

Food and beverage manufacturers in Canada: Policies and commitments to improve the food environment

BIA-Obesity Canada 2019



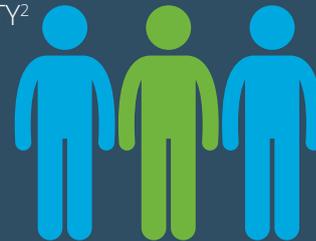
Unhealthy diets are creating a public health crisis in Canada

Unhealthy diets are among the leading contributors to obesity and non-communicable disease development in Canada.^{1,2}

Two out of every three Canadian adults, and one in three children have overweight or obesity.³ This has a high cost to the economy, including significant impacts on the healthcare system and productivity.³ Unhealthy food environments are important contributors to poor diet quality. Actions from the government, the food industry and the broader community all contribute to the healthfulness of food environments.⁴

Food and beverage manufacturers have an important role to play in creating healthier food environments and contributing to efforts to improve population diets.

IN CANADA,
2 OUT OF EVERY 3 ADULTS
HAVE EXCESS WEIGHT
OR OBESITY²



1 IN 3 CHILDREN
HAS EXCESS WEIGHT
OR OBESITY²



Benchmarking company nutrition policies and commitments

This study assessed, for the first time, the largest Canadian packaged food and non-alcoholic beverage manufacturers on their policies and commitments related to population nutrition and obesity prevention. The main objectives were to highlight where major packaged food and beverage manufacturers in Canada are demonstrating leadership in helping to create a healthier food environment, identify good practice examples, and make specific recommendations for improvement.

Globally-developed assessment methods, tailored to the Canadian context

Company policies and commitments related to obesity prevention and nutrition were assessed using the BIA-Obesity (Business Impact Assessment – Obesity and population-level nutrition) tool developed by INFORMAS, a global network of public health researchers that is monitoring food environments in >30 countries worldwide.^{4,5} The methods were adapted from the Access to Nutrition Index (ATNI) that benchmarks food company policies at the global level.⁶

The BIA-Obesity tool assesses company policies and commitments across six key domains: corporate strategy; product formulation; nutrition labelling; promotion to children and adolescents; product accessibility; and relationships with external groups. Each domain includes a number of indicators, with assessment based on the transparency, comprehensiveness and specificity of each company's policies and commitments.

Process of assessment

The largest packaged food and beverage manufacturers in Canada (n=22) were selected for assessment. For each company, publicly available information on their policies and commitments was collected up to the end of 2017. The project team liaised with company representatives to validate and supplement publicly available information. Companies were assessed across all the domains of the BIA-Obesity tool, and scores were combined across domains and weighted to derive an overall score out of 100.

¹ Institute for Health Metrics and Disease. Country Profiles: Canada. Seattle, Washington 2017. Available at <http://www.healthdata.org/canada>.

² Statistics Canada. Measured body mass index, Canadian Community Health Survey – Nutrition, 2015.

³ Nshinmyumukiza L, et al. Temporal changes in diet quality and the associated economic burden in Canada. PLoS One 2018; 13(11): e0206877.

⁴ Swinburn et al. INFORMAS (International Network for Food and Obesity/non-communicable diseases Research, Monitoring and Action Support): overview and key principles. Obes Rev. 2013;14 Suppl 1:1-12.

⁵ www.informas.org

⁶ www.accesstonutrition.org

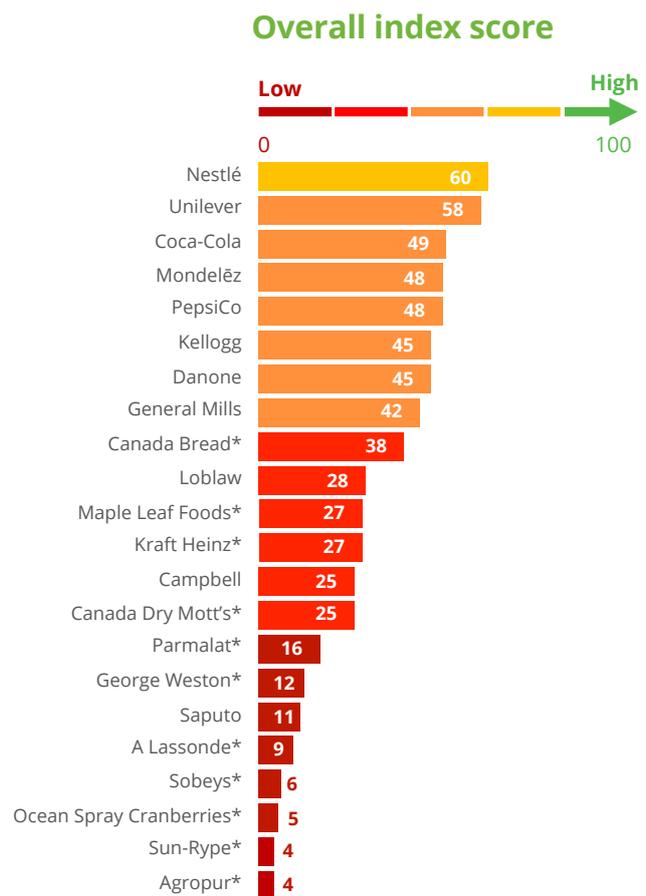
Key findings:

Overall, a number of food and beverage manufacturing companies are performing well and meeting good practice benchmarks in some policy areas, although not consistently across the industry:

- Scores for Canadian food and beverage manufacturers ranged from 4 to 60 (out of a possible 100 points), with a median score of 27.
- Half of the food and beverage manufacturing companies (11 out of 22) participated in the research process by providing data and clarification regarding company policies. On average, companies that participated in the process scored higher than those that did not. This indicates greater need for public disclosure of policy information from all companies.
- Overall, companies performed best in the **Corporate strategy** domain and poorest in the **Product accessibility** domain.

Areas where Canadian companies are showing leadership:

- **Corporate strategy:** Recognizing their responsibility and role in addressing diet-related non-communicable disease and obesity issues, and acknowledging obesity prevention and/or population nutrition and health in corporate strategies, missions and documents (18 of 22 companies).
- **Product formulation:** Action or commitments to reformulate or develop products to reduce levels of sodium in product portfolios (13 of 22 companies).
- **Promotion to children and adolescents:** Committing to some restrictions on marketing to children as part of national or international industry-led voluntary efforts (15 of 22 companies).



* Indicates companies that did not participate in the overall research process

Key recommendations

**Corporate strategy:**

- **Incorporate** commitments regarding population nutrition and health into overarching corporate strategies that clearly apply to Canada, with health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities. **Publicly report** progress against the targets and objectives that apply to Canada on a regular basis (e.g., annual or biannual).

**Product formulation**

- **Develop** a comprehensive commitment to reformulate company product portfolios in Canada, with SMART targets for multiple nutrients of concern (including sodium, added sugars, saturated fat, and portion size/energy content where relevant to portfolio) across all brands and product categories, in line with targets set by Health Canada. **Actively audit and publicly report** on progress in achieving these targets on a regular basis (e.g., annual or biannual).

**Nutrition labelling**

- **Commit** to implementing a simple, standardized, interpretive front-of-pack (FOP) labelling system across all products (pending the outcome of the Front of Pack regulations as part of the Healthy Eating Strategy), and **introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier, consistent with Canada’s FOP labelling system once finalized.

**Promotion to children & adolescents**

- **Implement** a comprehensive policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents (up to age 18) across all media channels, on food packages, and at events where a large number of children or adolescents are likely to be exposed (pending the outcome of Bill S-228: The Child Health Protection Act). **Eliminate** use of promotion techniques that appeal to children and adolescents (including company-owned licensed characters) for less healthy products and brands.

**Product accessibility**

- **Develop** strategic approaches to increase the accessibility and affordability of healthier products, that include commitments to work with schools to limit the supply of less healthy products in schools and to provide equivalent healthier options wherever less healthy products are sold. **Provide public support** for government policies or legislation concerning fiscal policies that are tied to nutrients of concern (such as sugary drink taxes).

**Relationships with external organizations**

- **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format. **Commit** to not make political donations, or disclose all political donations in real time.

Implications



Many Canadian food and beverage manufacturers are embedding population nutrition and obesity within their policy approaches and strategies, and some companies are making meaningful commitments to improve the food environment.



If companies follow through with policies and commitments, there is considerable potential for positive changes to the Canadian food environment.



Across all companies, there is room for improvement in policies and commitments related to population nutrition and obesity prevention.



Leadership from food companies is critical. The significant commitments and actions taken by some food companies identified in this evaluation demonstrate that development and implementation of such policies is possible.



There are gaps in the current voluntary industry policies and commitments. Government regulation may level the playing field to ensure that all companies are doing their part to improve the healthfulness of the food environment.



This was the first study to assess the policies and commitments of the largest food and beverage manufacturers in Canada, and provides considerable insight into the Canadian food environment.



This study did not assess performance of companies, for example, the nutritional quality of the company's product portfolio, or the extent and nature of less healthy food marketing, were not assessed in this study. Evaluating the performance and actions that relate to the policies and commitments outlined in this work is critical to understanding how these voluntary commitments translate into real-world practice.

Unhealthy diets and obesity are leading contributors to poor health in Canada

Overall diet quality in Canada is poor: fewer than one in four Canadians are consuming diets that are considered 'high quality' according to Canada's Food Guide¹ and packaged, 'ultra-processed' foods make up more than half of the Canadian diet, on average.² About two-thirds of Canadian adults and one-third of children currently have overweight or obesity,³ and non-communicable diseases are among the leading causes of disability and death in Canada.⁴ As a result, diet-related diseases also contribute approximately \$13 billion CAD per year in direct and indirect healthcare costs.¹



Improved diets are critical for sustainable development

The United Nations (UN) Sustainable Development Goals (SDGs) and associated targets present an agenda for all parts of society, including the corporate sector, to work towards improved economic prosperity, and the health and wellbeing of people and the planet.⁵ Internationally, many large companies and financial investors are now increasingly focusing on monitoring and evaluating their contributions to the SDGs.⁶

Improving population nutrition represents an important step in achieving the SDGs. Nutrition is considered a component of all 17 SDGs,⁷ and is part of, or linked to, performance targets of several SDGs, including:

- **SDG 2** Zero hunger
- **SDG 3** Good health and wellbeing
- **SDG 12** Responsible consumption and production



The food industry has an important role to play in addressing obesity and improving population diets

Tackling obesity and improving population diets requires a comprehensive societal response, including government policies, community support, and wide-scale action from the food industry. Canadian food and non-alcoholic beverage manufacturers (food and beverage manufacturers) have a major influence on how packaged food and beverage products are produced, sold and promoted. There is significant potential for these companies to contribute to efforts to create healthier food environments and improve population diets.

The World Health Organization (WHO) has identified a number of actions that the food industry can take to improve population nutrition and create healthier food environments,⁸ including:

- Limiting the levels of salt, free sugars,⁹ saturated fat and trans fat in products
- Ensuring that healthy and nutritious choices are available and affordable to all consumers
- Practicing responsible marketing of foods high in salt, free sugars, and unhealthy fats, especially to children
- Providing consumers with clear, easily understood, and evidence-based nutrition information on food labels.

¹ Nshinmyumukiza L, et al. Temporal changes in diet quality and the associated economic burden in Canada. PLoS One 2018; 13(11): e0206877.

² Moubarac JC. Ultra-processed foods in Canada: consumption, impact on diet quality and policy implications. Montréal: TRANSNUT, University of Montreal; December 2017.

³ Statistics Canada. Measured body mass index, Canadian Community Health Survey – Nutrition, 2015.

⁴ Statistics Canada. Table 13-10-0394-01 Leading causes of death, total population, by age group.

⁵ <http://www.un.org/sustainabledevelopment/sustainable-development-goals>

⁶ Hellström E, et al. Towards a Sustainable Well-Being Society. From Principles to Applications. 2015. Sitra Working Paper 14. Available from: https://media.sitra./2017/02/23221124/Towards_a_Sustainable_Wellbeing_Society_2.pdf

⁷ Global Nutrition Report 2017: Nourishing the SDGs. Bristol, UK: Development Initiatives.

⁸ World Health Organization. Global Strategy on Diet, Physical activity and Health, 2004.

⁹ Defined by the WHO as all sugars added to foods, plus sugars naturally present in honey, syrups, and fruit juices.

Supporting food companies to improve their commitments on nutrition

The goal of this study was to support Canadian food and beverage manufacturers in improving their policies and commitments related to obesity prevention and population nutrition. The objectives of this work were: 1) to highlight where Canadian food and beverage manufacturers are demonstrating leadership in their policies and commitments related to obesity prevention and nutrition; 2) to identify good practice examples of companies in Canada who have created outstanding policies and commitments; and 3) to make specific recommendations for improvement.

The study forms part of a broader initiative to assess company policies and performance across different sectors of the food industry, including supermarkets and restaurant chains in addition to packaged food and beverage manufacturers.¹

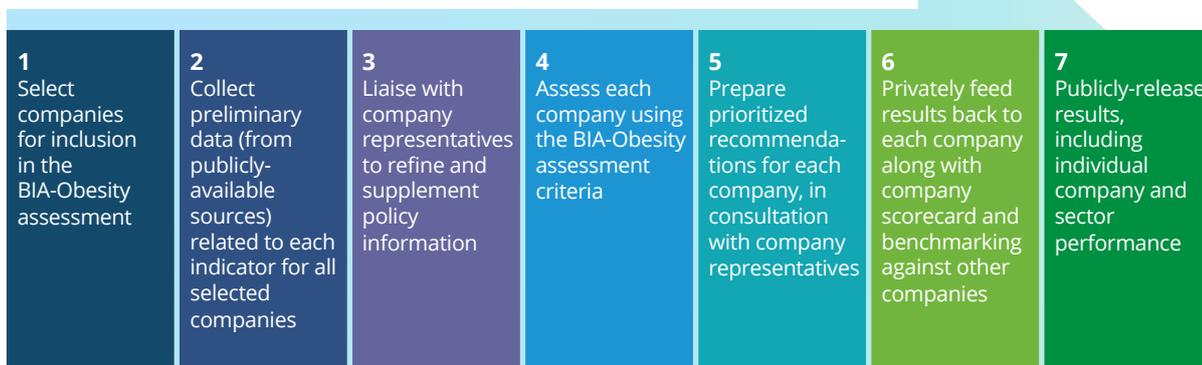
While this study focused on policies and commitments, future phases of the initiative will investigate the performance of companies (e.g., extent and nature of food marketing to children, healthfulness of overall product portfolio) and compliance with commitments made.

We acknowledge that this is a time of transition in nutrition and food policy in Canada, with the current *Healthy Eating Strategy*. Recommendations within this report have been developed to align with proposed regulations.

Company assessment

Company policies and commitments (as of December 31, 2017) related to obesity prevention and nutrition were assessed using the BIA-Obesity (Business Impact Assessment - Obesity and population-level nutrition) tool developed by INFORMAS, a global network of public health researchers that monitors food environments in >30 countries worldwide.^{1,2,3} These methods were adapted from the Access to Nutrition Index that benchmarks the nutrition-related commitments,⁴ performance and disclosure practices of global food and beverage manufacturers. The BIA-Obesity tool includes indicators specific to each food industry sector, which were tailored to the Canadian context.

Process for conducting the BIA-Obesity assessment



¹ www.informas.org

² Sacks G, Robinson E for INFORMAS. Inside our food and beverage manufacturers: assessment of company policies and commitments related to obesity prevention and nutrition, Australia 2018. Melbourne: Deakin University, 2018.

³ Vandevijvere S, Kasture A, Sacks G, Robinson E, Mackay S, Swinburn B. Committing to health: Food company policies for healthier food environments. Company assessments and recommendations using the Business Impact Assessment on obesity and population nutrition (BIA-Obesity) tool. New Zealand 2017. The University of Auckland, Auckland, 2018.

⁴ www.accessstonutrition.org

Companies selected for inclusion:

Market share data from Euromonitor 2016 were used to select companies for inclusion in the analysis.

| | |
|--|--|
| <p>Packaged food manufacturers representing 51.8% of the market share¹</p> | <p>Loblaw Companies Ltd.* Saputo Inc. Nestlé Canada Inc.*† Agropur Cooperative Ltd. Parmalat Canada Ltd. Kraft Canada Ltd.‡ Frito-Lay Canada*† General Mills Canada Corp. Sobeys Inc.* Schneider Corp.† Unilever Canada Inc. Kellogg Canada Inc. George Weston Ltd. Maple Leaf Foods Inc.† Canada Bread Co.† Danone Canada Inc. Cadbury Adams Canada Inc.† Mondelēz Canada Inc.† Heinz Co. of Canada Ltd.‡ Campbell Soup Co.</p> |
| <p>Non-alcoholic beverage manufacturers representing 69.8% of the market share^{2§}</p> | <p>PepsiCo Beverages Canada* Coca-Cola Ltd. Nestlé Waters of Canada Ltd.† Loblaw Companies Ltd.* Minute Maid Company of Canada† Canada Dry Mott's Inc. A Lassonde Inc. Sobeys Inc.* Sun-Rype Products Ltd. Ocean Spray Cranberries Inc.</p> |

* Company or parent company had a market share $\geq 1\%$ in both the packaged food and soft drink manufacturing sectors as of 2016.

† Indicates that the company was assessed according to policies and commitments of parent company affiliate where such information is typically communicated (i.e., Frito-Lay Canada is a subsidiary of PepsiCo, Schneider Corp. is owned by Maple Leaf Foods Inc., Cadbury Adams Canada Inc. is owned by Mondelēz Canada Inc., Nestlé Waters of Canada is a subsidiary of Nestlé Canada Inc., Minute Maid Co. of Canada is owned by Coca-Cola Ltd, Canada bread is owned by Grupo Bimbo, and Canada Dry Mott's is owned by Dr Pepper Snapple Group).

‡ Kraft Foods and Heinz merged to form the Kraft Heinz Company in 2015.

§ Beverage companies that sell water only were excluded.

¹ Euromonitor International. 2016. Packaged Food, Canada, 2016, Company Shares (National - Latest Owner), Historical, Retail Value RSP.

² Euromonitor International. 2016. Soft Drinks, Canada, 2016, Company Shares (National - Latest Owner), Historical, Off-trade Volume.

Domains assessed

The BIA-Obesity tool considers company policies and commitments across six key domains related to obesity prevention and nutrition.

| Domain | Policy area | Key indicator categories | Weighting (out of 100) |
|---|--|--|------------------------|
| A Corporate strategy | Overarching policies and commitments to addressing obesity and improving population nutrition | <ul style="list-style-type: none"> ✓ Commitment to nutrition and health in corporate strategy ✓ Reporting against nutrition and health objectives and targets ✓ Key Performance Indicators (KPIs) of senior management linked to nutrition and health-related targets | 10 |
| B Product formulation | Policies and commitments regarding product development and reformulation to reduce nutrients of concern (i.e., sodium, free sugars, saturated fat, trans fat) and energy content | <ul style="list-style-type: none"> ✓ Targets and actions related to reduction of sodium, free sugars, saturated fat, trans fat, and portion size/energy content where relevant across the portfolio ✓ Engagement with government initiatives related to product formulation (e.g., Health Canada's sodium reformulation targets) | 30 |
| C Nutrition labelling | Policies and commitments regarding disclosure and presentation of nutrition information on product packaging and online | <ul style="list-style-type: none"> ✓ Voluntary front-of-package labelling ✓ Online nutrition information ✓ Use of nutrition and health claims | 20 |
| D Promotion to children and adolescents | Policies and commitments for reducing the exposure of children and adolescents (aged <18) to promotion of less healthy foods/brands | <ul style="list-style-type: none"> ✓ Broadcast and non-broadcast media policy ✓ Use of marketing techniques that appeal to children and adolescents | 30 |
| E Product accessibility | Policies and commitments related to the availability and affordability of healthy compared to less healthy foods | <ul style="list-style-type: none"> ✓ Increasing proportion of healthy products across portfolio ✓ Increasing availability of healthy products ✓ Supporting a tax on sugar-sweetened beverages, in line with the WHO position | 5 |
| F Relationships with external groups | Policies and commitments related to support provided to external groups (e.g., professional associations, research organizations, community and industry groups) related to health and nutrition, with a focus on transparency | <ul style="list-style-type: none"> ✓ Disclosure and transparency of relevant relationships ✓ Accessibility of relevant information | 5 |

In each domain, policies and commitments were assessed based on:

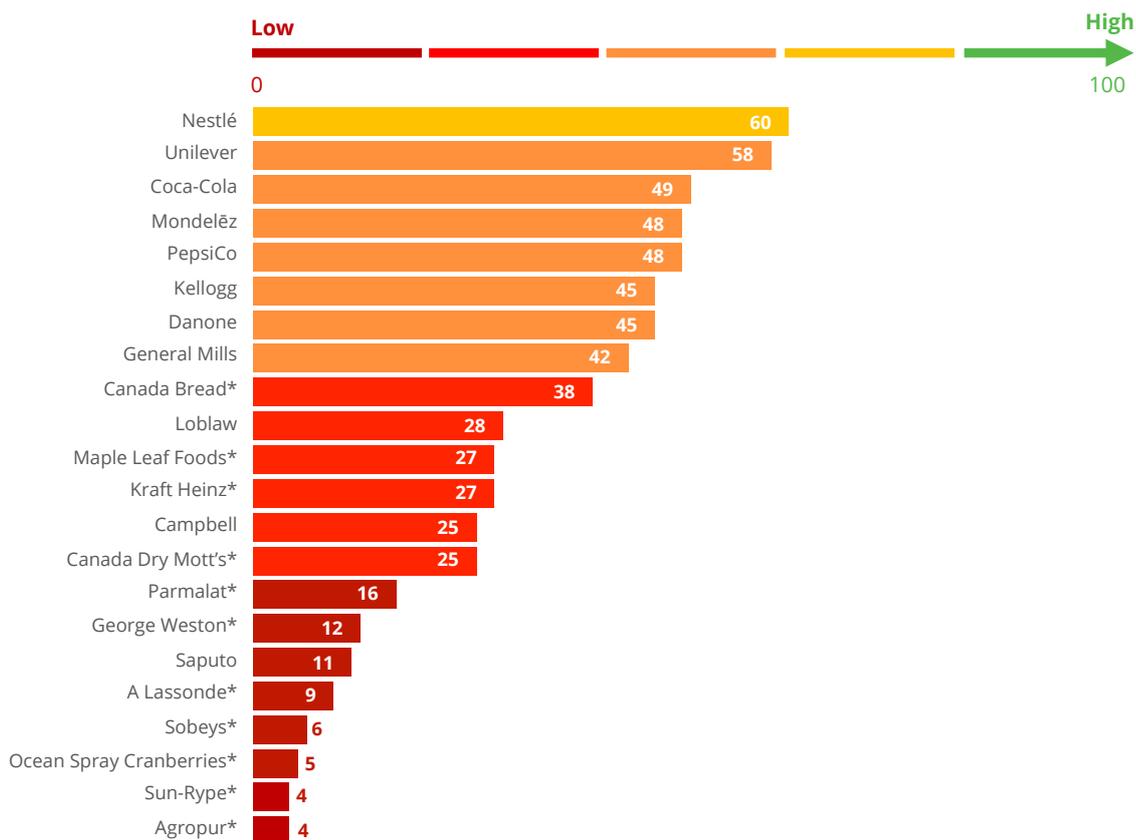
- ✓ **Transparency**
- ✓ **Comprehensiveness**
- ✓ **Specificity**
- ✓ **Relevance to the Canadian context**

Scores were combined across domains and weighted to derive an overall score out of 100 for each company.

Most of the largest food and beverage manufacturers in Canada acknowledged a commitment to addressing nutrition and health among Canadians; however, the transparency, comprehensiveness, and specificity of their policies varied substantially.

The majority of companies need to commit to significant efforts to address all policy areas related to population nutrition and obesity prevention, in order to improve the overall food environment.

Overall index score



* Indicates companies that did not participate in the overall research process

Summary

- Scores for Canadian food and beverage manufacturers ranged from 4 to 60 (out of a possible 100 points), with a median score of 27.
- Half of the food and beverage manufacturing companies (11 out of 22) participated in the research process by providing data and clarification regarding company policies. On average, companies that participated in the process scored higher than those that did not. This indicates greater need for public disclosure of policy information from all companies.
- Overall, companies performed best in the **Corporate strategy** domain and poorest in the **Product accessibility** domain.

Areas where Canadian companies are showing leadership:

- **Corporate strategy:** Recognizing their responsibility and role in addressing diet-related non-communicable disease and obesity issues by acknowledging obesity prevention and/or population nutrition and health in corporate strategies, missions and documents (18 of 22 companies).
- **Product formulation:** Action or commitments to reformulate or develop products to reduce levels of sodium in products (13 of 22 companies).
- **Promotion to children and adolescents:** Committing to some restrictions on marketing to children as part of national or international industry-led voluntary efforts (15 of 22 companies).

Areas where considerable progress is needed in Canada:

- **Product formulation:** Only 10 of 22 companies had commitments related to reducing amounts of added sugars in their product portfolios.
- **Nutrition labelling:** No companies committed to providing interpretive information on the front of product packaging.
- **Promotion to children and adolescents:** No companies restricted promotion to children over the age of 12.
- **Product accessibility:** Only 3 of 22 companies addressed issues related to the affordability and accessibility of healthier products in their product portfolio.
- **Relationships with external organizations:** Hardly any companies were transparent about their political donations and/or the funding they provide to researchers or research groups.

A] Corporate strategy

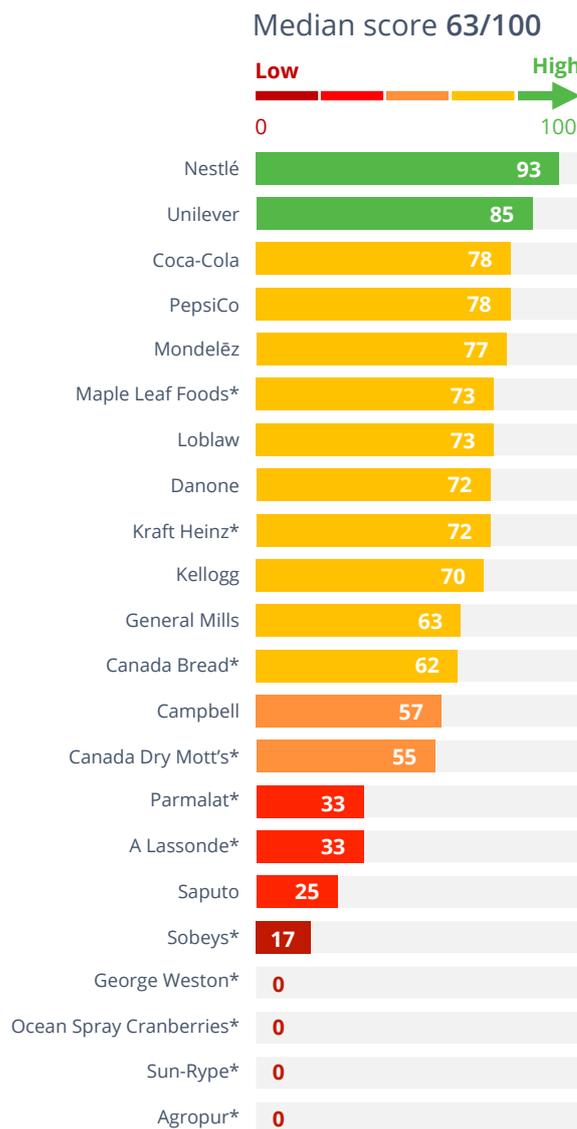
Good practice statement

The company has a strategic document or collection of documents that outline the company's overarching commitment to population nutrition and health, with relevant objectives and targets that are prioritized as part of the overall corporate strategy. These policies are publicly available, reference relevant international and national priorities, and apply to the national context.

Key findings

Most companies acknowledged the importance of health or nutrition in corporate strategies; however, fewer companies have extensive and comprehensive national strategies to address these issues.

- Overall, 18 of 22 companies made some mention of nutrition or health in their overarching national or global strategies.
- Nestlé, Kraft Heinz, Maple Leaf Foods, and Loblaw had comprehensive commitments to nutrition and health that included regular public reporting against objectives and targets at a national level.
- Nestlé Canada regularly reported on their strategy and national progress in biannual reports; global progress has been reported annually.
- At Unilever, Personal Performance Goals incorporated targets outlined in their Unilever Sustainable Living Plan, which includes health and nutrition. In addition, reporting on nutrition targets in their Sustainable Living Plan was independently assured by an external consultant company.
- Coca-Cola Canada acknowledged obesity and the meaningful role they play in a solution to obesity on their website and in corporate documents.



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers:

- **Identify** commitments regarding population nutrition and health into overarching corporate strategies that clearly apply to Canada.
- **Develop** missions or strategies incorporating health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan).
- **Publicly report** progress against the targets and objectives that apply to Canada on a regular basis (e.g., annual or biannual).

B] Product formulation

Good practice statement

The company has a set of product formulation commitments relating to new product development and reformulation of existing products to limit or reduce nutrients of concern (including sodium, saturated fat, trans fat and added sugars), and reducing energy content per serving of product or providing smaller portion sizes.

Key findings

The majority of companies reported that they have taken or were taking action to improve the nutritional profile of their products; this was more common for sodium than for other nutrients of concern.

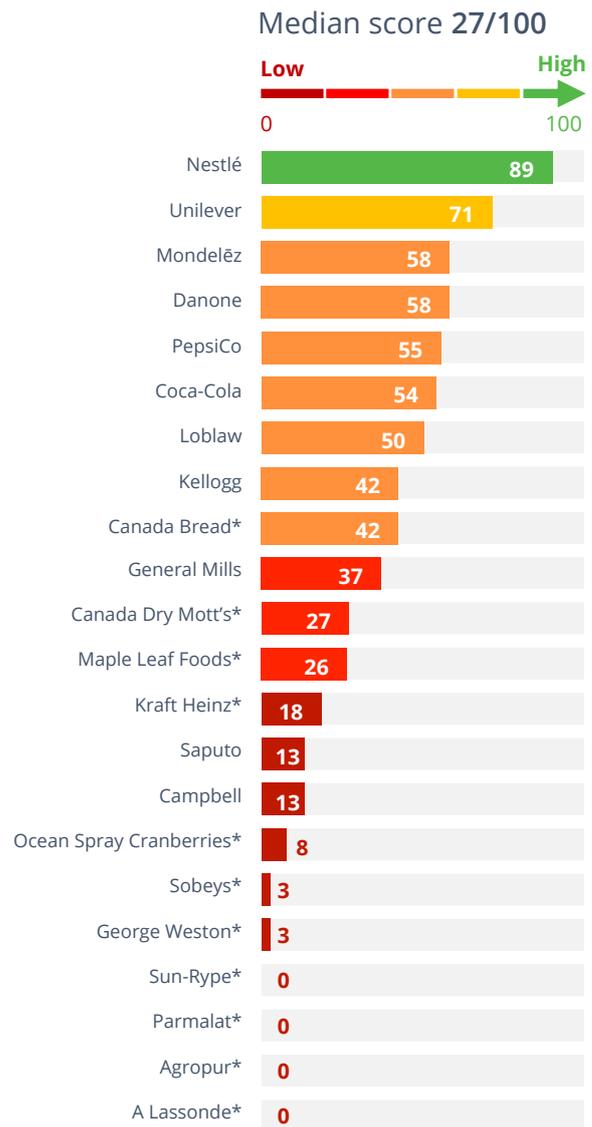
Food and beverage companies (out of 18 companies) that had a commitment for:

- Sodium: 72% (13 of 18)
- Trans fat: 56% (10 of 18)
- Added sugars: 44% (8 of 18)
- Saturated fat: 39% (7 of 18)
- Energy / portion size: 39% (7 of 18)

Beverage only companies (out of 4 companies) that had a commitment for:

- Energy / portion size: 75% (3 of 4)
- Added sugars: 50% (2 of 4)

- Nestlé and Unilever have developed specific commitments to reduce levels of sugar, sodium, trans fat and saturated fat across their product portfolios that have been adapted over time to reflect progress. These targets are based on nutrient profiling systems that have been published in peer-reviewed literature. Progress is publicly reported on a regular basis.
- Mondelez has set time-bound targets for reductions in sodium, trans fat and saturated fat across its entire global portfolio (but not added sugar).
- Danone has established global targets for sodium, saturated fat, added sugar and energy content that are time-bound and developed according to the age of the intended consumer and whether they are intended to be for daily or occasional consumption.



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Develop** a comprehensive commitment to reformulate the company product portfolio in Canada, with SMART (specific, measureable, attainable, realistic and time-sensitive) targets for multiple nutrients of concern (including sodium, added sugars, saturated fat, and portion size/energy content where relevant to portfolio) across all brands and product categories.
- **Ensure** that compositional targets for sodium are in line with Health Canada's voluntary sodium reduction targets.
- **Actively audit and report** on progress in achieving these targets on a regular basis (e.g., annual or biannual) and disclose this information publicly.

C] Nutrition labelling

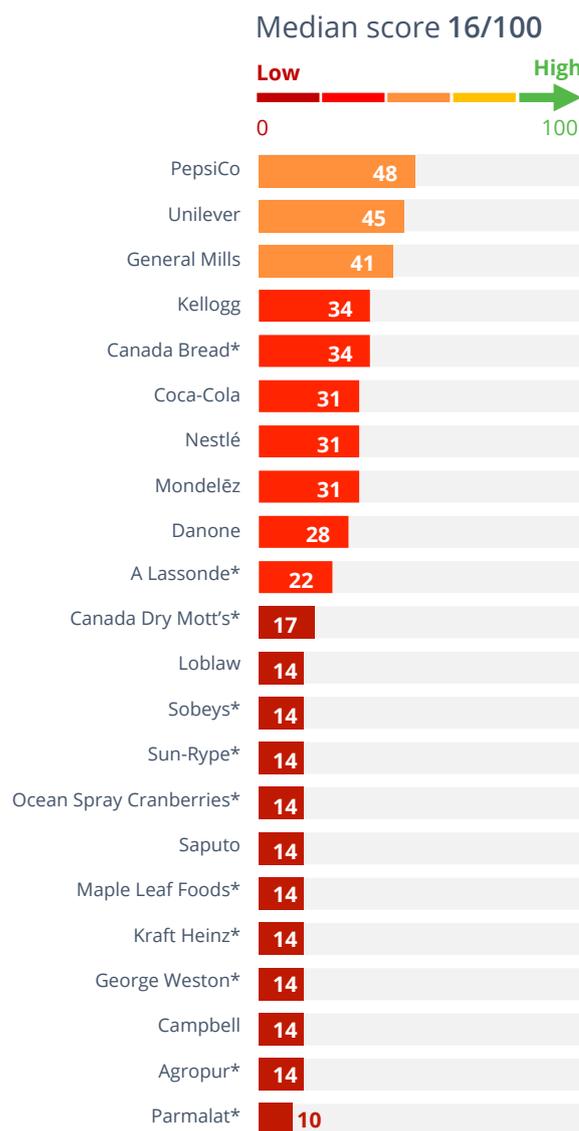
Good practice statement

The company has a set of published commitments relating to nutrition labelling that are designed to inform consumers about the nutrient composition of products, including the provision of comprehensive nutrition information, and interpretive front-of-pack (FOP) labelling in a way that is easy to understand.

Key findings

Voluntary front-of-package labelling in Canada is currently limited to informational approaches (e.g., Guideline Daily Amount labels) which are not interpretive in nature, and are only implemented among some companies. All food and beverage manufacturers provided comprehensive nutrition information online for the vast majority of products across their portfolios.

- PepsiCo, General Mills, Kellogg, and Canada Bread (Grupo Bimbo) provided Guideline Daily Amounts for at least some nutrients on the front of food and beverage products in Canada; no companies committed to providing interpretive information on the front of product packages
- All companies published comprehensive nutrition information for products on company or brand websites.
- No companies voluntarily labelled added or free sugar amounts in products.
- PepsiCo and Unilever had global commitments that support clear FOP labelling, including endorsement for interpretive labelling.
- Members of the International Food and Beverage Alliance published their position on FOP labelling; committing to information-based labelling, with no mention of interpretive information.
- Several major beverage companies (PepsiCo, Canada Dry Mott's, and Coca-Cola) participated in the industry-led 'Clear on Calories' initiative to include calorie information on the front of beverage containers.
- No companies had a specific published commitment to only make nutrition content claims on products that are considered healthier (according to validated or government-endorsed nutrient profiling systems).



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Commit** to implementing a simple, standardized, interpretive FOP labelling system across all products (pending the outcome of the Front of Pack regulations as part of the Healthy Eating Strategy). Provide public support for government FOP labelling policies and initiatives.
- **Introduce** a policy to only make nutrient content claims (e.g., "99% fat free") on products that are classified as healthier (consistent with Canada's FOP labelling system once finalized).

D] Promotion to children and adolescents

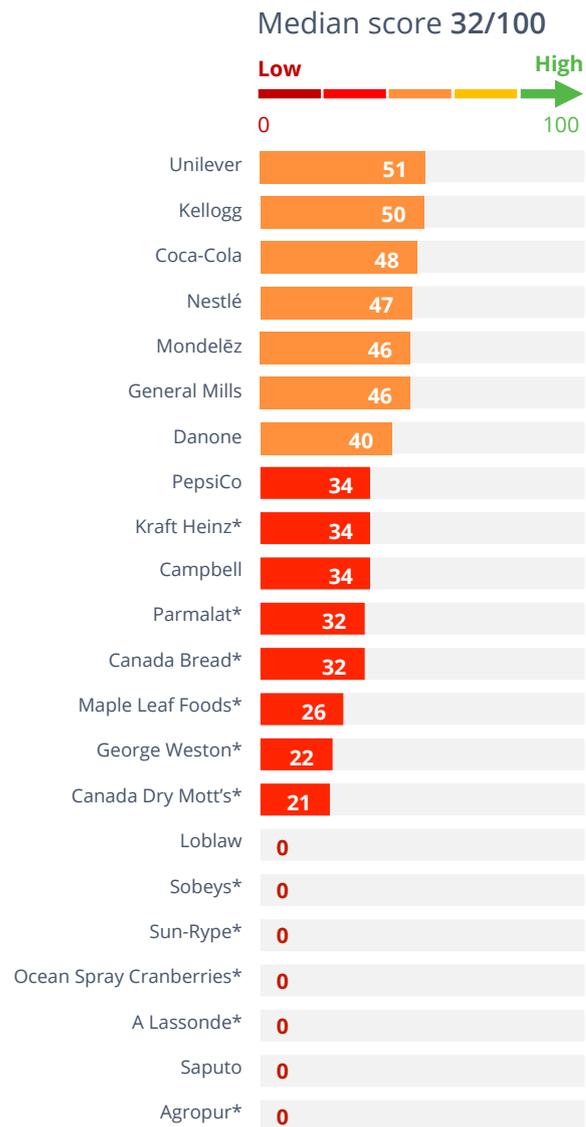
Good practice statement

The company has a comprehensive policy/commitment to reduce the power and exposure of marketing of unhealthy foods to children that is independently audited on a regular basis. This policy clearly defines the age group included in the policy, and addresses promotion in broadcast and non-broadcast media, sponsorship of children's activities, and in settings where children gather (e.g., schools).

Key findings

Although most (15 of 22) companies had policies or commitments restricting marketing to children, none were likely to be effective at limiting exposure to less healthy food and brand promotion for both children and adolescents.

- 13 companies participated in the Canadian Children's Food and Beverage Advertising Initiative (CAI) and use the CAI Uniform Nutrition Criteria to define healthier foods that could be advertised. 10 companies had a global policy concerning marketing to children; of these, 4 companies apply their own nutrition criteria to determine which products are eligible to be marketed.
- Five food and beverage companies (Loblaw, Sobeys, Saputo, Sun-Rype and Agropur) and 2 beverage companies (Ocean Spray Cranberries and A. Lassonde) did not have any policies related to restricting marketing to children.
- Coca-Cola, Maple Leaf Foods and Mondelēz pledged to not market any products (regardless of nutritional profile) to children under 12.
- Campbell, Canada Bread, Danone, Kraft Heinz, Nestlé, Parmalat, PepsiCo and Unilever committed to not market their products in primary schools. General Mills and Mondelēz pledged to avoid marketing their products in both primary and secondary schools, and Kellogg committed to only market 'healthy' products in secondary schools.
- Kellogg and Unilever had policies that include restrictions on marketing to children on product packaging.



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Implement** a comprehensive policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents (up to age 18) across all media channels, on food packages, and at events where a large number of children or adolescents are likely to be exposed (pending the outcome of the *Restricting Marketing of Unhealthy Food and Beverages to Children policy as part of the Healthy Eating Strategy*).
- **Eliminate** use of promotion techniques that appeal to children and adolescents (including company-owned licensed characters) for less healthy products and brands.
- **Assign** independent third-party auditing of policies in the area, with compliance tracked and reported on a regular basis
- **Provide** public support for government policies or legislation concerning restricting marketing to children.

E] Product accessibility

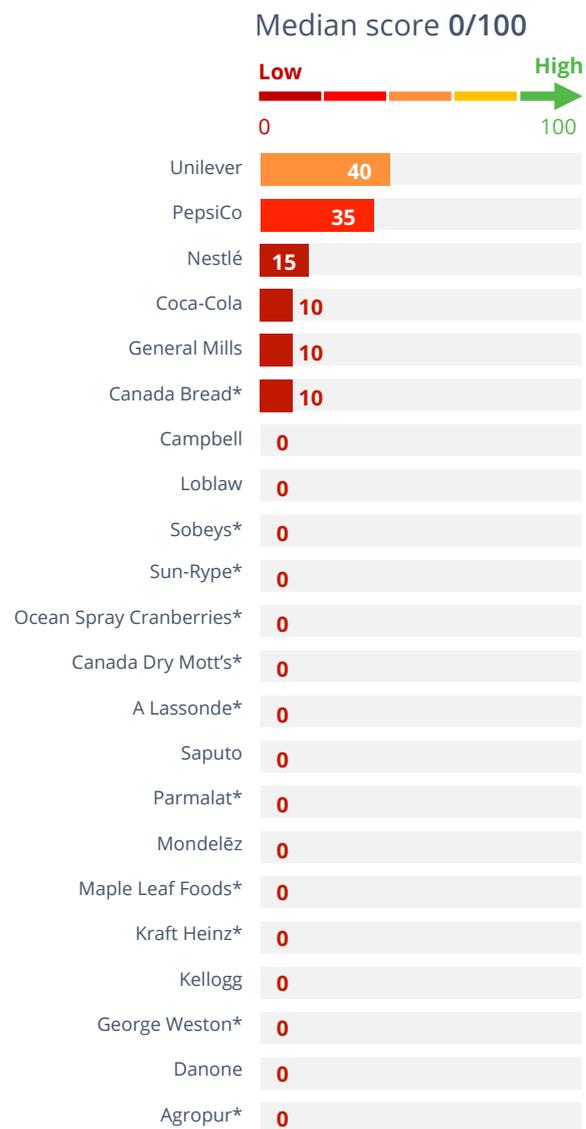
Good practice statement

The company has a commitment to address the pricing and availability of healthy products relative to less healthy products to ensure that healthy products are more readily available and are at similar or lower cost than their less healthy counterparts. This commitment focuses on areas where access to healthy foods is limited, and in children's settings such as schools. This commitment includes specific, time-bound targets and is made available to the public.

Key findings

Overall, this was the lowest scoring domain; few companies had any commitments related to product accessibility.

- No companies had comprehensive national commitments and targets to ensure the price of healthier foods is comparable to the price of their less healthy counterparts.
- Unilever identified affordability and availability as a key part of their business strategy, and described intentions to address the affordability and accessibility of foods to provide healthier options at lower prices. They made a commitment to increasing the availability of healthier products in Canada, with no specific targets described.
- PepsiCo had specific goals to increase access to nutritious foods in underserved communities by increasing both accessibility and affordability.
- Canada Bread (Grupo Bimbo) had a global commitment to make healthier options more accessible by reducing the prices and increasing availability of healthier products.
- No companies reported efforts or commitments to increase the availability of healthier products in retail settings.
- Nestlé had a commitment to not sell less healthy products in elementary schools; Coca-Cola committed to only offer water and 100% fruit juice in elementary schools, and to only offer water and low- or no-calorie beverage options in secondary schools.
- No companies voiced support for fiscal policies to make healthier foods relatively cheaper and unhealthy foods relatively more expensive.



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Develop** strategic commitments to increase the accessibility and affordability of healthier products.
- Wherever less healthy products are available (e.g. in vending machines, recreation centres, etc.), **commit** to also providing 'equivalent' healthier options (where possible).
- **Work with** schools to limit the supply of less healthy products in schools
- **Provide** public support for government policies or legislation concerning fiscal policies that are tied to nutrients of concern (such as sugary drink taxes).

F] Relationships with external organizations

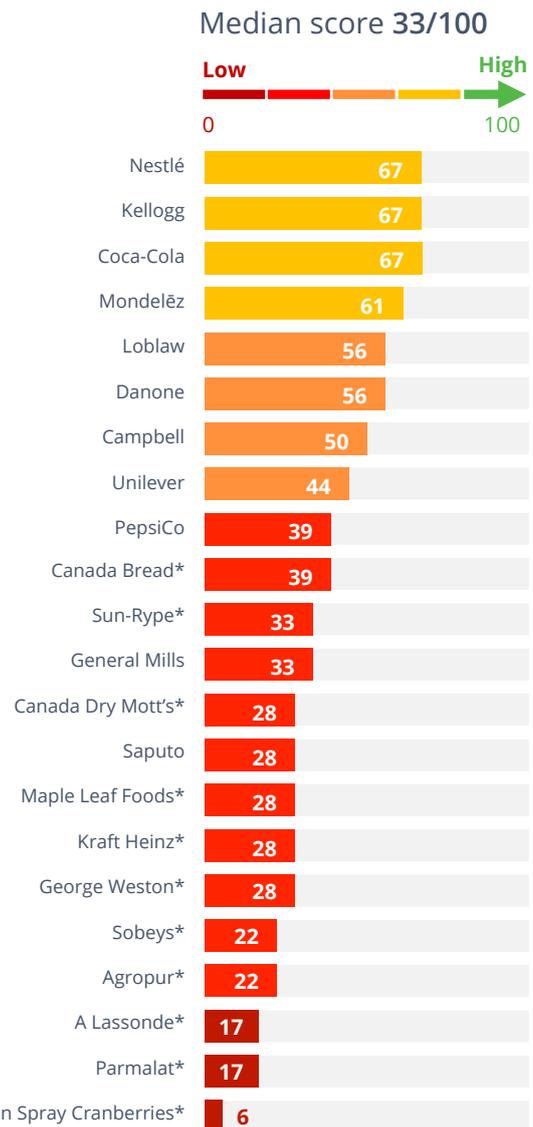
Good practice statement

The company has a policy or document(s) that outline the types of relationships with external organisations in which the company will engage. The company adopts full transparency regarding the amount and type of external support provided to external organisations.

Key findings

This domain had the highest scores overall, indicating a reasonably high level of transparency among food and beverage manufacturers in regards to external engagements.

- Most companies disclosed philanthropic support as part of corporate social responsibility actions; fewer companies reported this in a consolidated location or at the national level.
- Coca-Cola was the only company to disclose research funding amounts for all research groups and individuals supported in Canada and updated this information on a national basis; the majority of companies only disclosed information regarding general funding support for research organizations.
- Several companies, including Campbell, Nestlé, Unilever, and Coca-Cola, had commitments to not make political donations in Canada.
- No food and beverage manufacturers posted submissions to public consultations regarding relevant population nutrition policies on their websites.



*Assessment based on publicly available information only

Key recommendations for food and beverage manufacturers

- **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.
- **Commit** to not make political donations, or disclose all political donations in real time.



Corporate strategy:

- **Incorporate** commitments regarding population nutrition and health into overarching corporate strategies that clearly apply to Canada.
- **Develop** missions or strategies incorporating health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan).
- **Publicly report** progress against the targets and objectives that apply to Canada on a regular basis (e.g., annual or biannual).

Best available commitment in Canada:

- Nestlé Canada has a national commitment that acknowledges their role in helping to promote healthy food choices and addresses a broad range of nutrition policy areas, such as product formulation, availability and labelling. The company's commitment also makes reference to nutrition and health objectives established by the World Health Organization and the United Nations (Sustainable Development Goals). Progress in achieving Nestlé's nutrition and health targets is reported in their global Creating Shared Value report each year; progress specific to the Canadian market is publicly reported on a biannual basis.

Best available commitment internationally:

- Unilever has made a strong commitment to nutrition and health at the global level, and highlights health as one of three key pillars that make up the company's Sustainable Living Plan. It sets out specific, time-bound nutrition and health targets and objectives that are routinely reported against. It aligns its approach with priorities set out by the WHO and the UN Sustainable Development Goals.



Product formulation:

- **Develop** a comprehensive commitment to reformulate company product portfolios in Canada, with SMART targets for multiple nutrients of concern (including sodium, added sugars, saturated fat, and portion size/energy content where relevant to portfolio) across all brands and product categories.
- **Ensure** that compositional targets for sodium are in line with Health Canada's voluntary sodium reduction targets.
- **Actively audit and report** on progress in achieving these targets on a regular basis change to (e.g., annual or biannual) and disclose this information publicly.

Best available commitment in Canada and internationally:

- Nestlé has committed to reduce levels of sugar, sodium, trans fat and saturated fat across its global product portfolio (including Canada). Nestlé has also committed to meeting Health Canada's voluntary sodium reduction targets. Progress in achieving these targets is reported annually in the company's Creating Shared Value report.



Nutrition labelling

- **Commit** to implementing a simple, standardized, interpretive FOP labelling system across all products (*pending the outcome of the Front of Pack regulations as part of the Healthy Eating Strategy*). Provide public support for government FOP labelling policies and initiatives.
- **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (consistent with Canada’s FOP labelling system once finalized).

Best available commitment in Canada:

- PepsiCo displays Guideline Daily Amounts for energy, sugar, fat and sodium on products sold in Canada. As a member of the Canadian Beverage Association, the company also participates in the Clear on Calories Initiative to include calorie information on the front of beverage containers.

Best available commitment internationally:

- Coles (supermarket) in Australia has a clear system for determining whether nutrition content claims are made in a responsible way on own-brand products (e.g., only making claims of “99% fat free” on products considered “healthy” overall). PepsiCo has published a position statement supporting the World Health Organization’s position on front-of-pack nutrition labelling.



Promotion to children & adolescents

- **Implement** a comprehensive policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents (up to age 18) across all media channels, on food packages, and at events where a large number of children or adolescents are likely to be exposed (*pending the outcome of Bill S-228: The Child Health Protection Act*).
- **Eliminate** use of promotion techniques that appeal to children and adolescents (including company-owned licensed characters) for less healthy products and brands.
- **Assign** independent third-party auditing of policies in the area, with compliance tracked and reported over time.
- **Provide** public support for government-led approaches to restricting marketing to children to level the playing field.

Best available commitment in Canada:

- As a member of the Canadian Children’s Food and Beverage Advertising Initiative (CAI), Unilever has committed to only marketing products to children under 12 that meet the CAI Uniform Nutrition Criteria. The company has also committed to not market less healthy products (defined according to their Highest Nutritional Standards criteria) using characters and celebrities on product packaging, digital media or point-of-sale materials. In addition, Unilever has pledged to not market their products in primary schools.

Best available commitment internationally:

- Danone implements a marketing to children policy (applying to children under 12 years) that covers broadcast and non-broadcast media. It commits to not use promotional techniques that appeal to children, and does not market in the vicinity of schools, in secondary schools, or in places where children gather (e.g., day care centres, activity centres). Danone reports compliance with its policies, and discloses and audits its marketing spending on healthy products, with a view to increase marketing spending on these products over time.



Product accessibility

- **Develop** strategic commitments to increase the accessibility and affordability of healthier products.
- Wherever less healthy products are available (e.g., in vending machines, recreation centres, etc.), **commit** to also providing 'equivalent' healthier options (where possible).
- **Work with** schools to limit the supply of less healthy products in schools.
- **Provide** public support for government policies or legislation concerning fiscal policies that are tied to nutrients of concern (such as sugary drink taxes).

Best available commitment in Canada and internationally:

- Unilever has set a clear, time-bound target to transition a portion of its portfolio into a healthier product category. The company makes a commitment to increase the affordability and availability of 'healthy' products across its global markets, and identifies accessibility issues as a key part of its business strategy, aligning with the UN's Sustainable Development Goals.
- Coca-Cola commits to not directly supply any schools in several countries (including Canada) with full-sugar carbonated beverages or energy drinks.



Relationships with external organizations

- **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.
- **Commit** to not make political donations, or disclose all political donations in real time.

Best available commitment in Canada:

- Nestlé Canada publicly discloses its financial support of specific professional societies, research groups and individual researchers, philanthropic organizations, nutrition education programs and active lifestyle (physical activity) programs. The company also commits to not make political donations. Much of this information is consolidated and easy to locate on the Nestlé website.

Best available commitment internationally:

- Coca-Cola International (and Coca-Cola Canada) publish a list of the external groups it funds/supports, including details of the nature, date and amount of support/funding given to research institutions, health professionals, scientific experts, professional associations and partnerships related to health and nutrition. They disclose all nutrition and active lifestyle programs with which they are affiliated, and all information is updated annually.

Implications



Many Canadian food and beverage manufacturers are embedding population nutrition and obesity within their policy approaches and strategies, and some companies are making meaningful commitments to improve the food environment.



If companies follow through with policies and commitments, there is considerable potential for positive changes to the Canadian food environment.



Across all companies, there is room for improvement in policies and commitments related to population nutrition and obesity prevention.



Leadership from food companies is critical. The significant commitments and actions taken by some food companies identified in this evaluation demonstrate that development and implementation of such policies is possible.



There are gaps in the current voluntary industry policies and commitments. Government regulation may level the playing field to ensure that all companies are doing their part to improve the healthfulness of the food environment.



This was the first study to assess the policies and commitments of the largest food and beverage manufacturers in Canada, and provides considerable insight into the Canadian food environment.



This study did not assess performance of companies, for example, the nutritional quality of the company's product portfolio, or the extent and nature of less healthy food marketing, were not assessed in this study. Evaluating the performance and actions that relate to the policies and commitments outlined in this work is critical to understanding how these voluntary commitments translate into real-world practice.

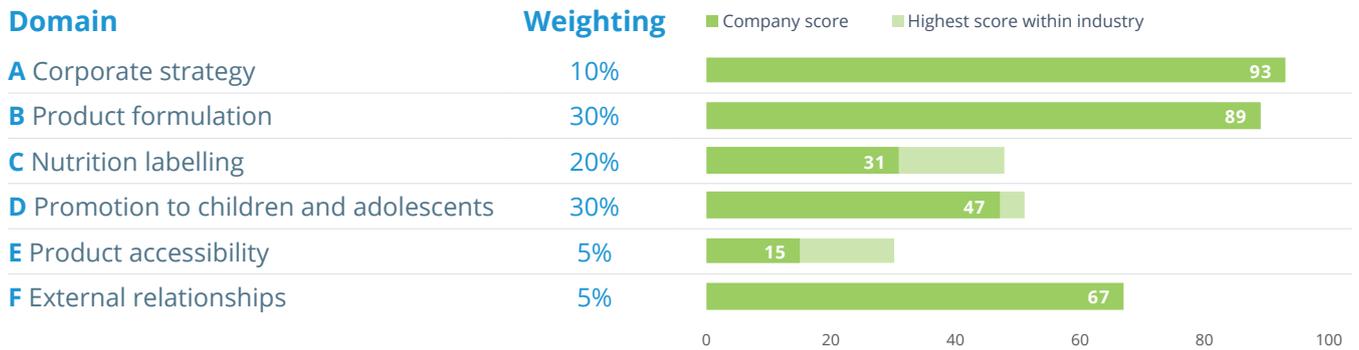
Nestlé

1st

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

60

OVERALL SCORE (OUT OF 100)



Areas of strength

- Nestlé Canada has a mission and vision focused on nutrition and health that includes approaches to health across multiple policy areas. The company has a set of clear nutrition commitments and objectives that are time-bound and progress against them is reported at the national and global level on a regular basis. The company corporate strategy references priorities laid out by the United Nations Sustainable Development Goals.
- Nestlé has developed specific, time-bound targets for the reduction of salt, added sugar and saturated fat across the company's product portfolio that have evolved over time as targets are met, and has removed all artificially-produced trans fat from its products. Sodium reduction targets align with Health Canada's sodium reformulation initiatives. Progress in achieving reformulation targets is tracked and comprehensively reported in the public domain.

Priority recommended actions for Nestlé

- Develop** specific, time-bound targets for the reduction of calorie content in single-serve snacks across the portfolio.
- Extend** Nestlé's policy on marketing to children to include adolescents up to age 18, using government-endorsed standards for defining less healthy foods
- Eliminate** use of promotion techniques designed to appeal to children (including owned copyright characters), particularly in relation to less healthy products.
- Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.

Unilever

2nd OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

58 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 85 | |
| B Product formulation | 30% | 71 | |
| C Nutrition labelling | 20% | 45 | |
| D Promotion to children and adolescents | 30% | 51 | |
| E Product accessibility | 5% | 25 | |
| F External relationships | 5% | 44 | |

Areas of strength

- Unilever has a strong policy on restricting marketing to children that includes digital communications, packaging and point-of-sale materials.
- Unilever has a comprehensive global corporate nutrition strategy which acknowledges over- and undernutrition and references the UN nutrition goals that apply to Canada.
- The company has global reformulation targets that are based on globally-recognized dietary guidelines, measured by sales volume, and acknowledge Health Canada’s reformulation targets.
- Unilever does not support political parties or contribute to political groups.

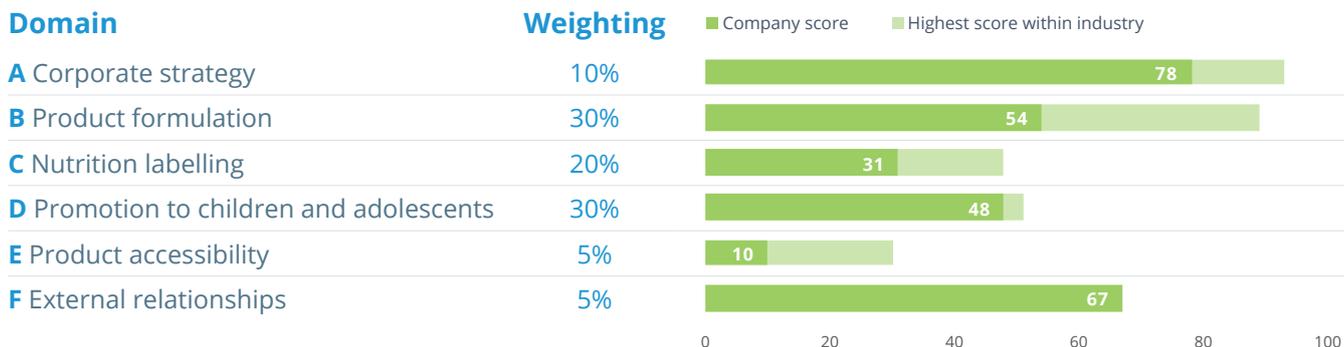
Priority recommended actions for Unilever

- 1| **Implement** a strengthened policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages and include all time/events when a large number of children or adolescents are likely to be exposed. Appoint a third-party to independently audit compliance with this policy.
- 2| **Report** progress against specific nutrition and health objectives at the national level.
- 3| **Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 4| **Consolidate** national information on external relationships and ensure broad transparency in types and amount of support provided.

Coca-Cola

3rd OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

49 OVERALL SCORE (OUT OF 100)



Areas of strength

- Coca-Cola Canada has a national strategy that specifically acknowledges obesity and population-level nutrition.
- The company does not use branded sponsorship of sporting or entertainment events which primarily target children under 12, and does not advertise in any schools.
- Coca-Cola does not sell beverages other than water and 100% juice in elementary schools, and only water, juice and no- or low-calorie beverages in secondary schools.
- The company has a comprehensive transparency policy in which it discloses all funding for professional organizations and research funding, which includes any funding in Canada.

Priority recommended actions for Coca-Cola

- 1| Implement** a strengthened policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages and include all time/events when a large number of children or adolescents are likely to be exposed. Appoint a third party to independently audit compliance with this policy.
- 2| Extend** commitment to eliminate use of promotion techniques with strong appeal to children for less healthy products and brands by applying this policy to product packaging in addition to other forms of traditional and digital media, and include company-owned characters already in use.
- 3| Incorporate** Health Canada's recommendations and targets into the company's strategy and mission.
- 4| Commit** to also providing 'equivalent' healthier options wherever less healthy products are available, where possible (e.g., in vending machines, recreation centres, etc.).

Mondelēz

4th

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

48

OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 77 | |
| B Product formulation | 30% | 58 | |
| C Nutrition labelling | 20% | 31 | |
| D Promotion to children and adolescents | 30% | 46 | |
| E Product accessibility | 5% | 0 | |
| F External relationships | 5% | 61 | |

Areas of strength

- Mondelēz has extensive targets for portion size, saturated fat, and sodium and has achieved significant progress in reducing nutrients of concern in products across the portfolio.
- Mondelēz does not advertise any products to children under the age of 12, regardless of the nutritional profile.
- The company does not advertise or market products in primary or secondary schools up to the 12th grade.
- Mondelēz reports all major partnerships and sponsorships with external actors in their annual reports.

Priority recommended actions for Mondelēz

- 1| **Strengthen** the marketing policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18.
- 2| **Commit** not to sponsor sporting and community events that are popular with children/families using less healthy products and brands.
- 3| **Report** progress against specific nutrition and health objectives at the national level.
- 4| **Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 5| **Commit** to not make political donations, or disclose all political donations in real time.

PepsiCo

5th

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

48

OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 78 | |
| B Product formulation | 30% | 55 | |
| C Nutrition labelling | 20% | 48 | |
| D Promotion to children and adolescents | 30% | 34 | |
| E Product accessibility | 5% | 35 | |
| F External relationships | 5% | 39 | |

Areas of strength

- PepsiCo has a national-level commitment and strategy concerning population nutrition and health, and regularly reports on global targets and objectives in the Performance with Purpose documents.
- The company has extensive targets for reductions in sodium, saturated fat, and added sugar, and has achieved significant progress in reducing nutrients of concern in the vast majority products across the portfolio.
- PepsiCo does not advertise in elementary and middle schools in Canada.

Priority recommended actions for PepsiCo

- 1| **Apply** reformulation targets for added sugars to other foods across the product portfolio.
- 2| **Implement** a strengthened policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages, and extend the policy to include marketing techniques on packaging, in-store and at the point-of-sale marketing. Appoint a third party to independently audit compliance with this policy.
- 3| **Incorporate** Health Canada’s recommendations and targets into the company’s strategy and mission.
- 4| **Report** progress against specific nutrition and health objectives at the national level.
- 5| **Commit** to work with schools to not provide full-sugar beverages in high school settings in Canada.
- 6| **Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 7| **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

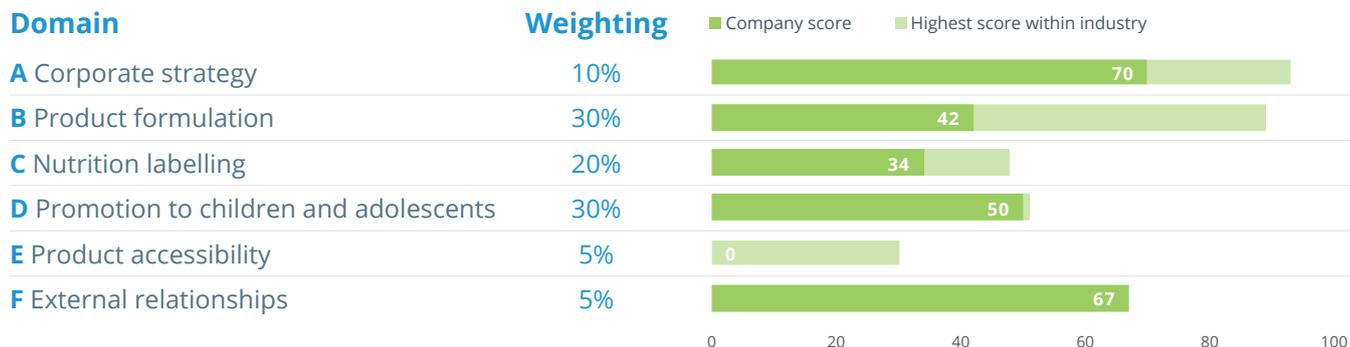
Kellogg

6th

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

45

OVERALL SCORE (OUT OF 100)



Areas of strength

- Kellogg Canada comprehensively reports on their external relationships, including professional associations, philanthropy, research funding and industry associations in Canada.
- Global policy requires Kellogg Canada to review website traffic to ensure that any digital advertising on third-party websites is not designed to appeal to children.
- Kellogg does not advertise in elementary schools and ensures that advertising healthier products only occurs in secondary schools in agreement with schools and parents. The company also has specific policies for events where the audience is primarily children under 12.

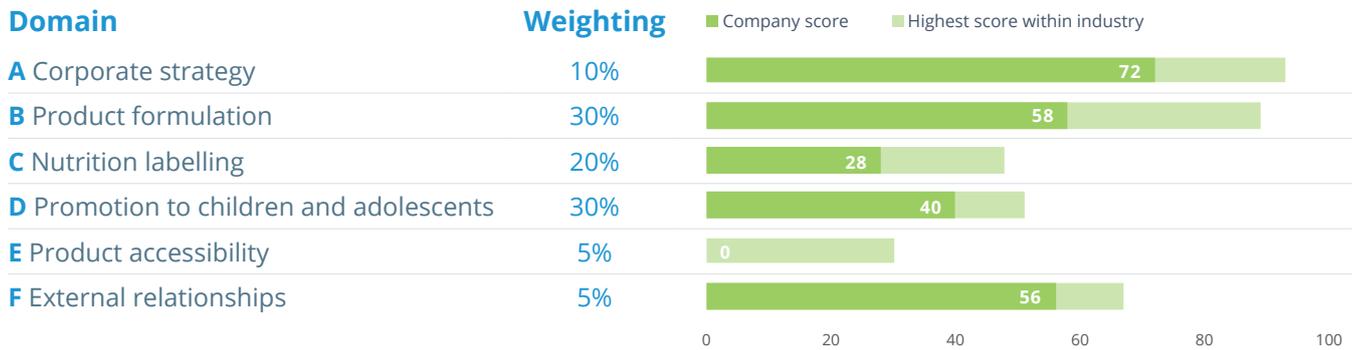
Priority recommended actions for Kellogg

- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) and energy content across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Implement** a comprehensive (**strengthened**) policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages, and include restrictions on the use of company-owned characters. Appoint a third party to independently audit compliance with this policy.
- 3| **Apply** formulation targets to all product categories.
- 4| **Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.

Danone

7th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

45 OVERALL SCORE (OUT OF 100)



Areas of strength

- Nutrition and health are central to Danone Canada's mission and vision.
- Danone has global targets for reducing sodium, saturated fat, added sugars and portion size that are specific, time-bound and tailored to the age group of the intended consumer.

Priority recommended actions for Danone

- 1 | Publish** marketing policies on Danone Canada's website.
- 2 | Implement** a strengthened policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages and include all time/events when a large number of children or adolescents are likely to be exposed. Appoint a third party to independently audit compliance with this policy.
- 3 | Incorporate** recommendations from Health Canada and major authoritative bodies (e.g., World Health Organization, United Nations) into the company's strategy and mission.
- 4 | Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 5 | Commit** to not make political donations, or disclose all political donations in real time.

General Mills

8th

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

42

OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 63 | |
| B Product formulation | 30% | 37 | |
| C Nutrition labelling | 20% | 41 | |
| D Promotion to children and adolescents | 30% | 46 | |
| E Product accessibility | 5% | 10 | |
| F External relationships | 5% | 33 | |

Areas of strength

- General Mills has a broad commitment to make healthy food more accessible to consumers.
- General Mills has key performance indicators that are tied to health and nutrition objectives and accomplishments.
- The company has made a strong global commitment to nutrition and health that is comprehensive and references the Sustainable Development Goals.
- General Mills does not advertise any products in any media to children under six, regardless of nutritional profile.
- General Mills does not directly advertise any products in schools, pre-K to 12th grade.

Priority recommended actions for General Mills

- 1| Broaden** specific, time-bound reformulation targets for the reduction of nutrients of concern (including saturated fat) and energy content to apply to all relevant food categories across the product portfolio. Routinely report on progress in achieving reformulation targets, clearly indicating what proportion of the products have been included in reformulation efforts.
- 2| Eliminate** use of promotion techniques designed to appeal to children (including owned copyright characters), particularly in relation to less healthy products (according to validated or government-endorsed nutrition criteria). Apply this policy to product packaging in addition to other forms of traditional and digital media.
- 3| Incorporate** Health Canada's recommendations and targets into the company's strategy and mission.
- 4| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

Canada Bread*

9th

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

38

OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 62 | |
| B Product formulation | 30% | 42 | |
| C Nutrition labelling | 20% | 34 | |
| D Promotion to children and adolescents | 30% | 32 | |
| E Product accessibility | 5% | 10 | |
| F External relationships | 5% | 39 | |

Areas of strength

- Canada Bread publicly reports the organizations to which it donates philanthropic funds on its website.
- Grupo Bimbo (the parent company of Canada Bread) has a set of commitments related to nutrition and health that align with relevant World Health Organization strategies.
- Grupo Bimbo has made broad commitments to increase the availability and affordability of healthier options.

Priority recommended actions for Canada Bread

- 1| Broaden** specific, time-bound reformulation targets for the reduction of nutrients of concern and energy content to apply to all relevant food categories.
- 2| Implement** a comprehensive national policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages and include all time/events when a large number of children or adolescents are likely to be exposed. Appoint a third party to independently audit compliance with this policy.
- 3| Commit** to not sponsor sporting and community events that are popular with children/families using less healthy products and brands.
- 4| Report** progress against specific nutrition and health objectives at the national level.
- 5| Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 6| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Loblaw

10th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

28 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 73 | |
| B Product formulation | 30% | 50 | |
| C Nutrition labelling | 20% | 14 | |
| D Promotion to children and adolescents | 30% | 0 | |
| E Product accessibility | 5% | 0 | |
| F External relationships | 5% | 56 | |

Areas of strength

- Loblaw publishes detailed and consolidated information about the research groups, philanthropic organizations, nutrition education programs and active lifestyle programs that it funds. The company also publicly discloses its membership or support for industry associations and lobby groups.
- Loblaw reports recent efforts to reduce the amounts of sodium, saturated fat, and free sugars in some of its products.
- Loblaw provides nutrition information for its private-label products on their website.

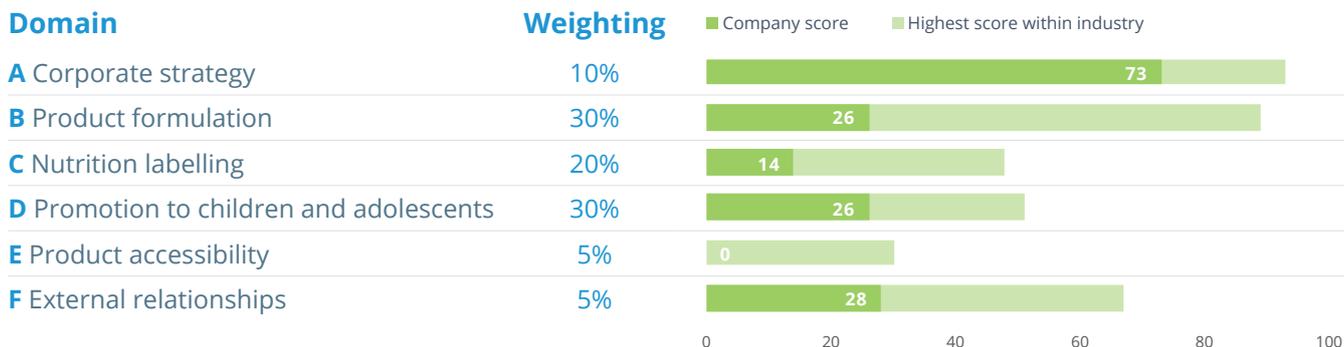
Priority recommended actions for Loblaw

- 1| **Develop** and acknowledge a policy for reducing promotion of less healthy products/brands that appeal to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 2| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 3| **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| **Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives at the national level.
- 5| **Commit** to increasing the prominence of healthier private-label products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.

Maple Leaf Foods*

11th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

27 OVERALL SCORE (OUT OF 100)



Areas of strength

- Maple Leaf Foods produces an annual national Sustainability Report which includes progress on achieving health and nutrition objectives.

Priority recommended actions for Maple Leaf Foods

- 1| Develop** specific, time-bound targets for the reduction of other nutrients of concern beyond sodium (added sugar, saturated fat) and energy content across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| Implement** a strengthened policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages and include all time/events when a large number of children or adolescents are likely to be exposed. Appoint a third party to independently audit compliance with this policy.
- 3| Incorporate** recommendations from Health Canada and major authoritative bodies (e.g., World Health Organization, United Nations) into the company's strategy and mission.
- 4| Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 5| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Kraft Heinz*

12th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

27 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 72 | |
| B Product formulation | 30% | 18 | |
| C Nutrition labelling | 20% | 14 | |
| D Promotion to children and adolescents | 30% | 34 | |
| E Product accessibility | 5% | 0 | |
| F External relationships | 5% | 28 | |

Areas of strength

- Kraft Heinz has made a strong global commitment to nutrition and health that is comprehensive and references the UN Sustainable Development Goals.
- Kraft Heinz publishes details of the philanthropic organizations, active lifestyle programs in the community and external research groups that are supported by the company.
- Kraft Heinz is a member of the Canadian Children’s Food and Beverage Advertising Initiative (CAI). The company commits to not market any products in media directly to children under 6 years of age, and to only market products to children between ages 6-11 years that meet the CAI Uniform Nutrition Criteria. Kraft Heinz also pledges not to market their products in elementary schools.

Priority recommended actions for Kraft Heinz

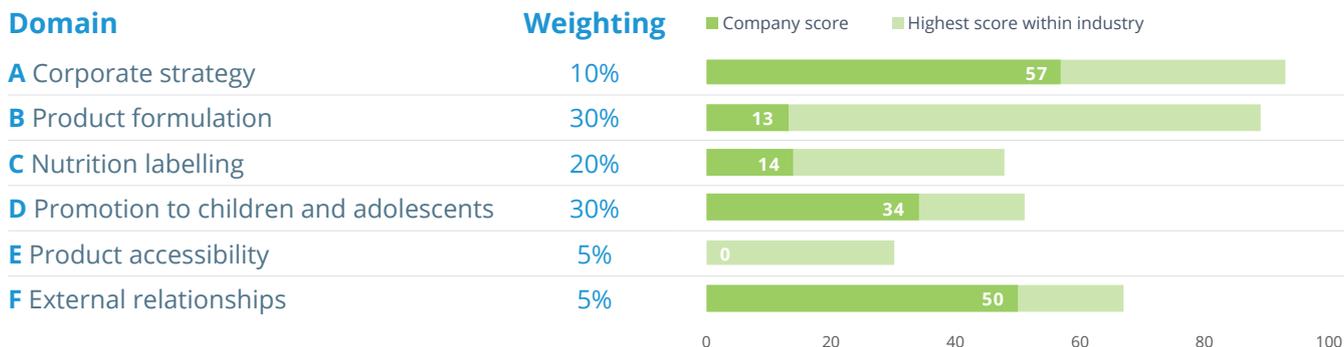
- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Implement** a comprehensive policy that restricts the exposure and promotion of less healthy foods and brands (using validated nutrition criteria) to children and adolescents up to age 18 across all media and on food packages. Appoint a third party to independently audit compliance with this policy.
- 3| **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| **Commit** to also providing ‘equivalent’ healthier options wherever less healthy products are available, where possible (e.g., in vending machines, recreation centres, etc.).
- 5| **Commit** to not make political donations, or disclose all political donations in real time.

* Assessment based on publicly available information only

Campbell Soup Co.

13th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

25 OVERALL SCORE (OUT OF 100)



Areas of strength

- Campbell Soup Co. has made a global commitment that addresses multiple policy domains, such as product formulation and nutrition education.
- At the global level, Campbell Soup Co. publishes details of the professional organizations (e.g., professional associations for nutrition or dietetics, physical activity, or medicine) that it funds or supports. The company also provides consolidated and comprehensive information about its philanthropic funding efforts and support for nutrition education programs both nationally and globally.
- Campbell Soup Co. participates in the Canadian Children’s Food and Beverage Advertising Initiative (CAI). As part of this commitment, the company commits to only market products that meet the CAI Uniform Nutrition Criteria.

Priority recommended actions for Campbell Soup Co

- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Eliminate** use of promotion techniques designed to appeal to children (including owned copyright characters), particularly in relation to less healthy products (according to validated or government-endorsed nutrition criteria). Apply this policy to product packaging in addition to other forms of traditional and digital media.
- 3| **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| **Set** health and nutrition targets and objectives that reference specific goals identified by Health Canada and other major international authorities (e.g., World Health Organization, United Nations).

Canada Dry Mott's*

14th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

25 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 55 | |
| B Product formulation | 30% | 27 | |
| C Nutrition labelling | 20% | 17 | |
| D Promotion to children and adolescents | 30% | 21 | |
| E Product accessibility | 5% | 0 | |
| F External relationships | 5% | 28 | |

Areas of strength

- Under its parent company, Dr. Pepper Snapple Group, Canada Dry Mott's has a global corporate mission that includes nutrition and health.
- As a participant of the Balance Calories Initiative, Canada Dry Mott's has made a commitment to reduce the calorie content of some of their products.
- Canada Dry Mott's publishes information about its financial support for philanthropic organizations, active lifestyle programs, and industry associations.
- Under Dr. Pepper Snapple Group, Canada Dry Mott's has a global policy concerning marketing of less healthy products to children.

Priority recommended actions for Canada Dry Mott's*

- 1 | Develop** specific, time-bound targets for the reduction of free sugar across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2 | Eliminate** use of promotion techniques designed to appeal to children, particularly in relation to less healthy products (according to validated or government-endorsed nutrition criteria). Apply this policy to product packaging in addition to other forms of traditional and digital media. Introduce a commitment to avoid marketing less healthy brands or products in school settings.
- 3 | Commit** to also providing 'equivalent' healthier options wherever less healthy products are available, where possible (e.g., in vending machines, recreation centres, etc.).
- 4 | Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Parmalat*

15th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

16 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 33 | 90 |
| B Product formulation | 30% | 0 | 85 |
| C Nutrition labelling | 20% | 10 | 50 |
| D Promotion to children and adolescents | 30% | 32 | 55 |
| E Product accessibility | 5% | 0 | 30 |
| F External relationships | 5% | 17 | 70 |

Areas of strength

- Parmalat has a corporate mission and vision that include nutrition and health.
- Through the Canadian Children’s Food and Beverage Advertising Initiative (CAI), Parmalat commits to only market products that meet the CAI Uniform Nutrition Criteria in media directed at children under 12. The company also pledges to not advertise in elementary schools.
- Parmalat publicly discloses their financial support for philanthropic organizations and external research.

Priority recommended actions for Parmalat

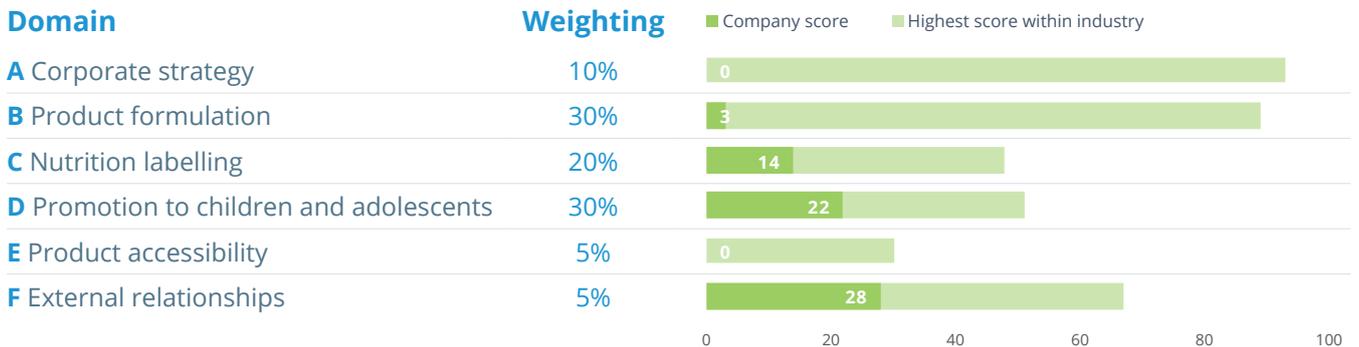
- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Extend** existing CAI commitment to include company-owned copyright characters and marketing on-package.
- 3| **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| **Strengthen** corporate population nutrition strategy by developing health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities (e.g., World Health Organizations, United Nations).
- 5| **Commit** to work with schools to not sell less healthy products in school settings.
- 6| **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format. Make a public commitment to refrain from making political donations.

* Assessment based on publicly available information only

George Weston*

16th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

12 OVERALL SCORE (OUT OF 100)



Areas of strength

- George Weston publishes detailed and consolidated information about the external research funded by the company. It also reports on the types of philanthropic organizations, nutrition education programs and active lifestyle programs that it supports.
- George Weston includes nutrition information for all products on its websites.

Priority recommended actions for George Weston

- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Implement** a policy for reducing promotion of less healthy products/brands that applies to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 3| **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| **Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives at the national level.
- 5| **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format. Make a public commitment to refrain from making political donations.
- 6| **Commit** to work with retailers to increase the prominence of healthier products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.

* Assessment based on publicly available information only

Saputo

17th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

11 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 25 | ~85 |
| B Product formulation | 30% | 13 | ~85 |
| C Nutrition labelling | 20% | 14 | ~50 |
| D Promotion to children and adolescents | 30% | 0 | ~50 |
| E Product accessibility | 5% | 0 | ~30 |
| F External relationships | 5% | 28 | ~70 |

Areas of strength

- Saputo has an overarching commitment to population nutrition and health.
- The company reports details of its support for nutrition education and active lifestyle programs.
- Saputo provides nutrition information for all products on its website.

Priority recommended actions for Saputo

- 1| Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| Implement** a policy for reducing promotion of less healthy products/brands that applies to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 3| Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| Strengthen** corporate population nutrition strategy by developing health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities (e.g., World Health Organizations, United Nations).
- 5| Commit** to work with schools to not sell less healthy products in school settings.
- 6| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

A. Lassonde*

18th

OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

9

OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 33 | ~90 |
| B Product formulation | 30% | 0 | ~90 |
| C Nutrition labelling | 20% | 22 | ~50 |
| D Promotion to children and adolescents | 30% | 0 | ~50 |
| E Product accessibility | 5% | 0 | ~30 |
| F External relationships | 5% | 17 | ~70 |

Areas of strength

- A. Lassonde has a mission and vision that acknowledge nutrition and health.
- The company publishes information about the types of research groups, philanthropic organizations and active lifestyle programs that it supports.
- A. Lassonde has their own front-of-package labelling system. The “Health Signature” logo appears on products that are made from 100% juice, contain no artificial flavours or colours, have no added sugar, are a good source of vitamin C, and contain two servings of fruits or vegetables per 250 mL serving.

Priority recommended actions for A. Lassonde

- 1| Develop** specific, time-bound targets for the reduction of free sugar and calories across the portfolio. Routinely report on progress in achieving reformulation targets.
- 2| Implement** a policy for reducing promotion of less healthy products/brands that applies to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 3| Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| Strengthen** corporate population nutrition strategy by developing health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities (e.g., World Health Organizations, United Nations).
- 5| Commit** to work with schools to not sell less healthy products in school settings.
- 6| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Sobeys*

19th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

6 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 17 | 90 |
| B Product formulation | 30% | 3 | 85 |
| C Nutrition labelling | 20% | 14 | 50 |
| D Promotion to children and adolescents | 30% | 0 | 55 |
| E Product accessibility | 5% | 0 | 30 |
| F External relationships | 5% | 22 | 70 |

Areas of strength

- Sobeys has a corporate mission and vision that acknowledges nutrition and health.
- The company publishes details of the philanthropic organizations and nutrition education programs that it funds, in a consolidated format.
- Sobeys provides nutrition information for its private-label products on their website.

Priority recommended actions for Sobeys

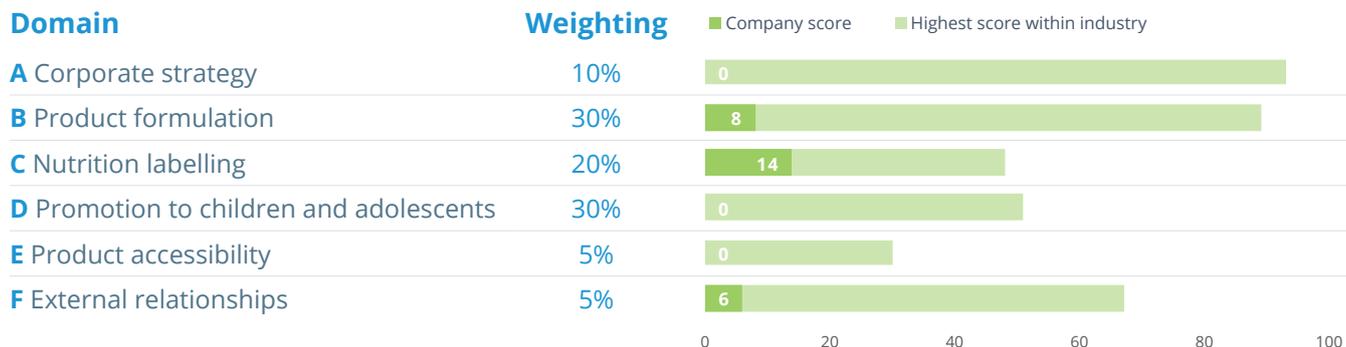
- 1| Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| Implement** a policy for reducing promotion of less healthy products/brands that applies to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 3| Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| Strengthen** corporate population nutrition strategy by developing health and nutrition targets and objectives that reference specific goals identified by Health Canada and major international authorities (e.g., World Health Organizations, United Nations).
- 5| Commit** to increasing the prominence of healthier private-label products relative to less healthy products in-store (e.g., through shelf space and strategic placement) and in grocery store flyers.
- 6| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Ocean Spray Cranberries*

20th OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

5 OVERALL SCORE (OUT OF 100)



Areas of strength

- Ocean Spray Cranberries publishes nutrition information for all products on their website.
- The company reports having made recent efforts to reduce the sugar content in some of their products.

Priority recommended actions for Ocean Spray Cranberries

- 1| Develop** specific, time-bound targets for the reduction of added sugar and calories across the portfolio. Routinely report on progress in achieving reformulation targets.
- 2| Implement** a policy for reducing promotion of less healthy products/brands that applies to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 3| Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives at the national level.
- 4| Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Sun-Rype*

21st OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

4 OVERALL SCORE (OUT OF 100)

| Domain | Weighting | Company score | Highest score within industry |
|---|-----------|---------------|-------------------------------|
| A Corporate strategy | 10% | 0 | 100 |
| B Product formulation | 30% | 0 | 90 |
| C Nutrition labelling | 20% | 14 | 50 |
| D Promotion to children and adolescents | 30% | 0 | 50 |
| E Product accessibility | 5% | 0 | 30 |
| F External relationships | 5% | 33 | 70 |

Areas of strength

- Sun-Rype publicly discloses their financial support for external research, philanthropic organizations and active lifestyle programs.
- The company publishes nutritional information for all products on their website.

Priority recommended actions for Sun-Rype

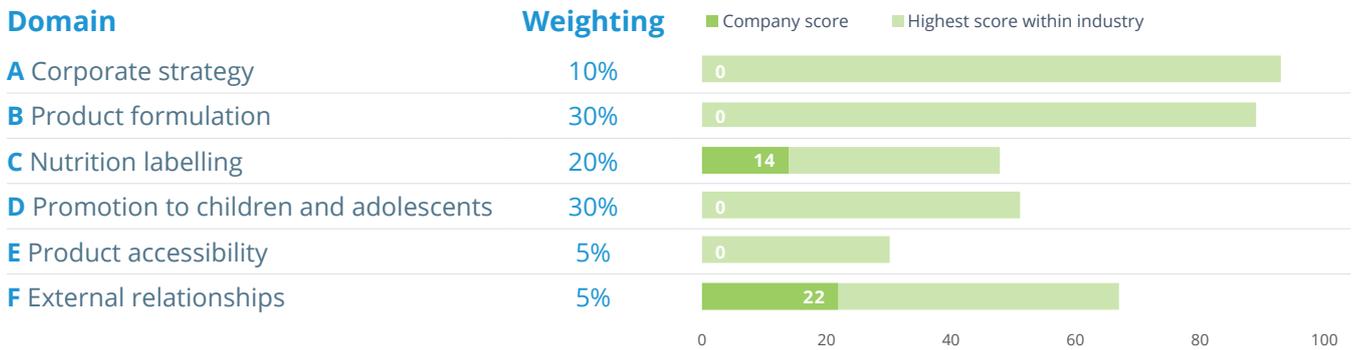
- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Implement** a policy for reducing promotion of less healthy products/brands that applies to children and adolescents (up to the age of 18) on product packaging and across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Adopt validated or government-endorsed nutrition criteria for identifying less healthy foods.
- 3| **Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as healthier (according to validated or government-endorsed nutrition criteria).
- 4| **Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives at the national level.
- 5| **Commit** to work with schools to not sell less healthy products in school settings.
- 6| **Improve** transparency of relationships with external groups related to nutrition and health, through public disclosure of funding (philanthropy, research, events) and support for third-party groups, presented in a consolidated and accessible format.

* Assessment based on publicly available information only

Agropur*

22nd OUT OF 22 FOOD AND BEVERAGE MANUFACTURERS

4 OVERALL SCORE (OUT OF 100)



Areas of strength

- Agropur discloses some of the organizations that have received research funding from the company. It also publishes details of philanthropic groups that it funds or supports, and publicly reports on its membership or support for industry associations and lobby groups.
- Agropur publishes complete nutrition information for their products online.

Priority recommended actions for Agropur

- 1| **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugar, saturated fat) across the product portfolio. Routinely report on progress in achieving reformulation targets.
- 2| **Implement** a policy for reducing promotion of less healthy products/brands appealing to children and adolescents up to the age of 18 years, across all media channels, and including times/events when a large number of children/adolescents are likely to be exposed, including on food packages. The policy should use government-endorsed standards to define less healthy foods.
- 3| **Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against specific nutrition and health objectives at the national level.
- 4| **Commit** to work with schools to not sell less healthy products in school settings.

* Assessment based on publicly available information only

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