

General Mills, Inc.

Product categories assessed

Breakfast Cereals|Dairy|Ready Meals|Soup|Sweet Biscuits, Snack Bars and Fruit Snacks

Percentage of company US sales covered by Product Profile assessment
80-90%

Headquarters
Minneapolis, Minnesota, US

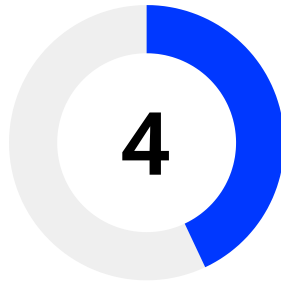
Number of US employees
~15,000

Type of ownership
Public

Sales revenue (range) of packaged foods and beverages
USD 8-12 Billion

US share in global packaged food and beverage sales
59-64%

Euromonitor International Limited [2021]
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Rank 4 / Score 4.3
Rank 6 (2018)



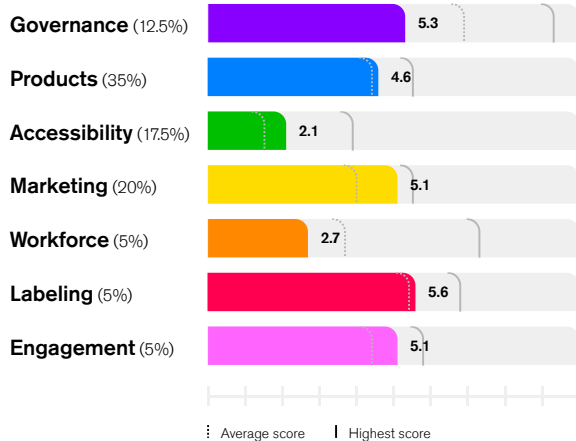
Product Profile ⓘ¹

Rank 3 / HSR 2.6 ⓘ²
Rank 3 (2018) ⓘ³

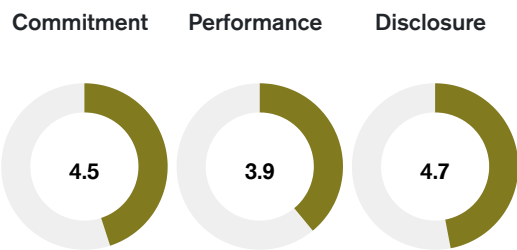
Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Scoring Overview



(%) Figure in brackets is the weighting of the category
All category and criteria scores are out of 10



The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

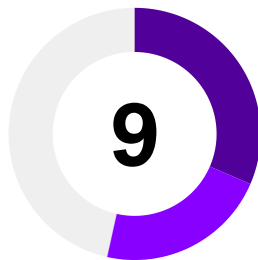
Categories

The US Index 2022 assesses companies' nutrition-related commitments and policies, practices and disclosure across seven categories. A product profiling exercise, assessing the healthiness of companies' product portfolios using the Health Star Rating model is also part of the Corporate Profile.



Governance

12.5% of overall score



Rank 9 / Score 5.3

Rank 6 (2018)

Highest score 9.3

Average score 6.9

A1 Nutrition strategy

A2 Nutrition management

- General Mills commits to producing more 'Nutrition-Forward' foods, which is the framework of nutrition metrics as defined by the company. The company's 'Accelerate Business Strategy' calls for growing sales across key categories, many of which are Nutrition-Forward foods. In addition, the company commits to providing a diverse portfolio of products that contribute to the wellbeing of consumers and meet a variety of needs, including nutrient density, affordability, and accessibility, offering lower calorie options and portion control, and scientific communication on maintaining healthy weight.
- General Mills publicly discloses that senior executives in the company are accountable for product nutrition. The Bell Institute of Health and Nutrition reports to the senior executive, who approves the overall health and wellness strategy and updates the responsible board committee, which ultimately approves the nutrition strategy. General Mills is one of five companies in the Index that conducts annual management reviews and audits of its nutrition plan.

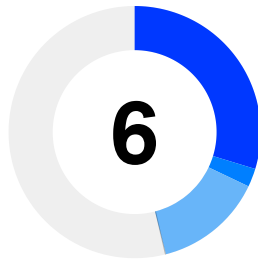
Areas of improvement

- While General Mills commits to "improving the variety, nutrient density, affordability, and accessibility" of its products and "enabling access to affordable, nutrient-dense foods," this approach translates to formulating products to qualify for federal nutrition assistance programs, such as WIC and NSLP, where the company's products are made available to low-income beneficiaries. General Mills is encouraged to include a focus on addressing the needs of priority populations in its commercial strategy (beyond creating and formulating products that meet the requirements of government assistance programs), including products targeting health concerns faced by these communities as defined by public authorities such as the United States Department of Agriculture (USDA).
- General Mills is advised to link executive compensation to performance on nutrition objectives and disclose this arrangement publicly.



Products

35% of overall score



Rank 6 / Score 4.6

Rank 6 (2018)

Highest score 5.5

Average score 4.4

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

▪ In 2019, the company updated its nutrient profiling model (NPM) and established the Nutrition-Forward Foods framework. A product can be considered Nutrition-Forward if it meets one of the following two criteria per serving: a) provides at least 8g of wholegrain; provides half a serving of low-fat or non-fat dairy per regional definition; provides half a serving of fruits, vegetables, or nuts/seeds; or b) meets US FDA Healthy criteria. In FY2021, 47% of General Mills US volume met the Nutrition-Forward criteria. Disclosing US-specific progress is a positive development. However, products with unhealthy levels of sugar and salt, for example, can still be compliant under the Nutrition-Forward Foods (as long as it provides at least 8g of wholegrain; provides half a serving of low-fat or non-fat dairy per regional definition; provides half a serving of fruits, vegetables, or nuts/seeds).

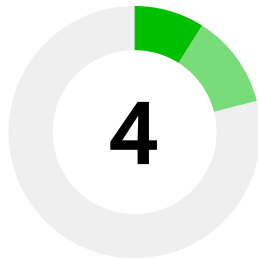
Areas of improvement

- General Mills is strongly encouraged to apply stringent thresholds for nutrients of concern (e.g. sugar, salt, fat) to criterion a) of its 'Nutrition-Forward Foods' criteria, since high consumption of these nutrients can exacerbate public health outcomes. Ideally, the company would apply a single approach to defining products as 'Nutrition-Forward Foods', such as compliance with the FDA Healthy Criteria.
- When the FDA releases its new definition of 'healthy', ATNI expects that General Mills will align their internal nutrition criteria against these new standards. General Mills could consider reporting progress and setting targets in relation to the FDA Healthy Criteria for all products: this independent metric would help other stakeholders compare and evaluate progress over time.
- In addition, the company has not yet set a quantitative target (with baseline and target year) to increase sales of healthier products. The company is encouraged to do this and report on US-specific progress annually. In addition, the company has not defined concrete targets to reduce levels of saturated fat, sugar, and sodium in its products.
- General Mills participates in the Smart Snacks in School program and has over 80 items eligible to be sold in schools – with several of these products also available in the retail settings. The company is encouraged to commit and provide evidence that all Smart Snacks in School products sold in retail settings are formulated with the same standards as in schools. General Mills is encouraged to continuously review its portfolio intended for children and reformulate less healthy products following (inter)national guidelines for healthy products reformulation.



Accessibility

17.5% of overall score



Rank 4 / Score 2.1

Rank 4 (2018)

Highest score 3.9

Average score 1.5

C1 Product pricing

C2 Product distribution

- General Mills commits to “improving the variety, nutrient density, affordability, and accessibility” of its products and “enabling access to affordable, nutrient-dense foods.” Its main approach in this regard is to formulate products to qualify for federal nutrition assistance programs such as WIC, the Child and Adult Care Food Program (CACFP), the School Breakfast Program (SBP), and the National School Lunch Program (NSLP). The company’s products are then made available to low-income beneficiaries through government intervention.
- General Mills also emphasizes the affordability of its own ready-to-eat cereals, which, according to the company, all meet its internal definition of ‘healthy’ (as ‘Nutrition-Forward Foods’), and are available in both economy- and value-bag formats. In addition, it has also developed temporary promotional deals for the joint purchase of its cereals with the company’s Yoplait yoghurts and Chiquita bananas, to facilitate the consumption of ‘balanced breakfasts’ at \$1 per serving.
- However, ATNI notes that General Mills’ ‘Nutrition-Forward’ criteria enable products without thresholds on negative nutrients, such as added sugar and sodium, to be classified as ‘healthy’ by the company’s definition. As such, it is difficult to distinguish whether the company is making such products, as affordable as products with lower amounts of negative nutrients.
- General Mills also has a commitment to address inequitable food access through its philanthropy. In the US, this involves making considerable in-kind donations, working with Food Research and Action Center (FRAC) to provide school meals and No Kid Hungry for summer meals, as well as donating meals to Feeding America during the pandemic and diverting food loss and waste to food banks. However, the company does not have a policy in place to limit the donation of unhealthy products and prioritize donations of healthy products, nor does it track the nutritional profile of its product donations.

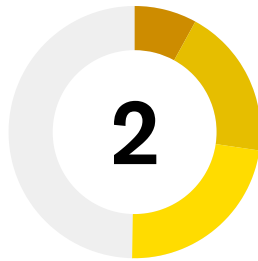
Areas of improvement

- General Mills is strongly encouraged to develop an affordability strategy specifically for the 'Nutrition-Forward' products that meet the FDA Healthy Criteria only, or to consider revising the second 'Nutrition-Forward' criterion to ensure that only products with a threshold on negative nutrients qualify. Products with unhealthy levels of added sugar and salt, for example, should not be promoted as an affordable nutritious food.
- For 'Nutrition-Forward' products with an upper threshold on negative nutrients, General Mills is encouraged to track the relative prices (per serving) of these products and develop targets to improve the price differential between them. It could also work with retailers and distributors to ensure that its healthy products are offered at an affordable price at point-of-sale and are adequately distributed in low-income neighborhoods. In doing so, the company can reach a wider number of consumers than only those that qualify for federal nutrition assistance programs, and therefore have greater and more systemic impact.
- Especially given that philanthropic food donations are core to General Mills' approach to addressing inequitable food access, it is important that the company develops a policy to ensure its product donations are made responsibly, consisting predominantly of nutritious products, so that they do not unintentionally exacerbate public health issues. For example, it could commit to responsible donation guidelines, such as the Healthy Eating Research (HER) Nutrition Guidelines. In addition, it is recommended to track the nutritional profile of its product donations for philanthropic programs.



Marketing

20% of overall score



Rank 2 / Score 5.1

Rank 8 (2018)

Highest score 5.5

Average score 4

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

- General Mills reports its compliance levels for TV and digital marketing to children, as assessed by the Children's Food and Beverage Advertising Initiative (CFBAI), in its General Mills' 2021 Responsibility Report. Furthermore, it has a well-structured response mechanism to ensure corrective measures are taken regarding any non-compliance with its marketing policy.
- The extensive marketing policy for children of General Mills commits to no marketing or advertising in secondary schools and to only market or advertise 'healthy' products in (or near) other settings where children gather in consultation with their management and users. General Mills distinguishes their commitments applicable to child (under 13) and teen (13-17) audiences. General Mills is the only company awarded age multiplier u18 for extending its commitment to all media relevant to the school environment, including educational websites and games. It also includes in its commitments not to provide any branded educational and other materials to be used in schools, other than in agreement with schools/parents.
- General Mills is one of two companies that has an extensive mechanism in place to ensure that its digital marketing does not reach younger age groups (together with Mars). General Mills has various techniques in place to achieve this, such as creative designing (so adverts primarily appeal to older audiences), using age-screening techniques, and reviewing available audience data.

Areas of improvement

- No information on auditing the compliance of marketing for the general audience was found on General Mills' website. It is therefore recommended to ensure annual independent external auditing of the company's compliance with its general marketing policy applicable to the US, covering all media specified in the policy.
- General Mills is encouraged to commit to increasing the proportion of marketing spending on healthy products relative to overall marketing spending, and publish a commentary outlining the changes to the company's marketing spending in support of healthier eating.



Workforce

5% of overall score



Rank 6 / Score 2.7

Rank 6 (2018)

Highest score 7.3

Average score 3.7

E1 Employee health

E2 Breastfeeding support

- General Mills makes a commitment to support employee health with a focus on nutrition through its My Wellbeing program in the US.
- General Mills formally commits to granting paid parental leave to employees. Maternity leave offered is 18-20 weeks, and parental leave offered to fathers, partners, and adoptive parents is 12 weeks.

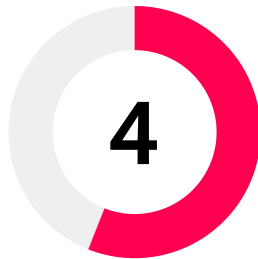
Areas of improvement

- General Mills should ensure its My Wellbeing program includes expected outcomes (such as healthy behavior, health-related, or employee absenteeism outcomes).
- General Mills should also consider for its workforce nutrition program:
 - 1) A commitment to making the program available to all employees and all family members;
 - 2) Including nutrition education and nutrition-focused health checks;
 - 3) Disclosing the percentage of employees that participate in the program.
- General Mills is encouraged to evaluate the health impact of its workforce nutrition program in the US, regulated by a third-party independent evaluator. The company is further encouraged to disclose quantitative and qualitative information of the outcomes of the program.
- General Mills could commit to improve the health and nutrition of groups across the food value chains it is involved in, that are not directly employed by the company (supply chain partners in the US and abroad), through programs focused on nutrition.
- General Mills is encouraged to extend its current paid parental leave policies to ideally six months or more.
- General Mills states that it complies with the Minnesota breastfeeding law across its twin city locations. General Mills is encouraged to publish a US policy on supporting breastfeeding mothers at work and supporting to maternal health, which applies equally in all facilities. The policy should cover the following arrangements: 1) provide private, hygienic, safe rooms for expressing breastmilk (including refrigerators); 2) allow breastfeeding mothers breaks to express breastmilk; and 3) offer flexible working arrangements to support breastfeeding mothers.



Labeling

5% of overall score



Rank 4 / Score 5.6

Rank 1 (2018)

Highest score 6.8

Average score 5.4

 Product labeling

- General Mills uses the Facts up Front (FuF) labeling icons to display front-of-pack (FOP) information for the majority of its US products. This label shows calories, saturated fat, sodium, and total sugar contained in each serving of a food or beverage product.
- General Mills displays online nutrition for all products in its US portfolio via SmartLabel.

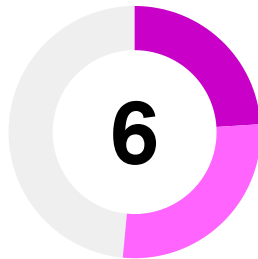
Areas of improvement

- General Mills is advised to adopt an interpretive FOP labeling system and apply this to all products in its portfolio.
- General Mills is encouraged to further track the percentage of its portfolio that is compliant with its approach to FOP labelling and publicly report on this. Currently, the company states that the majority of its US products carry FOP labels.
- General Mills is encouraged to use an externally recognized NPM to underpin FOP labeling information in the US. General Mills currently uses the FuF labeling system, which pulls nutrient information from the Nutrition Facts Panel. However, this does not tell consumers what products the company considers healthier and the criteria used for that purpose.
- General Mills could provide the percentage of wholegrain relative to all grain or refined grains on all relevant products, to assist consumers in making informed decisions on the healthiness of products. The company currently displays wholegrain first in the ingredients list, but for consumers to easily decipher the ratio of wholegrain to refined grains in a product, either the quantity of both grains or the percentage of wholegrains is needed on the product label.
- General Mills displays the amount of fruit and/or vegetables on some product labels, but the company could ensure this information is displayed on all relevant products.
- General Mills offers a 'special diet' filter option on its online product website (Progresso), which includes a filter for 'reduced sodium' products. General Mills could provide an online healthy filter that is aligned with FOP information and/or ensure at least three nutrient-based filters are available on its online product website, e.g., 'high in fiber' and 'low in sugar'.



Engagement

5% of overall score



Rank 6 / Score 5.1

Rank 6 (2018)

Highest score 5.8

Average score 4.4

- G1** Influencing policymakers
- G2** Stakeholder engagement

- The Public Responsibility Committee of the Board of Directors oversees General Mills' political activities, including its policy, disclosure of corporate political contributions, trade association memberships, and independent political expenditures. The company also audits (internally) its compliance with its Civic Policy and lobbying disclosures.
- On its website, General Mills describes some of its lobbying activities relating to addressing malnutrition in the US, including supporting flexibilities in USDA food and nutrition programs to ensure full benefit access to WIC, School Lunch, Breakfast, and SNAP during the COVID-19 pandemic. It also publishes its formal comments on the FDA's Voluntary Short Term Sodium Targets, the FDA's definition of 'healthy', and the Dietary Guidelines for Americans, which is a leading practice for transparency among companies assessed.
- However, the company provides no examples of lobbying in support of World Health Organization (WHO)-endorsed government policies to address malnutrition (including obesity and diet-related non-communicable diseases (NCDs)) in the US, at a federal, state, or local level; nor does the company publish its position on these policies.
- General Mills publishes a limited list of trade association memberships, only disclosing those to which its membership dues used specifically for lobbying are over \$25,000. For the associations it discloses, it now discloses the specific amount of dues used for lobbying purposes, an improvement on previous years. General Mills also publishes a link to the Lobbying Disclosure Act website on its domain, and is one of few companies to disclose which states it is registered as a lobbying entity (Minnesota and California).
- General Mills publishes about its political contributions from the company treasury, having made no such contributions in the last two years. The company also discloses that it has an employee-run Political Action Committee (PAC), the General Mills Political Action Committee (G-PAC), and publishes a link to its FEC filings, but does not publish details about its expenditures directly on its domain.
- General Mills has a Health and Wellness Advisory Council consisting of external experts from academia and research institutes, who provide input on the company's strategies, policies, and research programs. In addition, the company actively engages with a range of stakeholders through the Obesity Round Table and Portion Balance Coalition on addressing obesity, and is also involved in the Tufts University Food and Nutrition Innovation Council and University of Illinois' Personalized Nutrition Initiative. It also has the General Mills' nutrition strategy and approach at the American Heart Association (AHA)'s Foodscape Summit.

Areas of improvement

- General Mills is recommended to enhance and publish about its processes to review and manage relationships with its trade associations. It is also encouraged to disclose a more comprehensive list of its memberships – reducing the threshold for disclosure to \$10,000 in total membership dues, for example – and to indicate which, if any, it holds Board seats on.
- General Mills is strongly encouraged to actively support (or commit to not lobby against) key WHO-endorsed public policy measures to address obesity and diet-related NCDs – such as fiscal measures to address obesity, regulatory restrictions on marketing/advertising unhealthy products (to children), or increased FOP labelling requirements, whether at federal, state, or local level, where such proposals arise. General Mills is also encouraged to significantly improve its disclosure regarding its lobbying positions on these key public health policies. These positions should be as specific and unambiguous as possible.
- General Mills could also be more transparent on its own domain about its lobbying expenditures and activities, including publishing the names of its lobbyists/lobbying firms.
- General Mills is encouraged to continue engaging with external stakeholders with expertise in nutrition and public health to further improve its nutrition strategies and policies. This should include targeted one-to-one meetings to solicit feedback and gather insights to ensure these are sufficiently aligned with the public health interest.
- General Mills is encouraged to improve its transparency regarding the identities of experts it consults and organizations it engages with on nutrition-related topics, as well as the degree of financial compensation for these engagements. Importantly, the company should also be clear about the purpose and outcomes of the engagements, and how they were used to change its nutrition-related practices or plans.

Product Profile ^{i 4}



3

Rank 3/11 / Score 2.6/5

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. The underlying nutrient profile model assesses nutrients of concern (sodium, total sugar, saturated fat, and overall energy) and positive food components/ nutrients (fruit and vegetable content, protein, fiber, and, in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthier. Product Profile results account for 20% of the total Index score.

Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	Products meeting the 'healthy' threshold (HSR of (3.5 stars or more))			Range of total 2021 US sales covered ^{i 5}
	Total no. products assessed	% of distinct healthier products	% sales from healthier products*	
2.6	1540	26%	27%	80-90%

ATNI estimates this value by taking the proportion of 'healthy' products within each category assessed and multiplying that figure by the corresponding category US retail sales-values in 2021. The values are then aggregated to generate an estimate of the overall US healthy sales.

- General Mills' average sales-weighted HSR is 2.6 (stars) out of 5 (2.3 unweighted), ranking third out of the 11 companies assessed in the Product Profile. A total of 1540 products across the company's five best-selling product categories were assessed using the HSR system.
- 26% of distinct products analyzed for General Mills met the 'healthy' threshold (3.5 stars or more in the HSR). When taking category sales values into account, the company was estimated to derive 27% of its 2021 U.S. retail sales from 'healthy' products. General Mills is encouraged to improve the product mix and increase its marketing efforts to derive more of its sales from healthier products.

Mean Health Star Rating by category for General Mills, Inc.

	No. of products assessed	Mean HSR
Baked Goods	456	1.2
Breakfast Cereals	181	2.6
Dairy	343	3.9
Ready Meals	129	2.2
Sweet Biscuits, Snack Bars and Fruit Snacks	431	2.3

▪ Among categories assessed, General Mill's Dairy category (Yoplait and Oui brands among others) had the highest mean HSR (3.9 out of 5), followed by the Breakfast Cereals category (2.6 out of 5). A total of 343 products from the Dairy category were analyzed and 277 of them (or 81%) met the 'healthy' threshold, indicating that on average the company sells a wide variety of dairy products low in fat and added sugar in the U.S. A total of 181 Breakfast Cereal (Cheerios, Lucky Charms among others) products were analyzed, but only 36 of them (or 20%) met the 'healthy' threshold. The company's lowest scoring category was Baked Goods (including Betty Crocker and Pillsbury brands), with one of the 456 products assessed meeting the 'healthy' threshold. These results illustrate General Mills should accelerate its efforts to reduce high levels of added sugar, saturated fat and calories in its products and change the product mix to derive more sales from healthier products.

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Footnotes

1. The Product Profile corresponds to criterion B1, assessing the nutritional quality of companies' portfolios, relative product quality within categories compared to peers and changes in portfolio healthiness over time.
2. The current Product Profile score accounts for 20% of the total Index score. It corresponds to criterion B1 of the Index.
3. In the US Index 2018, the Product Profile Assessment was conducted as a separate assessment. The results were based on scores generated by applying the Health Star Rating (HSR) nutrient profiling system, which analyzes the level of several positive nutrients (e.g. fruits, vegetables and fibers) and several negative nutrients (e.g. salt, sugar and saturated fat) in products.
4. The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. The underlying nutrient profile model assesses nutrients of concern (sodium, total sugar, saturated fat, and overall energy) and positive food components/ nutrients (fruit and vegetable content, protein, fiber, and, in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthier. Product Profile results account for 20% of the total Index score.
5. Retail sales data derived from Euromonitor International.

