



# Guidance Framework to Support Healthier Food Retail Environments for Children

A practical tool for nutrition and children's rights in the food retail sector

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# Introduction

● **Food retailers have a critical role to play in efforts to improve population diets.** Globally, the business practices of food retailers have an important impact on what children and families eat and the healthiness of their diets. There is a tremendous opportunity for food retailers to influence the availability and affordability of food and the way it is marketed such that good health and well-being are actively promoted.

Currently, unhealthy diets and malnutrition in all its forms substantially contribute to the global burden of disease. In particular, childhood overweight and obesity rates are increasing around the world, with substantial negative impacts for individuals and society, both immediately and in the long run. A key driver of children’s unhealthy diets is that they are growing up in environments in which unhealthy foods are more readily available and heavily marketed than ever before. As part of a comprehensive approach to protecting children’s rights to good nutrition and health, improvements to the healthiness of food environments<sup>i</sup> are essential.

While governments are the primary duty-bearers for the fulfilment of child rights,<sup>ii</sup> businesses have a responsibility to respect and support children’s rights and avoid harm through their products and practices.<sup>1</sup> Businesses also have an important role to play in contributing to the attainment of the United Nations Sustainable Development Goals (SDGs).<sup>2</sup>

Stronger and more effective actions from food retailers are needed to positively influence the diets of children and families and respond to growing regulatory, reputational and financial risks. There are a wide range of evidence-based actions that food retailers can take to improve population nutrition. Effective and timely action can also create substantial business opportunities related to nutrition and health.

The **aim of this document** is to provide practical guidance for the food retail sector and investors on effective steps that food retailers can take to create healthy food retail environments and contribute to improved business practices that support good nutrition among children and families.<sup>iii</sup>

**The primary focus is on supermarkets,** but many aspects of the guidance provided in the document are likely to be relevant to other businesses in the food value chain, including restaurants and food manufacturers.

This Guidance Framework is the output of the UNICEF-NBIM Network on Children’s Rights and Nutrition in the Food Retail Sector that was active between March 2021 and March 2023, involving an extensive review of the academic and grey literature and a detailed consultation with large food retailers from multiple regions, academic experts and non-government organizations focused on activities to improve population health. A separate **Network Report** has also been published alongside this Guidance Framework, in addition to an **Evidence Review**.

i Food environments are defined as the “physical, economic, political and sociocultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food.” High Level Panel of Experts, 2017. Nutrition and food systems. A report by the High-Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. Available at: <https://www.fao.org/3/i7846e/i7846e.pdf> (pg 11).

ii For the purposes of this document, children are defined as people under the age of 18, in line with the United Nations Convention on the Rights of the Child.

iii In developing this guidance framework for a global audience, it is recognized that regulations vary across markets, and the actions and metrics that are proposed in the document may be regulated in some markets. Stakeholders should consider the concepts and ideas presented in the document with reference to the market regulations that apply.

## Background

● **Unhealthy diets and malnutrition in all its forms are the leading cause of death and disability worldwide.** In 2017, dietary risk factors were associated with 22 per cent of all premature deaths globally.<sup>3</sup> Unhealthy diets are the primary driver of overweight and obesity and related non-communicable diseases (NCDs), the rates of which have almost tripled since 1975.<sup>4</sup> Of particular concern is the growing prevalence of overweight and obesity among children and adolescents, which has risen from 4 per cent in 1975 to 18 per cent of all children and adolescents globally in 2016.<sup>5</sup>

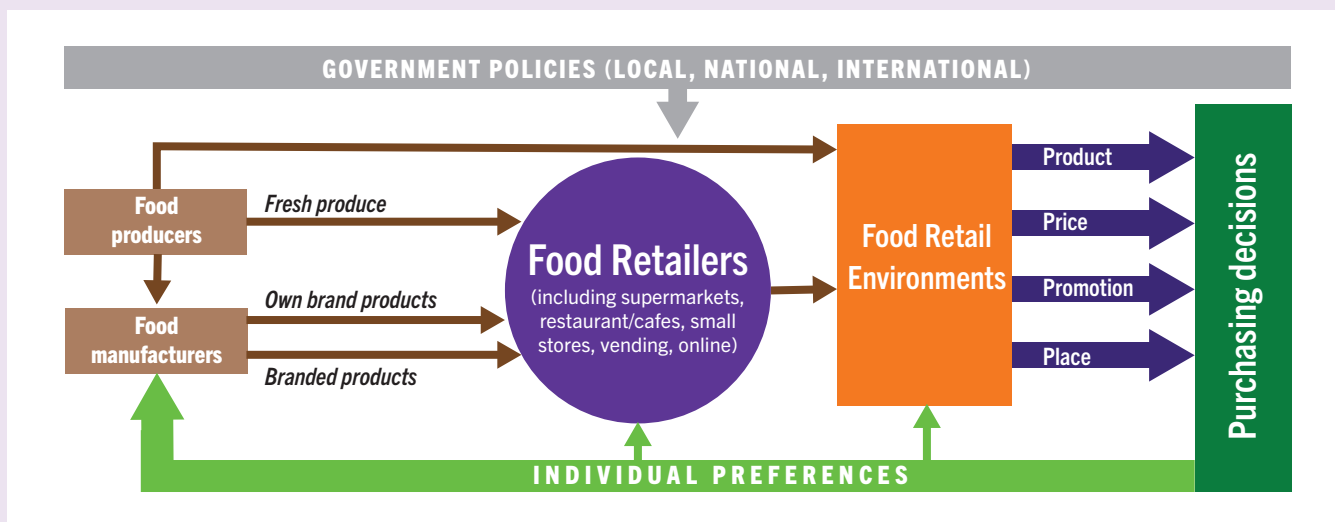
Childhood overweight and obesity are no longer just a concern in high-income countries; rates are also increasing rapidly in low- and middle-income countries.<sup>5</sup> Many of these countries are now facing a 'triple burden' of undernutrition, micronutrient deficiencies, and overweight and obesity.<sup>6</sup> Children

are particularly exposed to this 'triple burden', with inadequate nutrition in infancy and early childhood co-existing with diets high in fat, sugar and salt and low in nutrients.<sup>7</sup> In particular, in addition to being at high risk of developing serious NCDs later in life, children living with overweight and obesity can experience weight-related stigma that can be damaging to their self-esteem and mental well-being.<sup>8</sup> The impact of unhealthy diets and the triple burden of malnutrition has an enormous economic impact, estimated at up to US\$3.5 trillion a year.<sup>9</sup>

A main driver of unhealthy diets and the triple burden of malnutrition is unhealthy food environments that are dominated by the supply, distribution and marketing of ultra-processed foods (including products such as sugary drinks, confectionery, chocolates, cakes and biscuits) that are high in free sugars, sodium, harmful fats and/or energy.<sup>10</sup> Actions from government, the food industry,

and broader society are required as part of a comprehensive response to improving the healthiness of food environments, children's nutrition and population health.<sup>11</sup> For investors, addressing the healthiness of food environments can mitigate financial risks and enhance long-term shareholder value through positive environmental, social and economic outcomes.<sup>12</sup>

Children's diets are impacted by the practices of the food industry, including food producers, food manufacturers and food retailers (Figure 1). Increasing urbanization and globalization has led to a rapid shift away from traditional food sources, such as fresh food markets, and towards modern food retail environments, which are dominated by food retail chains.<sup>13</sup> In high-income countries, and increasingly in low- and middle-income countries, people buy the majority of their food from large food retailers or smaller retailers owned by larger chains.<sup>14</sup>



**Figure 1:** Factors affecting the healthiness of food retail environments, and their importance for nutrition, adapted from Peeters et al.<sup>20</sup>



As such, the types of foods available, their prices and affordability, and the way they are promoted, have a direct and substantial impact on what people choose to buy and on the healthiness of their diets.<sup>15</sup>

Food retail environments, including digital food retail environments, also shape the social norms with in which children grow up. Food marketing in food retail settings, including in-store and online, often targets children directly, for example, using cartoon and animated characters, celebrities, prizes and games. Critically, children are typically exposed to many of the same food environments as adults and are influenced by the same marketing strategies used by food retailers, even if these are not directly targeted to them.

Importantly, parents and caregivers make purchasing decisions on behalf of children and are influenced by the marketing practices used within food retail environments.<sup>16</sup> For example, marketing of infant formula and infant foods targets caregivers but has a direct impact on children.

A number of governments have implemented regulations designed to improve population diets, including legislation targeting marketing and pricing practices of food retailers (**Box 1**). Such government leadership is critical in setting a regulatory environment that promotes health.

At the same time, there is a responsibility and substantial opportunity for food retailers to take stronger and more effective steps to protect children’s rights to good nutrition and health (**Box 2**). First and foremost, food retailers should comply with existing laws that protect and uphold these rights. In addition, food retailers should not oppose or lobby against proposed regulations intended to protect children’s rights and promote population health. For food retailers to support children’s rights, their policies and practices should both protect children and ensure they do not appeal to caregivers in a way that can have a harmful impact on children.

Positive food retailer actions in the area of children’s rights to good nutrition and health can contribute to meeting expectations under the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Child Rights and Business Principles, while addressing broader sustainability considerations under emerging environmental, social and governance (ESG) frameworks.<sup>17</sup> Several retailers have demonstrated global leadership by taking steps towards these principles and goals in their strategies and ambitions.<sup>18, 19</sup>

By collaborating with other businesses that are part of food systems, including food producers and food manufacturers, food retailers can play an important role in improving population health.





## Regulatory action to create healthier food environments

The Committee on the Rights of the Child states that governments “must take all necessary, appropriate and reasonable measures to prevent business enterprises from causing or contributing to abuses of children’s rights. Such measures can encompass the passing of law and regulation...”.<sup>21</sup> There is also increasing evidence that there is only so far businesses can move within the regulatory structures and profit incentives under which they currently operate, and that industry self-regulation has not been effective in radically changing business practices.<sup>22,23,24</sup> In fact, recent evidence shows that self-regulation can do more harm than good by interfering with government regulation.<sup>25</sup> As such, governments are increasingly regulating to improve the healthiness of food environments, including by taxing unhealthy foods and beverages, restricting marketing to children, implementing nutrition labelling, public procurement, school food policies, and restricting promotion and placement of unhealthy products in-store. Rather than opposing regulatory changes, businesses can anticipate and support regulation, while adapting their practices.

- 1. Taxes on sugar-sweetened beverages:** More than 50 countries have now introduced some type of tax on sugar-sweetened beverages.<sup>26</sup> Such taxes directly influence consumer demand, which can have important revenue impacts for food retailers. In addition, depending on the tax structure, such taxes can provide impetus to reformulate products to reduce their sugar content.
- 2. Food labelling regulations and restrictions on children’s exposure to unhealthy food marketing:** A range of governments have mandatory food labelling regulations in place, and several governments have recently legislated to restrict children’s exposure to the marketing of unhealthy food.<sup>27</sup> A leading example of comprehensive policy action in this area is Chile, where the government introduced a suite of policy measures to protect children from unhealthy food

marketing, including mandatory front-of-pack warning labels on foods high in fat, salt and sugar; restrictions on marketing to children; and bans on the sale of foods and beverages high in fat, salt and sugar in schools.<sup>28</sup>

- 3. Restrictions on placement and promotion of unhealthy food in stores:** In 2022, the Government of the United Kingdom implemented restrictions on the placement of unhealthy foods and beverages in prominent places (e.g., checkouts) in supermarkets. Additional restrictions on price promotions of unhealthy foods (e.g., ‘buy-one-get-one-free’ specials) have also been proposed.
- 4. Restrictions on product sales to children:** Numerous countries have implemented regulations on the sale of energy drinks to minors.<sup>29,30</sup> The Governments of Latvia, Lithuania and Türkiye have mandated a ban on the sale of energy drinks to persons under the age of 18, while the United Kingdom and the United Arab Emirates have banned sales to under-16-year-olds. In Latvia, supermarkets are also required to display energy drinks separate from other food items, while in Sweden, sales of some energy drink products are restricted to pharmacies. The southern Mexican state of Oaxaca has banned the sale of sugary drinks and high-calorie snack foods to children under age 18, and other Mexican states are considering similar policies.<sup>31</sup>
- 5. Limits on content of risk nutrients:** Countries such as Argentina and South Africa have introduced mandatory limits on sodium content in certain food categories.<sup>32,33</sup>
- 6. Mandatory business reporting requirements:** In 2022, the European Union adopted new mandatory reporting requirements for all large companies to disclose and audit data on the impact of their activities on people and planet and any sustainability risks they are exposed to.<sup>34</sup> In 2021, the National Food Strategy for England recommended mandatory reporting on unhealthy and healthy sales-based metrics for all large food businesses.<sup>35</sup>





## BOX 2

### A human rights approach to food retailer action on nutrition

The United Nations Convention on the Rights of the Child recognizes that all children up to 18 years of age are entitled to inalienable rights – inherent to human dignity – including the right to healthy food and adequate nutrition.<sup>36</sup>

Unhealthy diets can be viewed as resulting from the failure to protect essential human rights, due largely to insufficient action, governance and accountability.<sup>37</sup> A rights-based approach to improving children’s food environments and nutrition focuses on ensuring that all population groups, including marginalized and vulnerable populations, have equitable access to environments that promote consumption of healthy diets.

The United Nations Guiding Principles on Business and Human Rights (UNGPs) provide guidance for addressing and preventing human rights impacts associated with business activity.<sup>38</sup> The UNGPs hold that companies have a responsibility to acknowledge their role in upholding and protecting human rights. Furthermore, the UNGPs state that businesses must act with due diligence to avoid infringing on the rights of others and to address any negative impacts. In conducting due diligence, the UNGPs encourage companies to conduct a Human Rights Impact Assessment through which they assess their actual and potential human rights impacts.

The United Nations Guiding Principles Reporting Framework provides details on how companies can meaningfully report on their progress in implementing their responsibility to respect human rights. The Children’s Rights and Business Principles, which build on the UNGPs, articulate the specific responsibility for businesses to

respect and opportunity to support children’s rights, including through product formulation and responsible marketing practices.<sup>39</sup>

Critically, the obligation of States to uphold children’s rights has been interpreted to require strong action in the area of food and nutrition, and with respect to the food industry specifically. Key examples include:

- General comment No. 16 on the Convention on the Rights of the Child, which states that “States must take all necessary, appropriate and reasonable measures to prevent business enterprises from causing or contributing to abuses of children’s rights. Such measures can encompass the passing of law and regulation...”<sup>40</sup>
- The comments of the Special Rapporteur on the Right to Food 2016: “Recognizing that industry self-regulation is ineffective, Governments should impose strong regulatory systems to ensure that the food industry does not violate citizens’ human rights to adequate food and nutrition. It is recognised, however, that such efforts may face formidable resistance from a food industry seeking to protect its economic interests.”<sup>41</sup>
- The recommendations of the Special Rapporteur on the Right to Health: “The responsibility to protect the enjoyment of the right to health warrants State intervention in situations when third parties, such as food companies, use their position to influence dietary habits by directly or indirectly encouraging unhealthy diets, which negatively affect people’s health.”<sup>42</sup>



# The business case for addressing unhealthy diets and obesity

● **Companies have a responsibility to avoid harm through their products and practices and to respect children's rights.** They also have an important role to play in contributing to the attainment of the SDGs. Factors such as the changing regulatory environment, increasing public scrutiny, and shifting consumer demand for nutritious and sustainable foods are bringing added incentives for business practices to evolve towards healthier food retail environments. With this strong business case, there is a major opportunity for food retailers to make meaningful commitments and take strong actions to ensure that their business decisions contribute to children's rights to nutrition and health.

## 3.1 Regulatory risks and opportunities

In response to the social and economic threats posed by unhealthy diets and obesity, governments around the world are taking regulatory action to create healthier food environments (refer to **Box 1**).

Large-scale regulatory changes are highly effective in changing corporate practices. International bodies, such as the World Health Organization (WHO), recommend a number of regulatory approaches that governments can use to support healthy diets in childhood, including mandatory sugar-sweetened beverage taxation, restrictions on the

exposure of children to the marketing of unhealthy foods, and interpretive food labelling.<sup>43</sup> These regulatory approaches are cost-effective and have widespread population health benefits.

Regulation can also serve as an opportunity for food retailers by providing clear guidance and creating a 'level playing field'.<sup>44</sup> For example, when strong nutrition-related regulations are implemented, companies that have already invested resources in healthier foods are likely to have a competitive advantage.

However, regulatory changes can also represent substantial risks to companies. Regulation to improve population diets has the potential to pose financial risks to the food industry where companies are not 'ahead of the curve' and well prepared to respond to regulatory changes.<sup>45,46</sup> For example, companies that have already shifted their product portfolio and marketing practices to focus on healthier foods are likely to adjust more easily to regulations in these areas. A 2017 report released by Schroders and Rathbone Greenbank Investments outlined expectations for companies that rely heavily on revenue from unhealthy products, particularly those high in sugar.<sup>47</sup> The report estimated a negative impact on earnings associated with changing regulations on sugar and consumer preferences between -3 and -25 per cent per share. There is therefore a strong business case

for food retailers to be prepared and incorporate such 'transition risk' into their risk management.

## 3.2 Reputational considerations

Food retailer actions to improve nutrition can also have a positive impact on brand reputation, which can attract further customers and employees to the company. Many businesses recognize the benefits of responsible business practices that foster positive relationships with society.<sup>48</sup> Public health and consumer advocacy groups are increasingly highlighting the practices of the food industry, while negative stories centred on supermarkets are frequently covered by the media.<sup>49,50,51</sup> There is also increased public and government pressure on food retailers to act in a socially responsible way.<sup>52</sup> Accordingly, food retailers may also face reputational risks associated with not supporting healthy diets. In particular, lobbying against public health regulations not only puts children's rights to nutrition and health at risk, but can also damage food retailers' reputations. These reputational risks are likely to be amplified by the public's familiarity with supermarkets and their branding.

## 3.3 Potential profitability of actions to promote healthy food

Consumer attitudes towards healthier and more environmentally sustainable products are becoming increasingly positive. The market for healthy, ethical and environmentally

sustainable products is rapidly growing, and many food retailers are responding to this by capitalizing on 'healthier' product investment.<sup>53,54,55</sup>

Evidence suggests that food retail actions that promote health can be profitable and are perceived as beneficial to retailers and customers.<sup>56,57</sup> For example, refurbishing store layouts to highlight healthier products, such as fresh fruit and vegetables, can help increase desirability of those products, increase foot traffic into the store, and increase overall sales.<sup>58</sup> In some countries, food retailers have substantially increased the size and prominence of the fresh food area over time, including positioning

such areas near the entrance of the store.<sup>59</sup> Techniques such as promotional discounts, shelf displays and labelling, can also benefit both population health and food retailer profits if these are directed towards healthier products.<sup>60</sup>

### 3.4 Young people want healthier food retail environments

Consumers are increasingly demanding that food companies support them in making healthier choices. For example, a recent multi-country survey conducted by ShareAction found that the vast majority of consumers believe that food companies play an important role in influencing their dietary

choices; they want food companies to reformulate unhealthy foods to make them more healthy and to produce healthy alternatives to less healthy foods.<sup>61</sup>

In 2021 and 2022, UNICEF co-ordinated a youth consultation initiative to engage young people about their experiences of food retail environments (refer to **Box 3**). As the consumers of today and tomorrow, young people said that they wanted food retailers to provide healthy, affordable and sustainable options, while ensuring that products are clearly labelled, accessible and marketed in a way that makes healthy foods appealing.



**BOX 3**

## Youth consultations on healthier food retail environments

In 2021 and 2022, UNICEF, in partnership with EAT Foundation, the Food Foundation, Bite Back 2030 and VicHealth, co-ordinated three youth consultations across Europe and Australia. Harnessing the interactive CO-CREATE Dialogue Tool,<sup>62</sup> the consultations aimed to gain a better understanding of young people's experiences in food retail environments and ideas for shaping them to be healthier, affordable and more sustainable.

The consultations involved 50 youth, aged 16–23 years, with representation across gender, cultural and indigenous groups. Discussions centred around aspects of the four 'P's' of marketing – product, price, placement and promotion.

These consultations found that young people want food retail environments to support healthy and affordable options. **Specifically, the young people consulted want:**

#### Healthy and affordable food that does not compromise on taste:

- ➔ Greater variety of healthy, affordable foods, portion-controlled products and less processed foods

#### Sustainable, ethical and culturally appropriate options:

- ➔ Locally-sourced, fairtrade, less plastic and packaging, in-season and access to foods from different cultures

#### More information, less temptation:

- ➔ Clearer and more transparent labelling to distinguish between processed and unprocessed foods and support to make healthy choices

#### Marketing, but for good:

- ➔ Less promotion of unhealthy, processed foods
- ➔ More promotion of fresh foods



### 3.5 Environmental and sustainable development considerations

Food systems are one of the most significant drivers of climate change, biodiversity loss, water and land use.<sup>63</sup> The health and environmental sustainability of food systems and diets are highly interconnected: improving nutrition can have substantial benefits on environmental sustainability, and actions to improve the environmental sustainability of food environments are likely to positively impact population health.<sup>64,65</sup> This can at the same time respond to increasing consumer awareness and governmental requirements around climate change.

While actions taken to address environmental sustainability generally align with efforts to improve population nutrition, there are some areas in which there are potential trade-offs. For example, retailer actions targeted at reducing red meat purchases may inadvertently lead to higher consumption of unhealthy ultra-processed 'plant-based' meat alternatives.<sup>66</sup> In these instances, retailer actions can likely be tailored to promote both healthy and environmentally sustainable options, for example, through the promotion of minimally processed plant-based alternatives (such as beans, legumes, lentils) rather than plant-based meat analogues.

Actions aimed at improving the healthiness of food environments also present food retailers with an opportunity to align responsible business practices with international action on sustainable development. Engaging in healthy food retail initiatives can form an important component of food retailers' actions and reporting, which contribute towards achieving the SDG targets.<sup>67</sup> Furthermore, companies that contribute to the healthiness of food retail environments can support UNICEF's goals of upholding children's rights to good nutrition and health<sup>68</sup> (refer to **Box 2**) and the World Health Assembly global nutrition target to halt the rise in obesity among children by 2025.<sup>69</sup>



# Nutrition is becoming a material issue for investors

● **Nutrition has become an increasingly important environmental, social and governance (ESG) issue for institutional investors.**<sup>70</sup> In particular, material risks related to litigation, regulation and changing consumer preferences can negatively impact food company profitability, brand value and market share.<sup>71</sup> The burden of diet-related diseases also substantially impacts economic growth, for example through productivity losses and reduced gross domestic product, which can impact potential future earnings for companies and investors.<sup>72</sup>

In response to these risks, investors are increasingly including nutrition as part of their investment analyses. Some investors are starting to report on how they consider nutrition issues within their analyses, and some are engaging with companies to improve nutrition-related practices, such as marketing of unhealthy food to children.<sup>73 74,75</sup>

Investors are also calling for greater transparency from companies on nutrition-related issues.<sup>76</sup> For example, NBIM has established expectations for companies on children's rights that recognize that companies can positively or negatively impact children through their marketing practices and food offerings.<sup>77</sup>

NBIM has an expectation that company policies include measures for identification, prevention, mitigation and remediation of adverse children's rights impacts in their direct operations and value chain, as well as from products, services and marketing.

Investors are also increasingly expecting food companies to provide detailed information about their sales of healthy versus unhealthy foods.<sup>78</sup> In some cases, shareholders have filed nutrition-related motions at company Annual General Meetings, giving exposure to these asks to other investors.

A number of coalitions aim to bring investors together to collectively address nutrition issues and improve food industry practices. Recent examples include:

- In 2020, the Access to Nutrition Initiative (ATNI) released the 'Investor Expectations on Nutrition, Diets and Health', which outlines four key areas for investors to engage with food companies to address nutrition challenges and deliver the SDGs.<sup>79</sup> More than 80 institutional investors representing US\$19.7 trillion in assets under management have signed this document.

- In 2021, in the United Kingdom, Rathbone Greenbank Investments led a coalition of investors representing £2.8 trillion in assets (alongside ShareAction and the Food Foundation), urging the Government to demonstrate leadership and ambition in its response to the National Food Strategy's recommendations for promoting a healthy and sustainable food system.<sup>80</sup>
- Also in 2021, a group of shareholders called on Tesco to disclose the proportion of food and beverage sales that are generated from healthier products. In March 2021, Tesco announced new commitments to support healthy and sustainable diets, including targets to increase the sale of healthier foods by providing a greater range of healthier products and nutritional information on labelling.<sup>81</sup>

# Recommended actions that food retailers can take to support healthy diets among children and families

● **There are a range of evidence-based actions that food retailers can take to improve the healthiness of retail food environments, ensure children's rights to good nutrition and health, and positively impact the diets of children and families.**

These actions can be broadly categorized under four areas (each detailed, in turn, in the sections that follow):

- a. 'Corporate strategy'**, including actions related to: overarching company strategies and goals related to nutrition and health; actively supporting relevant public health-related government interventions; and avoiding lobbying against public health regulations to address unhealthy diets
- b. 'Product development and labelling'**, including actions related to: reformulation of existing own-brand products; introduction of new healthier own-brand products; implementation of easy-to-understand food labelling on own-brand products; and working with suppliers of branded products to encourage similar actions related to product formulation and labelling

**c. 'Product availability and placement'**, including actions related to: availability and stocking products, allocation of floor and shelf space, placement of products in prominent areas (checkouts, end-of-aisle displays and/or online equivalents), and affordable and equitable distribution of healthy products

**d. 'Promotional activities'**, including actions related to: pricing strategies, promotions in catalogues/circulars, in-store / online signage, images or branding that appeal to children, and other promotional actions (such as loyalty rewards and mobile apps)

In developing and implementing their nutrition-related policies, actions and associated reporting, food retailers should adhere to principles of best practice, including ensuring that actions and reporting are transparent, accountable, coherent and linked with public health priorities (**Box 4**). Additionally, the evidence-base for what is considered 'healthy' should always be guided by relevant government regulations and guidelines or global guidance (e.g., WHO Nutrient Profile Models) (see **Box 5**).

Meaningful action to improve the healthiness of retail food environments is likely to be facilitated by collaboration and cooperation across the sector, supported by government leadership and regulation. Food retailers can actively participate in industry forums to advocate for increased evidence-based action on nutrition and health. Food retailers can also publicly support government interventions that create a level playing field on nutrition-related issues, including by sharing data and evidence about what is working, and collaborating with government officials to ensure policies are as strong as possible from a public health perspective. In some cases, such as regarding restrictions on price promotions for unhealthy foods, mandatory government regulation is likely to be needed to remove commercial barriers.<sup>82</sup> Recognition and rewards for retailer leadership may also prove helpful and provide a means for sharing best practice.

Globally, coherent and comprehensive action will require multinational collaboration, including important roles for WHO, UNICEF and other United Nations agencies in driving consistent adoption of best practice.



## BOX 4

### Principles of best practice guiding food retailer actions on nutrition

**Transparent:** Publicly report and disclose commitments, policies and performance (e.g., as part of sustainability reporting and/or other company policy documents in the public domain).

**Accountable:** Regularly (e.g., annually) report performance against commitments and targets, including comparisons over time, with independent verification.

**Coherent:** Ensure actions are coherent across all aspects of the company (including nutrition, marketing, finance, and operations), and based on a consistent classification of the healthiness of different foods (also refer to **Box 5**).

**Linked with public health priorities:** Address priorities for population health and nutrition, based on reliable scientific evidence, in line with global public health recommendations.

**Aligned:** Use standardized, meaningful metrics that are aligned with existing sustainability reporting standards (such as Global Reporting Initiative and International Sustainability Standards Board), civil society-led benchmarking initiatives (such as ATNI, World Benchmarking Alliance and ShareAction), and relevant government policies and initiatives.

**Comprehensive and specific:** Include SMART (specific, measurable, achievable, relevant and time-bound) goals and explicit comparisons with relevant government guidelines and targets (e.g., WHO sodium benchmarks, national reformulation targets).

**Locally relevant:** Tailor actions to the local context. Where multinational retailers have existing global nutrition-related commitments or targets, these can be strengthened by ensuring they are specific to the countries in which they operate.





## Considerations in defining healthy and unhealthy foods

- WHO defines a healthy diet as essential for good health and nutrition and comprising a variety of different foods, including legumes, fruits and vegetables, cereals (wheat, rice, rye) and starchy tubers or roots (potato, yam), with some animal-source foods (meat, fish, eggs and milk).<sup>83</sup>
- There are a variety of ways to classify the ‘healthfulness’ of foods. Most classification schemes classify foods based on the food category (e.g., fruit and vegetables, confectionery, soft drinks) and/or their nutrient content (e.g., sodium, saturated fat, free sugars and/or fibre content).
- It is important that food retailers adopt externally recognized, evidence-based definitions of healthy and unhealthy foods and beverages. National food-based dietary guidelines, as well as food classification schemes (including Nutrient Profiling Models) adopted by the government, are useful guides. Where a government has adopted a national food classification scheme, food retailers should use this scheme to ensure consumers receive consistent messaging. In the absence of national systems, WHO has a range of region-specific nutrient profiling systems that can be applied.<sup>84</sup>
- Reformulating products to contain fewer harmful nutrients is important. For example, reducing salt content in products can help reduce heart disease risk. However, it is critical that reformulation efforts do not replace one risk nutrient with another (e.g., replacing saturated fat with sugar). In addition, reformulation to include addition of positive ingredients, such as vegetables and whole grains, both of which support healthful diets and NCD reduction, is likely to be beneficial.
- Food retailers have great potential to act as leaders in promoting healthy diets. Where retailers adopt evidence-based definitions of ‘healthy foods’, such as those established by governments as part of government-endorsed Nutrient Profiling Models,<sup>85</sup> these definitions can be applied in relation to their product portfolios and distribution activities, their labelling and marketing practices, and as part of managing their relationships with other organizations, such as in guiding food manufacturers to take steps towards improving population nutrition.

### What about level of processing?

In the last decade, evidence has revealed that the degree of processing also influences the health profile of food products.<sup>86</sup> While processing has been beneficial to human diets for millennia, the food supply has recently become ‘ultra-processed’ (e.g., extracting minimally processed ingredients and inserting additives such as artificial colours or preservatives). These products are usually made in factories by food manufacturers and contain a multitude of ingredients – most of which cannot be found in everyday kitchens. There is increasing evidence of serious health risks associated with high levels of consumption of ultra-processed foods, including obesity, type 2 diabetes, depression and heart disease.<sup>87</sup> Food retailers can focus on promoting minimally processed and fresh foods, and ensuring that packaged foods are made with as few processed ingredients and additives as possible, while balancing food safety and shelf stability considerations.

### Taking into account environmental sustainability

It is imperative that healthy diets are sourced from environmentally sustainable food systems, including the way in which food and food products are grown, processed, manufactured, packaged and distributed. There is generally strong overlap between products that are healthy and those that are more environmentally sustainable. For example, when consumed in high amounts, processed red meat is associated with harmful health outcomes – such as colorectal cancer, cardiovascular disease and type 2 diabetes.<sup>88</sup> The production of processed red meat is also associated with high levels of environmental damage. Food retailers should consider supplying red meat from certified sustainable producers, as well as aiming to promote other healthy, minimally processed sources of protein, such as legumes.



## A. Corporate strategy

Recommended actions for food retailers	Suggested metrics for monitoring and reporting	International examples of leading practice
<p><b>A1. Explicitly incorporate nutrition and health as a core part of corporate strategy</b></p>	<ul style="list-style-type: none"> <li>• Mention of nutrition and health as part of mission statement and/or strategic vision, with reference to global and national population nutrition priorities</li> </ul>	<ul style="list-style-type: none"> <li>• Tesco (United Kingdom) outlined (in 2021–2022) a series of commitments to support healthy diets under their healthy, sustainable diets strategy.<sup>89</sup> Since 2022, publicly available reports have been released annually describing the progress made towards achieving relevant targets. Recent reports outline health and diet-specific key performance indicators. This includes a target to increase the proportion of sales of healthy food (as defined by their “Tesco Health Score”, based on the Government’s nutrient profiling model) to 65 per cent by 2025, from 58 per cent as of 2020.<sup>81</sup></li> </ul>
<p><b>A2. Ensure accountability</b> for nutrition and health, through an appropriate governance structure and nutrition-related performance metrics for management at multiple levels</p>	<ul style="list-style-type: none"> <li>• Report on governance structure for accountability in relation to nutrition and health</li> </ul>	
<p><b>A3. Adopt an evidence-based definition of ‘healthy’</b> that is based on (inter)national nutrition standards and/or guidelines and independent scientific evidence, and apply that definition consistently across all nutrition-related practices (see Box 5)</p>	<ul style="list-style-type: none"> <li>• Adoption of SMART nutrition-related goals / targets</li> <li>• Regular disclosure of commitments and progress against goals / targets in publicly accessible reports</li> </ul>	
<p><b>A4. Actively support implementation of global and national recommendations to improve nutrition</b>, including refraining from lobbying activities that oppose or delay public health regulations to address unhealthy diets</p>	<ul style="list-style-type: none"> <li>• Volume and proportion of sales from healthy/unhealthy products, as defined by nationally endorsed classification systems</li> <li>• Volume and proportion of sales from fruit and vegetables</li> </ul>	<ul style="list-style-type: none"> <li>• Woolworths (Australia) outlines their action and progress on promoting healthier diets in their 2022 Annual Sustainability Report and Corporate Responsibility strategy documents.<sup>90</sup> This publicly available document outlines their goals to “materially increase healthier choices in our customers’ baskets” and “inspire healthier choices.” It also describes an ambition to grow the proportion of sales from healthier products (defined as those with a Health Star Rating of 3.5 stars and above) by 50 basis points annually.</li> </ul>
<p><b>A5. Set SMART (specific, measurable, achievable, relevant and time-bound) goals</b> related to a comprehensive range of nutrition-related action areas (e.g., product development, labelling, product availability and placement, responsible marketing)</p>		
<p><b>A6. Regularly monitor and evaluate progress against goals</b>, including as part of external reporting</p>		
<p><b>A7. Disclose commitments and quantified progress against commitments</b> in publicly accessible reports</p>		<ul style="list-style-type: none"> <li>• Lidl (United Kingdom) pledges goals of increasing sales of healthy and healthier products (defined by a nutrient profiling system adapted from Public Health England’s nutrient criteria) to 85 per cent (based on tonnage volume) and increasing the sales of fresh fruit and vegetables by 35 per cent by 2025.<sup>91</sup></li> </ul>
<p><b>A8. Routinely conduct due diligence assessments</b>, including risk analyses, on how the business influences children’s rights to health and healthy food,<sup>92</sup> and report on such activities in line with the United Nations Guiding Principles Reporting Framework<sup>93</sup></p>		

## B. Product development and labelling

Recommended actions for food retailers	Suggested metrics for monitoring and reporting	International examples of leading practice
<p><b>B1. Reformulation of existing product portfolios:</b> Improve the healthiness of product portfolios by continuing to reformulate existing 'own-brand' products (including products for infants and young children) to make them healthier by reducing levels of free sugars, sodium and harmful fats in line with, and in support of, relevant government targets and guidelines,<sup>94</sup> while also adding positive ingredients, such as vegetables and whole grains</p>	<ul style="list-style-type: none"> <li>• Average levels of sodium, sugar, harmful fats and energy (per 100g) in own-brand products (by food category), including comparison with relevant government targets and guidelines (standard and sales-weighted)</li> <li>• Proportion of products (by food category) that meet relevant government nutrient targets and guidelines (standard and sales-weighted)</li> </ul>	<ul style="list-style-type: none"> <li>• Tesco (United Kingdom) reports annually on their progress in healthier reformulation,<sup>95</sup> noting for example that the proportion of own-brand ready-made meals containing at least one of the recommended 'five a day' (fruit and vegetables) increased by 26 per cent between 2018 and 2022. Tesco has set a target to increase the percentage of meals that contain at least one of the 'five a day' from 50 per cent in 2021 to 66 per cent by 2025.</li> </ul>
<p><b>B2. New product development:</b> Ensure new product development is focused on healthier 'own-brand' products, while shifting product portfolios away from ultra-processed products high in sugar, sodium and harmful fats (see <b>Box 5</b>)</p>	<ul style="list-style-type: none"> <li>• Proportion of sales from healthy/unhealthy own-brand products, as defined by nationally endorsed classification systems</li> </ul>	<ul style="list-style-type: none"> <li>• Lidl (United Kingdom) has committed to reducing the average sales-weighted level of added sugar and added sodium in their own-brand products by 20 per cent by 2025 (baseline year of 2015).<sup>96</sup> This commitment refers to several national and international nutrition policy documents and expert recommendations.</li> </ul>
<p><b>B3. Portion sizes:</b> Stock small and/or reduced package sizes of single serve unhealthy products, in line with government guidelines (relevant to product categories that are typically high in sodium, sugar, energy and/or harmful fats, such as confectionery, beverages, snacks and ice creams)</p>	<ul style="list-style-type: none"> <li>• Report on efforts to offer small and/or reduced single serve package sizes of unhealthy products in relevant categories</li> <li>• Proportion of single serve packaged own-brand lines that offer 'smaller' (relative to current standard) package sizes (in key relevant product lines)</li> <li>• Proportion of product sales from smaller single serve package sizes, compared with larger (current standard) package sizes (in key relevant product lines)</li> </ul>	<ul style="list-style-type: none"> <li>• Woolworths (Australia) has committed to working towards voluntary reformulation targets set by the Australian Government's Healthy Food Partnership, and reports having reached 76 per cent compliance with the targets as of August 2022. Their New Zealand supermarket chain, Countdown, reports that 65 per cent of own-brand products meet the New Zealand Heart Foundation's HeartSAFE nutrient targets.<sup>97</sup></li> </ul>
<p><b>B4. Nutrition information online:</b> Provide detailed nutrition information online for all products sold on online stores</p>	<ul style="list-style-type: none"> <li>• Report on provision of nutrition information for online stores</li> </ul>	
<p><b>B5. Front-of-pack nutrition labelling:</b> Comply with government regulations and recommendations for front-of-pack nutrition labelling. Where government policies / recommendations are not in place, adopt globally recommended best practice front-of-pack nutrition labelling (simple, easy-to-understand) on all eligible 'own-brand' products</p>	<ul style="list-style-type: none"> <li>• Proportion of eligible own-brand products displaying government-recommended front-of-package labelling (if labelling system is not yet mandatory and a government-recommended scheme exists)</li> </ul>	<ul style="list-style-type: none"> <li>• Coles and Woolworths (both Australia), include the Australian Government-endorsed Health Star Rating front-of-pack labelling system on all intended own-brand products. Their labelling practices have been verified by independent monitoring.<sup>98</sup></li> </ul>



## Product development and labelling (cont.)

Recommended actions for food retailers	Suggested metrics for monitoring and reporting	International examples of leading practice
<p><b>B6. Nutrition- and health-related claims:</b> Comply with government regulations and recommendations for use of claims. Where government policies are not in place or are not comprehensive, claims should comply with Codex Alimentarius Guidelines for use of nutrition and health claims, and retailers should responsibly use nutrition content claims (e.g., low in fat), health claims and health branding on own-brand products by only using them on a product or as a part of advertising when the product is healthy.</p>	<ul style="list-style-type: none"> <li>• Number of incidents of non-compliance with industry or regulatory labelling and/or marketing codes, and report on actions taken to remediate non-compliance (where applicable)</li> <li>• Total amount of monetary losses as a result of legal proceedings associated with marketing and/or labelling practices</li> </ul>	<ul style="list-style-type: none"> <li>• Several supermarkets in the United Kingdom (including Asda, Tesco and Sainsbury’s) have pledged that own-brand products that do not meet their healthiness criteria cannot display health or nutrition claims, or ‘healthier’ branding and logos.<sup>99</sup></li> <li>• Through the 2022 ATNI United Kingdom Retailer assessment, Morrisons (United Kingdom) cites engaging with food manufacturers to encourage reformulation of unhealthy products.<sup>100</sup> Woolworths notes in their 2022 Sustainability Report that they have formed a Supplier Sustainability Council called “Healthier Choices”, which is a forum for engaging with their suppliers to support the achievement of their 2025 commitments, focused on increasing healthier choices in customers’ baskets.<sup>101</sup></li> </ul>
<p><b>B7. Summary nutrition information:</b> Display summary nutrition information (in a simple, easy-to-understand format) at point of sale (e.g., on shelves, shelf/price tags, menu boards, in online stores). Such information should support, and be consistent with, implementation of front-of-pack nutrition labelling (where relevant)</p>	<ul style="list-style-type: none"> <li>• Report on strategies to provide summary nutrition information at point of sale (e.g., on shelves, shelf tags, online)</li> </ul>	<ul style="list-style-type: none"> <li>• Since 2006, several US supermarkets<sup>102</sup> have implemented nutrition summary shelf label systems, often combined with in-store educational programmes.</li> </ul>
<p><b>B8. Breast-milk substitutes:</b> Retailers that either produce their own-brand breast-milk substitutes (formula) or sell other brands of formula must ensure that all products adhere to the relevant Codex standards for product quality and labelling and are in alignment with the International Code of Marketing of Breast-milk Substitutes (Code) (see <b>Box 6</b>). Retailers should avoid selling any products covered by the Code until the manufacturers comply with product quality and labelling provisions.</p>	<ul style="list-style-type: none"> <li>• Report on compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions</li> </ul>	<ul style="list-style-type: none"> <li>• Since 2006, several US supermarkets<sup>102</sup> have implemented nutrition summary shelf label systems, often combined with in-store educational programmes.</li> </ul>
<p><b>B9. Working with suppliers:</b> Where permissible under local regulations, work backwards in the value chain to require and incentivize food manufacturers and suppliers to improve the healthiness of their products and the way that they are labelled, in support of relevant government targets and guidelines. For example, ensuring contracts with manufacturers and suppliers support sales of their healthy or healthier products, including through product development/reformulation and shelf space provision.</p>	<ul style="list-style-type: none"> <li>• Evidence of engagement with food manufacturers to improve healthiness of products supplied and product labelling, in line with government guidelines</li> </ul>	

## C. Product availability and placement

Recommended actions for food retailers	Suggested metrics for monitoring and reporting	International examples of leading practice
<p><b>C1. Work with suppliers to reduce in-store (and online) placement strategies that promote less healthy foods</b> (e.g., unhealthy products at the eye and hand height of children, at checkouts, end-of-aisle displays and island bins), at all times of the year (including seasonal promotions, such as during major cultural festivals, where these strategies are often highly prevalent). Instead, ensure that non-food items and/or healthy foods are promoted in prominent places in-store (and online)</p>	<ul style="list-style-type: none"> <li>Percentage of space devoted to unhealthy food and beverages within displays at checkouts, end-of-aisles and promotional displays, including reporting by season</li> </ul>	<ul style="list-style-type: none"> <li>Between 2012 to 2020, Kiwi supermarkets (Norway) implemented placement strategies in-store to promote fruit and vegetables, including moving fruit and vegetable sections to the front of stores, increasing floor space for fresh produce, and stocking portioned cups of ‘on the go’ fruit and vegetables at store checkouts. These actions, adopted with other promotional and pricing initiatives, led to an increase in fruit and vegetable sales of 34 per cent, more than seven times the national level.<sup>103</sup></li> </ul>
<p><b>C2. Restrict the sale of certain less healthy products</b>, such as energy drinks, to children</p>	<ul style="list-style-type: none"> <li>Report on evidence of implementation of strategies to restrict the sale of certain less healthy products to children (e.g., a documented policy and evidence that retail staff have received training on the issue)</li> </ul>	<ul style="list-style-type: none"> <li>Prior to the implementation of relevant government regulation, seven of the largest supermarket retailers in the United Kingdom (Aldi, Co-op, Lidl, Marks &amp; Spencer, Morrisons, Sainsbury’s and Tesco) made commitments in relation to removing confectionery from their checkouts.<sup>104,105,106,107</sup> In addition, Aldi required all products sold at checkouts to meet their “Healthier Checkout criteria” (adapted from the Government’s Ofcom model).<sup>108</sup> Evaluation of the impact of these commitments and the extent of their implementation is in progress.</li> </ul>
<p><b>C3. Ensure healthy and ‘healthier’ products are affordable and equitability distributed across geographic areas and store formats.</b> For example, ensure healthier options are priced similarly to (and preferably cheaper than) less healthy equivalents, and healthier options are widely available (particularly in rural/remote areas and lower-income communities), taking into account local preferences</p>	<ul style="list-style-type: none"> <li>Report on strategies to ensure healthy and ‘healthier’ products are equitably distributed by geographic area</li> <li>Proportion of healthy/unhealthy product sales in rural and metropolitan areas</li> <li>Provide evidence of conducting pricing and distribution analysis to appropriately price and distribute healthy, affordable products</li> </ul>	<ul style="list-style-type: none"> <li>Several supermarkets across the United Kingdom (Waitrose, Sainsbury’s, Morrisons, Lidl, Co-op, Asda, Aldi and Tesco) and New Zealand (Countdown) restrict the sale of energy drinks to children under the age of 16.<sup>109,110</sup></li> <li>Co-op (United Kingdom) publicly pledged to ensure that 100 per cent of their healthier own-brand products are no more expensive than their standard equivalent product (based on price per kg).<sup>111</sup> They also monitor and report on their compliance to this commitment – with a 2021 assessment identifying only one non-compliant product.</li> </ul>

## D. Promotional activities

Recommended actions for food retailers	Suggested metrics for monitoring and reporting	International examples of leading practice
<p><b>D1. Work with suppliers to use price promotion strategies</b> (e.g., discounts, loyalty discounts) <b>to incentivize the purchase of healthier foods</b></p>	<ul style="list-style-type: none"> <li>• Report on strategies to use price promotions to incentivize the purchase of healthier foods</li> <li>• Report on strategies to restrict use of price promotions related to less healthy foods. Include metric on percentage of food and beverage price promotions devoted to less healthy food and beverages (implemented in various settings, such as catalogues, checkouts, end-of-aisle displays, as part of loyalty programmes), including reporting by season; and report on the size of discounts offered for less healthy vs. healthy food and beverages</li> </ul>	<ul style="list-style-type: none"> <li>• Delhaize (Belgium) provides customer incentives and discounts for purchasing healthy products. The supermarket's 'SuperPlus' loyalty programme provides customers with an automatic 5–15 per cent discount on products with a 'Nutri-Score' of A or B (most healthy).<sup>112</sup> Delhaize also launched the 'Healthy Membership Programme', a pilot programme where employees of participating companies receive a 20 per cent discount on 'healthy' products, resulting in substantially more sales of these products.</li> </ul>
<p><b>D2. Work with suppliers to restrict use of price promotion strategies</b> (e.g., discounts, loyalty discounts) – at any time of the year (including seasonal promotions, such as during major cultural festivals, where these strategies are often highly prevalent) – <b>that incentivize the purchase of less healthy foods</b></p>	<ul style="list-style-type: none"> <li>• Commit to removing imagery and other promotional techniques that appeal to children from less healthy 'own-brand' products</li> <li>• Report on additional strategies to avoid promotional techniques that appeal to children in relation to less healthy foods</li> </ul>	<ul style="list-style-type: none"> <li>• Morrisons (United Kingdom) have committed to providing promotions for an average of 50 lines of fresh fruit and vegetables each week in an effort to keep fresh food affordable for shoppers.<sup>113</sup></li> </ul>
<p><b>D3. Work with suppliers to avoid promotional techniques that appeal to children</b> (e.g., product packaging that features cartoon and animated characters, celebrities and/or images that appeal to children, competitions, toys, prizes or giveaways) in relation to less healthy foods</p>	<ul style="list-style-type: none"> <li>• Report on compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions</li> </ul>	<ul style="list-style-type: none"> <li>• Sainsbury (United Kingdom) phased out multi-buy promotions in 2016. In light of proposed government restrictions on unhealthy food promotions (implementation currently delayed), Tesco (United Kingdom) also pledged to cease multi-buy promotions on unhealthy foods by the end of October 2022.<sup>114</sup></li> </ul>
<p><b>D4. Align policies and practices on the marketing of breast-milk substitutes (formula) with the International Code of Marketing of Breast-milk Substitutes</b> (including subsequent resolutions) such that these products are not promoted in any form (e.g., no special displays, no discounts, no gifts/giveaways/samples) (see <b>Box 6</b>)</p>	<ul style="list-style-type: none"> <li>• Report on compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions</li> </ul>	<ul style="list-style-type: none"> <li>• Marks and Spencer (United Kingdom) commits to not directly advertise any unhealthy foods to children under 18.<sup>115</sup> In 2021, Morrisons (United Kingdom) removed all characters that appeal to children from children's snacks that are high in fat, sugar and sodium.<sup>116</sup> Similarly, Woolworths (Australia), have pledged that, by 2025, characters appealing to children will only appear on packaging of healthier products.<sup>117</sup></li> </ul>
<p><b>D5. Align policies and practices relating to complementary foods</b> ('baby' foods or foods for infants and young children between 6 months and 3 years of age) with the International Code of Marketing of Breast-milk Substitutes (including subsequent resolutions, particularly World Health Assembly resolution 69.9) (see <b>Box 6</b>)<sup>118</sup></p>		



## Promotional activities (cont.)

Recommended actions for food retailers	Suggested metrics for monitoring and reporting	International examples of leading practice
<p><b>D6. Where protein foods are promoted,</b><sup>i</sup> work with suppliers to focus promotions on healthy and environmentally sustainable sources of minimally processed protein foods</p>	<ul style="list-style-type: none"> <li>Report on change in proportion of sales that come from animal versus plant-based protein sources</li> </ul>	<ul style="list-style-type: none"> <li>Sainsbury's (United Kingdom) ran a <b>'half and half' campaign</b> (2022) to encourage customers to mix pulses with half meat in popular recipes, like curries, lasagne and casseroles. Evaluation showed that customers were more willing to try this in innovative recipes, like curry, than traditional favourites, like lasagne.<sup>119</sup></li> </ul>
<p><b>D7. Implement strategies to improve food literacy and inspire selection of healthier choices,</b> aligned with relevant government guidelines and strategies (e.g., dietary guidelines, relevant food labelling regulations)</p>	<ul style="list-style-type: none"> <li>Report on strategies used to improve food literacy and inspire selection of healthier choices</li> </ul>	<ul style="list-style-type: none"> <li>Migros Ticaret (Türkiye) has an ongoing project, 'Growing Healthy with Migros', to strengthen children's awareness about healthy living. Store managers carry out store tours for children while addressing the following topics: the importance of a balanced diet, balancing energy intake with physical activity, health benefits of fruits and vegetables, food security, and reading nutrition labels. Migros Ticaret also created an animated video covering all educational materials with the support of the Food and Agriculture Organization of the United Nations (FAO), which reached 2.1 million children through Migros TV and social media channels.<sup>120</sup></li> <li>The Kroger Co (USA) has a core group of dietitians that provide services in-store and virtually to customers. The services include nutrition advice, education and personalized approaches to eating and enjoying food. A large scale evaluation of Kroger dietitian-led nutrition interventions found positive results on diet quality of participants.<sup>121</sup></li> </ul>

i In many markets, such as in the United Kingdom and Australia, most people already eat more than enough protein (see: <https://dietitiansaustralia.org.au/health-advice/protein>). In these markets, there are some groups of people, such as children and older people, who may need to monitor the amount of protein they eat to ensure they get enough. In some low- and middle-income countries, protein intake at the population level may be below recommendations (see: [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(18\)31788-4/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)31788-4/fulltext)).

## International Code of Marketing of Breast-milk Substitutes and the role of food retailers

- The World Health Assembly adopted the International Code of Marketing of Breast-milk Substitutes in 1981 and relevant subsequent resolutions (collectively referred to as ‘the Code’) to protect and promote appropriate infant and young child feeding. The scope of the Code includes all breast-milk substitutes (all formula and milk products marketed as suitable for children 0–36 months of age), feeding bottles and teats. Subsequent World Health Assembly resolutions also provide guidance on the regulation of complementary foods.
- The Code advocates for babies to be breastfed, and where this is not possible, that they are fed safely on the best available nutritional alternative. Substitutes should be available when needed, but should not be promoted.<sup>122</sup>
- Food retailers have specific responsibilities as part of the Code. These responsibilities include not promoting infant and toddler formulas through marketing or other promotional practices such as special displays or discounts. The Code also contains a detailed list of labelling requirements for both breast-milk substitutes and complementary foods that include instructions for appropriate and safe use of the products (including a pathogen warning), as well as specific criteria on the use of health/nutrition claims and messages that support breastfeeding, among others.
- UNICEF recommends the following actions from food retailers who sell breast-milk substitutes and complementary foods:
  - ➔ Adhering to all provisions of the Code that apply to distributors (and manufacturers as appropriate) to all products sold that are within the scope of the Code, and public disclosure of such adherence. Retailers are required to adopt the provisions of the Code regardless of the status of national laws or regulations.
  - ➔ Ensuring that the nutritional composition of own-brand complementary food products aligns with the nutrient profiling standards set out in WHO Europe’s Nutrient and Promotion Profile Model.<sup>123</sup>
  - ➔ Ensuring that labelling requirements, nutritional quality and promotional criteria of complementary foods (even if not own-brand) align with the provisions set out by WHO. This includes no marketing of complementary foods in relation to infants under 6 months of age. In countries where standards and/or nutrient profiles for this age group have not been developed, all promotion of complementary foods is prohibited until such standards are adopted.
  - ➔ Establishing strong systems to monitor adherence to the Code.



## Current food retailer actions to promote healthy eating

● **Around the world, many large food retailers are taking voluntary action to improve the healthiness of food environments.**<sup>124</sup> Common actions include product reformulation (e.g., reducing sodium and sugar content of own-brand products), front-of-pack nutrition labelling and promotional initiatives. Refer to **Box 7**, **Box 8** and **Box 9** for case study examples.

While many of the voluntary actions taken by large food retailers are supported by evidence and are likely to be effective if implemented at scale, independent evaluations and external benchmarks suggest that, thus far, the actions taken fall short of recommendations (refer to

**Box 10** for an assessment of food retailer performance in the United Kingdom).<sup>125,126,127,128</sup>

A key challenge in assessing the value of existing measures is that there are a lack of comparable nutrition-related data on food retailers, limited disclosure across the sector, and many of the actions taken have been limited in scope. Moreover, food retailers typically do not report the impact of existing initiatives on consumer purchases. Comprehensive action to restrict the promotion and placement of unhealthy foods and/or increase the promotion and placement of healthy foods in-store is also lacking.

It is critical that food retailers expand the scope and scale of their current nutrition-related actions, with a focus on measures that have a broad impact on the population, as these will have an impact on children and young people either directly or via their parents. Moreover, it is important for food retailers to rigorously evaluate their activities and share relevant data/results, regularly report on progress using standardized metrics, and actively support government implementation of structural measures (e.g., taxes and regulations) that aim to promote healthy diets among children and the rest of the population.





## Woolworths (Australia)

Woolworths (Australia) integrates nutrition as part of their corporate strategy. In their Sustainability Plan 2025,<sup>129</sup> the supermarket chain outlines a goal to “materially increase healthier choices in customers’ baskets” and explicitly references SDG3 on “good health and well-being”. Woolworths’ nutrition-related goal is supported by a range of detailed commitments on product range and formulation, nutrition labelling, promotional initiatives to support nutrition, and responsible marketing to children.

Woolworths’ ambition is to have the healthiest supermarket own-brand portfolio in Australia, striving for healthier product innovation, and continuing reformulation of own-brand products to reduce sodium, sugar and saturated fats and include more vegetables and wholegrains.

A focus on clear and transparent nutrition labelling has seen Woolworths voluntarily adopt the government-endorsed Health Star Rating on 100 per cent of eligible own-brand products, and commit to using nutrition content claims responsibly.

In all stores across Australia, Woolworths provides free fresh Fruit for Kids. Woolworths also offers Fresh Food Kids Discovery Tours, a curriculum-aligned, digital programme that allows schools and children to learn about where fresh food comes from. Additionally, Woolworths has committed to placing “characters, graphics and activities that are primarily appealing to children” solely on packaging for healthier own brand products.



## Tesco (United Kingdom)

Tesco (United Kingdom) has made several commitments towards the provision of healthier foods. In 1994, Tesco began voluntarily restricting the sale of unhealthy food and beverages at checkouts, replacing them with products, such as dried fruit and nuts, that are considered under national guidelines to be 'healthier' snacks. This initiative was completed in 2015.<sup>130</sup>

In 2021 and 2022, under Tesco's healthy, sustainable diets strategy,<sup>131</sup> the supermarket chain reported that it aimed to increase the proportion of sales of healthier food to 65 per cent by 2025, while also reformulating own-brand products to reduce sugar, salt, fat, while increasing fruit, vegetable

and fibre content. Tesco publicized its intention to ensure that 'healthier' alternatives would be available to customers at the same or a lower price than what they would pay for an unhealthy item. This built on Tesco's commitment to increasing the number of promotions of healthy products.

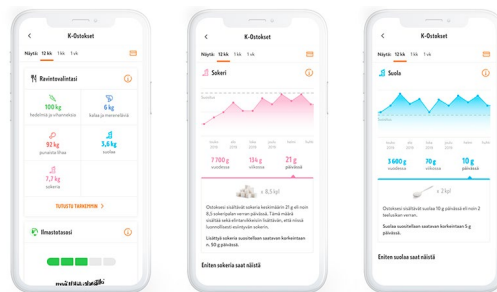
Tesco also established a Corporate Responsibility Committee, renamed the Sustainability Committee in April 2023, chaired by an independent non-executive Director, to oversee the implementation of these commitments. The committee meets at least tri-annually and publicly reports on its progress annually.



## Digital tools to encourage consumers to make healthier purchases

Several food retailers have developed app-based and/or other digital initiatives to encourage consumers to purchase healthier products, typically linked with consumer loyalty programmes. There is a large amount of encouraging innovation in this area, but few impact evaluations on the characteristics of these initiatives that are most effective from a public health perspective. Accordingly, when implementing these types of initiatives, it is important for food retailers to commit to ongoing evaluation, including assessment of their impact on the healthiness of overall store sales, consumer baskets and dietary consumption. Sharing insights from evaluations can raise standards across the field by encouraging other food retailers to adopt effective actions. Below are three recent examples of initiatives in this area:

**K Group (Finland)** launched the K-Ostokset smartphone app in 2020.<sup>133</sup> Through the app, shoppers can compare levels of risk nutrients (like sodium and sugar) and particular food groups (such as vegetables, fish and red meat) in the foods they buy to national recommendations, and then set goals for their next shop. The app connects with the supermarket’s loyalty programme and product nutrition information from a national product database.

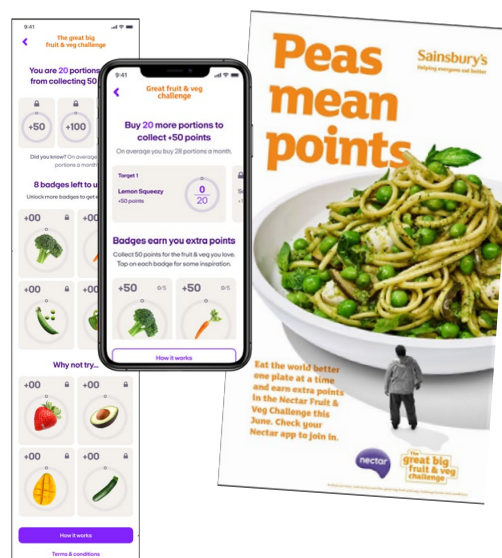


**Migros Ticaret (Türkiye)** has added a *Well-being Journey* programme to its customer loyalty app and online shopping app.<sup>134</sup> The programme compares customers’ food purchases with recommended consumption, and shares customized video messages prepared by dietitians about the food groups they need for balanced nutrition. Customers are also provided with personalized discounts on food groups in which their consumption is below recommendations. The programme has options for vegans and vegetarians and also provides interactive digital advice supporting healthy lifestyles, such as a water consumption reminder and step tracker. By 2023, the programme had reached 5.4 million unique customers, with 30 per cent of customers indicating positive behavioural change.

**Sainsbury’s (United Kingdom)** incorporated a fruit and vegetable tracker into a customer loyalty app to encourage shoppers to purchase more fruit and vegetables, as part of their ‘Great Big Fruit and Veg Challenge’ (June 2021).<sup>135</sup> The gamification app leverages multiple initiatives:

- Sets personalised goals to encourage customers to increase their fruit and veg intake over 6 weeks.
- Helps customers track progress through ‘data playback’.
- Rewards customers with loyalty points for increasing purchase and for trying something new.

An evaluation conducted in partnership with the University of Leeds reported that loyalty programme shoppers who participated in the challenge (over 460,000 customers) purchased an average of 3.6 more portions of fruit and vegetables per week, compared to before pre-challenge purchasing habits. This pattern was maintained for vegetable purchases up to 6-weeks post-trial but returned to baseline levels for fruit purchases.<sup>135</sup>





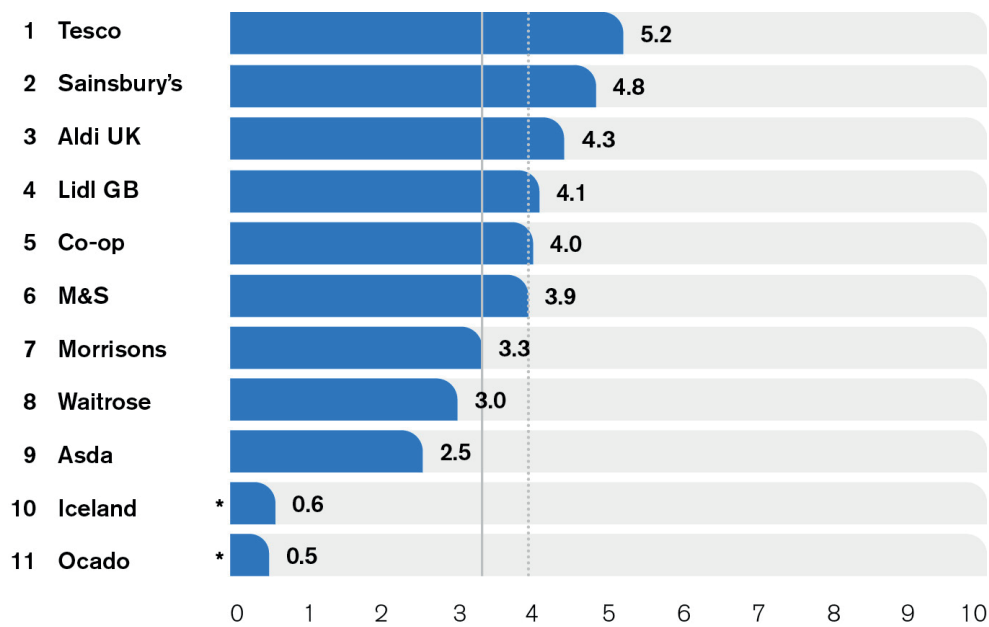
## Access to Nutrition Initiative (ATNI) – United Kingdom Retailer Index 2022

In 2022, ATNI published the United Kingdom Retailer Index 2022 as an external benchmark of the nutrition- and health-related policies and practices of the largest 11 grocery retailers in the country.<sup>132</sup>

Findings from the report indicated that there was considerable variation in the performance of the retailers, with no one company standing out as taking strong action across all topics assessed. The report found that while some retailers had recognized their role in contributing to nutrition-related efforts and had made commitments to

reduce sugar and salt, introduce healthy checkouts and use front-of-pack nutrition labelling, these policies and commitments typically fell short of recommended good practice.

In 2024, ATNI’s new retail index will be rolled out among the top 10 global food retailers as part of ATNI’s next Global Index. ATNI aims to repeat these every two years thereafter to benchmark and assess progress on nutrition by the world’s largest retailers.



\*Did not provide information to ATNI





## Conclusion

● **Food retailers have a critical role as part of societal efforts to improve the diets of children and to address malnutrition in all its forms.** A strong focus on nutrition and health is likely to deliver long-term value to food retailers and their investors. There are a range of evidence-based actions that food retailers can take to improve the healthiness of retail food environments, and positively impact the diets of children and families. First and foremost, food retailers can support government-led regulation to create healthy food environments and a level playing field for all food retailers. Food retailers can also ensure that their business decisions contribute to children’s rights to

nutrition and health by making meaningful commitments, taking evidence-based nutrition-related actions, and routinely reporting on progress using standardized metrics. These actions can reduce risks and increase business opportunities.

There are many international examples of food retailers showing leadership in the area of nutrition and demonstrating the feasibility of implementing nutrition-related initiatives. In order to increase the impact of current actions, food retailers globally will need to expand the scope and scale of their current nutrition-related activities, with a focus on measures that have a broad impact on the population,

accompanied by rigorous evaluation and sharing of lessons learned. Collaboration and cooperation across the sector, supported by strong government leadership and regulation on nutrition-related issues, are likely to be critical in ensuring sustained improvements to the healthiness of retail food environments.

This Guidance Framework is designed to inspire food retail companies towards a ‘race to the top’ on nutrition, encouraging best practices that both prioritize children’s rights to good nutrition and health, while generating long-term business value.



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