



Which?

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Consumer Report

December 2012

A taste for change?

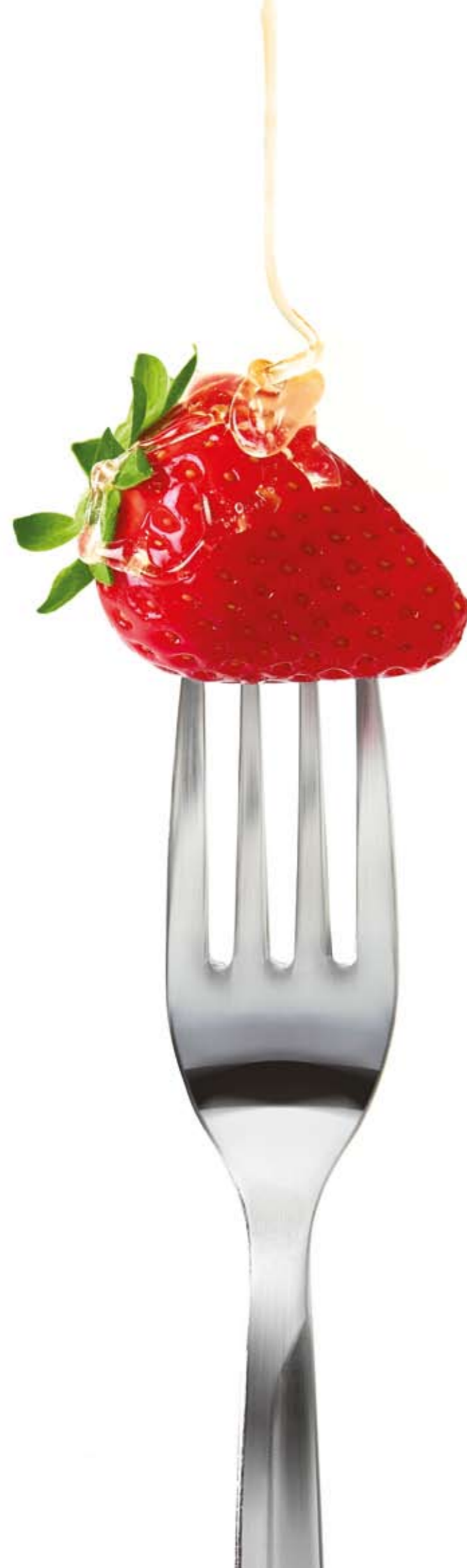
Food companies assessed for action to enable healthier choices

Which?

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Around a quarter of people in the UK are now obese and diet-related diseases, such as cancers, heart disease and stroke are the major killers. It is estimated that excess weight is costing the NHS more than £5 billion every year¹

Which? research* shows that most people are interested in eating healthily, know what makes up a healthy diet, but have difficulty putting it into practice. A range of factors from inconsistent labelling to the cost of healthier choices generally make it easier to opt for less healthy food options instead. Successive government initiatives have tried to push companies to take more action with varying degrees of success. The most recent initiative, the Public Health Responsibility Deal, encourages companies to sign up to voluntary pledges to take action to improve health. When it was launched in 2011, the Government stated that it would deliver faster and better results than could be achieved through a regulatory route. But a Which? survey in February 2012 found that only 39 per cent of people thought that supermarkets were taking enough action to help - and just 20 per cent thought this was the case with food manufacturers.

Company responses to the crisis have been varied. While some have a long-standing commitment to diet and health issues, others have taken longer to recognise that they have to be more responsible.

A Which? assessment in March 2012 concluded that the Responsibility Deal was too limited and issued a call for urgent action by the Government and food industry on a wider range of issues. This report assesses how far the leading companies have moved to deliver positive changes for consumers and sets out a series of recommendations to government and industry to ensure that the action taken is more comprehensive.

Our assessment:

The response from the food industry is key to tackling the public health challenges facing the UK. In our research we looked at 20 leading food manufacturers and retailers to assess the steps they have taken to deliver positive changes that will benefit consumers and make healthy choices easier in the following areas:

- Overall commitment within the company to take action.
- Improvements made to salt levels in foods.
- Action to lower saturated fat, sugar and calorie content.
- Removal of trans fatty acids.
- Clear, prominent nutrition labelling.
- A balance of healthier choices in price promotions.
- Responsible advertising and claims.
- Responsible marketing practices to children.

We analysed each company's performance in these areas, some of which are currently outside the Responsibility Deal. We found that although some examples of good practice exist, on the whole consumers are being let down by an inconsistent approach. Some companies have made good progress on one or



two issues, but less in others. And very few have made good progress on all the areas we looked at.

Overall, The Co-operative leads the way among the retailers, demonstrating a high level of commitment to change having introduced the best front of pack labelling scheme several years ago and by recognising the power of price promotions to encourage healthier choices. In contrast, Iceland has taken a much more limited approach, failing to commit to salt targets and work on calorie reduction. It is also the only retailer to provide no nutrition information on front of pack – although it has recently committed to include traffic light labelling during 2013.

Manufacturers have generally been less pro-active than retailers with none of the companies we looked at yet committed to providing traffic light labelling on front of pack. No company consistently comes out as best or worst across all of the areas, but PepsiCo stands out for scoring highly on corporate commitment and one of the companies taking more action on salt and saturated fat and sugar reductions.

Main findings and recommendations

Overall commitment to change

There is great variation across the industry - while some companies have built a series of specific health targets into their business plans, others have made vague statements and some emphasise the importance of physical activity, rather than focusing on changes to products and the way they are promoted.

Reducing salt

Small changes in products have removed tonnes of salt from the nation's diet and a Department of Health 2011 survey showed this has translated into clear clinical evidence of a fall in how much salt people are eating³. But some companies are making much more progress than others. More action is needed to ensure that 2012 salt reduction targets are met and further government targets need to be set for on-going reductions across a broad range of foods.

Removing harmful trans fats

A lot of progress has been made eliminating trans fats from the products of all 20 companies we looked at. The Government should ensure that they are removed from all products, including those from smaller manufacturers and caterers by introducing a ban.

Cutting calories, fat and sugar

Some progress has been made in reducing fat, saturated fat, sugars and calories - although this has been patchy. Many companies we looked at had signed the Responsibility Deal calorie reduction pledge, but not all, and some of the commitments are vague. More action is needed by companies to reduce saturated fat, sugar and the calorie content of foods where this is feasible without compromising on quality. The Government needs to set targets for key food categories to drive this forward.

Clear nutrition labelling

Most companies are now providing some form of nutrition information on the front of food and drink packaging, but the approach is inconsistent, making it harder for consumers to make healthy choices. All retailers are now committed to using the traffic light labelling scheme to indicate whether fat, sugar and salt levels are high, medium or low and some have been providing this for some time. However, none of the manufacturers we looked at was committed. The Government needs to ensure all companies use the traffic light scheme and that it is based on robust criteria.

Price promotions

The Co-operative and Sainsbury's stand out for having set specific targets for the balance of healthier foods to be included in their price promotions. But even these retailers still only aim for one third of the products on promotion to be healthy. Other retailers have regular promotions on fruit and vegetables but lack policies across other products. All retailers need to establish meaningful targets for healthier products in price promotions. The Government should therefore make this a priority for the Responsibility Deal.

Responsible advertising and claims

Despite new rules coming into place on health and nutrition claims made on foods, claims can still be confusing and the criteria that underpin healthy eating logos are not always transparent. Companies need to ensure claims are only made on genuinely healthy choices. The Government should ensure nutritional criteria are set for levels of fat, sugar and salt in products that make claims.

Marketing to children

Food manufacturers' policies on marketing of foods to children are too limited. They fail to cover all forms of marketing and protect older children. Of the retailers we looked at, only The Co-operative had a specific policy covering the marketing of unhealthy foods to children. More comprehensive policies that cover all forms of marketing of less healthy foods and encourage healthier promotions to children up to 16 are needed. The Government should develop restrictions to address current gaps in protection and ensure all companies commit to them.

Sweets at checkouts

Only The Co-operative, Sainsbury's and Tesco have policies in place to prohibit sweets and other unhealthy foods from being on display at checkouts. The Government should ensure that retailers adopt policies and implement them.

A change of pace

Overall, consumers need to see consistent approaches to key issues across the food industry. Which? research⁴ has found that people expect the Government to be taking more action in areas such as encouraging companies to lower the fat, sugar and salt level of foods; ensuring responsible marketing; and promoting consistent labelling.

Our assessment looked at the largest retailers and manufacturers, but it is very important that action is taken across the industry, including the many smaller companies and the catering sector. Overall, the pace of change needs to be increased dramatically. A much greater sense of urgency is needed. The Government has to take more responsibility for helping people to eat healthily.

Clear targets and milestones need to be set out by the Government and there need to be more effective sanctions for companies that are not doing enough. Companies should be named and shamed and legislation should be considered where insufficient action is taken voluntarily.

Greater Parliamentary scrutiny is needed given the scale of the public health challenge and level of consumer concern. The Health Select Committee should conduct an inquiry into the Government's response to the diet and health crisis, including the effectiveness of the Responsibility Deal, following up on its 2004 Obesity report.

The Responsibility Deal: no incentive or disincentive

Our research shows that the Government's Public Health Responsibility Deal is currently failing to deliver on its promise that by challenging businesses to lead the way it would achieve faster and better results than through other approaches, such as using legislation.

A limited number of voluntary pledges have been adopted, but some of these cover areas where action was already well underway, such as salt reduction and trans fat removal. Pledges to encourage action in new areas, such as calorie reduction and increasing fruit and vegetable consumption, are vague with no clear indication of the scale of action required. Many important areas, such as the need for action on saturated fat reductions, traffic light labelling, responsible price promotions and food marketing to children are not being addressed by the Deal.

A more ambitious and more comprehensive approach is therefore needed that gives clearer guidance on the actions that are required, one that incentivises companies to go further and penalises those that don't.

Our research

Food companies can have an enormous influence on our food choices through the types of products they offer, how they market and label them and the price that they charge. Which? has repeatedly called for a range of actions to be taken by companies to use this influence in a positive way, curb irresponsible practices and make it easier to eat healthily. In March we assessed the progress that the Government's Public Health Responsibility Deal, set up to encourage voluntary action by food companies, was making.³ We concluded that it was far too limited and issued a call for a more ambitious approach.

Our March 2012 call for Government action

- Demand that all food companies use traffic light nutrition labelling
- Establish further salt reduction targets for foods
- Introduce a robust pledge for sugar and fat reductions
- Make saturated fat reduction a priority
- Ban artificial trans fats
- Require calorie labelling in chain restaurants
- Put pressure on companies to be more responsible in their promotions

This report assesses how far leading food companies have moved in these areas. We have also compared their overall commitment to change and how they monitor and report on this. It focuses on the company policies.

The evidence used for our assessments comes from a variety of sources: information on company websites and reports; information provided directly by

companies in response to our questions; a supermarket trawl to identify practices in relation to food labelling and nutrition and health claims made on food packaging; searches of the Advertising Standards Authority database of judgements about complaints about misleading adverts in the last three years; and searches of databases of online advertising and marketing techniques.



Companies assessed in the report

Retailers

Aldi

Asda

The Co-operative

Iceland

Lidl

Marks and Spencer

Morrisons

Sainsbury's

Tesco

Waitrose

Manufacturers

Coca-Cola (brands include Coca Cola, Schweppes, Capri-Sun and Fanta).

Heinz (brands include Heinz tomato ketchup, Heinz beanz, Heinz salad cream).

Kellogg's (brands include All Bran, Coco Pops, Crunchy Nut, Pop Tarts).

Kraft Foods (brands include Bassetts, Cadbury, Dairylea, Philadelphia, Ritz).

Mars (brands include Mars, Snickers, Twix, Seeds of Change, Dolmio, Uncle Ben's).

Nestlé (brands include Cheerios, Nesquick, Kit Kat, Smarties, Carnation)

PepsiCo (brands include Walkers, Quaker, Tropicana, Pepsi, Copella)

Premier Foods (brands include Hovis, Ambrosia, Mr Kipling, Sharwood and Batchelors)

Unilever (brands include Ben and Jerry's, Bertolli, Flora, Hellmann's, Knorr and Wall's).

United Biscuits (brands include McVities, Jacob's, KP, McCoys, Go Ahead)

Specific findings

Overall commitment to action

Meaningful change by food companies requires clear commitment at the highest management level. This should ideally include measurable targets and actions and a clear process for reporting on progress. Responsibility for delivery has to be clear and progress indicators should be part of the overall assessment of the performance of the business



We used company information to assess corporate statements on nutrition and health, looking for specific, measurable targets and clarity on who is responsible and how progress will be reported.

To score highly, companies needed to have broad ranging measurable and ambitious targets, clear monitoring and

reporting mechanisms, clearly defined responsibility at Board or director level and a link to the company's performance indicators or management pay. We gave companies a low score if they had vague or general statements on health without transparent detailed actions or evidence of a way to report on steps taken.

Manufacturers

PepsiCo and Premier Foods stood out among the manufacturers for having detailed plans in place and clear systems for reporting on progress. In contrast, Kraft, Kelloggs and Coca-Cola had less developed plans.

Ranking	Manufacturer	Actions taken
5/5	PepsiCo	Set out 27 specific health commitments for the UK in 2010 with detailed measurable targets which it reports on annually based on an assessment by an external auditor. Health and nutrition is a board level responsibility and a Global Nutrition Group was set up in 2010. It has pledged that 60 per cent of its business (sales by volume) will be healthier (based on Food Standards Agency criteria) by 2015.
5/5	Premier Foods	Has a four strand health and nutrition strategy as part of its sustainability strategy and has set out four detailed measurable targets that are included as Key Performance Indicators for the business. In 2011 it completed health and nutrition priority action plans for its eight key brands. Responsibility for monitoring and reporting are clearly set out and progress is reported through the annual sustainability report.
4.5/5	Nestlé	Approach is set out in its Corporate Business Principles and Health and Wellness Strategy. There is clear responsibility for monitoring and reporting on progress and the company has nutrition-related Key Performance Indicators.
4.5/5	Unilever	Has a global nutrition policy and reports on some measurable nutrition-related targets in its Sustainable Living Plan with progress against targets reported publicly. Nutrition policy is led by the Global President for Foods who sits on the company's Executive Committee.
4/5	United Biscuits	Launched a 10 year Health and Nutrition Programme in 2005 which contains a series of specific, measurable targets focused on how the company can change its products. The Health and Nutrition Steering Group involving senior management is responsible for this programme and it regularly reports on progress.
3.5/5	Mars	Produced a manifesto that includes commitments to offer different products and portion sizes, provide clear nutrition information and promote responsible consumption. Has put in place some measurable targets linked to this at the global level.
3/5	Coca-Cola	Has explicitly recognised obesity as a business risk and made a commitment to promote active healthy living through a health and wellbeing strategy, but a lot of the focus is on promoting physical activity.
3/5	Heinz	Has a four point plan for nutrition which includes reformulation and launch of healthier products, provision of nutrition information, measures on marketing to children and promoting healthier lifestyles.
3/5	Kellogg's	Has a company nutrition policy and a global Corporate Responsibility Strategy which includes strands on nutrition and health, responsible marketing and consumer information and labelling but it lacks measurable targets. The global Social Responsibility Committee monitors progress and an annual corporate responsibility report is published.
2/5	Kraft Foods	Outlined a global approach to nutrition in its corporate social responsibility report which reports on progress, but does not include specific targets and is reviewing how these issues are to be handled in light of its recent reorganisation. Advised by a worldwide Health and Wellness Advisory Council.

Retailers

The Co-operative and Marks & Spencer stand out for having the most developed plans with clear reporting mechanisms. In contrast, Iceland, Aldi and Lidl have very general statements of commitment to take action.

Ranking	Retailer	Actions taken
5/5	The Co-operative	Has set out a responsible retailing strategy and its Ethical Plan for 2012-14 sets out a number of specific, measurable commitments. Responsibility for reviewing progress lies with the Values and Principles Committee, a sub-committee of the board, and the Sustainability Executive, chaired by the Chief Executive.
5/5	Marks & Spencer	Its ethical and environmental Plan A sets out a series of specific, measurable commitments, including a number on food and nutrition. There is clear responsibility for monitoring progress in meeting these promises, annual updates are published and the company says it will link progress on Plan A to bonuses for the management board.
4/5	Morrisons	Made core commitments on nutrition and its policy on healthy eating includes some specific, measurable targets. It has clearly defined who is responsible for these issues and has committed to providing regular, independently verified updates on progress.
4/5	Sainsbury's	Its 20 by 20 sustainability plan includes 'Best for food and health' as one of its values. The plan sets out a goal for healthiest baskets and a series of measurable targets. There is a clearly set out mechanism for responsibility with a Board member responsible for ensuring that the food and health commitments are met and reporting in the annual corporate responsibility report.
2.5/5	Asda	Its sustainability strategy contains a commitment to continue to develop more healthy, sustainable and affordable food choices. It tells us that it has a detailed internal food and nutrition policy with measurable targets but this is not public.
2.5/5	Tesco	One of Tesco's five Community Promises that make up its corporate responsibility strategy is to provide consumers with healthy choices. This promise refers to various actions. There is responsibility at Board level for these issues and progress is reported on in the annual corporate responsibility review.
2.5/5	Waitrose	Waitrose's principles, outlined in the Waitrose Way, include a commitment on healthy eating. There is a rolling three year nutrition strategy which Waitrose says includes actions to change the nutritional content of standard products. Progress is monitored by the Health and Wellness Steering Group and reported in the corporate responsibility/ sustainability report.
1/5	Aldi	Its corporate responsibility policy contains a paragraph on food and health, but this is a very general statement and does not include specific goals or targets.
1/5	Lidl	No explicit nutrition strategy or policy. Responsibility lies with the Quality Assurance Team.
1/5	Iceland	Corporate responsibility statement sets out what has been done in relation to healthier food, but does not outline any strategy or make promises for further action.

Clear measurable targets

Some companies set out specific, measurable targets for changing their products.

- The Co-operative has promised that at least 30 per cent of food products with traffic light labelling will be healthy.
- Sainsbury's has committed to reducing the proportion of foods with red traffic light labels by 2020.
- PepsiCo says that 60 per cent of its business (sales by volume) will be healthier, according to the Food Standards Agency criteria, by 2015.
- From this year, at least 50 per cent of the new products Premier Foods launches must have a "claimable health or nutrition benefit".
- Unilever says that it increased the proportion of its products which "meet the highest nutritional standards" to 25 per cent by the end of 2011, and aims to double this by 2020.

Action needed

There is great variation across the industry. While some companies have built a series of specific health targets into their business plans, others have made vague statements and some emphasise the importance of physical activity, rather than focusing on changes to products and the way they are promoted.

Real and widespread change across the food industry requires board level commitment. This commitment should include specific targets, measurable indicators and deadlines by which targets are to be met. Processes need to be in place for reporting and there needs to be clear accountability to ensure progress.



Reducing salt

The Department of Health estimates that reducing salt intakes by 1g would avoid 4147 preventable deaths and save the NHS £288 million every year⁵

Health experts have set a public health target of 6g of salt per person per day but most people exceed this and the average intake is currently around 8g per day. Previous Which? reports on products such as breakfast cereals⁶, sandwiches⁷ and pizzas⁸ have highlighted large variations in salt levels and scope to make reductions. The Food Standards Agency (FSA) began a programme of work to reduce salt intakes in 2006 with targets for reduction, a public campaign around the 6g a day target and clearer labelling. Specific targets for the amount of salt for particular foods were set for 2010. These were then followed by targets to be met by the end of 2012.

The Government's current Public Health Responsibility Deal, which focuses on encouraging companies to sign voluntary

pledges to take action, includes a pledge to meet the 2012 targets. We assessed companies based on their progress updates as part of the Responsibility Deal, asking companies for further information if necessary. We have ranked the companies for progress made in this area based on the percentage of relevant categories where they reported that the salt targets were being met or were on track for the end of the year. Companies with a larger portfolio have to meet a broader range of salt targets, but we have assessed them on the overall proportion of relevant targets they are achieving.

To score highly, companies needed to have made significant progress meeting the 2012 salt reduction targets relevant to their products and to be on track to meet them all by the end of the year.

A different pace

Based on company reporting as part of the Responsibility Deal earlier this year, differences included:

- Heinz and Mars were meeting the targets for cook-in and pasta sauces, but Nestlé and Premier Foods were not
- Kraft was meeting the target for standard potato crisps but Pepsico (Walkers) and United Biscuits were not
- Kraft foods, Nestlé and Premier Foods were not meeting the target for pasta and noodles, but Heinz and Mars were.

Manufacturers

The salt reduction targets aim to ensure that companies take action across the board to achieve consistent maximum or average salt targets for different food products. Mars, Heinz and PepsiCo stand out for making the most progress towards the targets that are relevant to their products. United Biscuits had made the least progress in its relevant categories and although it is hoping to have taken more action by the end of the year and says that 84 per cent of its products will meet the target levels, this would still only mean achieving 2012 salt reduction targets in 25 per cent of relevant product categories.

Some companies are moving faster than others. The overall percentages don't reflect progress made across the many products that fall within these broad categories. Companies point out that if only one of many products fails to meet the target, then the target is missed for the whole category. But this is how companies are required to report under the Responsibility Deal. We gave the companies the opportunity to report the extent to which products within each category met the targets, but they were not all able to provide this information.

Ranking	Manufacturer	Actions taken
4/5	Mars	Reports meeting 2012 salt reduction targets for 6 of the 7 relevant categories (86 per cent) and is on track to meet the final category (flavoured rice) by the end of the year.
3/5	Heinz	Reports meeting the 2012 targets in 12 out of 17 (70 per cent) of the categories that affect its products and on track to meet 88 per cent by end of year.
3/5	PepsiCo	Reports meeting 2012 targets in 3 (60 per cent) of the 5 relevant categories (70 per cent of its relevant products). On track to meet the target in one more category by the end of the year.
2/5	Kellogg's	Not yet meeting the targets for the one relevant category (cereals) but reports being on track to have met this by the end of the year.
2/5	Kraft Foods	Reports that it is meeting the 2012 targets in 7 of the 15 (47 per cent) relevant categories but has not said that it will achieve more by the end of the year.
2/5	Nestlé	Reports that it is meeting the 2012 targets in 25 per cent of the 16 categories that are relevant (equivalent to around 80 per cent of relevant products) and is on track to meet the rest by the end of the year.
2/5	Premier Foods	At end of July, reported meeting 2012 targets in 6 of the 15 (40 per cent) relevant categories and states that is on track to meet the rest by the end of the year.
2/5	Unilever	Reports meeting 2012 targets in 5 (36 per cent) of the 14 relevant categories (equivalent to 62 per cent of products) and is on track to meet the targets in 10 out of 14 categories (71 per cent of relevant categories and 82 per cent of products) by the end of the year.
1/5	United Biscuits	Not yet meeting the 2012 targets in any of the 8 relevant categories although it says it will meet targets in two categories (25 per cent) by the end of the year and will be meeting the targets in 84 per cent of the 281 products covered by its pledge by then.

(Coca-Cola not included as not relevant to its products)

Retailers

Some food manufacturers have a more difficult task than others to achieve the salt reduction targets depending on the breadth of their product portfolio. But this is far more of an issue for retailers who have products in a vast range of categories. Waitrose and Tesco have made the most progress, based on their reporting to date, followed by The Co-operative and Marks & Spencer. Many retailers, however, told us that they will have made more progress by the end of 2012.

It was very difficult to see how some retailers such as Aldi, Asda, Lidl and Sainsbury's compared to the other retailers as they have not reported an overall figure for the extent to which they are meeting the reduction targets across product categories. Iceland was the only retailer not to have signed up to meet the 2012 reduction targets. As with the manufacturers, some companies are also making progress within product categories even if all of their products do not yet meet the salt reduction targets. Tesco, for example, has reported that only 3 per cent of its products now exceed the 2012 salt reduction target for ready meals. Marks & Spencer tells us that 96 per cent of its crisps and savoury snacks and meals meet the 2012 targets.



Ranking	Retailer	Actions taken
4/5	Waitrose	Reports meeting the 2012 targets in 82 per cent of the 67 categories covering its products and says it is on track to meet the targets in 92 per cent of categories by the end of the year.
3.5/5	Tesco	Reports meeting the 2012 targets in 57 of the 77 (74 per cent) relevant categories equivalent to 94 per cent of its products. It aims to meet the targets in 74 of the 77 categories (96 per cent) by the end of the year.
3/5	The Co-operative	Reports meeting 2012 targets for 38 of the 64 relevant categories (59 per cent) and 87 per cent of relevant products. It says it is on track to meet the targets in 14 other categories (81 per cent of categories in total) and 94 per cent of relevant products by the end of the year.
3/5	Marks & Spencer	Reports meeting the 2012 targets in 55 per cent of the 61 relevant categories but says it is on track to meet additional targets by the end of the year.
2.5/5	Morrisons	Reports meeting the 2012 targets in 30 (42 per cent) of the 71 food categories that are within its pledge. It expects to meet the targets in 90 per cent of the categories by the end of the year.
2/5	Aldi	Signed up to the 2012 salt reduction targets but unable to give specific details of progress made. It says that almost a third of its products now meet the targets.
2/5	Asda	Tells us it was meeting 24 out of 75 categories in May but this is not based on sales weighted averages (as required for the Responsibility Deal updates) so it did not report on the number of categories meeting targets in its update to the salt pledge, making it difficult to compare.
2/5	Lidl	Signed up to the 2012 salt reduction targets and reported earlier this year that it has reduced the number of products not yet meeting 2012 targets from 305 to 89. It tells us that by January 2013 all its own brand products will meet the targets.
2/5	Sainsbury's	Sainsbury's was not able to provide details of progress made against the targets to date but says that it will have met the targets in all 72 relevant categories by the end of the year where there is no compromise on safety, quality or taste.
1/5	Iceland	Met the 2010 salt reduction targets but has not signed up to the 2012 salt reduction targets.

Action needed

Small changes in products have removed tonnes of salt from the nation's diet. But some companies are making much more progress towards meeting the 2012 salt reduction targets than others.

- More action is needed to ensure that 2012 salt reduction targets are met. Manufacturers and retailers should continue to work collaboratively to cut salt across their products and resolve any technical issues.
- The Government needs to push poorer performing companies to act. It also needs to set further salt reduction targets for 2015 across food product categories in consultation with food companies, public health experts and consumer groups in order to ensure further incremental changes to help reach the 6g salt target.

Cutting calories, fat and sugar

As well as reducing salt levels and removing trans fats there is considerable scope for food companies to reduce the fat, saturated fat, calorie and sugar levels in their products

The FSA began a programme of work on fat and sugar reduction. The Government's current approach through the Responsibility Deal is focused on overall calorie reduction. The Government's Call to Action on obesity² last year included a challenge to the nation to reduce calorie consumption by 5 billion calories a day. The Responsibility Deal pledge on calorie reduction refers to a range of actions such as product or menu reformulation, reviewing portion sizes, education and information, and actions to shift marketing towards lower calorie options.

We looked at company information, and asked companies for further details, on their work to reduce fat, saturated fat, calorie

and sugar levels. We also looked at the detail of companies' commitments to the calorie reduction pledge. Overall, progress in this area was more mixed and more difficult to assess as many companies referred to general intentions to reduce fat, sugar or calorie levels, rather than having clearly defined targets.

Companies scored highly if they reported significant progress on reducing saturated fat, sugars and calories across a wide range of products and had specific plans in place for further reductions.

Removing trans fats

The health effects of trans fats on cholesterol levels, and ultimately on the risk of coronary heart disease, are thought to be worse than saturated fats.

There is no benefit to consumers from including this particular type of fat, usually added to foods as partially hydrogenated vegetable oil. Several countries have banned trans fats or are in the process of introducing a ban. The Government's approach under the FSA, and now under the Responsibility Deal, has been to encourage voluntary removal. The Responsibility Deal includes a pledge to remove trans fats within 12 months of signing up.

We assessed companies based on their Responsibility Deal commitments and reports, as well as wider company information about the removal of trans fats. All of the companies told us they have now removed trans fats from their products. Some companies had done this prior to the pledge and scored 5/5. Mars scored 4/5 as it has only just completed this process more recently, whereas most of the retailers and manufacturers we looked at removed trans fats several years ago.

Action needed

A lot of progress has been made eliminating harmful trans fats from the foods and drinks sold by all 20 companies we looked at. Our research focused on the leading companies and it is important that this is also mirrored across the whole food industry including the catering sector.

■ The Government should follow the example of other countries and ensure that artificial trans fats are removed from all products by introducing a ban.

Manufacturers

Nestlé, PepsiCo, Unilever and United biscuits have already reported significant progress and have more comprehensive plans in place. Others are also taking action. Heinz and Kellogg's

have not signed the calorie reduction pledge. Heinz has set its own targets to reduce sugar in its products. Kellogg's has made some commitments to do this.

Ranking	Manufacturer	Actions taken
3/5	Nestlé	Has reduced saturated fat and calories across several products. Signed up to the calorie reduction pledge. Says that 88 per cent of its products include lower or low calorie options and that 39 per cent of its confectionery products contain less than 110 calories per serving.
3/5	PepsiCo	Cut the sugar in standard Pepsi by 4 per cent and achieved 70-80 per cent reductions in saturated fat in crisps by using healthier oils. Targets set for further reductions by 2015, including for calorie and fat reduction.
3/5	Unilever	A plan to reduce saturated fat has already shown some progress. Less than a third of the fat in the company's most popular spreads is now saturated fat and some reductions in sugar have also been achieved. Signed up to the calorie reduction pledge.
3/5	United Biscuits	Has set specific targets for reducing saturated fat and sugars and has made progress in reducing saturated fat in biscuits and snacks with reductions of between one third and 80 per cent.
2.5/5	Mars	Reduced the saturated fat in Mars, Snickers, Milky Way and Topic bars by 15 per cent and says it has reduced the average number of calories in single portion products by more than 10 per cent between 2007 and 2011 by focusing on reformulating and portion size. Pledged that all chocolate products will have no more than 250 calories per portion by 2013.
2/5	Coca-Cola	Has low or no calorie versions for nearly all its brands and has reformulated some regular products to reduce sugars. This does not, however, include regular Coca-Cola.
2/5	Heinz	Working to reduce sugar levels in products and has set targets, but had not signed up to the calorie reduction pledge at the time of going to print.
2/5	Kraft Foods	Working to reduce fat and has signed up to the calorie reduction pledge which it says it will achieve by increasing its range of lower fat and lighter versions of products.
2/5	Premier Foods	Signed up to calorie pledge and committed to reduce calories in one third of branded products by end of 2014 by changing recipes and increasing the choice of portion sizes. Reports that it will be over half way to meeting this target by end of 2012.
0.5/5	Kellogg's	Not signed up to the calorie reduction pledge. Some announcements made about offering more lower sugar cereals. Tells us it will announce further plans in the near future.



Retailers

Of the retailers, Sainsbury's, The Co-operative and Marks & Spencer stand out for having detailed plans for reductions. Iceland, Lidl and Aldi have far less specific plans and refer to more general requirements for suppliers to review products.

Ranking	Retailer	Action taken
3/5	The Co-operative	Has an on-going programme to reduce saturated fat and sugars eg. a 34 per cent reduction in sponge cakes. It has not signed the Government's calorie reduction pledge but has its own plans on calorie reduction.
3/5	Marks & Spencer	Continuing work on cutting saturated fat and says it is a priority, is continuing to develop lower sugar products and has signed up to the calorie reduction pledge with commitments to broaden the range of calorie-controlled products and provision of information.
3/5	Sainsbury's	Committed to reducing fat, saturated fat, sugar and calories from its own brand products and specifically to reducing the number of products with red traffic light labelling by 2020. For example, it reduced the number of red traffic lights across its Taste the Difference range by 7 per cent in 2012. The company has also signed up to the calorie reduction pledge, reiterating its existing commitments.
2.5/5	Tesco	Says it has been working to cut sugar and salt levels since 2005. Has made a number of specific commitments under the calorie reduction pledge, including a commitment to reduce the number of calories sold in soft drinks and to introduce a code of practice to help produce suppliers and developers reduce calories.
2.5/5	Waitrose	States that its processes for product review and new product development have resulted in nutritional improvements. In its calorie reduction pledge, it has set out a number of areas for action across different parts of its business.
2/5	Asda	In April 2012 it started working on an action plan to reduce calories. It is also working on a reformulation plan to reduce fat, saturated fat and added sugar and is in the process of setting one to three year targets.
2/5	Morrisons	Says it is currently working to cut fat, saturated fat and sugar levels across its own brand products and is aiming to reduce saturated fat by 25 per cent. It has signed the calorie reduction pledge with the main action being the launch of its NuMe healthier own brand range.
1/5	Aldi	Aldi says that manufacturers and buyers are tasked with continuing to improve the nutritional profile of products and that it is reviewing its products to identify areas where calories can be reduced. Aldi has signed up to the calorie reduction pledge but with no specific plans.
0.5/5	Iceland	Has a policy to promote reductions in saturated fat and sugar by asking its suppliers to review products and reports that it has cut saturated fat in some products. It has not signed the calorie reduction pledge.
0.5/5	Lidl	Reduced saturated fat by switching to sunflower or rapeseed oil in some crisp and frozen potato products. Hasn't reported any progress or action plans to reduce calories, fat or sugar but tells us it is continually reviewing the nutritional content of its products. It has not signed up to the calorie reduction pledge.

Action needed

Some progress has been made in reducing fat, saturated fat, sugars and calories - but action in this area is a lot more patchy than on salt reduction. Attention is also now turning to cutting calories, by changing recipes or varying portion sizes, and many companies we looked at had signed the Responsibility Deal calorie reduction pledge.

- More action is needed by companies to reduce saturated fat, sugar and calorie content of foods where this is feasible without compromising on quality.
- Reducing saturated fat levels should be a much greater priority within the Responsibility Deal. The Government should set clear measurable targets and deadlines against which progress on sugar and saturated fat reductions can be driven and assessed. These should focus on foods that contribute most of these nutrients to our diets.



Clear nutrition labelling

Which? research has repeatedly highlighted the importance of simple, consistent nutrition labelling on the front of packs with more detailed information on the back. Our research⁹ has shown that traffic light colour coding works best for most consumers

This was reinforced by an independent evaluation commissioned by the FSA¹⁰. This found that the overall scheme that worked best for consumers included traffic lights, percentage guideline daily amounts (GDAs) and high, medium and low in text. Some retailers adopted traffic lights early on, using FSA criteria, but others developed a scheme based solely around percentage GDAs. This percentage GDA scheme was also adopted by many food manufacturers.

Last year, new EU labelling legislation (the Food Information Regulations¹¹) was adopted. This makes nutrition information mandatory, but it failed to specify that traffic lights should be included. It allowed for percentage GDA information to be provided, but also allowed for additional information. The four UK governments have recently consulted on the best way to move towards a consistent scheme and supported a hybrid

traffic light labelling scheme that also includes percentage GDAs. This prompted action by the main retailers who are now all committed to the use of traffic lights. In October the four governments called for industry-wide adoption of the scheme that includes traffic lights, percentage GDAs and high, medium and low in words.

We looked at company labelling schemes and future intentions. We wanted to see traffic light labelling, ideally accompanied by percentage GDAs and the wording high, medium or low, on the front of pack. This labelling should apply to a wide range of products or there should be plans for a wider roll out in place. We also took into account companies' promises to introduce traffic light labelling, even if they have not implemented it yet. To score 5/5 companies needed to be using traffic light labelling, percentage GDAs and include the words high, medium or low.

Manufacturers

Food manufacturers have made very limited progress in this area. None of the companies we looked at have committed to using traffic light labelling, despite the Government now recommending this.

Ranking	Manufacturer	Actions taken
2/5	Coca-Cola	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	Kellogg's	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	Kraft Foods	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	Nestlé	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	PepsiCo	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	Premier Foods	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	Unilever	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
2/5	United Biscuits	Use the % GDA scheme on front of pack alone. No indication so far that they will be following retailers and including traffic lights.
1.5/5	Mars	Use the %GDA scheme, but chocolate and sweets have limited front of pack information.
0.5/5	Heinz	No standard nutrition information on front of pack.

Retailers

There has been a lot of movement on this issue by retailers in recent months. Asda and The Co-operative stand out for using the optimum scheme including traffic lights, percentage GDAs and high, medium and low in text. Marks & Spencer, Waitrose and Sainsbury's have been using traffic light labelling for some

time. Tesco recently changed its approach and committed to use traffic lights as well as percentage GDAs. This prompted Aldi, Lidl, Morrisons and eventually Iceland also to commit to use the scheme, subject to the criteria that underpin it.

Ranking	Retailer	Actions taken
5/5	Asda	Use traffic lights, %GDAs and high, medium and low text
5/5	The Co-operative	Use traffic lights, %GDAs and high, medium and low text
4/5	Marks & Spencer	Use traffic lights and %GDAs.
4/5	Waitrose	Use traffic lights and %GDAs.
3.5/5	Sainsbury's	Has used traffic lights in the form of its wheel of health since 2005 and has now committed to combining %GDAs and traffic lights.
2.5/5	Aldi	Currently use %GDA but have announced that they will use traffic lights
2.5/5	Lidl	Currently use %GDA but have announced that they will use traffic lights
2.5/5	Morrisons	Currently use %GDA but have announced that they will use traffic lights
2.5/5	Tesco	Currently use %GDA but have announced that they will use traffic lights
1.5/5	Iceland	Currently has no front of pack nutrition labelling, but was the last of the supermarkets to announce it will introduce the traffic light labelling scheme.

Action needed

Most companies are now providing some form of nutrition information on the front of food and drink packaging. All retailers are now committed to using the traffic light labelling scheme and several have been providing this for some time. None of the manufacturers we looked at is, however, using the scheme.

- The manufacturers need to commit to using the scheme now proposed by the Government, including traffic lights.
- The Government needs to put pressure on them to follow the example of retailers and provide this. It also needs to ensure that consistent, across the board criteria underpin the scheme, based on the guidance already developed by the FSA and used by many retailers.



Price promotions

Many people are concerned about rising food prices. Which? research¹² has found that people are shopping around more for food and trading down

Around 40 per cent of foods are on promotion in supermarkets. A Which? survey in February found that including more healthier choices in promotions and making healthier options cheaper were the two main actions people wanted from supermarkets to make it easier to eat healthily. It is therefore important that price promotions include a balance of foods, including healthier choices.

We asked retailers whether they had any guidance or targets for the balance of healthy and less healthy products in their price promotions. We wanted to see retailers acknowledging

this issue and setting targets to ensure that a substantial proportion of price promotions are on healthy products. Only The Co-operative and Sainsbury's had set targets across the board. This is encouraging, but even in their stores, two thirds of promotions can be for less healthy foods. Morrisons has a target for at least 50 price promotions on fruit and vegetables every week. Other supermarkets referred to regular promotions on fruit and vegetables, for example, Aldi's Super 6 promotion. But overall this is a missed opportunity to help people make healthier choices.

Retailers

Ranking	Retailer	Actions taken
3/5	The Co-operative	Promised that at least 30 per cent of its promotions will be on healthier products (based on FSA criteria or its Healthier Choice range) and in 2011 achieved 34 per cent.
3/5	Sainsbury's	Has recently introduced a specific target that at least a third of food and drink promotions will be on healthier choices. It has been developing the criteria to underpin this.
1/5	Morrisons	Does not set a target for the proportion of promotions to be on healthier foods, but ensures at least 50 price promotions on fruit and vegetables every week.
0.5/5	Aldi	No general target. It does however have Super 6 deals every week on fruit and vegetables.
0/5	Asda	Could not provide any information about company guidance.
0/5	Iceland	No information was provided. Although Iceland has said that it will introduce money off coupons at the till as part of the Responsibility Deal pledge to help people eat more fruit and vegetables.
0/5	Lidl	No targets. Features healthy products in its promotional mix by, for example, offering half price fruit and vegetable items every week. Products in its Linessa healthier eating range are included in its promotional activities.
0/5	Marks & Spencer	Promotes healthier foods throughout the year and says it includes healthier options in its Dine In promotions. Does not have any specific guidance or targets in what proportion of product promotions should be for healthy products.
0/5	Tesco	Has no guidelines or targets for the balance of foods in promotions. It has committed to use price promotions to help people eat more fruit and vegetables.
0/5	Waitrose	No targets or guidance. It tells us it regularly has promotions on fruit and vegetables.

Action needed

The Co-operative and Sainsbury's stand out for having specific targets for the balance of promotions, but this is still only for around a third of products. Other retailers have regular promotions on fruit and vegetables but lack policies across other products. It is disappointing that more retailers are not taking action in this area.

- Food retailers and manufacturers need to do more to use product pricing, and specifically price promotions, to help people to make healthier choices.
- The Government needs to take a more active role in driving forward action in this area, including developing a specific pledge as part of the Responsibility Deal and ensuring sign up across the industry.



Manufacturers using price to encourage healthier choices

■ There is also scope for manufacturers to use their promotional techniques, including price promotions, to do more to encourage healthier choices. PepsiCo recognised this by effectively making no sugar versions of Pepsi cheaper – by selling a 600ml bottle of a no-sugar variety at the same price as a 500ml bottle of regular Pepsi.

Responsible advertising and claims

Many companies highlight foods that are healthier choices or have specific health benefits. A Which? survey¹ in February found that 82 per cent of people think that these claims should be independently assessed to ensure they are accurate before they are used.

There has been significant progress made in this area in the last few years. In 2006 an EU regulation on nutrition and health claims was adopted². This defined nutrition claims such as 'low fat' and specified that health claims had to be independently assessed by the European Food Safety Authority (EFSA). It also required 'nutrient profiles' to be set to define what a healthy food is. This is important so that products that are high in fat, sugar or salt cannot claim to be healthy. While the independent assessments have been carried out and an approved list of health claims was adopted this year, action is still needed to establish the nutrient profiles to ensure that claims do not appear on unhealthy foods.

Our assessment still found examples where we thought companies were using claims irresponsibly. A Which? report looking at low fat and light foods, published in September³, also showed that products low in fat can have high levels of sugar and that products described as 'light' may not be as low in fat as people expect.

How healthy?

It is not always easy to know which products are healthy, especially in the absence of traffic light labelling. When a food or drink is included in a healthy eating range people could expect it to be an all-round healthy product. In practice, some of the retailers' healthy eating ranges include healthier versions of equivalent products which are still high in fat, saturated fat, salt or sugar.

This is often the case for cheese products. The Cooperative's Healthier Choice cheese, Morrisons NuMe cheese, Tesco Half-Fat Medium Cheese and Sainsbury's Be Good to Yourself Mature White cheese, for example, are all high in saturated fat.

There are similar issues with snacks, puddings and meat products. Examples include:

- NuMe Sweet Thai Chilli Flavour Soy and Potato Crisps are high in salt (1.5 g per 100 g).
- Lidl Linessa Reduced Fat Nuremberg Pork Sausages are high in fat (22g per 100 g).
- Sainsbury's Be Good to Yourself Chocolate Sponge Pudding is high in sugar (18.2 g per 100 g).



Manufacturers

We looked at the type of claims manufacturers were making on their most popular brands and also looked to see whether any complaints had been upheld by the Advertising Standards Authority in the last three years.

There are still too many examples of confusing adverts about the nutritional benefits of products that breach advertising rules. The Advertising Standards Authority had ruled against adverts on nutrition and health grounds by half of the manufacturers we looked at in the last three years: Coca-Cola, Kellogg's, Nestlé, Premier Foods and Unilever.

Retailers

We also asked retailers to provide details of the criteria that underpin their own-brand healthy eating ranges. It was difficult to compare these because some do not make this information publicly available. The Co-operative, for example, has a policy that its 'green dot' to indicate a healthier choice cannot be used on products that have red traffic lights. Marks & Spencer says that it does not make nutrition and health claims on products that have red traffic lights but the criteria for its Eat Well range are not made public.

By introducing healthier ranges many of the retailers have broadened the choice of healthy products available for their customers. The nutritional criteria, however, do vary from one range to another. A main meal in Waitrose's Love Life range, for example, provides fewer than 600 calories. A meal in Tesco's Eat Live Enjoy range provides 500 calories, while a ready meal in Sainsbury's Be Good to Yourself range provides no more than 400 calories. It is not always easy to find out what the criteria are. Most websites simply refer to 'strict nutritional criteria but don't go into detail.

Action needed

Despite new rules coming into place on health and nutrition claims made on foods, claims can still be confusing and it can be difficult to see how some retailers apply their healthy eating logos.

- Food retailers and manufacturers need to ensure that products which are high in fat, saturated fat, salt or sugar are not confusingly presented as a healthy choice. Retailers should ensure that the criteria they apply for their healthier ranges are transparent and robust.
- The Government needs to ensure that claims can be substantiated, based on the EU's list of approved and rejected claims - but also ensure that criteria are established for the fat, sugar and salt levels in foods allowed to make health or nutrition claims.

Marketing to children

Which? research has highlighted the many ways that less healthy foods are marketed to children. Research¹⁵ has shown that food marketing influences children's preferences and their buying and eating habits.

Since January 2009, Ofcom rules¹⁶ have been in place to restrict TV advertising of less healthy foods to children under 16. In July 2010 Ofcom assessed the impact of the restrictions and found that children were exposed to 37 per cent less advertising for foods high in fat, salt or sugar¹⁷. Self-regulatory, industry-wide codes also apply¹⁸, the British Code of Advertising Practice and the Committee of Advertising Practice's Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing. Despite the introduction of the Ofcom restrictions and the tightening of the self-regulatory codes, gaps remain and children are still exposed to marketing messages for less healthy foods.

Some food manufacturers launched their own internal codes of practice on marketing, including rules on marketing to children. Several companies also came together to issue a joint EU Pledge not to advertise less healthy foods through certain media to children under 12. This covers TV, on-line and in-school advertising, but does not cover forms of marketing such as packaging, sponsorship or other forms of digital media. Companies supporting the Pledge have been using different criteria to determine which foods should be restricted. Some, such as Coca-Cola, apply the restrictions to all of their products. Others have criteria specific to their products. Kellogg's, for example, applies the criteria to products

that have more than 40 per cent sugar. Earlier this month, the companies announced plans to move towards more consistent criteria from the end of 2014.

The World Health Organisation has recognised the need for action in this area and issued a set of recommendations calling on countries to implement robust approaches to reduce the exposure of children to, and the power of, marketing less healthy foods¹⁹. Packaging, in-store promotions and product positioning at checkouts are not included in the current regulatory/self-regulatory framework. There is not a Responsibility Deal pledge covering this area, although it is an issue that may be looked at in the future. The Scottish Government has also set out plans to look at this area.

To score highly in our assessment, manufacturers had to have policies to restrict the advertising and promotion of less healthy foods to children up to the age of 16. These restrictions should apply to all forms of media (including sponsorship) and have robust criteria for how to determine what constitutes a less healthy food and how marketing to children is defined. A child audience should include audiences where a significant proportion of the audience is made up of children or where large numbers of children are exposed.

Retailers

Our assessment focused on food manufacturers, but The Co-operative stands out among the retailers for being the only one to have a specific policy not to market foods high in fat, sugar and salt to children, including through use of cartoon characters on packaging. Other retailers do not have a policy on this issue and many continue to use cartoon characters to promote foods such as breakfast cereals, regardless of the nutritional content.

Manufacturers

United Biscuits has a policy that goes the furthest in that it limits marketing to children up to 16, although some of its practices appear to contradict this. Most manufacturers base their policies on the EU Pledge, but this only protects children up to 12 and does not cover all media. It is also weak in the way that it defines a child audience. Mars goes slightly further than the other Pledge signatories in this respect.



Ranking	Manufacturer	Actions taken
3/5	United Biscuits	Its policy guidelines place some restrictions on advertising to audiences where more than half of the audience is children under 16.
2/5	Coca-Cola	Signed up to the EU Pledge and apply its restrictions on marketing to children up to 12 to all its products.
2/5	Mars	Signed the EU Pledge but goes slightly further in the way that it defines a child audience (where more than a quarter is under 12, rather than the 35 per cent Pledge criteria).
1/5	Kellogg's	Signed up to the EU Pledge.
1/5	Kraft Foods	Signed up to the EU pledge.
1/5	Nestlé	Signed up to the EU pledge.
1/5	PepsiCo	Signed up to the EU pledge.
1/5	Unilever	Signed up to the EU pledge.
0.5/5	Premier Foods	Has not signed up to the EU pledge but has introduced its own limited restrictions on advertising to children under 11.
0.5/5	Heinz	Its marketing and communications guidelines set out general principles and state that no marketing should be directed solely at pre-school children. It has however made progress in relation to products that carry cartoon characters.

Action needed

The introduction of Ofcom restrictions on TV and radio advertising of unhealthy foods to children, along with different voluntary codes of practice and industry pledges, has brought greater protection, especially for younger children, from advertising of less healthy foods. Seven of the 10 manufacturers we looked at had also signed up to the voluntary EU pledge to change food advertising to children. Neither these voluntary commitments or the rules in place, however, go far enough. In reality, children are still exposed to numerous marketing messages for foods that are high in fat, salt or sugar.

Ofcom defines a child as a person under 16. But most of the companies we looked at use a definition of under 12. Too many loopholes mean that marketing messages still reach children, whether it's through sponsorship of sporting events, advertising

or sponsorship of TV programmes that have large adult and child audiences or online and viral marketing. Many manufacturers and retailers still use cartoon characters and illustrations designed to appeal to young children on their packaging and promote foods high in fat, sugar or salt, rather than healthier choices.

■ Company policies need to be extended to cover children up to 16, a broader range of marketing media and techniques and use robust criteria for defining which foods are unhealthy and therefore restricted.

■ The Government needs to build on initial action taken in relation to TV advertising and ensure that there are tighter restrictions to tackle the many forms of media that are still used to market less healthy foods to children, including on-line marketing, sponsorship and packaging.

Sweets at checkouts

Several companies adopted policies to remove confectionery from checkout displays a few years ago in response to pressure from health campaigners who were particularly concerned about the impact on children. Recent research, however, has highlighted that the practice still seems to be widespread²⁰.

We asked companies for their policies on product positioning at checkouts. This showed a wide variation in approach.

The Co-operative, Sainsbury's and Tesco's policies go the furthest by not allowing sweets at checkouts, although this is not always applied in smaller, convenience stores. Asda and Iceland limit the number of tills where this is permitted. Others only have restrictions relating to promotions, such as cartoon characters on packaging. Aldi, Lidl and Waitrose have no policy in place.

Ranking	Retailer	Actions taken
4/5	The Co-operative	Has banned displays of high fat, sugar or salt products from checkout stands and kiosks.
3/5	Sainsbury's	Has a policy of no sweets or chocolates at checkouts in supermarkets. This does not apply to smaller convenience stores. It says it encourages store managers to display healthier options.
3/5	Tesco	Its policy is not to place any confectionery at checkouts, but this does not extend to Tesco Express stores.
2/5	Asda	Limits display of confectionery treats to one in three checkout ends.
2/5	Iceland	Does not allow sweets at some checkouts. Its policy is to allow a confectionery stand at only one checkout in each of its stores.
2/5	Marks & Spencer	Policy is to remove children's sweets and confectionery with characters or designs likely to appeal to children from some checkouts (belted till points).
2/5	Morrisons	Says that it endeavours not to display confectionery that appeals unduly to children at checkouts. It says it is reviewing its policy.
0/5	Aldi	Does not have a policy on this.
0/5	Lidl	Does not have a clear policy. Tells us it is considering an initiative where at least one checkout in every store will display healthy products such as fresh fruit.
0/5	Waitrose	Does not have a policy on this.

Action needed

Only The Co-operative, Sainsbury's and Tesco have policies in place to prohibit sweets and other unhealthy foods from being on display at checkouts.

■ Retailers need to introduce or extend product positioning policies, and to ensure that these policies are properly put into practice, so that sweets are not promoted at checkouts. Product positioning should be used to encourage people to choose healthier products.

■ The Government should ensure retailers all commit to promoting products responsibly in-store and remove sweets from checkouts. This could be done by ensuring all retailers commit to a pledge under the Responsibility Deal.

Conclusions and action needed

Healthy progress?

Among the retailers, The Co-operative leads the way for a broad range of actions, including the ideal front of pack labelling scheme and action on price promotions. It has made progress on product reformulation and is the only retailer to have a clear policy on marketing of foods to children. Iceland, in contrast, has made the least progress among the supermarkets with much vaguer statements about the action it intends to take going forward. It was also the last to commit to traffic light labelling and has not signed up to 2012 salt reduction targets.

Manufacturers have generally made less progress than retailers. While there is more scope for retailers to take action – and we looked at a broader range of actions that could be taken – the manufacturers had generally taken more limited action. They lag behind on front of pack nutrition labelling for example. However, no manufacturer was clearly far ahead or behind. Pepsico stands out for having made significant commitments to make changes in this area and clear reporting mechanisms for how this will be achieved. They are also one of the companies doing better on salt reduction and fat and sugar reductions.

The Government's role

The Government has an important role driving forward action in this area. Under the last government, responsibility lay with the Food Standards Agency. This encouraged food companies to take voluntary action but the Agency also played a central role in setting targets and monitoring them to drive the necessary change. This included parallel programmes of work on front of pack nutrition labelling, marketing of foods to children, salt reduction targets, calorie information out of home, responsible portion sizes and saturated fat and sugar reductions. This laid the foundations for much of the action that companies have taken.

The Government's current approach also relies on voluntary action, but with an important distinction. The Government now plays a far less active role in driving change and setting targets. The Public Health Responsibility Deal relies on companies agreeing to pledges to take action and has tended to look at areas for action one by one. Although separate policies exist across the UK, such as the Scottish national food and drink policy, Recipe for Success, and the Scottish Obesity Routemap, in practice, the Responsibility Deal, which is an English initiative, is the main means by which company behaviour will be influenced. When the Deal was launched, the Government stated that it could deliver faster and better results than a regulatory route.

Initial Responsibility Deal pledges built on the FSA work on salt reduction targets and calorie information in restaurants. It also followed through on action many companies had already taken to remove trans fats. New pledges have been introduced on calorie reduction and increasing fruit and vegetable consumption, but these are short on specific detail. Important areas, such as reducing saturated fat levels and ensuring responsible food promotions, have yet to be dealt with. The Pledges so far developed are set out in the table below.

Responsibility Deal Pledges

1. Calorie information to be provided out of home
2. Salt reduction
3. Removal of trans fats
4. Calorie reduction
5. Increasing fruit and vegetables



No incentive or disincentive

The companies that have gone furthest have broad ranging policies and commitments that they see as central to their overall business performance. PepsiCo has, for example, broadened its portfolio in recent years and has a comprehensive system of reporting on actions from product reformulation to marketing and availability of products. Many of these areas have yet to be addressed by the Responsibility Deal. Companies that have made least progress, such as Iceland, have not signed up to Responsibility Deal pledges on salt and calorie reduction.

The Responsibility Deal is therefore currently failing in its promise to deliver faster and better results than would be possible through other approaches. A more ambitious and more comprehensive approach is needed that gives clearer guidance on the actions that are needed, incentivises companies to go further and takes a comprehensive approach.

Priority actions for food manufacturers and retailers

Food companies have made progress in some areas, but there is much further to go. Our report has focused on the main food manufacturers and retailers, but it is also important that action is taken across the industry, including by smaller companies.

■ **Further work on salt reduction:** Those not yet meeting 2012 salt reduction targets need to ensure that they maintain the momentum behind salt reduction by supporting further reduction targets across product categories for 2015.

■ **A greater focus on reducing saturated fat, sugar and calories in foods:** It is not as easy to take a uniform approach to reducing fat and sugar levels as it is for salt in products, but some companies are doing a lot more than others. This area needs to become a greater priority, particularly for companies whose products are major contributors to people's intakes, including soft drinks and snacks.

■ **Adopt traffic light labelling:** Manufacturers now stand out for failing to support the hybrid traffic light scheme that all retailers have now committed to. Action is urgently needed. Companies should also support consistent, robust criteria to underpin traffic light labelling that apply across the board.

■ **Use pricing and price promotions to help people make healthier choices:** Food manufacturers should work with retailers to see how they can use price incentives to help people make healthier choices. Retailers should set targets for the balance of healthier choices to be included in special offers.

■ **Ensure products carrying health and nutrition claims are healthy:** Companies need to ensure that they only make claims about health or nutritional benefits on foods products that are a genuinely healthy choice. Supermarkets should also be transparent about the criteria behind their healthy eating ranges.

■ **Strengthen policies on food marketing to children:** Although some steps have been taken, company policies in this area remain weak and have many loopholes. More comprehensive policies that cover all forms of marketing of less healthy foods and encourage healthier promotions to children up to 16 are needed.

Priority actions for the Government

■ **Set further salt reduction targets:** Salt reduction targets for 2015 are needed across food product categories in order to reach the 6g a day salt target. The Government also needs to highlight companies who are not yet meeting 2012 salt reduction targets and ensure compliance across the board, including action by the catering sector.

■ **Set targets for saturated fat and sugar reductions:** Progress on reducing fat, sugar and calorie levels in foods is mixed. The Government has so far only focused on calories, without pushing companies to also look at ways to reduce saturated fat. Saturated fat reduction should therefore be a greater priority within the Responsibility Deal. More specific time-limited targets for key product categories are needed, and good and bad practice needs to be promoted, so that companies take action.

■ **Ensure trans fats are removed across the board:** The Government should follow the example of other countries and ensure that artificial trans fats are removed from all products, not just those developed by the larger food companies, by introducing a ban.

■ **Establish robust criteria for traffic light labelling:** The Government must apply pressure to ensure all food companies use traffic light labelling on front of pack. It must also ensure that the criteria for how the traffic light labelling scheme is applied are not weakened in order to ensure that more companies use it. The existing Food Standards Agency guidance which applies across all products should be the standard.

■ **Take action on price promotions:** The Government needs to take a more active role to ensure that food retailers and manufacturers use price promotions responsibly and that they help people make healthier choices rather than discourage them. Targets should be set for the balance of foods to be included based on Food Standards Agency criteria for what is a healthy product.

A change of pace

■ Overall, the pace of change needs to be dramatically increased. The Responsibility Deal has become associated with half-hearted measures and buck-passing by government. A much greater sense of urgency is needed. The Government has to take greater responsibility for helping people to eat healthily.

■ The Responsibility Deal needs to be given more teeth and become more ambitious. Clear targets and milestones need to be set out by the Government and there need to be more effective sanctions for companies that are not responding. Companies should be named and shamed if they are not doing enough and legislation should be used where insufficient action is taken voluntarily.

■ **Police claims and ensure they are used responsibly:** The Government needs to ensure that claims can be substantiated, based on the EU's list of approved and rejected claims. It must also ensure that criteria are established for fat, sugar and salt levels of foods allowed to make health or nutrition claims.

■ **Develop comprehensive restrictions on the marketing of unhealthy foods to children:** The Government needs to build on initial action taken in relation to TV advertising and ensure that there are tighter restrictions to tackle the many forms of media that are still used to market less healthy foods to children, including on-line marketing, sponsorship and packaging.

■ **Ensure retailers stop heavily promoting unhealthy foods through product positioning:** The Government needs to ensure retailers all commit to promoting products responsibly in store and all remove sweets and less healthy foods from checkouts.

Action for Parliament

■ Greater parliamentary scrutiny is needed given the scale of the public health challenge and level of consumer concern. The Health Select Committee should conduct an inquiry into the Government's response to the diet and health crisis, including the effectiveness of the Responsibility Deal, following up on its 2004 Obesity report.



The Manufacturers compared

Coca-Cola

Coca-Cola sells 25 brands (more than 100 products) of soft drink in the UK. Most popular brands are Coca-Cola, Diet Coke, Schweppes, Capri-Sun and Fanta. The company has diversified by increasing its range of low- and no-calorie drinks: 19 of the company's top 20 brands have a low- or no- calorie alternative or are low- or no-calorie. Around a third (36 per cent) of the drinks sold in Great Britain in 2011 were low- or no-calorie drinks.

Corporate commitment: 3/5

Globally Coca-Cola has explicitly recognised obesity as a business risk. Its efforts include a commitment to promote 'active healthy living' through its health and wellbeing strategy. Its approach, however, tends to put more emphasis on encouraging people to be physically active than on the role of food and drinks.

Healthier products - cutting salt: N/A

Soft drinks contain no, or relatively little, sodium so this isn't a priority area. We have not assessed them for action on trans fats for the same reason.

Healthier products - cutting calories, fat and sugar: 2/5

As well as developing low or no calorie versions of nearly all its brands, Coca-Cola has reformulated some regular products, including Fanta, Lilt and Oasis, to reduce calories. Its Responsibility Deal pledge says it will invest £15 million in reducing calories in several of its leading brands by at least 30 per cent and, on average, across its full range of sparkling drinks by 5 per cent by 2014. This will not, however, involve changes to regular Coca-Cola.

Sport sponsorship

Millions of children are exposed to Coca-Cola marketing regularly. This has included the brand's sponsorship of the Olympic torch relay, the Olympic Games and the associated ad campaigns featuring Mark Ronson and Katy B. Many of Coca-Cola's marketing activities may be aimed at older teens, but they are likely to appeal to younger teens and children too. A Which? survey in February¹ found that 64 per cent of people think that allowing the Olympics to be sponsored by companies who predominantly manufacture unhealthy foods undermines the healthy ethos of the Games.

Clear nutrition labelling: 2/5

There is nutrition labelling on the front of all Coca-Cola's drinks, but this is in the form of percentage guideline daily amounts that are less clear to consumers than colour-coded traffic lights.

Marketing to children: 2/5

Coca-Cola has a Responsible Marketing Operational Code and, along with many other major food manufacturers, has signed up to the EU pledge. The company pledges not to target marketing for any of its drinks to children under 12.

Overall verdict

Coca-Cola has diversified its product range to include more no calorie and low calorie versions. It has reduced sugar levels in some regular brands, but it is not cutting sugar in regular Coca-Cola. It needs to provide traffic light labels and has been guilty of misleading claims in its advertising for Vitamin Water. The emphasis on promoting physical activity should not divert attention from the need to change products and marketing them responsibly.

Responsible advertising and promotions

■ The Advertising Standards Authority (ASA) has upheld a number of complaints about adverts for Coca-Cola products in the last three years. In 2009 the ASA ruled that adverts for Coca-Cola's Vitamin Water were misleading for using headlines like "more muscles than brussels", "keep perky when you're feeling murky" and claims that the drinks would "help you beat your granny in an arm wrestle" or "help you spend less time reading old magazines in the doctor's waiting room". The ASA also concluded that readers would infer that the drinks were "healthy" and that this was likely to mislead because a 500ml serving provided 23 g of sugar (26% of the guideline daily amount).

In April 2011, the ASA upheld a further complaint about a poster advertising "nutritious" Vitaminwater because consumers "would not expect a "nutritious" drink to contain the equivalent of four or five teaspoons of added sugar."

Heinz

Heinz products include soups, beans, pasta, sauces and frozen ready meals. The company has diversified by introducing the WeightWatchers from Heinz range in 1985 and has launched many of 'better for you' products.

Corporate commitment: 3/5

Heinz has a four-point plan for nutrition, which includes reformulation and launch of healthier products, provision of nutrition information, measures on marketing and advertising to children and promoting healthier lifestyles. It has defined some nutrition criteria for new products and has clearly defined who is responsible for nutrition.

Healthier products - salt: 3/5

Heinz was one of the first companies to reduce salt levels in 1986. Earlier this year, the company reported meeting the 2012 salt targets in 70 per cent of the categories that affect its products and says it is on track to meet 88 per cent by the end of 2012.

Healthier products - removing harmful trans fats: 5/5

Heinz eliminated ingredients containing trans fats in 2004 and was meeting the Responsibility Deal pledge on artificial trans fats when the pledge was launched.

Healthier products - cutting calories, fat and sugar: 2/5

Heinz UK says it is working to reduce sugar levels in products and has set targets. It is also working to increase the vegetable content of foods and, at the global level, Heinz has established nutrition criteria for new products. The company had not signed up to the calorie reduction pledge at the time of publication, although it tells us it is 'keeping an open mind' and says that most of its products are relatively low in calories.

Clear nutrition labelling: 0.5 /5

Heinz does not currently provide any standard nutrition information on the front of packs. Some WeightWatchers from Heinz products carry front of pack information on calories or calories plus fat.

Marketing to children: 0.5/5

Heinz has not signed up to the EU pledge on marketing to children, but it does have its own worldwide marketing and communication guidelines. These guidelines set out a number of general principles for marketing communications, including some diet and health considerations, and state that no marketing should be directed solely at pre-school children. Heinz's guidelines are weaker than the EU pledge because they don't restrict advertising or marketing of particular foods to children over pre-school age.

Overall verdict:

Heinz deserves credit for being one of the first companies to reduce salt levels and the company has put in place an action plan, has removed ingredients containing trans fats and is working to reduce sugars. But Heinz stands out for not including any simplified nutrition information on front of pack and having a very limited policy on food marketing to children even though it has made some positive moves, such as reducing the salt in its pasta products targeted at children.

Cutting salt in children's pasta shapes

■ Which? used to criticise foods like pasta shapes specifically aimed to appeal to younger children because of their salt content. Heinz has cut salt in its pasta shapes products aimed at children by 63 per cent, and levels have been reduced to around 0.4g per 100g.

Responsible advertising and promotions

Heinz has worldwide voluntary guidelines that cover its marketing and communications. The Advertising Standards Authority has not ruled against any claims or adverts in relation to health and nutrition issues on any Heinz foods we have focused on in the last three years. When we looked at nutrition claims on Heinz's top products we did not find any misleading examples or claims on high fat, sugar or salt foods.

Kellogg's

Kellogg's products are mainly breakfast cereals and snack bars. As well as Kellogg's cereals, the company manufactures Fruit Winders, Nutri Grain, Optivita, Pop Tarts and Rice Krispie Squares. It recently bought Pringles.

Corporate commitment: 3/5

Kellogg's has a Company Nutrition Policy and a global Corporate Responsibility Strategy that includes strands on nutrition and health, responsible marketing, and consumer information and labelling but the strategy lacks measurable targets. The global Social Responsibility Committee monitors progress and an annual corporate responsibility report is published.

Healthier products - salt: 2/5

Kellogg's has been working to reduce salt levels in its products for 14 years. Earlier this year, Kellogg's reported that it was not yet meeting, but was on track to meet, the Responsibility Deal's 2012 targets in the one relevant category.

Healthier products - removing harmful fats: 5/5

Kellogg's has not added artificial trans fats to its products since 2007 and has met the Responsibility Deal artificial trans fat pledge.

Healthier products - cutting calories, fat and sugar: 0.5/5

The company has not signed up to the UK Responsibility Deal Calorie Reduction pledge, but has committed to removing calories through the US Healthy Weight Commitment Foundation. We have previously raised concern about the sugar levels in breakfast cereals aimed at children, such as Coco Pops. In 2010 Kellogg's announced it would be cutting sugar in Coco Pops by 15 per cent by mid-2011, but our breakfast cereal research published in February found that they contained 35g sugar per 100g, compared to 34g when we looked at the cereal market in 2009⁶.

Clear nutrition labelling: 2/5

There is nutrition labelling on the front of all Kellogg's product packs, but this is in the form of percentage Guideline Daily Amount values that are less clear to consumers than colour-coded traffic lights.

Marketing to children: 1/5

Kellogg's has signed up to the voluntary EU pledge and has its own Worldwide Marketing and Communication Guidelines. In practice, this means it restricts advertising of less healthy products to children under 12. Kellogg's criteria for what constitutes a less healthy food, however, are not very strict, particularly in relation to sugars. Its restrictions would only apply if a product contained more than 12g sugar per 30g serving (i.e. 40g per 100g). Although many of its products marketed to children have high sugar levels, they are still not this high, apparently making the commitment meaningless. Kellogg's packaging for Coco Pops features Coco the monkey, and Tony the tiger appears on Frosties packaging.

These cereals contain 35g and 37g of sugars per 100g respectively. An on-line campaign for Kellogg's Chocolate Caramel Krave also appeared on sites popular with teens. Although Kellogg's has launched products aimed at children with a lower sugar content (such as Coco Pops Moon and Stars), our reports have repeatedly highlighted that most products aimed at children are high in sugar, including a recent cereal bar investigation²².

Overall verdict:

Kellogg's has made commitments to change at the global level and set up global mechanisms for monitoring and reporting. It has removed trans fats and made some progress on reducing salt, but there is limited evidence of progress to reduce sugar levels. Nutrition information is only in the form of guideline daily amount information and it also performs poorly for responsible advertising and promotion.

Responsible advertising and promotions

■ Kellogg's describes itself as 'a leader in creating ethical and responsible marketing standards' but the Advertising Standards Authority has upheld complaints about Kellogg's ads twice this year and we found some inappropriate claims. In one instance, the ASA criticised Kellogg's for not including the calories provided by milk in an advert which emphasised on calories and showed Special K being consumed with milk. The Authority also upheld a complaint that information about a section on sugars and health in a Kellogg's website for children's cereal was misleading and breached advertising rules.

■ When we looked at nutrition and health claims Kellogg's is making on its top selling products, we found a few examples of claims we think imply that some breakfast cereals are healthier than they actually are. Special K, for example, may be 'less than 2 per cent fat' as the claim states, but it also has 35g sugar per 100g (meaning that it would have a red traffic light label for sugar). Similarly, we think that detailed claims for the vitamins and minerals in Coco Pops and for Crunchy Nut Cornflakes are inappropriate on products that are more than one third sugar (35g sugar per 100g).

Kraft Foods

Kraft Foods products include confectionery and biscuits, coffee, cheese spread and cream cheese and chewing gum. The main food brands are Bassetts, Belvita, Cadbury, Daim, Dairylea, Green&Black's, Halls, Maynards, Mikado, Milka, Oreo, Philadelphia, Ritz, Terry's, The Natural Confectionery Company, Toblerone and Trebor. The company says it has diversified by launching, since 2005, more than 5,500 'better for you' products and claims that there is now a 'better for you' option for almost a third (30 per cent) of its global product portfolio.

Corporate commitment: 2/5

Kraft Foods has outlined its global approach to nutrition in its corporate social responsibility report, which reported on its progress in 2011 but doesn't set out any specific targets. The company is advised by a worldwide Health and Wellness Advisory Council but doesn't say who is responsible for ensuring progress on these issues. The company tells us that, following the recent change in the corporate structure, it is still working out how these issues are to be handled.

Healthier products - salt: 2/5

Earlier this year Kraft Foods said it was meeting the 2012 salt targets in seven of the 15 Responsibility Deal categories (47 per cent) where it has products. It says it will be challenging to meet the targets in some of the remaining categories, including for biscuits and some types of cheese.

Healthier products - removing harmful trans fats: 5/5

Kraft Foods started to remove artificial trans fats in 2003 and had met the Responsibility Deal pledge on trans fats before the Deal was launched in March 2011.

Healthier products - cutting calories, fat and sugar: 2/5

Kraft Foods says it is working to reduce fat along with its work to reduce salt and to increase positive nutrients, such as wholegrains. The company has signed up to the Calorie Reduction pledge, which it says it will achieve by increasing the range of lower fat and lighter versions of products.

Clear nutrition labelling: 2/5

There is nutrition labelling on the front of all Kraft Foods products in the UK, but this is in the form of percentage Guideline Daily Amount values that are less clear to consumers than traffic lights.

Marketing to children: 1/5

Kraft Foods is a signatory to the EU pledge on marketing to children. Kraft Foods policy is not to advertise at all to children under six and to only advertise products that meet its nutrition criteria to children aged between six and 11. The policy covers TV, radio, print and internet advertising. In comparison to some other companies who say that they will still go into schools, for example, for educational purposes, Kraft Foods makes a clear commitment it will not do any advertising or marketing

in schools. Products, such as some of its Dairylea Lunchables range, are, however, still marketed as ideal for children's lunchboxes and feature designs likely to appeal to children.

Overall verdict:

Kraft Foods has made some corporate commitment to change, has removed trans fats and has been working to reduce salt and fat levels. Earlier this year Kraft Foods was struggling to meet the 2012 salt targets in more than half of the relevant categories. The work to make healthier products is ongoing. We found inappropriate nutrition claims on some of Kraft Foods' top selling products and, despite the fact that Kraft Foods is a signatory to the EU pledge on advertising to children, some promotions for high fat, sugar or salty foods that were likely to reach and appeal to children. It also needs to improve front of pack nutrition information.

Olympic gold

■ Cadbury's, like Coca-Cola, will have reached millions of children through its sponsorship of the London 2012 Olympic Games. Many of the campaigns associated with the games — such as Crème Egg's, animated Goo-ing for Gold adverts—undoubtedly have family appeal. As part of its many promotions linked to the games, Cadbury's placed banner adverts for confectionery on games sites — such as addictinggames.com and uk.games.yahoo.com — that appear to be largely targeted at children or young teens.

Responsible advertising and promotions

■ There have been no complaints about Kraft Foods adverts upheld by the Advertising Standards Authority in the past three years. When we looked at the nutrition claims Kraft was making on its top products, we found some examples of claims on foods high in fat, sugar or salt. Kraft Food's Light French Dressing may be 'fat free' but is high in salt, for example.

Mars

Mars products include chocolate and sugar confectionery, ice cream, pasta sauces and rice. Brands include Mars, Snickers, Twix, Milky Way, Starburst, Skittles, Revels, Bounty, Celebrations, Galaxy, M&Ms, Maltesers, Seeds of Change, Tracker, Dolmio and Uncle Ben's. The company also sells Flyte a chocolate bar with lower than average fat content.

Corporate commitment: 3.5/5

Mars has produced a manifesto that includes commitments to offer different products and portion sizes, provide clear nutrition information and promote responsible consumption. At the global level, the company has also put in place some measurable targets linked to these commitments.

Healthier products - salt: 4/5

Mars is a signatory to the Responsibility Deal pledge on salt reduction and it has met the 2012 targets for salt reduction in six of the seven (85 per cent) relevant categories (equivalent to over 90 per cent of relevant products) and says it is on track to meet the target for the one remaining category (flavoured rice) by the end of the year.

Healthier products - removing harmful trans fats: 4/5

Mars started to remove trans fats in 2002 and met its Responsibility Deal commitment to remove artificial trans fats from all its products at the end of 2011.

Healthier products - cutting calories, fat and sugar: 2.5/5

Mars has reduced the saturated fat in Mars, Snickers, Milky Way and Topic bars by 15 per cent and says it has reduced the average number of calories in single portion products by more than 10 per cent between 2007 and 2011. Mars has pledged that all chocolate products will have no more than 250 calories per portion by 2013 although 250 calories is a high calorie count for a snack (10 per cent to 12 per cent of daily energy needs for most adults).

Clear nutrition labelling: 1.5/5

Mars chocolate and sweets have limited front-of-pack nutrition information—many products only show calorie contents. All other Mars foods sold in the UK carry front of pack nutrition information for energy, sugars, fat, saturated fat and salt, but in the less clearly understood percentage GDA format.

Marketing to children: 2/5

Mars has signed the EU pledge on marketing to children and has an advisory group of external experts to advise on advertising campaigns. Its policy goes further than the basic pledge commitments because it defines marketing to children as where more than a quarter of the audience is under 12. The EU pledge relates to audiences where 35% or more are under 12. Visitors to Mars promotional websites have to input their date of birth to enter the site. Nonetheless, children are still exposed to marketing for Mars confectionery. Brands like Galaxy Minstrels and M&M's have sponsored Harry Hill's TV burp, a programme likely to appeal to teenagers.

Overall verdict:

Mars has made progress in reducing salt, has removed trans fat and has achieved some reductions in saturated fat and calories. Nutrition information on the front of food labels needs to improve. Mars' policy on marketing to children goes further than most in the way it defines child audiences and because it covers all the company's products, but still does not go far enough.

Responsible advertising and promotions

■ The Advertising Standards Authority has not upheld any complaints about Mars adverts in relation to food and health in the last three years.

We looked at nutrition claims on the labels of Mars products which are best sellers in their category. A claim on Uncle Ben's Sweet and Sour Sauce could be confusing as it says it has 'just the right amount of salt' but is still high in sugar.

Nestlé

Nestlé products include bottled water (Nestlé Pure Life), breakfast cereals (Cheerios, Shredded Wheat, Shreddies, Oats & More, Golden Nuggets, Nesquik), chocolate confectionery (including Kit Kat, Aero, Yorkie, Smarties, Milkybar, Munchies, Walnut Whip, Caramac, Lion Bar) and sweet confectionery (Fruit Gums, Fruit Pastilles, Sour Pastilles, Tooty Frooties, Jelly Tots, Very Berry Jellies, Polo), biscuits (Blue Riband, Breakaway, Drifter, Toffee Crisp), a variety of other grocery products (such as Carnation sweetened milks, Herta, yoghurts, mousses and ice cream) and a range of coffees and other beverages. More than four fifths (88 per cent) of Nestlé's food and drink products include lower or low calorie options.

Corporate commitment: 4.5/5

Nestlé's approach to nutrition is set out in its Corporate Business Principles and its Health and Wellness Strategy. There is clear responsibility for monitoring and reporting on progress and the company has set out some nutrition-related Key Performance Indicators.

Healthier products - salt: 2/5

Nestlé reported earlier this year that it was meeting the 2012 salt targets in 25 per cent of the 16 relevant Responsibility Deal categories (equivalent to around 80 per cent of relevant products) and said it was on track to meet the rest of the targets by the end of the year.

Healthier products - removing harmful trans fats: 5/5

Nestlé started to remove artificial trans fats through the removal of partially hydrogenated vegetable oils from its products in 2003 and had already completed the process before the March 2011 Responsibility Deal pledge on removal of artificial trans fats.

Healthier products - cutting calories, fat and sugar: 3/5

Since Nestlé started its programme of reformulation, it says that 52 per cent of its products now contain less sodium, sugars, trans fats, total fat or artificial colours than they did. Nestlé has signed up to the Responsibility Deal's calorie reduction pledge and outlined a series of specific actions. The company says that 88 per cent of its food and drink products include lower or low calorie options and that 39 per cent of its confectionery products contain less than 110 calories per serving.

Clear nutrition labelling: 2/5

Most Nestlé products have nutrition labelling on the front of pack, in the less clear percentage Guideline Daily Amount format, although some products have calorie information only on the front of packs.

Marketing to children: 1/5

Nestlé has signed up to the EU pledge and has its own internal rules on marketing to children. In line with the pledge, Nestlé's policy is not to advertise at all to children under six years old and only to market foods which meet its detailed nutrition criteria to children under 12. Nonetheless, some foods which are high in fat, sugar or salt are still marketed to children. For example, Nestlé has a dedicated Nesquik web-site aimed at children featuring Quicky the rabbit, games and ecards. Nesquik breakfast cereal contains 30 per cent sugar.

Overall verdict:

Nestlé has made many corporate statements committing to change and this is recognised as important to the business. The company has removed trans fats and is working towards the 2012 salt targets, which it says it is on track to meet at the end of the year although it was only meeting the targets in 25 per cent of categories (covering 80 per cent of relevant products) earlier in the year. Nestlé's approach to advertising, claims and marketing to children is disappointing – the company needs to take more action to avoid making misleading claims and to protect children from marketing messages for sugary foods.

Responsible advertising and promotions

■ Advertising for Nestlé brands is covered by the company's Consumer Communication Principles, which cover a range of issues. The Advertising Standards Authority has upheld a number of complaints against adverts for Nestlé products in recent years. This includes an advert emphasising the calorie content of a two-finger Kit Kat and stating that the product 'May aid weight control within a balanced, calorie controlled diet' which was judged in June 2010 to give the misleading impression that a two finger Kit Kat is low in energy. We also found some inappropriate use of claims when we looked at Nestlé's top selling products. Claims for Cheerios, Cookie Crisp and Nesquik cereals highlight the vitamin, minerals and wholegrains the cereals contain, but all three products are high in sugar and would get a red traffic light rating. The 'contains 25 per cent fruit juice' claim on Rowntrees fruit gums implies the sweets are healthier than they are, given the 43g of sugar per 100g they contain.

PepsiCo

PepsiCo's main products in the UK are savoury snacks, soft drinks and other drinks, along with oats and oat based products. The main brands are Walkers, Quaker, Tropicana and Pepsi, but also include Copella, Naked, SoBe, V Water, Snack a Jacks, Red Sky, Sunbites and Oats So Simple. The company has diversified by promoting no sugar soft drinks, which now account for more than two-thirds of Pepsi retail sales, and providing a wider choice of healthier snacks. The company has also taken over Tropicana (fruit juice) and Quaker (oats).

Corporate commitment: 5/5

In 2010 PepsiCo set out 27 specific health commitments for the UK, and has set detailed measurable targets. Health and Nutrition is a board-level responsibility, through the Vice-President for Research and Development, and a Global Nutrition Group was set up in October 2010. Progress against these commitments is independently assessed by an external auditor and is reported through annual updates.

Healthier products – salt: 3/5

PepsiCo, which has been working on salt reductions since 2006, reported earlier this year that it was meeting the Responsibility Deal targets in three (60 per cent) of the five relevant categories (70 per cent of its total range) and is 'on track' to meet the target in one more category by the end of the year.

PepsiCo marketing messages still reaching children

■ Despite signing up to the EU pledge and the Ofcom rules governing TV advertising in the UK, PepsiCo is still reaching millions of children with its marketing methods. Walkers Extra Crunchy will be the main sponsor brand of the live final of the X Factor talent show in December 2012, a show that is popular with all ages and last year attracted a total audience of over 12 million people. PepsiCo is also likely to be appealing to young audiences, with the use of two illustrated characters (Doritos Fire and PepsiMax Citrus Freeze) in email promotions. Internet advertising for Doritos was promoted on gaming websites popular with children, such as agame.com and girlsgogames.co.uk.

Healthier products – removing harmful trans fats: 5/5

PepsiCo has eliminated artificial trans fats, and had met the Responsibility Deal pledge requirements before the March 2011 launch of the Deal.

Healthier products – cutting calories, fat and sugar: 3/5

The company has cut the sugar in standard Pepsi by four per cent and achieved large reductions (70-80 per cent) in saturated fat levels in crisps by switching to healthier oils (sunflower and rape seed oils). Targets have been set for further reductions by 2015, including for calorie and fat reduction.

Clear nutrition labelling: 2/5

Most products have front of pack nutrition information, although using the less helpful percentage GDA format.

Marketing to children: 1/5

PepsiCo has signed up to the EU pledge, and promises, therefore, to only advertise products that meet its defined nutrition criteria to children under 12.

Overall verdict:

PepsiCo has made a strong corporate commitment to change, and has made good progress in removing trans fats and reducing salt, saturated fat and, to a lesser degree, sugar. The company does poorly, however, for nutrition information and could do more to protect children from irresponsible marketing messages.

Creating a healthier portfolio

■ PepsiCo is one of the companies that we looked at that has made a very specific, quantitative target to change the balance of products it sells - pledging that 60 per cent of its business (sales by volume) will be healthier, according to strict nutrition criteria (by the Food Standards Agency's definition), by 2015. PepsiCo reports that over half (54 per cent) of the company's products currently meet this definition.

Premier Foods

Premier Foods has a broad range of grocery products and its main brands are Hovis, Ambrosia, Mr Kipling, Sharwood, Lloyd Grossman, Bisto, Oxo and Batchelors. The company aims to increase the range of healthier products and from this year has said that at least 50 per cent of the new products it launches must have a claimable health or nutrition benefit.

Corporate commitment: 5/5

Premier Foods has a four-strand health and nutrition strategy as part of its sustainability strategy, and has set out four detailed, measurable targets that are included as Key Performance Indicators for the business. In 2011, the company completed Health and Nutrition Priority Action Plans for its eight key brands. Responsibility for monitoring and reporting is clearly set out and progress is reported through the annual sustainability report.

Healthier products – salt: 2/5

By the end of July, Premier Foods was meeting the Responsibility Deal 2012 targets in six of the 15 (40 per cent) categories which it signed up to and was 'on track' to meet the targets in all 15 categories by the end of the year. The company has signed up to the salt reduction pledge but explicitly excluded some product categories from its commitments. It did not initially commit to meeting the targets in five categories, including some types of savoury snacks (pellet snacks), cake and cake mix, citing technical problems. Consensus Action on Salt and Health (CASH)¹⁷ has pointed out that other manufacturers have overcome technical difficulties for similar savoury snacks, citing Sainsbury's Prawn Cocktail Shells or Tesco Bacon Rashers. Premier Foods tells us it has since managed to make some progress in the categories where it did not initially make commitments.

Healthier products – removing harmful trans fats: 5/5

Premier Foods has removed artificial trans fats and had met the conditions for the Responsibility Deal trans fat pledge before the Deal was launched in March 2011.

Healthier products – cutting calories, fat and sugar: 2/5

In signing up to the Responsibility Deal's calorie reduction pledge, Premier Foods has committed to reduce calories in one third of its branded products by the end of 2014 by changing recipes and increasing the choice of portion sizes. The company tells us it will be over half way to meeting this target by the end of 2012. The work towards meeting this calorie reduction target involves reductions in fat, saturated fat and sugar, as well as increasing vegetable and fibre contents of foods.

Clear nutrition labelling: 2/5

Premier Foods provides nutrition information, in the less helpful percentage GDA format, on the front of food packs. On smaller packs, only calories are shown on the front.

Marketing to children: 0.5/5

Premier Foods has not signed up to the EU pledge but has set out its policy on marketing to children. As with other companies, Premier Foods has to comply with the Ofcom and British Committee on Advertising Practice rules on responsible advertising. In addition, the company sets some additional criteria for marketing to children under 11 and children under five. The policy guidelines say that adverts will not encourage pester power, but they also say that marketing to under fives is permitted on packaging and on promotional materials at 'point of purchase where young children are accompanied by an adult who makes the final purchase decision.'

Overall verdict:

Premier Foods has issued a strong commitment to change, and has included some indicators of change in relation to health and nutrition as Key Performance Indicators for the business. It has removed trans fats and made progress in reducing salt levels (although it shied away from commitments in some types of food under the Responsibility Deal) and is working towards cutting calories in particular, but also fat/saturated fat and sugars. The company needs to do more, however, in relation to nutrition information and advertising and promotion. Its policy guidelines on marketing to children appear to endorse unacceptable practices in relation to point of purchase promotions to young children.

Responsible advertising and promotions

■ In January 2009, the ASA banned an advert for Hovis Wholemeal because its claim that "just 2 slices provides you with 33 per cent more wholegrain than a bowl of cereal" was misleading, since it was based on a 30g bowl of cereal, whereas the cereal manufacturer's recommended portion was 45g. When we looked at claims on Premier Foods' top products we did not find any misleading claims, nor examples of nutrition claims on less healthy foods.

Unilever

Unilever products include tea, margarine, mayonnaise, pasta sauces, olive oil, soup, stock cubes and ice cream. Brands include Ben & Jerry's, Bertolli, Bovril, Carte D'Or, Colman's, Cornetto, Elmlea, Flora, Hellmann's, I Can't Believe It's Not Butter, Knorr, Magnum, Marmite, Peperami, Pot Noodle, Stork and Wall's. Globally, Unilever says that it has increased the proportion of its products which 'meet the highest nutritional standards' to 25 per cent by the end of 2011, and aims to double this by 2020.

Corporate commitment: 4.5/5

Unilever has a global nutrition policy and reports on some measurable nutrition-related targets in its Sustainable Living Plan, with progress against targets reported publicly. Nutrition policy is led by the Global President for Foods, who sits on the company's Executive Committee.

Healthier products – salt: 2/5

The company is meeting the 2012 salt targets in five (36 per cent) of the 14 Responsibility Deal relevant categories (equivalent to 62 per cent of products) and is 'on track' to meet the targets in 10 out of 14 categories (71 per cent of categories and 82 per cent of products) by the end of the year.

Healthier products – removing harmful trans fats: 5/5

Unilever removed trans fats from margarine in Europe in 1996 - an early example of how products could be reformulated to remove or reduce ingredients of concern - and had removed trans fats from almost all UK products by 2010. It has met the requirements of the Responsibility Deal pledge.

Healthier products – cutting calories, fat and sugar: 3/5

A plan to reduce saturated fat has already shown some progress - less than a third of the fat in the company's most popular spreads is now saturated fat - and some reductions in sugar have also been achieved. Unilever has also signed up to the Responsibility Deal calorie reduction pledge, and has already reduced calories in, for example, Flora and Flora Light.

Clear nutrition labelling: 2/5

Most Unilever products carry front of pack nutrition labelling, in the guideline daily amount format, for the five key nutrients. Some products, however, have no front of pack nutrition information or only display calorie counts on the front of pack—mainly, Unilever tells us, where packs are too small or where there is multilingual information. This means that some foods high in saturated fat, such as some flavours of Carte d'Or ice-cream, for example, do not have full front of pack nutrition information.

Marketing to children: 1/5

Unilever has signed up to the EU pledge and has developed its own global marketing principles. This means that the company will not advertise to children under six and will only market foods that meet its health criteria to children between six and twelve.

Overall verdict:

Unilever has strong corporate commitment to change and was a market leader in efforts to remove trans fats and reduce salt levels (although it is no longer ahead of other companies on meeting the 2012 salt targets). It has made progress in reducing saturated fats and is working on cutting calories and sugar. Provision of clear nutrition information, however, is disappointing and the company should strengthen its approach to responsible advertising and to protecting children from marketing messages.

Responsible advertising and promotions

■ Although adverts with health claims for some Unilever products have stood up to scrutiny, the ASA upheld a complaint about an advertorial for Flora pro.activ, in November 2011, because it gave the impression that the ad was an article written independently by a Telegraph journalist and was not clearly identifiable as a marketing communication.

United Biscuits

United Biscuits mainly sells biscuits and savoury snacks. Brands on sale in the UK include McVities, Jacob's, Twiglets, Phileas Fogg, Hula Hoops, Skips, Mini Cheddars, McCoys, KP and Carr's. United Biscuits has diversified by launching the Go Ahead range of healthier biscuits, and by introducing the McVities Lights range of reduced fat biscuits and Jacob's Light Cream Crackers.

Corporate commitment: 4/5

United Biscuits launched a 10-year Health and Nutrition Programme in 2005, which contains a series of specific, measurable targets focused on how the company can change its products. The company's Health and Nutrition Steering Group, involving senior management, is responsible for this programme and it regularly reports on progress.

Healthier products – salt: 1/5

The company is not yet meeting the Responsibility Deal's 2012 salt targets in any of the eight relevant categories, although it says it will meet targets in two categories (25 per cent) by the end of the year. However, it tells us that it will also be meeting the targets in 84 per cent of the 281 products covered by its pledge by then. The company cites 'considerable technical challenges' in the crisps and savoury snacks category, but this is an area where smaller brands and retailers' own brands have managed to meet targets.

Healthier products – removing harmful trans fats: 5/5

United Biscuits removed hydrogenated vegetable oils from doughs in 2004 and had removed all artificial trans fats, meeting the Responsibility Deal pledge requirements, before the Deal was launched in March 2011.

Healthier products – cutting calories, fat and sugar: 3/5

United Biscuits' 10-year plan sets specific targets for reducing saturated fat, salt and sugars. The company has made progress in reducing saturated fat in biscuits and snacks—with reductions of between one third (Jacob's Cream Crackers) and 80 per cent (McVities Digestives, McVities Light Digestives, KP Crisps, Roysters). All fried snacks are now made with sunflower oil. United Biscuits tells us that it is working on reducing sugar levels, but that they are finding this very challenging.

Clear nutrition labelling: 2/5

United Biscuits says that the majority (over 90 per cent) of products carry front of pack nutrition labelling, but this is in the percentage guideline daily amount format.

Marketing to children: 3/5

United Biscuits has its own policy guidelines on marketing to children, and these go further than every other manufacturer we looked at because they put restrictions on advertising to audiences where more than half of the children under the age 16. Despite this welcome policy, we found some online marketing that seemed to be designed to appeal to children and teenagers. Email marketing from July last year, for example, offered a downloadable animated penguin as 'your new desktop buddy'.

Overall verdict:

United Biscuits is another company that has made a strong corporate commitment to change backed up by specific targets to change its products. It has removed trans fats and is making progress on reducing salt and saturated fat. The company could do much more, however, to improve nutrition labelling and to ensure that it is not making misleading claims. While United Biscuits' policy on marketing to children goes further than any other manufacturer, we think some online marketing seems likely to appeal to children.

Responsible advertising and promotions

■ In the last three years, there have been no complaints about United Biscuits products upheld by the Advertising Standards Authority. Current Jaffa Cakes packaging, however, carries the claim that each biscuit contains 'only one gram of fat'. In October 2008, the advertising regulator ruled that this claim - which featured in an advert - misleadingly suggested that Jaffa Cakes (8g of fat per 100g solids) were low in fat. The website for Mini Cheddars states that 'using a blend of sunflower and vegetable oil, saturated fat has been reduced by 30 per cent on Mini Cheddars' nonetheless, the product is still high in fat, saturated fat and salt.

The Retailers compared

Aldi

Aldi is a discount retailer that primarily sells own brand products. It does not have a specific range of healthier products, although some of its ranges may include healthier choices.

Corporate commitment: 1/5

Aldi's corporate responsibility policy contains a paragraph on food and health, but this is a very general statement and does not include specific goals or targets. It is not clear who will be responsible for monitoring developments or how it will report on progress.

Healthier products – salt: 2/5

Aldi is a signatory to the Responsibility Deal pledge for salt. Specific figures are not available to confirm in how many products or categories Aldi is meeting the 2012 targets (the company did not submit specific figures for the 2012 Responsibility Deal update and hasn't provided us with detailed figures). The company does tell us that almost a third of its products now meet the 2012 targets and it is 'making good progress.'

Healthier products – removing harmful trans fats: 5/5

The discount retailer had already removed harmful trans fats from its products when it signed up to the Responsibility Deal pledge.

Healthier products – cutting calories, fat and sugar: 1/5

Aldi says that manufacturers and buyers are 'tasked with continuing to improve the nutritional profile' of products and that it is reviewing its products to identify areas where calories and salt can be reduced.

Marketing to children

The company has to comply with advertising rules, but does not have any other policy on marketing to children. Examples of illustrated characters likely to appeal to children on Aldi own-brand less healthy products were easily found, such as on Harvest Morn breakfast cereals which are high in sugar.

Clear nutrition labelling: 2.5/5

To date, Aldi food products have carried front of pack nutrient labelling in the less helpful percentage GDA format. It is good to see, however, that the company has recently announced that it is going to introduce colour-coded traffic light labelling alongside Guideline Daily Amount information.

Price promotions: 0.5/5

Aldi does not have any specific targets or guidelines to ensure that price promotions feature healthy options. It tells us, however, that it has its Super 6 deals on fruit and vegetables.

Sweets at checkout: 0/5

The retailer does not have any policy on display of sweets, snacks or other unhealthy products at checkouts.

Overall verdict:

Aldi has made few corporate commitments to change, although it has removed trans fats. It tells us it is making good progress towards the 2012 salt targets and is now working with a nutritionist to reduce calories and salt. Its recent announcement that it will be introducing traffic light labels for nutrition information is very welcome.

Asda

Around half the food sold in Asda is the retailer's own brand. Asda has developed three reduced ranges: Chosen By You Reduced Calorie, Chosen By You Reduced Sugar and Chosen By You Reduced Fat.

Corporate commitment: 2.5/5

Asda's sustainability strategy contains a commitment to continue to develop more healthy, sustainable and affordable food choices. It tells us it has a detailed internal food and nutrition policy with measurable targets and now carries out an annual audit to identify products where nutritional improvements can be made, but these documents are not made public. It is not clear who is responsible for ensuring delivery and there is limited reporting on progress.

Healthier products – salt: 2/5

Asda has signed up to the Responsibility Deal pledge on salt reduction and is 'committed to meeting the 2012 targets'. Asda tells us it was meeting 24 out of 75 categories in May but this is not based on sales weighted averages (as required for Responsibility Deal updates) so it did not report on the number of categories meeting targets in its update to the salt pledge. This makes it difficult to compare.

Healthier products – removing harmful trans fats: 5/5

Asda removed hydrogenated vegetable oils from its products in 2007 and is therefore meeting the Government's Responsibility Deal pledge on artificial trans fats.

Healthier products – cutting calories, fat and sugar: 2/5

In April 2012, the company started working on an action plan to reduce calories and make products healthier. It is also working on a reformulation plan to reduce fat, saturated fat and added sugar in own label and is in the process of setting one to three year targets.

Clear nutrition labelling: 5/5

Asda uses clear colour-coded nutrition traffic lights, along with the wording high, medium or low and Guideline Daily Amount information. This is being rolled out across its own brand range.

Price promotions: 0/5

No information available on whether Asda has any targets or guidance to ensure that price promotions include healthy products.

Sweets at checkouts: 2/5

Confectionery is on display at some Asda checkouts. Asda says parents report it that it is not helpful to have sweets on display low down in the checkout area so it limits display of confectionery treats to one in three checkout ends.

Overall verdict:

Asda tells us it has a detailed, broad-ranging plan for nutritional improvement but these commitments, and progress towards achieving them, are not transparent. Asda has removed trans fats and is making good progress in reducing salt and promises action on calories, fat, saturated fat and added sugar. Asda, along with The Cooperative, is already using the best form of comprehensive front of pack nutrition information. Asda could do more to protect children from marketing of less healthy foods – by introducing and implementing a policy on marketing to children which covers packaging, in-store promotions and positioning of sweets and other less healthy foods at checkouts.

Healthy eating ranges

■ Asda has three reduced sub-ranges which offer a 30 per cent reduction in sugar, calories or fat compared to equivalent standard products. These clearly communicate the purpose of the range, rather than suggesting an all round healthier product.

Marketing to children

Asda, like other retailers, has to comply with rules on advertising to children. Examples of packaging with cartoon character illustrations likely to appeal to children on Asda products which are high in sugar are easily found, particularly breakfast cereals and confectionery. Asda also told us that, when determining which foods to include as Back to School products, it uses the FSA nutrient profiling model and this year 60 per cent of products included were for healthier alternatives.

The Co-operative

The Co-operative is the UK's fifth largest food retailer with 3,300 own brand food products accounting for 46 per cent of sales. The retailer has a healthier range, under the Healthier Choice label.

Corporate commitment: 5/5

The Co-operative has set out a responsible retailing strategy and its Ethical Plan for 2012-14 sets out a number of specific, measurable commitments. Responsibility for reviewing progress lies with the Values and Principles Committee, a sub-committee of the board consisting of elected members, and the Sustainability Executive, chaired by the Chief Executive.

Healthier products - salt: 3/5

The Co-operative has been working on salt reduction since it challenged its suppliers to reduce salt levels in 1995. It has signed up to the Responsibility Deal and is currently meeting the 2012 targets in 38 (59 per cent) of the 64 relevant categories and 87 per cent of relevant products. It says it is on track to meet the targets in 14 other categories (81 per cent of categories in total and 94 per cent of relevant products) by the end of the year.

Healthier products - removing harmful trans fats: 5/5

The Co-operative had removed harmful trans fats from its products, a process it completed in 2007, before the launch of the Responsibility Deal pledge.

Healthy eating ranges

The nutrition criteria for the Healthier Choice range are transparent and robust, although some healthier versions of unhealthy foods, rather than all round healthy products, such as Healthier Choice cheese, are allowed. The Co-operative has also set out clear, strict criteria for use of its 'green dot' claims for products that are, for example, low fat, reduced fat, high fibre. It says that green dots won't appear on any products that have red traffic lights on the nutrition labels.

Marketing to children

The Co-operative is unusual among retailers in that it has a specific policy statement on marketing to children. This policy, which means they don't target children with marketing for foods that are high in fat, sugar or salt, covers in-store demonstrations, free samples, packaging and promotions.

Healthier products - cutting calories, fat and sugar: 3/5

The retailer has an on-going programme to reduce saturated fat and sugars and reports some progress - such as a 34 per cent cut in saturated fat in sponge cakes and a 9 per cent drop in sugar levels in 'high juice' squash drinks. The Co-operative has not signed up to the Government's Responsibility Deal calorie reduction pledge, but it tells us it has since been developing its own plans on calorie reduction.

Clear nutrition labelling: 5/5

The Co-operative has been using red, amber and green traffic lights, accompanied by the wording 'high', 'medium' and 'low', since 2006. They have since also included guideline daily amount (GDA) information. This type of labelling is the easiest to understand and most useful to help people make healthy choices at a glance.

Price promotions: 3/5

The retailer promised that at least 30 per cent of its promotions will be on healthier products and in 2011, it reports, 34 per cent of food promotions were on healthier options. This goes further than all the other retailers except Sainsbury's, but it still means that more than two-thirds of price promotions can be for less healthy products.

Sweets at checkouts: 4/5

The Co-operative has banned displays of high fat, sugar or salt products from checkout stands and kiosks although this is more difficult to apply in some of its smaller stores.

Overall verdict:

The Co-operative is leading the way among retailers. It has removed trans fats, is making progress reducing salt and saturated fat and has plans to cut calories from its own brand products. It is one of only two retailers that have set a clear target for the proportion of price promotions to feature healthy products. The Co-operative, along with Asda, provides the clearest form of nutrition labelling on the front of pack. The nutrition criteria for The Co-operative's healthier range and for the nutrition claims it makes on labels are transparent. It is the only retailer to have an explicit policy covering marketing to children and it has a policy which bans the display of less healthy foods at checkouts.



Executive pay for healthy results

■ The Co-operative is unusual in that it says that executive remuneration is influenced by how well the company is seen to be doing as a champion of social responsibility according to Business in the Community's Corporate Responsibility Index. Building nutrition and health results into a company's performance in this way is one way to ensure that issues are taken seriously.

Keeping healthier choices affordable

■ The Co-operative has made a specific promise that its Healthier Choice products won't cost more than their standard equivalents. Its 2011 report states that 100 per cent of Healthier Choice products were no more expensive than equivalent standard products.

Iceland

Iceland specialises in frozen food, but also sells grocery, chilled and fresh food. It does not currently have a healthier own brand range but sells the WeightWatchers frozen food range.

Corporate commitment: 1/5

Iceland's corporate responsibility statement sets out what has been done in relation to healthier food, but does not outline any strategy or make promises for further action.

Healthier products – reducing salt: 1/5

Iceland met the 2010 salt targets (set by the Food Standards Agency) but it has not signed up to the Responsibility Deal pledge to meet the 2012 salt targets. The company says it is committed to reducing salt levels in key products.

Healthier products – removing harmful trans fats: 5/5

Iceland removed hydrogenated fats from its own brand products by 2007 and has met the Responsibility Deal pledge on trans fats.

Healthier products – cutting calories, fat and sugar: 0.5/5

Iceland tells us that it has a policy to promote reductions in saturated fat and sugar by asking its suppliers to review products. It reports progress in cutting saturated fat in some products. It has not signed up to the Government's calorie reduction pledge.

Clear nutrition labelling: 1.5/5

Iceland is unusual among retailers because it does not currently put nutrition information on the front of the packaging for its own brand products. It did, however, commit to use front of pack labelling, including traffic lights, in October following the other retailers.

Price promotions: 0/5

No information was available about whether Iceland has guidance or targets for price promotions on healthier choices.

Sweets at checkouts: 2/5

Iceland does allow sweets at some checkouts. The retailer's policy is to allow a confectionery stand at only one checkout in each of its stores.

Overall verdict:

Iceland has made very little corporate commitment to change and this is reflected in the very limited improvements that have been made in practice. The company has removed trans fats, but is the only retailer we looked at that did not sign up to the Responsibility Deal salt reduction pledge. It did not provide information about cuts in fats or calories. It was also the last retailer, of the ten we looked at, to commit to use front of pack nutrition labelling, including traffic lights – although it is positive that it has now agreed to use the scheme.



Marketing to children

Iceland does not have a specific policy on marketing to children, but does not have a particular range marketed at children.

Lidl

Lidl is a discount supermarket that sells a smaller range of around 1,600 products, most of which are own brand products. It has introduced a healthy eating range, under the label Linessa.

Corporate commitment to change: 1/5

Lidl says that it is 'constantly addressing emerging nutritional issues' and has signed up to several Responsibility Deal pledges but it does not have an explicit nutrition strategy or policy. Lidl says that responsibility for nutrition policies and pledges lies with the Quality Assurance Team which works with the buyers on these issues.

Healthier products – reducing salt: 2/5

Lidl has signed up to the Responsibility Deal salt reduction pledge. Earlier this year the company reported it had reduced the number of products not meeting the 2012 targets from 305 to 89 but did not report the number of categories in which it is meeting targets, making it difficult to compare. It tells us that by January 2013 all its own brand products will meet the targets.

Healthier products – removing harmful trans fats: 5/5

Lidl had removed harmful trans fats from its own-brand products by early 2010.

Healthier products – cutting calories, fat and sugar: 0.5/5

Lidl has reduced saturated fat by switching to sunflower or rapeseed oil in some crisp and frozen potato products. The company hasn't reported any progress or action plans to reduce calories, fat or sugar but tells us it is continually reviewing the nutritional content of its products.

Clear nutrition labelling: 2.5/5

When we started this research Lidl was committed to providing front of pack nutrition information in the percentage guideline daily amount (GDA) format on all own brand products. Since then, however, following in the footsteps of Tesco and Aldi, Lidl has announced it will be introducing nutrition traffic lights along with the GDA information.

Price promotions: 0/5

Lidl tells us it features healthy products in its promotional mix by, for example, offering half price fruit and vegetable items every week. It also says that products in the Linessa healthier eating range are included in its promotional activities.

Sweets at checkouts: 0/5

Lidl's policy on displaying sweets or other unhealthy foods at checkouts is not clear. The company does tell us, however, that is considering an initiative to ensure that at least one checkout in every store will display healthy products, such as fresh fruit.

Overall verdict:

Lidl's corporate commitment to change is weak, although it has removed trans fats, made progress in reducing salt and has reduced saturated fat in some products. The company's recent announcement that it will be introducing traffic light labels for nutrition information is welcome. The criteria for Lidl's healthier range, Linessa, are however not transparent.

Healthy eating ranges

Lidl presents the Linessa range as a healthy range, but the criteria for these products are not transparent. Lidl says that all Linessa products are a healthier version of standard products on the market. In fact, we don't think some of the products in the range belong under a healthy label. Linessa Reduced Fat Nuremberg Pork Sausages, for example, are high in fat (22g per 100g).

Marketing to children

Lidl has to comply with the rules on advertising to children, but like most other retailers, it does not have any additional policy on marketing to children. It uses illustrations likely to appeal to children on foods that are high in sugar.

Marks & Spencer

Food makes up 51 per cent of Marks & Spencer sales. It has over 7000 product lines, most of which are its own brand. It has introduced several healthy eating ranges, including Eat Well, Count on Us and Simply Fuller Longer, and says that healthier choice products make up over 30 per cent of its food portfolio.

Corporate commitment to change: 5/5

Marks & Spencer's ethical and environmental plan, Plan A, sets out a series of 180 specific, measurable commitments, including a number on food and nutrition. There is clear responsibility for monitoring progress in meeting these promises, annual updates are published and the company says it will link progress on Plan A to bonuses for the management board.

Healthier products - reducing salt: 3/5

As a signatory to the Responsibility Deal salt pledge, Marks & Spencer said earlier this year that it was meeting the 2012 targets in 55 per cent of the 61 categories covered by the deal and Marks & Spencer tells us it is working towards meeting additional targets by the end of the year, but does not specify how many. It also highlighted a number of products, such as cured meats, where meeting the salt targets remains a challenge and where a number of retailers are working together to try and find solutions.

Healthier products - removing harmful trans fats: 5/5

Marks & Spencer had taken hydrogenated vegetable oil from its foods by 2006 and had met the Government's trans fats pledge when it signed up as part of the Responsibility Deal.

Healthy eating ranges

Marks & Spencer states that foods in its Eat Well healthy eating range meet strict, independently reviewed, nutritional criteria, but will not say what these criteria are. The company says it only makes nutrition or health claims on products that do not have any red traffic light labels.

Marketing to children

Marks and Spencer does not have a policy on marketing to children and says it does not advertise food products separately to children. Examples of packaging for less healthy products, such as sweets featuring cartoon characters or other illustrations likely to appeal to children were easily found.

Reducing saturated fat

■ Marks & Spencer has reduced the saturated fat in its milk (except organic, Jersey and Isle of Man milks) by six per cent compared to UK standard milk. This was achieved by removing palm oil from the diets of dairy cows. The company also reports a 30 per cent reduction in saturated fat in sandwiches, a 70 per cent reduction in crisps and aims to reduce saturated fat in ready meals by 20 per cent.

Healthier products - cutting calories, fat and sugar: 3/5

Marks & Spencer is working on cutting saturated fats, which it says is a priority, is continuing to develop lower sugar products and has signed up to the Government's calorie reduction pledge with commitments to broaden the range of calorie-controlled products.

Clear nutrition labelling: 4/5

Marks & Spencer uses clear colour-coded traffic light labels, accompanied by percentage guideline daily amount information, on the front of pack.

Price promotions: 0/5

Marks & Spencer promotes healthier foods throughout the year and says it includes healthier options in its Dine In promotions. But the company does not have any specific guidance or targets on what proportion of product promotions should be for healthy products.

Sweets at checkouts: 2/5

Marks & Spencer policy is to remove children's sweets and confectionery 'with characters or designs likely to appeal to children' from some checkouts ('belted' till points). Although this is welcome, it does mean that some foods high in fat, sugar or salt can still be displayed at checkouts and that tills in smaller shops are not covered.

Overall verdict:

Marks & Spencer has made strong commitments to change and has made good progress in making its products healthier by removing trans fats, reducing salt and cutting saturated fats in some products. It is also providing clear nutrition information on the front of food packs and in its in-store cafés. Like most retailers we looked at, it could do more to use price promotions to promote healthy products and to protect children from marketing or promotion for less healthy foods.

Morrisons

Morrisons is the UK's fourth largest supermarket. It has recently launched a new healthier range, under the NuMe label.

Corporate commitment to change: 4/5

Morrisons has made core commitments on nutrition, including making their products healthier, introducing new healthier products and extending nutrition information. The policy on healthy eating includes some specific, measurable targets. Morrisons has clearly defined who is responsible for these issues and has committed to providing regular, independently verified, updates on progress in its Corporate Responsibility Review.

Healthier products - reducing salt: 2.5/5

Earlier this year, Morrisons reported that it was meeting the 2012 salt targets in 30 (42 per cent) of the 71 food categories covered by its pledge under the Government's Responsibility Deal. It tells us it expects to be meeting the targets in 90 per cent of the categories by the end of the year.

Healthier products - removing harmful trans fats: 5/5

Morrisons had removed all artificial trans fats from its own label products by 2008 and has met the Responsibility Deal pledge.

Healthier products - cutting calories, fat and sugar: 2/5

Morrisons tells us it is currently working to cut fat, saturated fat and sugar levels across its own brand range. It is currently working on the recipes for its own brand Italian ready meals, for example, and is aiming to reduce saturated fat by up to 25 per cent. Morrisons has signed up to the Responsibility Deal's calorie reduction pledge, with the main action being the launch of its NuMe healthier own-brand range this year.

Clear nutrition labelling: 2.5/5

Morrisons currently provides front of pack nutrition information in the less clear guideline daily amount format. In September, however, it announced that it will move to the traffic light system, alongside the guideline daily amounts, if government and food industry can agree on the nutritional criteria.

Price promotions: 1/5

Morrisons does not set a target for the proportion of promotions to be on healthier foods, but ensures at least 50 price promotions on fruit and vegetables every week.

Sweets at checkouts: 2/5

Morrisons tells us that it endeavours not to display confectionery that 'appeal unduly to children' at checkouts. Morrisons says that it is in the process of reviewing its approach and may tighten up its policy.

Overall verdict:

Morrisons has made a fairly strong corporate commitment to change, and has set some measurable targets. It has removed trans fats and is making progress in reducing salt as well as saturated fat and sugar. Morrisons has announced that it will move towards the traffic light labelling scheme for front of pack nutrition labelling. It could do more to protect children from marketing as it does allow some types of less healthy foods to be displayed at checkouts and uses cartoon character illustrations designed to appeal to children to be used on packaging for less healthy foods.

Healthy eating ranges

Morrisons says that products in its NuMe range must make at least one nutrition claim and that it does not make nutrition claims on high fat, salt or sugar products. Some of the products in the NuMe range, however, are healthier versions of unhealthy products rather than all round healthy products. These include NuMe cheese (9.9g saturated fat per 100g), NuMe light crème fraiche (9.8g of saturated fat per 100g) and NuMe sweet Thai chilli flavour soy and potato crisps (1.5g of salt per 100g).

Marketing to children

Morrisons, like other retailers, has to comply with existing advertising and marketing rules, but does not have any specific policy on marketing to children. Examples of packaging for less healthy products, such as children's breakfast cereals, featuring cartoon characters or other illustrations likely to appeal to children were easily found.

Sainsbury's

Sainsbury's has around 15,000 own brand products and has a number of ranges focused on health and special diets, including its recently extended Be Good to Yourself range. In 2011, 64 per cent of Sainsbury's own brand range was low in sugar (ie with a green traffic light label), 46 per cent was low in salt, 35 per cent was low in fat and 45 per cent was low in saturated fat.

Corporate commitment to change: 4/5

Sainsbury's '20 by 20' sustainability plan includes 'Best for food and health' as one of its values. The plan sets out a goal for 'healthiest baskets' and a series of measurable targets, including cutting the proportion of red traffic lights on its own brand products, and ensuring that at least a third of promotions are on healthier choices. There is a clearly set out mechanism for responsibility - a member of the Board is charged with ensuring that the food and health commitments are met - and reporting is through an annual corporate responsibility report.

Healthier products - reducing salt: 2/5

Sainsbury's has been working on salt reduction for 13 years and is working on a wide range of products (broader than the Government's Responsibility Deal categories). The company has not reported information on its progress towards the salt targets in the same way as other companies, so it is difficult to compare. It says it is on track to meet the targets in all 72 relevant categories by the end of the year "where there is no compromise on safety, quality or taste".

Healthier products - removing harmful trans fats: 5/5

Artificial trans fats were removed in 2007 and the company has met the Responsibility Deal pledge.

Healthy eating ranges

The criteria for Sainsbury's healthier range Be Good to Yourself are transparent, and, in general, products meet healthy nutrition criteria, although some healthier versions of less healthy products are allowed, such as puddings (Chocolate sponge pudding with 19g sugar per 100g) or cheese (Mature grated cheese 19g salt per 100g)

Marketing to children

Beyond compliance with current rules on advertising to children, Sainsbury's has not published a specific policy on marketing to children. Sainsbury's uses a cartoon character, Eric the Elephant, on children's products, including some biscuits and confectionery that are high in sugars or fat. It also uses other illustrations likely to appeal to children on some less healthy foods, such as children's breakfast cereals that are high in sugar.

Healthier products - cutting calories, fat and sugar: 3/5

Sainsbury's has committed to reducing calories, saturated fat, fat, salt and sugar in own brand products and specifically, to reducing the proportion of foods with red traffic light labels by 2020. It has made progress, for example, in reducing the saturated fat levels in its value fish fingers by 76 per cent and in its Taste the Difference ready meals by 4.8 per cent. Across its Taste the Difference ready meal range it has decreased the number of red traffic light labels by 7 per cent in 2012. As part of a gradual plan to reduce sugars, levels of sugar in its own-brand juice drinks have been cut by at least 4 per cent. The company has also signed up to the calorie reduction pledge, although it has not made any specific new measurable commitments to meet this pledge but has reiterated its commitment to reduce the proportion of products with traffic lights rated red for calories.

Clear nutrition labelling: 3.5/5

Sainsbury's has been using colour-coded front of pack nutrition labelling since 2005 in the form of its 'wheel of health', which is now on over 9,000 Sainsbury's lines. Sainsbury's has recently announced it will be introducing a new form of front of pack nutrition information, which will still be colour coded, but will also include percentage guideline daily amounts.

Price promotions: 3/5

Sainsbury's has introduced a specific target that at least a third of food and drink promotions will be on healthier choices as part of its 20 by 20 commitments and is developing criteria to underpin this. It is too early to judge how well this will be put into practice, but it will be reported on in the company's annual corporate responsibility reports.

Sweets at checkouts: 3/5

Sainsbury's has a policy of no sweets or chocolate at checkouts in supermarkets, but the policy does not cover the smaller convenience stores. Sainsbury's says it also encourages store managers to also display healthier options in these areas.

Overall verdict:

Sainsbury's has set out a strong corporate commitment to change, with clear, measurable targets. The retailer has removed trans fats from its own brand products, says it is on track to meet the 2012 salt targets by the end of the year (although has been less transparent than most other companies in reporting progress against the Responsibility Deal pledge) and is committed to reducing fat, saturated fat and sugars. Sainsbury's does use colour-coded front of pack labelling. The announcement that this will soon incorporate GDA information is very welcome. Sainsbury's has set out a target for the proportion healthier products to be included in price promotions. More action is needed around marketing to children.

Tesco

Tesco is the largest supermarket chain in the UK and 38 per cent of its sales, across Tesco group, are own brand products. Tesco has several healthier ranges, including the Light Choices, Eat Live Enjoy, Whole Foods and Goodness (for children) labels.

Corporate commitment to change: 2.5/5

One of Tesco's five Community Promises that makes up its corporate responsibility strategy is to 'provide customers with healthy choices.' This promise refers to various actions affecting the nutritional content and price of food products, as well as promises on nutrition information and promoting physical activity, but does not set specific targets. There is clear responsibility at Board level for these issues and progress is reported in the annual corporate responsibility review.

Healthier products - reducing salt: 3.5/5

Tesco has been working to reduce salt levels since 2006 and has signed up to the Responsibility Deal pledge. Ninety four per cent of Tesco products meet the 2012 salt targets and, of the 77 Responsibility Deal categories that affect Tesco's products, the targets have been met in 57 (74 per cent). The company aims to meet the targets in 74 of the 77 (96 per cent) categories before the end of 2012, but says that the targets will be particularly challenging in three categories.

Healthier products - removing harmful trans fats: 5/5

Harmful trans fats have been removed from Tesco own brand products and it has signed up to the Responsibility Deal pledge.

Healthier products - cutting calories, fat and sugar: 2.5/5

The retailer says it has been working to cut sugar and fat levels since 2005 and changed the recipes of over 3,600 products to improve them nutritionally, but we haven't seen details of progress that has been made. Tesco has made a number of specific commitments under the Responsibility Deal calorie reduction pledge, including a commitment to reduce the number of calories sold in soft drinks by over 150 million this year and to introduce a code of practice, backed by training, to help product developers and suppliers to reduce calorie contents.

Clear nutrition labelling: 2.5/5

For several years Tesco has been providing front of pack nutrition information in the guideline daily amount format and has resisted calls to introduce clear traffic light labelling. During the course of this research, however, Tesco announced it is going to introduce a combination of traffic lights and guideline daily amounts onto food labels.

Price promotions: 0/5

It has no guidelines or targets for the healthy balance of price promotions.

Sweets at checkouts: 3/5

Tesco tells us its policy is not to place any confectionery at checkouts, but this does not extend to Tesco Express stores.

Overall verdict:

Tesco's corporate commitment to change is short on specific, measurable targets and the reporting emphasises promoting physical activity rather than changes to products. The retailer has removed trans fats, is making good progress in reducing salt across a very broad range of foods and work to reduce fat, sugar and calories is ongoing. Tesco's recent announcement that it will adopt traffic light labelling, alongside percentage guideline daily amount information, on the front of food labels is excellent news. Tesco, in common with most of the other retailers, is not doing enough with the power of price promotions to encourage healthier choices or on marketing to children.

Healthy eating ranges

Tesco labels products that meet its overall healthy eating criteria with its Healthy Eating wave on packaging. Tesco tells us that there are different nutritional criteria for different types of food, but the criteria are not transparent. Some healthier versions of unhealthy products are included in the Healthy Eating range, such as half-fat cheeses.

Marketing to children

Tesco has to comply with existing advertising and marketing rules and says it does 'not promote directly to children', but it does not have any specific policy or guidelines on marketing to children. Tesco uses cartoon character illustrations, or other illustrations likely to appeal to children, on own brand products that are high in sugars, including breakfast cereals and sweets.

Waitrose

Waitrose is part of the employee-owned John Lewis Partnership. Own brand products account for 54 per cent of the supermarket chain's sales. Waitrose has introduced the Love Life range for healthier eating and the Love Life You Count range for weight loss.

Corporate commitment to change: 2.5/5

Waitrose's principles, outlined in The Waitrose Way, include a commitment on healthy eating. The company has a rolling three-year nutrition strategy which Waitrose says includes actions to improve the nutritional content of standard products. Progress is monitored by the Health and Wellbeing Steering Group and is reported in the corporate social responsibility report.

Healthier products – reducing salt: 4/5

Having signed up to the Responsibility Deal salt reduction pledge, Waitrose said earlier this year that it was meeting the 2012 targets in 82 per cent of the 67 categories covering its products and said it is on track to meet the targets in 92 per cent of categories by the end of the year.

Healthier products – removing harmful trans fats: 5/5

Waitrose removed hydrogenated vegetable oils from its food in 2006 and had already met the trans fat pledge when the Responsibility Deal was launched.

Healthy eating ranges

The criteria for Love Life, Waitrose's healthy eating range, are transparent, clearly defined and don't have any red traffic lights on the label.

Marketing to children

Waitrose does not have a written policy on marketing to children, but tells us that it never targets children in its advertising or marketing. We found cartoon character illustrations likely to appeal to children on some Waitrose sweets, although they stood out from most other retailers and brands when we looked at breakfast cereals in February for not including this kind of illustration on chocolate puffed rice cereal, for example⁶.

Healthier products – cutting calories, fat and sugar: 2.5/5

Waitrose tells us its processes for product review and new product development have resulted in nutritional improvements. In its commitments under the Responsibility Deal calorie reduction pledge, Waitrose has set out a number of areas for action across different areas of its business, although it is not clear how progress will be measured on these issues, and it has committed to annual public reporting under the pledge.

Clear nutrition labelling: 4/5

Waitrose is using a combination of traffic lights and guideline daily amounts to provide nutrition information on the front of pack, and is rolling this labelling out across all its own brand products.

Price promotions: 0/5

Waitrose does not have any targets or guidance on the balance of healthy products on promotion. The company tells us that it regularly has promotions on fruit and vegetables to promote five a day.

Sweets at checkouts: 0/5

Waitrose tells us that it does not have a formal policy on sweets or other unhealthy foods at checkouts.

Overall verdict:

Waitrose has made corporate commitment to change but this could be more transparent. The company has removed trans fats and made good progress in reducing salt levels in its own brand products, and says it is working on plans to make products healthier. Waitrose customers benefit from clear nutrition labelling on front of food packs (traffic lights). The company's approach to claims for its healthy eating range is robust, but it could do more to promote healthier products within price promotions and protect children from marketing or promotion of less healthy foods.

Foot notes

¹Healthy lives, healthy people: a call to action on obesity in England. Department of Health, October 2011.

²A Which? online survey of 1995 UK adults between 16-23 February 2012. The data was weighted to be representative of the UK population.

³Health Warning to Government, Which? Policy Report, 2004.

⁴Responsibility Deal: One Year On an assessment of the Government's approach to healthier food choices, Which?, March 2012.

⁵Department of Health Public Health Responsibility Deal, Salt reduction pledge. See <http://responsibilitydeal.dh.gov.uk/2012/02/03/f2-factsheet/>

⁶What's in your bowl? – the most popular breakfast cereals compared, Which? briefing, February 2012.

⁷Sandwiches unwrapped, Which? briefing, May 2012.

⁸Pizzas exposed: calorie, fat and salt levels compared, Which? briefing, January 2011.

⁹Healthy Signs?, Which?, July 2006.

¹⁰Comprehension and use of UK nutrition signpost labelling schemes, May 2009, Food Standards Agency.

¹¹EU Regulation 1169/2011 on the provision of food information to consumers.

¹²A Which? online survey of 2114 UK adults between 5-7 October 2012. Data was weighted to be representative of UK adults.

¹³EU regulation 1924/2006 on nutrition and health claims made on foods. <http://ec.europa.eu/nuhclaims/>

¹⁴Are low fat foods really much better for you?, Which? magazine October 2012.

¹⁵The extent, nature and effects of food promotion to children: a review of the evidence to December 2008, Georgina Cairns, Kathryn Angus and Gerard Hastings, prepared for WHO, 2009.

¹⁶TV advertising of food and drink products to children, Final Statement, Ofcom, February 2007.

¹⁷HFSS advertising restrictions – final review, Ofcom, 26.7.10.

¹⁸<http://www.cap.org.uk/Advertising-Codes/Broadcast/BCAP-Code.aspx>

¹⁹Set of recommendations on the marketing of foods and non-alcoholic beverages to children. World Health Organisation 2010.

²⁰Checkouts checked out!, Children's Food Campaign, 2012.

²¹CASH. Technical solutions to salt reduction across 8 categories of food. Consensus Action on Salt and Health, April 2012.

²²Healthy Snacks? Which? magazine September 2012.

