When companies use different criteria to determine product healthiness, this makes it difficult to compare their commitments and practices. For example:



- Burger King states in its Responsible Marketing Principles that it 'will ensure that no advertising or marketing of HFSS products will be directly aimed at children under the age of 12 years – only products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable to national dietary guidelines'. However, no detail on how the company uses these criteria for product (re)formulation and/or menu planning was found. In addition to the FSA 2004/5 NPM, Burger King adheres to RBI's own nutrition criteria for children's meals, which requires meals to have less than 500 kcal, less than 10% of calories from saturated fats, no added trans fats, less than 650mg of sodium, less than 15g of added sugars, and to provide at least two servings of fruits, vegetables, dairy, and/or whole grains.
- McDonald's states that 'around 70% of items in our Happy Meal menu are non-high in fat, salt and sugar (non-HFSS), according to the UK Government's Nutrient Profiling Model'. However, it is unclear how the company's whole portfolio performs under this criterion, nor is it clear what percentage of Happy Meals sold actually contains one or more of these non-HFSS items.
- As already noted, Yum! Brands global nutrition criteria consist only of calorie restrictions for menu items so, while the company's time-bound commitment to improve the nutritional quality of its offerings is welcomed, it does not include nutrient levels, which a robust NPM would do.

Although several companies report making use of the traffic-light system to guide their (re)formulation strategies, this system includes only 'negative' nutrients, so the companies cannot use it to report into increasing 'positive' ingredients or nutrients to balance the overall nutritional composition of their foods or meals.

Box 14: Plant-based, vegetarian and vegan offerings

Vegan and vegetarian diets are on the rise in the United Kingdom. According to the British Takeaway Campaign, between 2015 and 2018 vegan takeaway orders more than quadrupled.⁸⁷ However, plant-based and vegetarian/vegan diets do not necessarily equate to healthier products: they can still be high in fat and salt.⁸⁸

The research found examples of companies moving towards non-meat options:

- In 2019 Greggs launched a vegan sausage roll, stating in its annual report that the success of the product enabled the company to test 'a whole range of vegan alternatives in 2021'. However, there was no indication of whether these products met the company's criteria to be 'healthier choices' (see above).
- Burger King UK has committed to make half of its menu meat-free by 2030, but no information was found about the anticipated nutritional quality of these new offerings.

The use of a robust NPM would help consumers understand the nutritional content of plant-based products, which are often positioned as being good for health of people and planet.

To what extent do companies report on their offering of healthier or calorie-capped meals/products in the UK?

Figure 8 shows that the **most reported-on strategies to provide healthier options in outlets and online were those linked to calorie-capped meals/products**: examples from four companies linked to



calorie- capped meals – KFC, McDonald's, Pizza Hut and Yum! Brands – were found in the public domain. The second most-reported-on strategies were linked to offering healthier side options, with three companies – Costa, Greggs and McDonald's – reporting on such efforts.

Of the 10 companies in this research, the company reporting the largest number of specific initiatives linked to offering healthier options in its restaurants was McDonald's. However, there is no indication about the extent to which these healthier initiatives are being rolled out/sold. A total of four different examples were found: Meals Under (meals under 400kcal and under 600kcal), a filter on the McDonald's online menu to access these options (see Topic 5), and, in addition, the default beverage option for these menus is water and, in some cases, zero-sugar soft drinks. ATNI also found that costumers have some options to customise meals ordered online – for example, an option to remove the dressing on salad.

Other examples include:

- As part of the Greggs Pledge on 'Incentivising healthier choices', in 2021 the company introduced an add-on to its meal deals, allowing customers to purchase a fruit pot for a reduced price of 75p.
- In 2019, Domino's launched a new range of pizza options containing 100 kcal per slice and under 650 kcal for a whole small pizza: the new options have the same tomato sauce and dough, but the dough is stretched to create a slightly thinner base and reduced-fat mozzarella is used.
- Pizza Hut is offering flatbreads under 550 kcal, promoting them as part of 'lighter lunch options' together with unlimited salad and bottomless drink.

Figure 8. Strategies for healthier offerings

	At least one calorie-capped meal	At least one calorie-capped distinct product*	A healthier side option (e.g. fruit or salad) in meal deals	A healthier product version as the primary (default) option	A healthier product version
Burger King	–	●	–	●	–
Coca-Cola	–	–	–	–	–
Costa Coffee	–	–	●	–	–
Domino's	–	●	–	–	●
Greggs	–	●	●	–	–
KFC	●	–	–	–	–
McDonald's	●	–	●	●	●
Pizza Hut	●	●	–	–	–
Restaurant Brands International	–	–	–	–	–
Yum! Brands	●	–	–	–	–

● Evidence found that company uses strategy

– No information found

* Excluding diet soft drinks



Examples from only two companies – Burger King and McDonald's – were found in which a healthier drink version was offered as the primary option. For its Kids Meals, Burger King offers bottled water as the default option, and McDonald's Meals Under offers are paired with bottled water and, in some cases, zero-sugar soft drinks.

- **Interesting example:** McDonald's has repositioned zero sugar/calorie drinks on its menus, noting that 'changing the position of low and no sugar drink options on our menu ordering screens has helped to create a significant increase in their sales'. McDonald's global website states that this initiative from McDonald's UK resulted in 1.9 million purchases switched from higher sugar variants to the no-added-sugar options when this was first introduced in 2017, but there is no indication of the percentage of the total sales of soft drinks that this constitutes or progress over the last five years.

Costa has recently established a partnership with M&S Food: 'Thanks to our collaboration with M&S Food, we also are pleased to be able to offer a range of products from their delicious Eat Well range. All of these choices are clearly labelled so it is easier to find a healthier option when in our stores.' As detailed in ATNI's UK Retailer Index 2022, M&S's Eat Well logo is only used when the product does not carry a red traffic light.

Recommendations

Companies in the OOH food sector are encouraged to improve and accelerate efforts to offer healthier alternatives and support healthy diets in the UK by:

- publicly disclosing specific, timebound targets both for nutrients of concern and positive nutrients/ingredients, aligned with government guidelines;
- global companies in the OOH food sector are strongly encouraged to disclose UK-specific progress against any global (re)formulation targets;
- adopting a nutrient profiling model (NPM) applicable to all products and meals sold, that aligns with the government-endorsed FSA 2004/5 NPM (and the new UK NPM as/when it is published), beyond or in addition to the traffic-light system; and
- ensuring all outlets offer appropriate portion sizes, healthier alternatives and side options (e.g. salads), with healthier products as default options in meal deals and placed prominently at the top of menus.





Topic 3: Pricing and promotions

Consumers need OOH food sector businesses to offer a wide range of healthier food and beverages, but they also need those products to be accessible, affordable and appealing – especially compared to the less healthy options on offer. This is particularly important for customers on lower incomes and at a time of rapid food-price inflation. This Topic assessed whether and how companies in the OOH food sector commit to address the relative affordability of healthier compared to less healthy options.

Relative pricing by portion size was identified as an area of focus for this Topic not only because of the increase in portion size witnessed in the UK and other markets over time (for example, pizzas have grown in size by 50% since the early 2000s⁸⁹), but also due to significant differences in portion size between products offered by OOH food businesses and those offered by retailers.⁹⁰

This Topic consists of two indicators and carries 20% of the weight of this research.

To perform well in this Topic, a company must provide evidence in the public domain of:

- committing not to use price promotions to encourage customers to purchase larger portion sizes of less healthy products or meals* and
- committing to address the price and affordability of healthy/healthier products relative to unhealthy/less healthy products (according to an external definition of healthy or at least to each company's own definition of healthy – see Topic 2).

Context

Food prices have recently been rising rapidly in the UK⁹¹ as a result of factors including the conflict in Ukraine⁹² and challenges of increased customs checks at the UK's border with the European Union, with food and drink inflation in August 2022 reaching 13.1%.⁹³ These food price rises are exacerbating food insecurity and inequalities in nutrition: as noted in the Context chapter above, statistics from The Food Foundation, published in October 2022, suggest that 4 million children were experiencing food insecurity – over one in four households with children.⁹⁴

Businesses in the food sector have been subject to an increasing level of regulatory pressure in the field of promotions, marketing and product placement in the course of 2022, which has been welcomed by public health experts.⁹⁵ The OOH food sector is mostly exempt from the new regulations** announced by the UK government in April 2022 that would prevent retailers and other food sector businesses – as of October 2023 – from running volume-based promotions on foods high in fat, salt and sugar (HFSS).⁹⁶ However, it has been announced that OOH food sector businesses will no longer be able to offer free refills for HFSS drinks from October 2023.

* During the development of the framework and indicators for this research, consideration was given to the fact that, at a time of price rises, providing larger portions at low extra cost could be beneficial to consumers facing economic hardship and wider cost-of-living increases. After consultation with stakeholders, ATNI decided to reward companies for commitments 'not to use price promotions to encourage consumers to purchase larger portion sizes of less healthy products or meals', because as offering greater amounts of unhealthy foods at marginal additional costs would be going against public health goals.

** It is unclear at the time of finalising this report (October 2022) whether these commitments will be rescinded by the new government.



At the time of writing, it is unclear whether the implementation of these regulations will go ahead.⁹⁷ What is clear, however, is that **it has never been more important for business in the food sector – including the OOH sector – to focus on affordability and accessibility of healthy, nutritious food.**

Headline results

No company scored in this Topic.

Only one company, McDonald's, was found to have a generic commitment to affordability posted on its website: 'At times like this, we know that providing great value is important. Since we opened in the UK in 1974, we have committed to offering great tasting food at affordable prices, and that commitment will not change. But, today's pressures mean, like many, we are having to make some tough choices about our prices.' This already broad commitment does not refer to the affordability of specifically *healthy* options and was not credited in this assessment.

The OOH Industry Code of Practice – adopted by four businesses included in this Action Research (Costa Coffee, Greggs, McDonald's, Pizza Hut Delivery – see box 4) – states that the companies 'will review ways of making healthier choices the easier choice for consumers such as *price incentives*'. However, no updates on whether this is being implemented were found on the websites of any of the four companies and no information was found regarding the results of any such 'review'.

Recommendations

Companies in the OOH food sector are encouraged to improve and accelerate efforts to ensure greater availability and affordability of healthy products to customers in the UK (particularly important during a cost-of-living crisis) by:

- refraining from using price promotions to encourage consumers to purchase larger portion sizes of less healthy products and/or meals;
- developing commercial strategies to address the price and affordability of healthy/healthier products relative to unhealthy/less healthy products (according to an external definition of healthy or at least to each company's own definition of healthy); and
- ensuring that nutrition and health are prioritised within their approach to pricing and promotions, also by disclosing whether and how the healthiness of products and meals is a factor in selecting products for pricing decisions and promotional campaigns.



Topic 4: Responsible marketing

Food companies, including in the OOH food sector, can support all consumers, and particularly children, to make healthy choices by adopting responsible marketing practices and by prioritising marketing of healthier products. This Topic assessed whether companies publicly acknowledge and report on responsible marketing policy and action.

This Topic consists of two indicators and carries 20% of the weight of the research.

To perform well in this Topic, a company must provide evidence in the public domain of:

- adopting a comprehensive responsible marketing policy that applies to all audiences, including children under the age of 18;
- applying its responsible marketing commitment across all media platforms, providing a list of the platforms to which the commitment applies;
- mechanisms being in place to ensure that marketing of healthier products is prioritised, especially to children; and
- an express commitment to adhere to the UK's Codes of Broadcast Advertising and Non-broadcast Advertising and Direct & Promotions Marketing, developed by the Broadcast Committee of Advertising Practice and Committee of Advertising Practice.

Context

The marketing and advertisement of unhealthy foods has become a topic of considerable public and government interest in the UK in recent years. **Food companies' marketing practices are increasingly being recognised as a factor influencing obesity** and, in 2021, the UK government introduced advertising rules to help tackle childhood obesity.⁹⁸ The rules introduced restrictions on advertising foods and beverages classed as high in fat, salt and sugar (according to the FSA 2004/5 NPM) online and on TV except between 9pm and 5:30am. Although these restrictions are reportedly being reviewed by the current UK government, such moves can be instrumental in shaping and highlighting the importance of food and beverage companies' responsible marketing practices in the UK.

ATNI encourages food and beverage companies globally – in manufacturing, retail and the OOH food sector – to adopt the principles of the International Chamber of Commerce's (ICC) *Framework for Responsible Food and Beverage Marketing Communications 2019*⁹⁹ in its responsible marketing strategies. The principles, which apply to all forms of advertising and marketing communications, stipulate that advertising should be legal, decent, honest and truthful, not mislead the consumer, and take special precautions in marketing communications directed to or featuring children.

In the UK, the ICC principles are reflected in the voluntary Codes of Broadcast Advertising (BCAP)¹⁰⁰ and Non-broadcast Advertising and Direct & Promotions Marketing (CAP Code).¹⁰¹ The BCAP and CAP Codes established guidelines that limit the use of health and nutrition claims and licensed characters and celebrities in advertising of HFSS products across various promotional platforms. They also include specific provisions on marketing to children under the age of 16. This Action Research assessed the alignment of companies' responsible marketing policies with the principles outlined in the ICC, BCAP and CAP Codes, as well as whether companies have expressly committed to comply with the marketing guidelines of the BCAP and CAP Codes.



Headline results

The Action Research showed that most of the companies assessed at least have some form of public commitment to market their products in a responsible way to all audiences and/or with specific reference to children. However, **all companies can do more to codify their responsible marketing commitments within a comprehensive, publicly available policy that applies to all audiences, and specifically to children under the age of 18** (see box 15).

Three companies – Burger King, Coca-Cola and McDonald's – were found to have responsible marketing policies in the public domain applicable to all audiences, with specific reference to children under the age of 13 (Coca-Cola and McDonald's) and 12 (Burger King) (rather than the recommended age of 18). Five other companies (Domino's, Greggs, KFC, Pizza Hut and Yum! Brands) were found to have a generic commitment to market responsibly to children, but their commitments were not clearly articulated in a comprehensive policy. No public commitments to responsible marketing were found for Costa or RBI.

Box 15: Defining the age of a child

ATNI recommends that companies set the age threshold for responsible marketing to children at age 18, to align with the UN Convention on the Rights of the Child.

Age of 'child'	Company
Under 18	Domino's
Under 16	CAP and BCAP Codes
Under 13	Coca-Cola, McDonald's
Under 12	Burger King, KFC, Pizza Hut, Yum! Brands
Not specified	Greggs
n/a – no commitment found	Costa, RBI

Detailed findings

To what extent do companies commit to market their products in a responsible way to all audiences and to children?

Only three companies in this assessment – Burger King, Coca-Cola and McDonald's – were found to have policies on responsible marketing applicable to all audiences, including children under the age of 13 (Coca-Cola and McDonald's) and 12 (Burger King). The most comprehensive of these is Burger King's policy, which explicitly incorporates five of the ICC principles, as well as aspects of the BCAP and CAP Codes relating to marketing to children and to substantiating health and nutrition claims.

Two companies – Burger King and McDonald's – commit to ensure that products considered high in fat, sugar and salt according to the FSA 2004/5 nutrient profiling model (see Topic 2) are not marketed to children under 12 and 13 respectively. Note, however, that up to the age of 18 would be best practice (see box 15).



Five other companies (Domino's, Greggs, KFC, Pizza Hut and Yum! Brands) were found to have a generic commitment to market responsibly to children, but their commitments were not clearly articulated in a comprehensive policy outlining the mechanisms used to market products in a responsible manner to all audiences, including children.

- **Interesting example:** At first glance, Domino's shows industry best practice by setting the age threshold for responsible marketing to children up to the age of 18. However, its commitment is very limited, consisting only of the statement that 'we do not proactively target children with any of our advertising. In all digital advertising where we can add age targeting, this is firmly set at 18+.'

What elements are covered in companies' responsible marketing commitments?

Eight out of the 10 companies were found to have a commitment to market their products responsibly, but the level of detail and specific elements included in these commitments vary significantly, as shown in figure 9.

Figure 9. Elements of responsible marketing commitments

	Endorses OOH Industry Code of Practice responsible marketing commitments	Responsible marketing policy or commitment*	Media channels specified?	Definition of children (age)	Nutrition criteria
Burger King	–	●	●	12	●
Coca-Cola	–	●	–	13	–
Costa Coffee	●	None found	n/a	n/a	n/a
Domino's	–	Generic commitment	–	18	–
Greggs	●	Generic commitment	●	–	–
KFC	–	Generic commitment	–	12	–
McDonald's	●	●	●	13	●
Pizza Hut	●**	Generic commitment	–	12	–
Restaurant Brands International	–	–	–	–	–
Yum! Brands	–	Generic commitment	–	12	–

● Yes

– No information found

* See box 4 in the Context chapter for more information on this Code of Practice.

** Pizza Hut is understood to be a signatory to the OOH Industry Code of Practice, but the company does not include a link to the Code on its website.

Media channels

Three companies (Burger King, Greggs and McDonald's) specifically state that their responsible marketing commitments – particularly those to children – apply across all media channels. Burger King and Greggs both provide a specific list of media channels, with Greggs clarifying that 'marketing' in its responsible marketing commitment refers to 'product advertising and promotion in all media including, but not limited to packaging, brand promotions, brand advertising, brand PR, product placement, sponsorship and brand experiential marketing, packaging, point of sale material, digital, online and mobile marketing plus social media.'

- **Interesting example:** McDonald's additionally commits to restrict out-of-home advertising to avoid being within 200 metres of a school.



Coca-Cola does not market to children in media channels in which 30% or more of the audience is composed of children under 13, including shows, print media, websites, social media, movies and SMS/email marketing. However, it is not clear to what extent this would be applicable to Costa, which is its subsidiary brand.

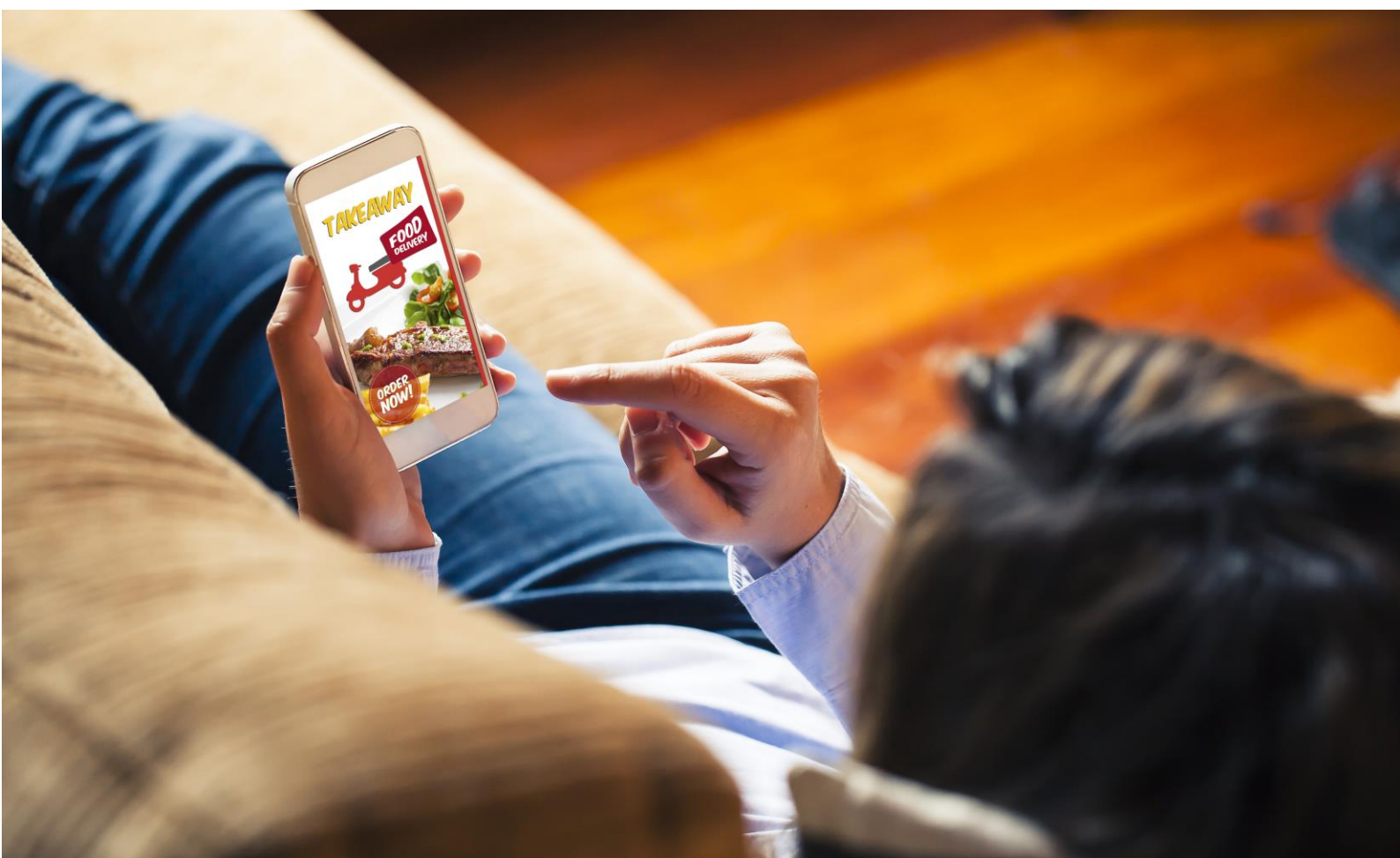
Nutrition criteria

Two companies (Burger King and McDonald's) specifically state in their responsible marketing policies that any products that qualify as HFSS according to the FSA 2004/5 NPM (see Topic 2) will not be marketed to children. This is important, as this is a commitment to use a robust, government-endorsed NPM to ensure that children are less exposed to these products in advertising.

- **Interesting example:** As part of fulfilling nutrition criteria, McDonald's states that, since 2007, adverts featuring a Happy Meal have included food and drink such as carrot sticks, fruit bags, milk or water.
- **Interesting example:** In addition to the FSA 2004/5 NPM, Burger King adheres to RBI's own nutrition criteria for children's meals, which requires meals to have less than 500 kcal, less than 10% of calories from saturated fats, no added trans fats, less than 650mg of sodium, less than 15g of added sugars, and to provide at least two servings of fruits, vegetables, dairy, and/or whole grains.

Truthful and accurate representation

Burger King explicitly commits to market its products in a truthful and accurate manner in line with ICC principles. This extends to ensuring that any presentation of food in the company's marketing and advertising accurately represents all material characteristics advertised including taste, size, and content, and that all product content, comparative and nutrition and health claims are accurate and appropriately substantiated. Burger King also commits to display moderate portion sizes in its advertising. However, no specific information was found as to the company's definition of 'moderate' portion size.





Box 16: The use of toys to market to children

Research suggests that using toys to market meals to children is of particular concern, as:

- many restaurant children's meals do not meet nutrition standards and
- restaurant toys or premiums* are often tied to movie and cartoon characters and celebrities, a practice that has been shown to affect children's food choices and preferences.¹⁰²

Burger King was the only company found to have a commitment not to offer gifts, toys, premiums or giveaways to children under 12.

McDonald's responsible marketing policy is directly applied to the company's Happy Meals, which famously include a toy purchased with every children's meal – but a commitment not to offer toys to children in either all meals or only in meals meeting the company's nutrition criteria was not found during the research.

ATNI encourages all companies in the OOH food sector to commit to offer toys, gifts, giveaways and premiums only in meals that align with the FSA 2004/5 NPM.

Do companies commit to adhere to the BCAP and CAP Codes?

Compliance with the BCAP and CAP Codes is mentioned in the 2019 Out of Home Industry Code of Practice, supported by four companies in this research (see box 4 in the Context chapter). Three of the companies included in this Action Research – Costa, Greggs and McDonald's – have the OOH Code of Practice available on their websites, and ATNI has chosen to credit them as reportedly adhering to the BCAP and CAP Codes on the strength of this. However, none of the companies assessed directly refer to the BCAP and CAP Codes in their responsible marketing commitments and policies.

Recommendations

Companies in the OOH food sector are encouraged to improve and accelerate efforts to ensure that all marketing to all consumers (and particularly to children) in the UK prioritises healthier products, by:

- laying out a clearly articulated responsible marketing policy for all audiences, including children under the age of 18, which applies to all forms of advertising and marketing communications across all media channels;
- applying the government-endorsed FSA 2004/5 NPM to underpin efforts to prioritise the marketing of healthier products and substantiate health and nutrition claims;
- publishing a commitment to market products in a manner than supports public health, including displaying accurate and moderate portion sizes; and
- explicitly and publicly committing to adhere to the BCAP and CAP Codes.

* Premiums (which include toys) are defined in by the article cited as 'specialty or premium items other than food products that are distributed in connection with the sale of any of the company's food products'.



Topic 5: Labelling and accessibility of nutrition information online

Providing accurate, easily understandable nutritional information is essential to assist customers in making informed decisions when purchasing products or meals. This Topic assessed the accessibility and availability of nutrition information online, in-restaurant and in-store (as applicable), and to what extent it is comprehensive.

This Topic consists of three indicators and carries 15% of the weight of this research.

To perform well in this Topic, a company must provide evidence in the public domain of:

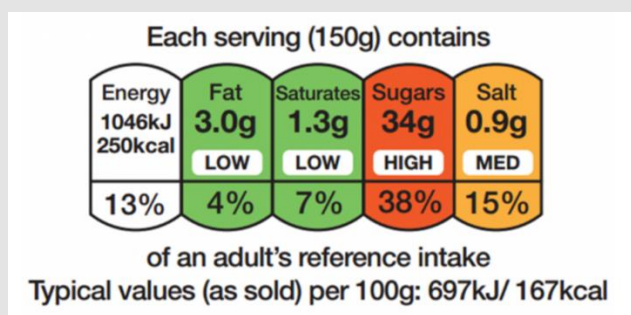
- making nutrition information for 100g of a product and per portion available and easily accessible online along with interpretive nutritional information, such as traffic-light labelling;
- providing nutrient (or food component) based filters on its website; and
- having a policy to provide comprehensive nutrition information (such as a booklet containing full nutritional information available on request) in every restaurant, store or outlet.

Context

Interpretive labelling (such as traffic-light labelling, see box 17) is increasingly used by food and beverage retailers and manufacturers in addition to back-of-pack (BOP) labelling (which is mandatory for all pre-packed products). This has been adopted to a lesser extent in the OOH food sector, although other labelling requirements for this food sector do exist.

Box 17: Interpretive labelling

Interpretive labels that include guidance and graphical information on the healthiness of a product (or meal) are easier for consumers to understand than numerical labels that provide quantitative information. This type of labelling has been found to encourage consumers towards healthier purchases.¹⁰³ An example is traffic-light labelling, developed by the UK's Food Standards Agency, which uses red (high), amber (medium) and green (low) indicators for the levels of total fat, saturated fat, total sugar and salt.¹⁰⁴ The percentages show the reference intake of each food component.





In 2022, the UK government made it a legal requirement for large OOH food businesses with more than 250 employees to display calorie information on menus, online menus, third party apps, food delivery platforms and food labels at the point of purchase.¹⁰⁵ This regulation covers both prepacked and non-prepacked products (see box 18 for definition). A year earlier, Natasha's Law was brought into effect, requiring OOH food sector businesses (and others) to provide allergen information on label and when ordering food in restaurant/in-store.¹⁰⁶ As in all ATNI research, companies were not assessed on labelling where it is a legal requirement, as it is assumed that all companies will comply.

Box 18: Prepacked and non-prepacked items

Prepacked products (also known as prepackaged products) are products put into packaging before being put on sale, that cannot then be altered without opening or changing the packaging.¹⁰⁷

The OOH food sector typically sells non-prepacked products. This includes, but is not limited to, food without packaging, food packaged at consumers request on the premise of sale, and food prepacked for direct sale (i.e. food that is packed before being offered for sale on the site on which it is sold).¹⁰⁸

Headline results

Eight out of 10 of the OOH food sector business included in the report disclose information on at least one area of this Topic. Greggs and McDonald's were found to have evidence of the most comprehensive labelling, reporting on all three indicators in this Topic. RBI and Yum! Brands are the only two found not to report on any of the indicators. All companies could do more, including providing more information to customers who are buying products in person in outlets, and increasing the number of nutrient-based filters on websites.

The indicator that was most reported on (by all but RBI and Yum! Brands) was the provision of full nutritional information (i.e. including saturated fat, carbohydrate and protein) for 100g/ml and per serving/portion for at least some products; however, this should be supplied for all products for best practice. The least-reported on indicator was clarity on how the companies provide nutritional information to customers when they are in an outlet, on which only three of the 10 companies – Domino's, Greggs and McDonald's – reported. Four companies were found to have nutrient-based filters on their websites, with McDonald's including a calculator to enable customers to work out the nutrients of a full meal.



Detailed findings

What nutritional information do the OOH food sector businesses provide online for products and meals?*

In total, eight OOH food sector businesses (all but RBI and Yum! Brands – the latter having a nutrition calculator only for its US brands) provide some information regarding nutritional information online.

- **Interesting example:** Greggs reports that it provides nutrition information for 100g of a product and per portion as well as showing traffic-light labelling alongside some products. This information was found for products displayed online (although it could not be verified for all products), and a statement in the Greggs Pledge Report states that Greggs puts calorie (which is mandatory) and nutritional information on-shelf in its stores, on the website and the Greggs app, as well as traffic-light labelling on its website and the Greggs app. Greggs also provides labelling (in the form of a logo) indicating products that are 'Balanced Choices'. These have fewer than 400 kcal and carry an amber or green traffic-light label for fat, salt and sugar. However, there does not appear to be a section of the online menu dedicated to these products or a filter to enable consumers to find these products easily.

Figure 10. Nutrition information displayed with product/meal online

	Interpretive	Per 100g/ml**	Per portion	% of reference intake
Burger King	–	●	●	–
Coca-Cola*	●	●	●	–
Costa Coffee	–	●	●	–
Domino's	–	●	●	–
Greggs	●	●	●	–
KFC	–	–	●	–
McDonald's	–	–	●	●
Pizza Hut	–	●	●	–
Restaurant Brands International	–	–	–	–
Yum! Brands	–	–	–	–

● Company displays information online

– No information found

* Coca-Cola does not show interpretive information for all products.

**Showing information per 100g/ml is mandatory for prepacked products, but not for non-prepacked products or meals.

Coca-Cola (parent company of Costa) showed some limited evidence in this space, as Costa products are sold in packs of 12 cans through the Coca-Cola UK website. For these (prepacked) products mandatory nutritional information per 100ml and per serving is displayed below the product image. On this website, traffic-light labelling is displayed only for two of the seven Costa products available.

* Providing nutritional information per portion is essential for customers to understand the nutrition of their food. Providing the information per 100g is useful for researchers who wish to compare across different products and brands.



The website for Costa itself also displays nutritional information per 100ml and per serving of products but does not appear to show traffic-light labelling for any products – most of which are Costa or Marks & Spencer (M&S) branded, as Costa has recently begun stocking a limited range of M&S products. Nutrition information for both Costa and M&S products is provided on the Costa website (per 100g/ml and per serving). For some, but not all, Costa products, nutrition information is displayed next to the product image.* Costa also provides nutrition information for other branded products (sold in outlets) from other manufacturers in a downloadable pdf (such as Pom-Bear crisps and bottled Sprite); however, these other branded products are not displayed on Costa's online menu.

- **Interesting example:** McDonald's is the only company that was found to provide nutritional information as a percentage of daily reference intake (for example, stating the amount of fat in a particular burger as a percentage of daily reference intake for an average adult).

Domino's and Pizza Hut both provide nutritional information per portion/serving. Domino's provides the information per slice, per pizza and per 100g, whilst Pizza Hut displays the information per pizza (with number of slices in each pizza specified). Burger King and KFC provide nutritional information only per portion and do not specify the size of the portion.

Four companies – Costa (for M&S and other branded products only), Domino's, KFC and Pizza Hut – provide nutrition information as a downloadable pdf rather than displaying nutrition information alongside each product when ordering/browsing online. However, pdfs need to be downloaded and searched for the relevant information: providing this information directly next to products and meal bundles is much more accessible for consumers.

Although the nutrition information of individual products is often supplied, that of the whole meal – as bought and consumed – is often not evident or hard to access.

- **Interesting example:** McDonalds UK was the only company found to have an online nutrition calculator that allows nutritional information for the whole meal (including calories, fat, saturated fat, sugar and salt) to be easily calculated.

Yum! Brands also publishes an online nutrition calculator for its US brands, but the same was not found for UK its brands.

Box 19: Nutrition information for prepacked versus non-packed food

It is mandatory in the UK for prepacked food to display back-of-pack nutrition information both on the physical product and online¹⁰⁹ – and as this is a legal requirement, this was not assessed for this Action Research paper. For non-prepacked products, it is not mandatory for nutrition information (other than calorie information) to be provided on any wrapping in which the food is served – and it is not required for this information to be displayed online (this is only mandatory for calorie information). Therefore, this Action Research paper did not assess companies for displaying calorie information but did assess companies for going beyond current regulation and displaying nutritional information for non-prepacked products. (See box 18 for definitions.)

* For information on M&S labelling, see 'M&S – UK Retailer Index 2022 company scorecard' (2021), p. 7 <https://accesstonutrition.org/app/uploads/2022/05/UK-Retailer-Index-scorecard-MS.pdf>



Do OOH food sector businesses provide nutrient (or food component) based filters online?

Having nutrient-based or food-component based filters online allows consumers to find healthy products more easily:

- Burger King's UK website has a filter that allows customers to select individual products with fewer than 500 kcal.
- Costa's website has a filter for allergens and food components (vegan, vegetarian, dairy free, nuts).
- Greggs' website has a sliding filter for calories in which a maximum number of calories can be capped at 1,000 per individual product, with a minimum search of zero calories bringing up herbal tea and water.
- McDonald's website has a calorie-capped meals section, showing main meals for under either 400 or 600 kcal and breakfast options for under 400 kcal.

No nutrient-based filters were found on the websites of Domino's, KFC or Pizza Hut. The remaining three companies (Coca-Cola, RBI and Yum! Brands) were not assessed as they are the parent companies and ordering does not take place through their websites.

Do any OOH food sector businesses have a policy to provide comprehensive nutritional information in-restaurant/in-store?

Comprehensive nutrition information in a restaurant, store or outlet allows consumers to make informed consumption and purchasing decisions. Such information could, for example, be provided in the form of a physical booklet with full nutritional information available in person on request or in the form of a QR code to access full nutrition information, along with assistance to consumers on understanding the full nutritional information of a whole meal.

Domino's, Greggs and McDonalds have a policy in place for some nutritional information to be shown at place of purchase. **However, none of the policies are comprehensive and the companies do not report on the information provided (such as traffic-light labelling, contribution to 5-a-day or full nutrition information):**

- Domino's states in its 2021 Annual Report that it has included a 'simplified version' of the nutritional profile on its printed menu as part of a 'commitment to provide customers with the information they want'.
- The Greggs Pledge Report states 'we've put calorie and nutritional information on the shelf, as well as on our website and mobile app' as well as 'We now have traffic lights on every item in our savoury and sweet lines and are working on our hot "to go" products.' It is unclear whether traffic-light label information is also available on-shelf in Greggs stores.
- McDonald's reports providing nutritional and allergen information for all standard products on trayliners, but the extent of nutrition information provided is not stated.

No relevant information or policy was found for the other seven OOH food sector businesses assessed in this report.

Recommendations

Companies in the OOH food sector are encouraged to improve and accelerate efforts to increase the accessibility of nutrition information in the UK by:



- ensuring that nutritional information (both comprehensive and interpretive) is available in all outlets. Where possible this should be on-shelf or on menus, and should always be available on request;
- displaying nutritional information alongside individual product images online and in apps. This information should include:
 - nutritional information for 100g and per serving/portion for all products (not only pre-packed products) and
 - interpretive colour-coded nutrition information (traffic-light labelling);
- making it easy for customers to work out the full nutrition profile of a whole meal (for example, through providing a nutrition calculator); and
- ensuring websites, own apps and third-party apps have nutrient (or food component)-based filter(s).



Topic 6: Engagement with stakeholders

Companies in the OOH food sector can impact upon customers' access to healthy food through the positions they take on government consultations and regulatory proposals on nutrition. Membership of industry and trade bodies gives businesses an opportunity to influence these bodies, who lobby on their behalf – and there are also opportunities for the sector to engage with wider nutrition stakeholders in support of public health.

This Topic assesses the extent to which OOH food sector businesses report on engagement with stakeholders in the UK. Businesses are assessed on reporting of efforts to engage in responsible lobbying, on their support for third-party initiatives that address the UK's nutrition challenges, and for the extent to which they disclose their membership of industry bodies.

This Topic has three indicators and carries 5% of the weight of this research.

To perform well in this Topic, a company must provide evidence in the public domain of:

- engaging with policymakers responsibly – including publishing all public policy positions and disclosing membership of trade associations that lobby on its behalf and
- taking an active role in initiatives to address the UK's nutrition and obesity challenges.

Context

Transparency around companies' engagement on health policy issues – either directly (through contributing to government consultations) or indirectly (through trade and industry associations) – is essential if stakeholders are to understand where companies position themselves on these issues.

This Topic includes elements of the Responsible Lobbying Framework, which ATNI played a part in developing and which was launched in 2020. The Framework can be used both as a set of globally applicable principles and standards, outlining what responsible lobbying should look like, and can be used as a free evaluation tool of an organisation's lobbying activities. Companies are encouraged to commit to the principles and integrate them into their own lobbying policies, practices, management systems and disclosure.¹¹⁰

In March 2022, The Food Foundation published a joint statement calling on the UK government to deliver on the opportunity provided by the publication of the National Food Strategy¹¹¹ 'by committing to new primary legislation and championing transformational food system change'. Only one of the companies assessed in this report – Greggs – is among the 110 signatories (including civil society organisations, industry, academia, farmers and local authorities) to this statement.

Headline results

Greggs was found to have the highest level of reporting in this Topic, with some information found on all three indicators, and it was the only company found to provide a public list of trade association memberships, although the list is not comprehensive. Four OOH food sector businesses (Costa, KFC, Pizza Hut and Burger King) were found to not be reporting on any of the indicators in this Topic.



All companies can do much more across this Topic to improve transparency of the level of engagement both with policymakers and with other stakeholders.

Detailed findings

Do OOH food sector businesses have lobbying policies and codes of conduct?

Overall, six OOH food sector businesses (Coca-Cola, Domino's, Greggs, McDonald's, RBI and Yum! Brands) were found to have some form of anti-bribery and corruption policy in place and in the public domain. However, the applicability of these policies from the parent companies (Coca-Cola, RBI and Yum! Brands) to their individual brands is not clearly set out (see Appendix 1).

No OOH food sector business was found to have a lobbying policy or 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.

Reporting on lobbying activities was found to be extremely limited. Domino's stated in its 2021 Annual Report that the company 'plays an active role in contributing to and shaping legislation around public health' and that (in relation to the Health and Social Care Bill) it is 'actively engaging with Lords and civil servants to propose a delay to the enforcement timetable, and to request that the brand exemption^{4*} is specifically referenced in the Bill to ensure it cannot be removed in the future without appropriate Parliamentary process.' It is difficult to see how such engagement is consistent with supporting public health beyond the company's own interests, although it is encouraging that the company is transparent about its activity and position on this Bill.

Do OOH food sector businesses disclose UK trade association memberships?

Trade associations perform a range of functions on behalf of their corporate members, including influencing policy through lobbying. It is therefore important that businesses are transparent about their memberships of these organisations, as well as about their level of engagement and the purpose of membership.

All OOH food sector businesses included in this report have been confirmed by the British Retail Consortium (BRC) to ATNI as being its members, but only Burger King and Greggs were found explicitly to state this on their websites.

Greggs was the only company found to disclose a list of trade association memberships in the UK, although it provides only the names of the organisations, not the level of engagement or the membership fee.

Parent companies RBI and Yum! Brands include a list of some global or US-based trade association memberships on their websites, but no information was found on UK-based memberships.

* The Health and Social Care Bill explicitly states that a number of brands will be exempt from the upcoming online and 9pm watershed 'provided the advertising does not include any identifiable less-healthy food and drink products [...] as this falls outside the scope of the restrictions': see DHSC, 'Health and Care Bill: advertising of less healthy food and drink' (2022) <https://www.gov.uk/government/publications/health-and-care-bill-factsheets/health-and-care-bill-advertising-of-less-healthy-food-and-drink>



Do OOH food sector businesses publicly report on participation in initiatives that aim to address the UK's nutrition challenges?

There are several initiatives in the UK with which OOH food sector businesses can be involved to help to address the country's pressing nutrition challenges (see box 7 in the Context chapter above). This area has the lowest rates of reporting in this Topic with **only two retailers (Greggs and McDonald's) reporting publicly on participation in initiatives linked to nutrition.**

Both Greggs and McDonald's are members of the Child Food Poverty Task Force,¹¹² a campaign established by footballer Marcus Rashford during 2020 aiming to end child food poverty.

The OOH Code of Practice is a voluntary code of practice developed in 2019 (see box 4), which states 'We will continue to support industry-wide initiatives, which help promote nutrition and healthier lifestyle awareness among consumers – for example Government and PHE's 400/600/600 calorie healthy-eating guidance, Change4Life and Peas Please'. However, of the four companies assessed in this report who are signatories to this Code, only two provide updates on their websites indicating that they are actively engaging in these initiatives: Greggs has made a Peas Please pledge and McDonalds reports actively working to align with the 400/600/600 guidance (see 'What we eat out' in the Context chapter).

Some OOH food sector businesses are working with food waste charities (Burger King and Costa have adopted WRAP's food waste reduction roadmap,¹¹³ and Domino's and KFC partner with FareShare¹¹⁴) but these are not specifically linked to donating nutritious/healthy food, so are not credited in this report.

Recommendations

Companies in the OOH food sector are encouraged to improve and accelerate efforts to increase transparency of stakeholder engagement in the UK by:

- publishing a clear and comprehensive lobbying policy or code of conduct that aligns with the Responsible Lobbying Framework, in which it commits to:
 - only engaging with government, political parties, policymakers and policymaking bodies in support of measures to improve health and nutrition, consistent with the public interest;
 - only engaging 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;
- publishing a full and comprehensive list of industry and trade association memberships;
- disclosing policy positions on government consultations on issues relating to nutrition or of relevance to the OOH food sector (including linking to its submissions to government consultations from its website); and
- engaging with third-party initiatives that address the UK's nutrition challenges, and fully disclose the extent and impact of involvement, such as progress towards pledges.



Conclusions

This Action Research has clearly illustrated the need for the OOH food sector to provide more structured and comprehensive reporting on all aspects of efforts to help their customers in the UK to eat healthier diets – and identifies the need for greater action. Comparing the results of this research with ATNI's previous work in the UK and globally¹¹⁵ would also suggest that many companies in the OOH food sector are relatively often less engaged in this agenda than are the major players in the food manufacturing and retail sectors.

While some of the companies assessed have begun to report on action they are taking, there is much more that can be done across all the Topic areas: governance, formulation, pricing and marketing of products, labelling and engagement with stakeholders. Greater detail on commitments and targets, and the changes being made to business practices, is needed if all stakeholders who have an interest in improving the diet of the UK population – policymakers, investors, non-governmental organisations, and even customers themselves – are to understand whether the companies fully appreciate the business and societal risks posed by nutrition-related issues.

ATNI recommends not only that companies, but also all parties that influence them – including policymakers, investors, non-governmental organizations and customers – engage with the findings of this research to leverage change in the OOH food sector in the UK.

This Action Research provides an insight into formal reporting and wider communications, as well as providing some indication of the companies' actions in the nutrition space. ATNI appreciates that this report is based only on an assessment of the companies' own public disclosure and, consequently, is likely not to have fully captured all that the companies are doing – but this in itself implies the need for improved transparency.

In the future, ATNI would welcome the opportunity to undertake a full, detailed Index of the OOH food sector, including a larger number of companies, in the UK or globally, which would include confidential, unpublished information (provided under non-disclosure agreement), and would therefore go beyond disclosure to more fully reflect companies' commitments, targets and actions.



Appendix 1: A comparison of parent company and subsidiary brands

As noted in box 9 in the About the Action Research chapter, above, parent companies and subsidiary brands have been assessed separately. This Appendix sets out the differences in reporting in the Topics between Coca-Cola, RBI and Yum! Brands and their brands.

Note that no information was found for Topic 3 (pricing and promotions) so it is not included in this figure.

Figure 11. Parent company and subsidiary brand

Topic	Indicator	Parent	Brand(s)	Comment
Governance	Commitment to nutrition and health ^{5*}	Coca-Cola	Costa	No commitments found.
		RBI	Burger King	RBI and Burger King both provide brief statements, with Burger King's contextualised to the UK.
		Yum! Brands	KFC, Pizza Hut	Yum! Brands and KFC both provide brief commitments, with KFC's also contextualised to the UK.
	Clear target on nutrition ⁶⁺	Coca-Cola	Costa	No target on nutrition found.
		RBI	Burger King	No target on nutrition found.
		Yum! Brands	KFC, Pizza Hut	KFC and Pizza Hut are scored on the strength of Yum! Brands' target. However, that the global target is not clearly rearticulated on both companies' websites remains an important concern: any such target should be specifically articulated in all markets and for all brands, or it will not be possible to assess progress.
Menu healthiness	(Re)formulation commitment	RBI	Burger King	RBI and Burger King both have a commitment focused on negative nutrients.
		Yum! Brands	KFC, Pizza Hut	KFC and Pizza Hut both have commitments focused on negative nutrients. Yum! Brands has only a generic commitment to reformulate menu items (based on its calorie-only criteria).
	Use of NPM	RBI	Burger King	RBI does not disclose use of an NPM.

* Note: An explicit commitment to nutrition within the specific UK context is essential, given the UK government's emphasis on improving nutrition.

+ Note: In this case, a global target by the parent company is sufficient.



				Burger King uses the HFSS system to identify products suitable for marketing to children, but no additional information was found about how it uses these criteria for product (re)formulation. In addition to the FSA 2004/5 NPM, Burger King adheres to RBI's own nutrition criteria for children's meals, which requires meals to have less than 500 kcal, less than 10% of calories from saturated fats, no added trans fats, less than 650mg of sodium, less than 15g of added sugars, and to provide at least two servings of fruits, vegetables, dairy, and/or whole grains.
		Yum! Brands	KFC, Pizza Hut	Yum Brands! has adopted calorie-only global nutrition criteria. Both KFC and Pizza Hut are credited for using these Yum! Brands criteria.
		RBI	Burger King	No requirement for brands to offer healthier menu options. Burger King: examples of offering calorie capped products and bottled water for kids' menus.
	Offering healthier menu options	Yum! Brands	KFC, Pizza Hut	No explicit requirement found for brands to offer healthier menu options but has adopted global nutrition criteria including 'combo/meal menu items being 750 calories or less'. KFC and Pizza Hut both provide calorie-capped meals linked to the Yum! Brands global nutrition criteria and Pizza Hut was found to provide calorie-capped flatbreads.
Responsible marketing	Commitment to adhere to the UK CAP and BCAP Codes	Coca-Cola	Costa	Commitment found for Costa only in the OOH Code of Practice (see box 4), but not for Coca-Cola.
		RBI	Burger King	No commitment found.
		Yum! Brands	KFC, Pizza Hut	No commitment found.
	Responsible marketing and advertising policy	Coca-Cola	Costa	Coca-Cola has a responsible marketing policy that applies to all audiences, including children under the age of 13, but the policy does not include reference to the company's subsidiary brands. No such responsible marketing policy or commitment was found for Costa.
		RBI	Burger King	Burger King in the UK was found to have the most comprehensive responsible marketing policy of the companies.



				RBI's website references Burger King's responsible marketing commitments but does not set out an approach by the parent company. Hence, RBI was not credited for a responsible marketing commitment or policy.
		Yum! Brands	KFC, Pizza Hut	Yum! Brands was found to have a generic commitment to limit its marketing to children under the age of 12, in line with US and international guidelines, for which its subsidiary brands are also credited. KFC and Pizza Hut are scored on the strength of these Yum! Brands responsible marketing commitments.
Labelling ^{7*}	Nutritional information provided online	Coca-Cola	Costa Coffee	Coca-Cola publishes evidence of providing nutritional information online per serving, per 100g and via interpretive labelling (traffic-light labelling). Costa does not appear to provide interpretive nutrition labelling online.
		RBI	Burger King	No information was found for RBI. Burger King reports on providing nutritional information online per 100g/ml and per serving.
		Yum! Brands	KFC, Pizza Hut	No information was found for Yum! Brands. KFC's UK website provides nutritional information by serving size only. Pizza Hut provides online nutritional information per serving and per 100g on its UK website
Engagement ⁺	Anti-corruption or anti-bribery policy	Coca-Cola	Costa Coffee	Coca-Cola has The Coca-Cola Code of Business Conduct but it does not mention Costa and there is no mention of the Code on the Costa website.
		RBI	Burger King	RBI has the Restaurant Brands International, Inc. Whistle Blowing Policy but there is no mention of Burger King and nor is there mention of the policy on the Burger King website.
		Yum! Brands	KFC, Pizza Hut	Yum! Brands has the Yum! Brands Code of Conduct and Anti-Corruption Policy but there is no mention of KFC and Pizza Hut and there is no mention of the code or policy on the KFC or Pizza Hut websites.

* The other two indicators for this Topic are not included in this figure because the parent companies are all n/a for one and no information was found on the other.

+ The other two indicators in this Topic are not included in this figure as no information was found for the parent companies or subsidiary brands.



Appendix 2: Salt, sugar and calorie reduction in the OOH food sector

Salt

The government published sets of voluntary salt reduction targets for the food industry in 2006, 2009, 2011, 2014 and 2020, with the latest (fifth) set to be achieved by 2024, aligning with the timing for the calorie reduction ambitions (see below). The new targets are aligned with the government's ambition to reduce the population salt intake to 7g per day.¹¹⁶

There are 2024 salt reduction targets for both the retail/manufacturer food sectors and, separately, for the OOH food sector (listed, respectively, in table 1 and table 2 of PHE's *Salt Reduction Targets for 2024*). Products used in the OOH food sector should also meet table 1 targets where relevant.¹¹⁷

The table 2 (OOH food sector) targets cover 11 food categories with 24 subcategories (all listed in table 2), based on the 10 most popular food groups purchased in the eating out, takeaway and delivery food sector with the addition of a specific target for children's meals. They fall into two categories:

- dish targets (items that can be served as a meal or on their own): potato products, burger in a bun, battered or breaded chicken portions and pieces, pies, sandwiches and pizza;
- meal targets (based around a specific dish but including sides such as salad or garlic bread): battered or breaded seafood-based meals, pies; sauce-based main dishes, beef steaks, grilled chicken and roast main meals, pasta meals, and children's main meals.¹¹⁸

Some of the recommended maximum levels of salt remain the same in the new targets – for example, seasoned fries remain at 0.88g salt (or 350mg sodium) per serving – but some have been strengthened – for example, pie-based meals have had the maximum level reduced from 4.25g salt (or 1,700mg sodium) to 3.83g salt (or 1,530mg sodium).¹¹⁹

Reporting on these new targets should take place in 2023, 2024 and 2025.

To date, reporting has been only on the reduction targets set in 2014, which were to be achieved by 2017¹²⁰ – and there is clearly some way to go, even with the less stringent targets. The most recent salt-reduction report (for 2017–18) notes:

*'For the eating out of home food sector, 74% of products overall were at or below maximum per serving targets set specifically for the food sector (compared to 70% in 2017). As in 2017, where comparisons between food sectors have been possible, it is clear that greater progress needs to be made by the eating out of home food sector.'*¹²¹

Sugar

In 2016, the UK government announced a voluntary ambition that challenged all food sectors of the food industry – including the OOH food sector – to reduce sugar by 20% by 2020 in the categories of food that contribute most to children's diets.

Data limitations mean that it is not possible to link purchases and nutrition data in the OOH food sector as accurately as for retailers and manufacturer-branded products, and the baseline is set at a later year for this food sector (2017), as data for 2015 was not available.



The categories assessed are the same as for the retail and manufacturer food sectors, namely: biscuits, breakfast cereals, cakes, chocolate confectionery, ice cream / lollies / sorbets, morning goods, puddings, sweet confectionery, sweet spreads and sauces and yoghurts / fromage frais.

The most recent report on progress was published in October 2020.¹²² It showed that between 2015 and 2019 there was very little change in simple average sugar content (from 24.6g per 100g to 24.5g per 100g) for the OOH food sector specifically, with the largest decreases being 17.1% for breakfast cereals, 6.8% for cakes and 3.9% for biscuits.¹²³

A chart showing the changes in simple average total sugar per 100g is presented, with data for three companies that are included in the current Action Research: Costa Coffee (a reduction of 10.1%), Greggs (a reduction of 8.1%) and McDonald's (an increase of 2.2%).¹²⁴ A particular challenge in the OOH food sector, however, is that portion size is generally around twice the size of equivalent products sold by retailers.

Some estimations are also made as to the changes in sugar content of soft drinks subject to the Soft Drinks Industry Levy (SDIL) in the OOH food sector – although with a proviso to treat comparisons with caution as different products are analysed each year. The estimate suggests that the simple average total sugar content fell from 5.8g per 100ml to 3.6g per 100ml, a fall of 38.5%.¹²⁵ It should be noted, however, that reducing sugar levels in drinks is generally much easier than it is for food products as it largely contributes to taste only and easy-to-use alternative ingredients are available.

Juice and milk-based drinks (which were not included in the SDIL) are also included in the sugar reduction programme, with ambitions and guidelines published in 2018¹²⁶ and with data on progress publishing in 2020.¹²⁷ Reductions in milk-based drinks will be reviewed after the last set of data on progress is published: if not enough has been achieved, they may be brought into the SDIL.

The final report on progress on sugar reduction was due to publish in 2021. In April 2022, a group of 40 health organisations, academics and food groups wrote to the health secretary to request that it be published without delay.¹²⁸ However, at the time of writing (October 2022), it is still forthcoming.

Calorie reduction

There are two parts to the government's voluntary calorie reduction programme.

1. Calorie reduction of categories of food within the sugar reduction programme

The sugar reduction programme set calorie reduction guidelines for single serve products in all the same categories (as listed above) for both the retail and OOH food sectors – for example, a maximum of 175kcal for yoghurts. The maximums are the same for the two food sectors except for puddings, which were set at 450kcal for at-home consumption and 550kcal for the OOH food sector,¹²⁹ which acknowledges that in many cases puddings eaten out of home are served with additions such as ice cream.

The 2020 sugar reduction report provided some comparisons between calories for products likely to be consumed on a single occasion for retailers/manufacturer-branded products versus products from the OOH food sector. In all categories other than chocolate confectionery, significantly more calories are consumed in the OOH food sector.¹³⁰

A chart showing the changes in calories for products likely to be consumed on a single occasion is also presented, with data for five of the companies included in the current report: Burger King (a reduction of 27.4%), Costa Coffee (a reduction of 16%), Greggs (a reduction of 4.8%), KFC (a reduction of 4.7%) and McDonald's (a reduction of 15.4%).¹³¹



As with the sugar content, data is also presented on the changes in average calorie content for soft drink products subject to the SDIL, likely to be consumed on a single occasion in the OOH food sector, falling from 95kcal to 59kcal.¹³²

However, the sugar reduction report makes clear that 'the simple average calories per single serve remains higher than for retailers and manufacturer branded products across all categories, apart from chocolate confectionary'.¹³³ This remains the case, despite the fact that OOH food sector businesses have made larger reductions to the calorie content of single-serve products that are included in the sugar reduction programme than they have for sugar levels. Overall, there was a reduction in average calories per portion from 394 kcal in 2017 to 355 kcal in 2019, a decrease of 9.7%. The largest decreases were seen in ice creams/lollies/sorbets (down 17.6%), cakes (down 11.5%) and puddings (down 9.1%).¹³⁴

As noted above, the final report for the foods included in the sugar reduction programme that was due in 2021, which would update on recent progress, has not yet been published.

2. Calorie reduction programme

This is the most recent voluntary ambition set by the government, for the food industry, including the OOH food sector, 'to achieve a 20% reduction in calories by 2024 in product categories that contribute substantially to children's calorie intakes (up to the age of 18 years) and where there is scope for substantial reformulation and/or portion size reduction'. There is also a maximum guideline for products likely to be consumed in a single occasion (calories per portion) across all categories. Categories covered include 'ready meals, pizzas, meat products, savoury snack products, sauces and dressings, prepared sandwiches, composite salads and other "on the go" foods including meal deals'.¹³⁵ All products included in the calorie reduction programme are different to those included in the sugar reduction programme.

This is estimated to have the potential to deliver very significant benefits:

*'The health and economic benefits of reducing the calorie content of these foods and excess calorie consumption are significant. A 20% reduction in calories from everyday foods that contribute to intakes, if achieved over 5 years, would prevent 35,370 premature deaths, save the NHS £4.5 billion healthcare costs and save social care costs of around £4.48 billion, over a 25-year period.'*¹³⁶

A 20% reduction in calories is largely being sought in the OOH food sector because the average calorie level is so much higher than for the retail/manufacturer branded products (where a lower reduction of 5–10% is sought). Guidelines are available for both the maximum calories per portion and as simple average for the OOH food sector, which allows companies to provide a range of products in their portfolio across a range of calorie levels. It also recognises that the OOH food sector often offers food as a complete meal rather than as individual products.

Portion size is particularly important in the OOH food sector, as there has been a significant increase in portion size in recent decades and there is also a substantial difference in portion size offered in OOH settings and the same products offered by retailers. However, it is clear that, in many cases, even a 20% reduction will not bring many food offerings below the calorie levels recommended by the government's



One You campaign,* that set out a healthy eating guide of 600kcal for lunch and dinner.¹³⁷ **A report on progress is due to be published in mid-2023.**

* The One You campaign was aimed at adults, particularly those in middle age, 'to take control of their health to enjoy significant benefits now, and in later life' – but it has not continued: PHE, 'PHE launches One You' (press release, 7 March 2016) <https://www.gov.uk/government/news/phe-launches-one-you>



Appendix 3: Methodology

Topic 1: Governance

Indicator	Description	Answer options per indicator	
1	Does the company clearly articulate a commitment to grow through improving nutrition and health for all in the UK in its business strategy? (Select applicable answer option)	Yes, a clearly articulated commitment to grow through improving nutrition and health	10
		Yes, a generic commitment to health	5
		No/no information found	0
2	Does the company have a clear and timebound target to increase sales or number of products/meals in its portfolio that are healthy/healthier relative to overall sales/portfolio? (Select applicable answer option)	Yes, a clear and timebound target based on a government-endorsed definition of healthy	10
		Yes, clear and timebound based on company's own definition of healthy	5
		Yes, a target that is not clear and timebound	2.5
		No/no information found	0

Topic 2: Menu healthiness

Indicator	Description	Answer options per indicator	
3	Does the company have a commitment to (re)formulate products? (Tick all that apply)	Commitment to (re)formulate both positive food components (fruit, vegetables, nuts, legumes and whole grains) and specific nutrients of concern (salt, saturated fats, trans fats, added sugar and calories) in menu items	10
		Commitment to (re)formulate EITHER specific nutrients of concern OR positive food components in menu items	5
		Generic commitment to reformulate menu items	2.5
		No/no information found	0
4	Does the company use a nutrient profiling model to determine product healthiness? (Select applicable answer option)	Yes, clearly stated	10
		Other criteria	5
		No/no information found	0



5	Does the company offer: (Tick all that apply)	At least one calorie-capped meal	2
		At least one calorie-capped distinct product (excluding 'zero' soft drinks)	2
		A healthier side option (e.g. fruit salad, salad) in meal deals	2
		A healthier product version as the primary option (e.g. zero sugar/zero calorie drinks for soft drinks, skimmed milk as the default for coffees etc.)	2
		A healthier product version (e.g. a healthier pizza / healthier burger etc.)?	2
		No/no information found	0

Topic 3: Pricing and promotions

Indicator	Description	Answer options per indicator	
6	Does the company commit not to use price promotions to encourage consumers to purchase larger portion sizes of less healthy products or meals? (Select applicable answer option)	Yes	10
		No/no information found	0
7	Does the company make a commitment to address the price and affordability of its healthy/ier products relative to its unhealthy/less healthy products (according to own definition of healthy) (Select applicable answer option)	Yes	10
		No/no information found	0

Topic 4: Responsible marketing



Indicator	Description	Answer options per indicator	
8	Does the company commit to adhere to the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP) or The UK Code of Broadcast Advertising (BCAP)? (Select applicable answer option)	Yes, both	10
		Either CAP code or BCAP code	5
		No/no information found	0
9	Does the company have a responsible marketing and advertising policy which applies to all audiences, specifically including children up to the age of 18? (Select applicable answer option)	Yes, a policy that applies to all audiences, specifically including children up to the age of 18	10
		Yes, a policy that applies to all audiences, specifically including children up to an age lower than 18	5
		Yes, but a policy that is not clearly articulated and/or a policy with no specific reference to children	2.5
		No/no information found	0

Topic 5: Accessibility of nutrition information and labelling

Indicator	Description	Answer options per indicator	
10	Does the company provide nutritional information for 100g of product/ per serving as well as interpretive nutritional information online? (Select applicable answer option)	Yes, at least three of the following four options: per 100g, per portion, % of reference intake and interpretive nutritional information	10
		Yes, only two (e.g. per 100gr and interpretive)	5
		Yes, only one (e.g. only per serving)	2.5
		No/no information found	0
11*	Does the company have at least one nutrient (or food component)-based filter on their website? (Select applicable answer option)	Yes, more than one filter	10
		Yes, one filter	5
		No/no information found	0
12	Does the company have a policy that it will provide comprehensive	Yes, policy for comprehensive nutritional information	10

* This indicator was made non-applicable for the parent companies as they do not all sell the full portfolio of products for each individual brand on their websites.



	nutrition information (e.g. a booklet with full nutritional information available in store on request, information about contribution to 5-a-day, total calories per products/bundles purchased) in-restaurant/in-store? (Select applicable answer option)	Yes, policy for some (not comprehensive) nutritional information	5
		No/no information found	0

Topic 6: Engagement with stakeholders and policymakers

Indicator	Description	Answer options per indicator	
13	Does the company have a lobbying policy or code of conduct in which the company commits to: (Tick all that apply)	Engage with governments, political parties, policymakers and policymaking bodies only in support of measures to improve health and nutrition, consistent with the public interest	5
		Prevent bribery and corruption in its relations with public officials, including the offering and receiving of gifts, hospitality or other financial and in-kind incentives	5
		No/no information found	0
14	Does the company disclose the following? (Tick all that apply)	List of membership of UK trade associations	5
		Public policy positions (in full) on UK government consultations	5
		No/no information found	0
15	Does the company participate in initiatives that aim to address the UK's nutrition challenges? (Tick all that apply)	Peas Please	2.5
		Food-waste initiative linked to healthy food	2.5
		PHE's 400/600/600 campaign	2.5
		Other philanthropic initiative(s) (linked to nutrition)	2.5
		No/no information found	0



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