



Inside our Food and Beverage Manufacturers Australia 2024

Assessing company policies and practices
for supporting healthier food environments
and improving population nutrition

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Inside our Food and Beverage Manufacturers

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Executive summary

Unhealthy diets and excess weight are leading contributors to poor health in Australia

A major driver of unhealthy diets are food environments that are dominated by the supply and marketing of unhealthy foods. Actions from the government, the food industry and the broader community all contribute to the healthiness of food environments.

Benchmarking packaged food and beverage manufacturers on nutrition

This study aimed to assess the largest food and beverage manufacturing companies in Australia on their voluntary policies and practices for supporting healthier food environments and improving population nutrition. The objective was to highlight where Australian food and beverage manufacturers were demonstrating leadership, and identify areas for improvement.

Globally-developed assessment methods, tailored to the Australian context

Company policies and practices were assessed using the validated BIA-Obesity (Business Impact Assessment – Obesity and population nutrition) tool developed by INFORMAS, a global network of public health researchers monitoring food environments in >65 countries globally. The methods were adapted from the Access to Nutrition Index (ATNI) that benchmarks the nutrition-related commitments, performance and disclosure practices of food and beverage manufacturers. The study was a repeat of a [similar assessment](#) conducted in Australia in 2018.

Information related to the voluntary policies and practices of each company were collected from publicly available sources in relation to the six domains of the BIA-Obesity assessment tool (see below). Company representatives were invited to verify and supplement information collected by the research team (up to the end of 2023), and review recommended actions.

AREAS ASSESSED

The BIA-Obesity tool considers voluntary company policies and practices across a range of indicators spread across six domains.

For each indicator, the **transparency, comprehensiveness** and **specificity** of voluntary company policies and practices were assessed against industry benchmarks and public health best practice.

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

Domain	Policy areas	Weighting
A Corporate strategy	Overarching policies, commitments and reporting practices related to improving population nutrition and addressing obesity	10
B Product formulation	Policies, commitments and reporting practices regarding product development and reformulation to reduce nutrients of concern (i.e., sodium, saturated fat, trans fat, sugar) and energy content	30
C Nutrition labelling & information	Policies, commitments and reporting practices regarding disclosure and presentation of nutrition information on product packaging, in-store and online	20
D Promotion practices	Policies, commitments and reporting practices related to reducing the exposure of children to the promotion of unhealthy foods and brands, and responsible promotion to all consumers	30
E Product accessibility and affordability	Policies, commitments and reporting practices related to the availability, affordability, distribution and placement of healthy compared to unhealthy products	5
F Disclosure of relationships with external groups	Disclosure of corporate relationships with, and support provided to, organisations external to the supply chain related to health and/or nutrition, such as government agencies, political parties, professional associations, research organisations, community and industry groups	5

Executive summary

Company policies and practices for improving population nutrition varied substantially across the sector, with room for major improvement across the board.

Areas in which food manufacturers have shown progress:

- 1 Stated commitment to improve nutrition:** Publishing overarching commitments to nutrition and health (17 out of 21 companies)
- 2 Product formulation:** Pledging for products to meet the Australian government's Healthy Food Partnership reformulation targets (9 out of 21 companies)
- 3 Nutrition labelling:** Committing to implement the government's Health Star Rating (HSR) system (16 out of 21 companies), although overall implementation of HSR across the packaged food supply remains substantially below government targets
- 4 Updated pledges on marketing to children:** Updates to the industry self-regulatory code that apply to all companies, although this code still falls far short of recommended best practice

Key areas for improvement:

- 1 Corporate reporting:** Routine reporting of the proportion of company sales from healthy products, using government-endorsed classification of product healthiness
- 2 Marketing to children:** Effective actions to reduce the exposure of children (aged up to 18 years) to the marketing of unhealthy products and brands
- 3 Affordability and accessibility of healthy products:** Clear, comprehensive policies to improve the accessibility and affordability of healthier foods, particularly relative to unhealthy foods

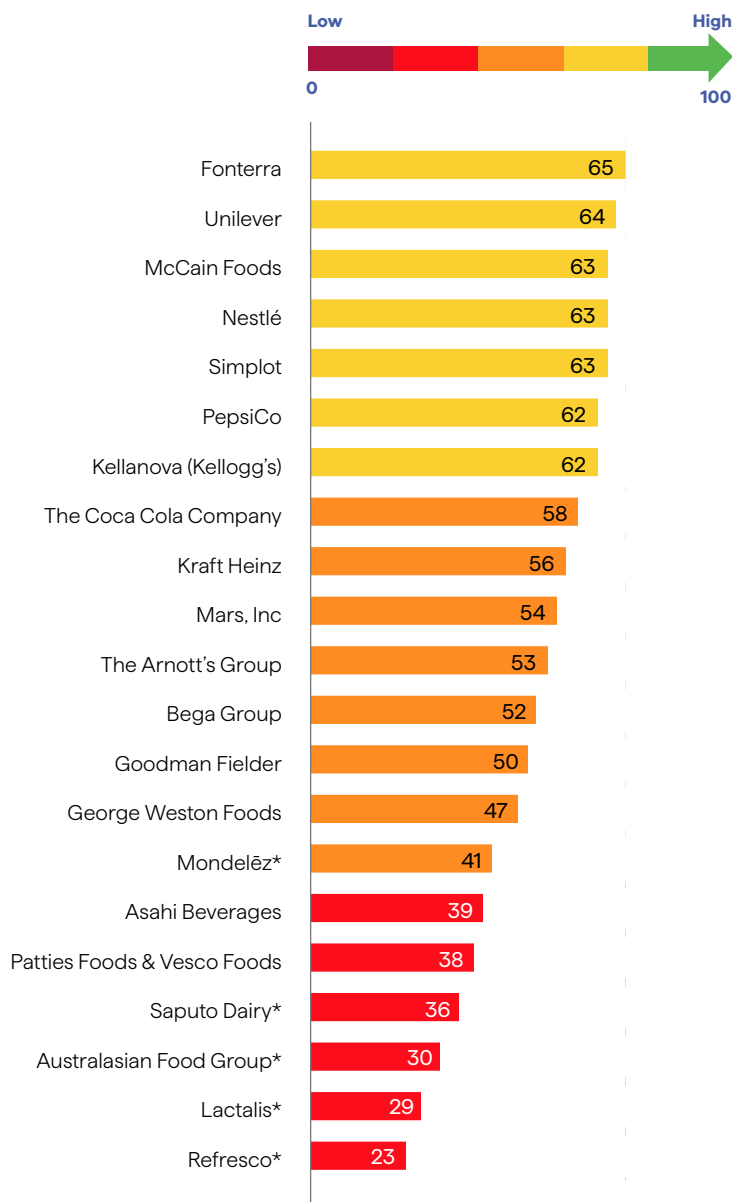
Comparison from 2018 to 2024[^]

- Mean score of the sector (out of 100) increased from **42 to 50**.
- Fewer companies scored 'Low' (<20 out of 100) in 2024 (0 companies in 2024, compared with 5 in 2018).
- The highest score among assessed companies dropped from 71 to 65 (out of 100) in 2024.

[^]Assessment in 2024 was adjusted to reflect updates in global best practice, due to regulatory and industry changes in Australia and globally

Australian packaged food and beverage manufacturers 2024

Policies and practices for supporting healthier food environments and improving population nutrition (scores out of 100)



*Assessment based on publicly available information only

“ Food and beverage manufacturers in Australia are not taking sufficient action to address unhealthy diets, and stronger government policy is required ”

Priority recommendations for the food and beverage manufacturing sector

- 1 Healthy food sales targets:** Set company-wide targets to increase the proportion of sales from healthy products, and publicly report progress against this target each year.
- 2 Marketing to children:** Reduce the exposure of children (up to age 18) to the marketing of unhealthy foods and brands, across all marketing channels (including broadcast media, online, product packaging, and outdoor advertising) and settings (including in-store settings, sports and recreational venues, and in and near areas where children gather).
- 3 Healthier products:** Publicise specific, time-bound targets for reducing nutrients of concern (sodium, sugar, saturated fat, and trans fat) and energy/portion sizes of products across the portfolio. Routinely report on progress towards commitments and targets.
- 4 Better nutrition labelling:** Commit to full implementation of the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- 5 Affordability and accessibility of healthy products:** Work with retailers to ensure that healthy and healthier products are widely available, affordably priced and prioritised in retailer price promotions and promotional campaigns.
- 6 Transparency of external relationships:** Publish all relationships (including funding and support) with external groups (e.g., government agencies, professional organisations, research organisations, community and industry groups) related to health and nutrition.

Conclusion and implications

- There are increasing expectations for manufacturers of packaged foods and beverages to take stronger action on nutrition and health.
- While the packaged food sector acknowledges their role in efforts to improve population diets, there is considerable variation in policies and practices across the sector. More significant action is needed from all major packaged food and beverage manufacturers to improve the healthiness of Australia's packaged food supply and the extent to which Australian food environments promote health.
- Australian governments are currently relying on voluntary industry action in key areas, such as marketing to children, nutrition labelling and product formulation. However, voluntary actions are not going nearly far enough, with insufficient improvements over time.
- In line with key priorities specified in the National Obesity Strategy (2022-2032) and the National Preventive Health Strategy (2021-2030), **stronger government action is needed**. In the absence of sufficient progress by industry, key areas for government action include comprehensive and consistent national legislation to restrict the exposure of children to the marketing of unhealthy foods and brands, and mandatory implementation of the Health Star Rating labelling scheme.
- Ongoing monitoring of food company policies and practices is essential, including the extent to which company commitments are implemented in practice. Mandatory company reporting using evidence-based, nutrition-related metrics would facilitate improved monitoring and accountability.

Background

Unhealthy diets and obesity are among the most pressing public health issues in Australia.

Few people in Australia consume diets consistent with the Australian Dietary Guidelines. Two thirds of adults and one quarter of children in Australia live with overweight or obesity.¹ Obesity and diet-related risk factors have a substantial impact on the health of individuals, communities, the health system and the economy.² The impact of unhealthy diets and obesity disproportionately affects those in low-socioeconomic groups, people living in remote and regional areas, and Indigenous populations.³

A key driver of unhealthy diets among Australians are food environments that do not support health.

The food supply in Australia is increasingly dominated by unhealthy, highly-processed foods and beverages that are often readily available, inexpensive and heavily marketed.⁴

Addressing unhealthy food environments and improving population diets requires broad-scale efforts from the whole community.

Societal change will require comprehensive action from the food industry, supported by effective government policy and legislation. Packaged food and non-alcoholic beverage manufacturers have a major influence over the way products are produced, sold and promoted. Key international health bodies recommend priority actions for the food industry to support healthier food environments,⁵ including:

- Reformulating existing products to reduce nutrients of concern (sodium, saturated fat, trans fat, sugar) and developing new healthier products
- Restricting the exposure of children to the marketing of unhealthy foods and brands
- Providing consumers with clear, easily understood and evidence-based nutrition information on food labels
- Ensuring that healthy and nutritious choices are widely available and affordable

 **4%**
OF ADULTS & CHILDREN
eat the recommended amount of fruits and vegetables⁶

 **53%**
of packaged foods in Australian supermarkets are classified as unhealthy⁷

 **10 per hour**
Number of unhealthy food and drink promotions to which children are exposed online⁸

ONLY 32% 
of packaged foods in supermarkets display the Health Star Rating⁹

¹ Australian Bureau of Statistics 2018. National Health Survey: First Results, 2017-18.

² Colagiuri et al. *The cost of overweight and obesity in Australia*. *Medical Journal of Australia*. 2010;192(5):260-264

³ Australian Institute of Health and Welfare, 2016. Australian Burden of Disease Study: Impact and Causes of Illness and Death in Australia 2011.

⁴ Swinburn et al. *The global obesity pandemic: shaped by global drivers and local environments*. *The Lancet*. 2011; 378(9793):804-14.

⁵ World Health Organization, 2024. *Global Strategy on Diet, Physical activity and Health*.

⁶ Australian Bureau of Statistics, 2023. National Health Survey 2022.

⁷ The George Institute for Global Health, FoodSwitch data 2022 and 2023. Published online on the Food Environments Dashboard: foodenvironmentdashboard.com.au

⁸ Kelly et al. *Social online marketing engagement (SoMe) study of food and drink brands: Real time measurement of Australian children*. *Journal of Medical Internet Research*. 2021;23(7).

⁹ Australian Government Food Ministers' Meeting communique, May 2024.

Increased focus on nutrition in Australia and globally

There is building momentum for change to improve population diets. Governments are increasingly implementing a range of policy measures to address unhealthy food environments.¹⁰ The food industry are placing greater attention on the issue, including their reporting of company actions related to nutrition.

Examples of Australian government initiatives related to nutrition

- The **Health Star Rating** (HSR) is a voluntary government-endorsed front-of-package labelling system that rates the healthiness of packaged food products. The government has stated a target for 70% of intended products to voluntarily adopt the HSR by November 2025, with the potential to mandate HSR labelling if the uptake target is not achieved by industry. Approximately one third of products in supermarkets displayed HSR labelling in 2023.¹¹
- The government's **Healthy Food Partnership Reformulation Program** is a program to encourage Australian food manufacturers to meet nutrient targets for (sodium, saturated fat and sugars) in specific food categories. Participating companies in the voluntary program aim for 80% of selected product categories (by sales volume) to meet set nutrient targets.

Industry initiatives related to health

- Globally, some packaged food and beverage manufacturing companies, as well as supermarket retailers, have taken some action on nutrition,¹² although progress over time has been limited.



- The **Australian Association of National Advertisers** introduced a Food and Beverage Advertising Code in November 2021. The voluntary guidelines restrict some types of unhealthy food advertising directed to children of 15 years and under. While the code reflects some efforts from industry to address unhealthy food marketing to children, several aspects of the code do not meet public health best practice in protecting children from exposure to unhealthy food marketing.^{13,14} For example, brand advertising and product packaging are excluded from current voluntary restrictions. Moreover, monitoring and compliance processes are weak and ineffective.

Global government policy actions

- Over 30 countries around the world have implemented front-of-package labelling systems.¹⁵ These labels are designed to provide clear, standardised information on the nutritional content of packaged foods. While the Australian Health Star Rating labelling scheme is currently voluntary for food manufacturers, several other countries have adopted mandatory schemes, typically in the form of nutritional warning labels.
- Globally, more than 85 countries have implemented taxes on sugar-sweetened beverages, with several countries also taxing unhealthy products more broadly.¹⁶
- An increasing number of countries, including Chile and the United Kingdom, have introduced mandatory legislation to restrict the exposure of children to unhealthy food marketing across a range of settings including on TV, online and in supermarkets.

¹⁰ Food Policy Index for Australia, 2022. <https://www.foodpolicyindex.org.au/>

¹¹ Australian Government Food Ministers' Meeting communique, May 2024.

¹² According to national and international benchmarking initiatives such as Access to Nutrition Index, the World Benchmarking Alliance and INFORMAS.

¹³ Obesity Policy Coalition 2018. *Overbranded, Underprotected: How industry self-regulation is failing to protect children from unhealthy food marketing* report.

¹⁴ World Health Organization, 2023. *Policies to protect children from the harmful impact of food marketing: WHO guideline.*

¹⁵ Obesity Evidence Hub, 2024: <https://www.obesityevidencehub.org.au/collections/prevention/front-of-pack-nutrition-labelling>

¹⁶ World Health Organization, 2022. *WHO manual on sugar-sweetened beverage taxation policies to promote healthy diets.*

Monitoring for accountability

Civil society is increasingly advocating for greater accountability from the food industry with respect to nutrition and health.^{17,18} There are several ongoing initiatives that seek to evaluate and support food industry actions to support healthy and environmentally sustainable diets. Prominent global initiatives include the [Access to Nutrition Initiative](#) (ATNI) and the [World Benchmarking Alliance](#).

[INFORMAS](#) (International Network for Food and Obesity/Non-communicable diseases Research, Monitoring and Action Support) is a global network (active in 60+ countries) of public-interest organisations and researchers that aims to monitor, benchmark and support actions to increase healthy food environments and reduce obesity.

In 2018, INFORMAS developed [the BIA-Obesity \(Business Impact Assessment – Obesity and population-level nutrition\) tool](#) to benchmark food company policies and commitments at a national-level. The tool has been customised for different sectors, including food and beverage manufacturers, supermarkets and quick service chains. The validated BIA-Obesity tool was first implemented in Australia in 2018, and subsequently implemented in eight other countries and across the European Union. Evaluations have shown that use of the tool has contributed to important policy and practice changes.¹⁹

Past international evaluations of food company policies and practices related to nutrition, led by INFORMAS

- [Australia 2018](#)
- [New Zealand 2018](#)
- [Canada 2019](#)
- [Thailand 2019](#)
- [Malaysia 2019](#)
- [Belgium 2022](#)
- [France 2022](#)
- [European Union 2022](#)

Classifying healthy and unhealthy foods

There are a variety of ways to define the healthiness of foods, including based on food categories, nutrient content and/or the degree of processing. It is important that food companies adopt externally recognised and evidence-based definitions of healthy and unhealthy foods and beverages, such as those developed by the Australian Government or the World Health Organization.

The [Australian Dietary Guidelines](#) (ADGs) define a healthy diet as including a variety of foods from the 'five food groups'. They also recommend limiting consumption of 'discretionary foods' which are high in saturated fat, added salt, added sugars and/or alcohol.

The [Health Star Rating](#) (HSR) is a government-endorsed front-of-pack labelling system that rates the overall nutritional profile of packaged food, and assigns it a rating from ½ a star to 5 stars. It is designed to provide a quick, easy, standard way to compare similar packaged foods.

More recently, there is increasing use of the [NOVA](#) system, which classifies food into four categories based on the degree of processing. **Ultra-processed foods** (UPFs) are industrially produced using a variety of processing techniques. They contain ingredients that cannot be found in a home kitchen, including preservatives, emulsifiers, sweeteners and/or artificial colours, among other additives. Examples of UPFs include packaged chips, soft drinks, flavoured yoghurts, biscuits, and chicken nuggets. UPFs have been associated with adverse health risks.^{20,21}

¹⁷ Swinburn et al. *Strengthening of accountability systems to create healthy food environments and reduce global obesity*. *The Lancet*. 2015;385(9986).

¹⁸ Garton et al. *A collective call to strengthen monitoring and evaluation efforts to support healthy and sustainable food systems: 'The Accountability Pact'*. *Public Health Nutrition*. 2022; 25(9):2353–2357.

¹⁹ Robinson et al. *Benchmarking Food and Beverage Companies on Obesity Prevention and Nutrition Policies: Evaluation of the BIA-Obesity Australia Initiative, 2017-2019*. *International Journal of Health Policy Management*. 2021;10(12)

²⁰ Monteiro et al. *Ultra-processed foods: what they are and how to identify them*. *Public Health Nutrition*. 2019;22(5):936–941.

²¹ Lane et al. *Ultra-processed food exposure and adverse health outcomes: umbrella review of epidemiological meta-analyses*. *British Medical Journal*. 2024; 384.

Assessment approach

Study aims

This study aimed to **assess the largest packaged food and non-alcoholic beverage manufacturers in Australia on their voluntary policies and practices for supporting healthier food environments and improving population nutrition**. The objective was to highlight where Australian food companies were demonstrating leadership in relation to supporting population health and nutrition, and identify areas for improvement.

The assessment used the validated BIA-Obesity tool and methods developed by INFORMAS.²² The study was a repeat of a similar assessment conducted in Australia in 2018.

For the 2024 assessment, the scoring criteria were adapted to reflect progress in best practice benchmarks, based on changes to government regulation and industry practice in Australia and internationally. Updates to the criteria included: additional indicators related to the reporting of company performance against commitments; revisions to *Nutrition Labelling* indicators to reflect updated government implementation guidelines and targets for the Health Star Rating system; and revisions to the *Promotion Practices* domain to align with recently released guidelines from the World Health Organization and changes to the industry self-regulatory code.

The study formed part of a broader initiative to assess company policies across different sectors of the food industry, also including supermarkets and quick service restaurants (fast-food outlets). Another arm of the study assessed the environmental sustainability policies of companies across the three sectors – these results will be published separately.

The assessment conducted in this study did not focus on the healthiness of the overall product portfolios of Australian food manufacturing companies. However, measures of portfolio healthiness were drawn from elsewhere to supplement our analyses.²³

Process for conducting the assessment

1

Research team briefs company on assessment process

2

Research team collects preliminary data (from publicly-available sources) for each company

3

Research team works with company representatives to refine and supplement preliminary data

4

Research team assesses policy information against best practice benchmarks and calculates a score for each company

5

Research team prepares a scorecard for each company, showing areas of strength and recommendations for action

6

Scorecard and comparison with rest of sector privately shared with each company

7

Results publicly-released, including individual company and industry sector performance

²² Sacks et al. BIA-Obesity (*Business Impact Assessment-Obesity and population-level nutrition*): A tool and process to assess food company policies and commitments related to obesity prevention and population nutrition at the national level. *Obesity Reviews*. 2019;20(2)

²³ The George Institute for Global Health 2023. *The State of the Food Supply report*.

Companies selected for inclusion

21 of the largest packaged food and non-alcoholic beverage manufacturers operating in Australia were selected based on their market share (according to Euromonitor 2022 data).

Sector	Companies included
Packaged food manufacturers	Australasian Food Group, Bega Group, Fonterra, George Weston Foods, Goodman Fielder, Kellanova (Kellogg's), Kraft Heinz, Lactalis, Mars Inc, McCain Foods, Mondelēz, Nestlé, Patties Foods & Vesco Foods, PepsiCo, Saputo Dairy, Simplot, The Arnott's Group, Unilever
Non-alcoholic beverage manufacturers	Asahi Beverages, Refresco, The Coca Cola Company

Data collection and validation

Information related to company policies, commitments and practices in relation to the six domains of the BIA-Obesity assessment tool (see next page) were collected between February and May 2023, from publicly available sources such as company websites and corporate sustainability reports. From June to December 2023, representatives from each company were invited to verify and supplement information collected by the research team.

Scoring of company policies and practices

Company policies and practices (up to the end of 2023) related to nutrition were assessed using the BIA-Obesity tool. The tool considers company actions across a range of indicators spread across six domains. In each indicator, the **transparency, comprehensiveness** and **specificity** of company policies and practices were assessed against industry benchmarks and public health best practice. Scores were combined across domains and weighted to derive an overall score out of 100 for each company.

Assessment areas

Domain	Policy areas	Key indicator categories	Weighting (out of 100)*
A Corporate strategy	Overarching policies, commitments and reporting practices related to improving population nutrition and addressing obesity	<ul style="list-style-type: none"> • Commitment to nutrition and health in corporate strategy • Reporting against nutrition and health objectives and targets • Reporting of governance arrangements related to nutrition • Reporting on the proportion of overall sales from healthy products 	10
B Product formulation	Policies, commitments and reporting practices regarding product development and reformulation to reduce nutrients of concern (i.e., sodium, saturated fat, trans fat, sugar) and energy content	<ul style="list-style-type: none"> • Targets and actions related to reduction of sodium, saturated fat, trans fat, sugar and portion size/energy content across the portfolio • Engagement with government-led initiatives related to product formulation (e.g., the Healthy Food Partnership) 	30
C Nutrition labelling and information	Policies, commitments and reporting practices regarding disclosure and presentation of nutrition information on product packaging and online	<ul style="list-style-type: none"> • Commitment to implementing the Health Star Rating labelling system and reporting of progress • Provision of on-pack information on trans-fat content • Provision of online nutrition information • Use of health and nutrition claims 	20
D Promotion practices	Policies, commitments and reporting practices related to reducing the exposure of children to the promotion of unhealthy foods and brands, and responsible promotion to all consumers	<ul style="list-style-type: none"> • Policies to prioritise marketing practices and spend on promoting healthy products • Policies to reduce the exposure of children to unhealthy food marketing, in broadcast media, online, on product packaging and in other settings 	30
E Product accessibility	Policies, commitments and reporting practices related to the availability, distribution and affordability of healthy compared to unhealthy products	<ul style="list-style-type: none"> • Increasing availability and distribution of healthy products • Increasing the affordability of healthy products • Engagement with retailers on improving product accessibility and affordability • Support for government fiscal policies related to nutrition 	5
F Disclosure of relationships with external groups	Disclosure of corporate relationships with, and support provided to, organisations external to the supply chain related to health and/or nutrition, such as government agencies, political parties, professional associations, research organisations, community and industry groups	<ul style="list-style-type: none"> • Disclosure and transparency of relationships with organisations related to health and nutrition, and lobbying and political practices 	5

*Weighting derived based on the relative importance of company policies and practices in each domain, as determined by INFORMAS

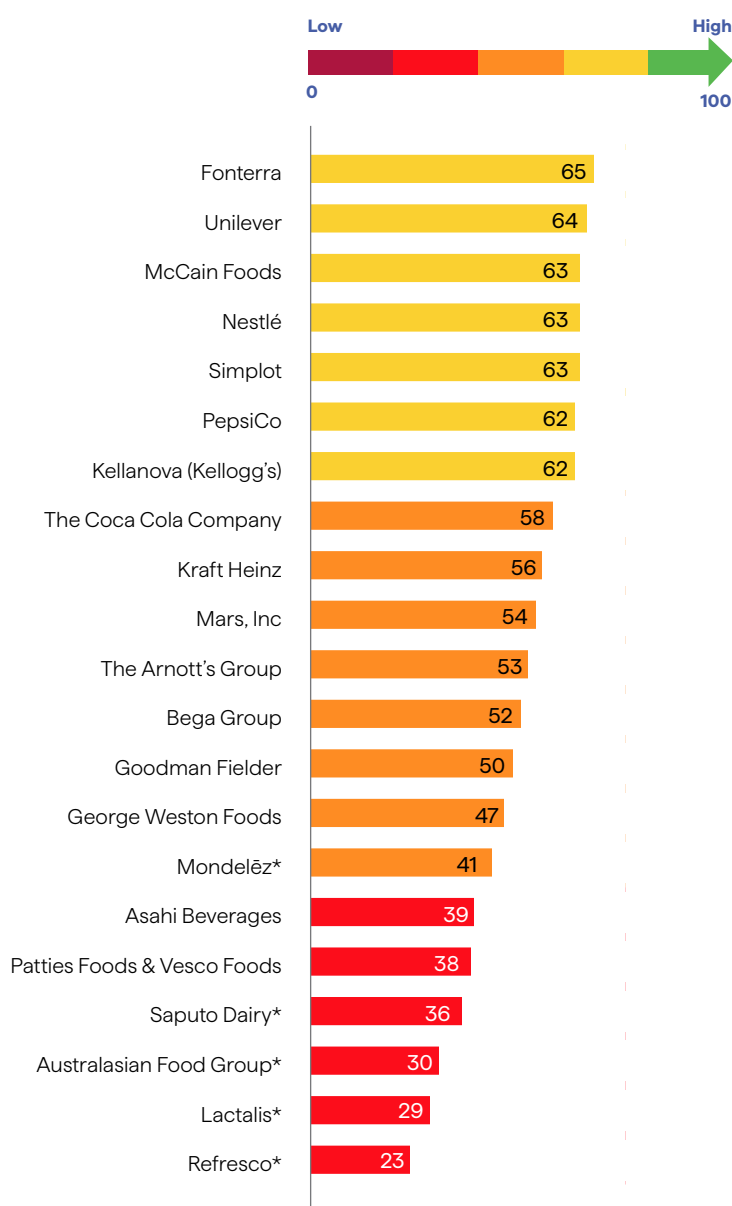
Results: key findings

Company policies and practices for improving population nutrition varied substantially across the sector, with major room for improvement across the board.

- Company scores (out of 100) ranged from 23 to 65, with a **mean score of 50**
- 16 of 21 companies selected for assessment fully engaged with the research process by verifying collected data and providing additional information

Australian packaged food and beverage manufacturers 2024

Policies and practices for supporting healthier food environments and improving population nutrition (scores out of 100)



*Assessment based on publicly available information only

Results: key findings

Overall, the best performing area was *Corporate Strategy*. Most companies acknowledged the importance of taking action on nutrition, as part of their public reporting.

Product Accessibility and Affordability was the worst performing area, with companies reporting very limited policies and practices to ensure healthy foods are widely available and affordable.

Food and beverage manufacturer	Overall score	A Corporate strategy (out of 100)	B Product formulation (out of 100)	C Nutrition labelling & information (out of 100)	D Promotion practices (out of 100)	E Product accessibility & affordability (out of 100)	F Disclosure of external relationships (out of 100)
Fonterra	65	77	85	67	47	13	75
Unilever	64	94	74	69	51	14	64
McCain Foods	63	80	71	73	49	0	92
Nestlé	63	94	74	44	58	25	81
Simplot	63	63	70	88	64	25	67
PepsiCo	62	56	83	53	55	21	64
Kellanova (Kellogg's)	62	86	64	75	49	19	64
The Coca Cola Company	58	80	48	56	66	13	81
Kraft Heinz	56	61	78	53	43	6	56
Mars, Inc	54	62	70	44	51	19	47
The Arnott's Group	53	50	65	59	43	13	53
Bega Group	52	56	58	58	46	6	69
Goodman Fielder	50	56	63	44	41	13	81
George Weston Foods	47	74	49	53	39	6	39
Mondelēz*	41	43	38	25	60	0	42
Asahi Beverages	39	56	26	38	46	19	64
Patties Foods & Vesco Foods	38	22	35	47	49	0	17
Saputo Dairy*	36	56	35	25	46	0	28
Australasian Food Group*	30	22	34	31	37	0	11
Lactalis*	29	71	19	25	33	0	22
Refresco*	23	33	13	25	35	0	3

*Assessment based on publicly available information only. Companies ranked highest to lowest by overall score.



Areas in which food manufacturers have shown progress:

- **Stated commitment to improve nutrition:** Recognising their role in addressing unhealthy diets, by publishing overarching commitments to nutrition and health (17 out of 21 companies)
- **Product formulation:** Pledging for products to meet the Australian government's Healthy Food Partnership reformulation targets (9 out of 21 companies)
- **Nutrition labelling:** Committing to implement the government's Health Star Rating (HSR) system (16 out of 21 companies), although overall implementation of HSR across the packaged food supply remains substantially below government targets
- **Updated pledges on marketing to children:** Updates to the industry self-regulatory code that apply to all companies, although this code still falls far short of recommended best practice

Key areas for improvement:

- **Corporate reporting:** Routine reporting of the proportion of company sales from healthy products, using government-endorsed classification of product healthiness
- **Marketing to children:** Effective actions to reduce the exposure of children (aged up to 18 years) to the marketing of unhealthy products and brands
- **Affordability and accessibility of healthy products:** Clear, comprehensive policies to improve the accessibility and affordability of healthier foods, particularly relative to unhealthy foods

A | Corporate strategy

Good practice statement

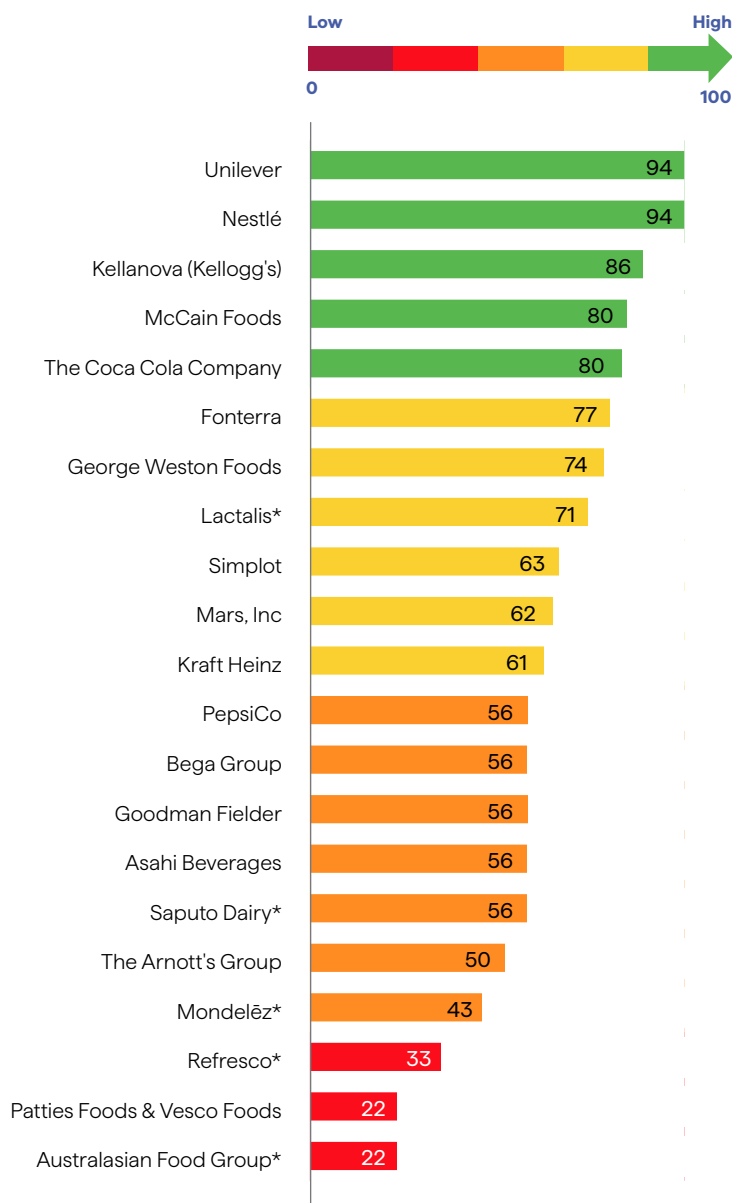
The company has a strategic document or collection of documents that outline the company's overarching commitment to population nutrition and health. This may include mission statements, strategies and/or overarching policies that are publicly available and apply to the national context.

Key findings

Most companies referred to health and nutrition-related issues in their corporate strategies; however, typically lacked detail in their reporting of commitments and performance around nutrition.

- This was the best performing domain.
- Most companies (17 out of 21) recognised their role in addressing unhealthy diets, and published overarching commitments to nutrition and health.
- Four companies (Nestlé, Kellanova, Fonterra and Bega) reported on progress against nutrition-related commitments in publicly available, annual and national-level reporting that was audited independently.
- Nine companies reported that accountability for nutrition issues was assigned to senior management. Unilever also reported that they linked the remuneration of senior managers to nutrition-related targets.
- Four companies (Unilever, Nestlé, Lactalis, The Coca Cola Company) publicly reported on the proportion of sales from 'healthy' products in their portfolio. Of these companies, Unilever and Nestlé base their reporting on a government-endorsed definition of product healthiness (e.g., products with a HSR of at least 3.5).

Mean domain score: 62 / 100



*Assessment based on publicly available information only

Company reporting on proportion of sales from healthy and unhealthy products

The proportion of a company's food-related sales from healthy and unhealthy products has been consistently highlighted by benchmarking initiatives and investor groups as a priority metric for companies to disclose their overall performance on nutrition. The metric encompasses business-wide actions across nutrition-related areas (such as product formulation, marketing and distribution), and can be used to track company progress on nutrition.²⁴ Widespread reporting of the metric can allow for comparison across companies differing in size and market share.



²⁴ Including groups such as Access to Nutrition Index (ATNI) and World Benchmarking Alliance, Share Action and the Food Foundation.

Key recommendations for the packaged food manufacturing sector:

- 1 **Identify** population nutrition and health as a priority focus area for the company, in line with national and international government priorities, with relevant goals, objectives, reporting of performance and appropriate resourcing
- 2 **Set** a target to increase the proportion of overall sales from healthy products, and publicly report progress against this target each year
- 3 **Adopt** government-endorsed standards for defining healthy and unhealthy foods and brands
- 4 **Report** on governance arrangements that assign accountability for the company's nutrition-related commitments, policies and practices

Leading policy and practice examples

Key indicator category	Australian and international leading policy and practice examples
Commitment to nutrition and health in corporate strategy	<ul style="list-style-type: none"> • Unilever publicly reports on the healthiness of their product sales (by volume) against six different externally endorsed nutrient classification systems, including the Health Star Rating. In 2021, they reported that 14% of sales in Australia and 17% of sales globally were from products with a Health Star Rating of at least 3.5. • Nestlé reports on the proportion of product sales from healthy products (defined as those with a Health Star Rating of at least 3.5). In 2022, 38% of global sales and 13% of Australian/New Zealand sales were from healthy products. • Kraft Heinz assigns key sustainability-related (including health and nutrition) performance metrics to the Chief Executive Officer and other company leaders. Achievement of these metrics are linked with compensation.
Reporting against nutrition and health objectives and targets	
Reporting on proportion of overall sales from healthy products	
Reporting of governance arrangements related to nutrition	

Linking nutrition with environmental sustainability

Beyond their impact on health, population diets also affect the environment. Global food systems substantially contribute to climate change, biodiversity loss, water use, pollution, excessive greenhouse gas emissions, and deforestation.²⁵ The food system is also inherently vulnerable to the changing climate, meaning that food production will face significant challenges as global temperatures increase.²⁶

Efforts to improve the healthiness of population diets are likely to have flow-on benefits to the environment, given that diets that are high in fruits, vegetables and low in animal-source and ultra-processed foods are the least environmentally damaging.²⁷ There are, however, some areas where trade-offs exist. For example, food manufacturer actions to reduce red meat purchases may inadvertently promote consumption of unhealthy, ultra-processed 'plant-based meat' alternatives.²⁸ Manufacturers can avoid these trade-offs by promoting products that are both healthy and environmentally sustainable, such as minimally processed plant-based alternatives (like beans, legumes, and tofu). Aligning company policies to promote healthy and sustainable diets also contributes to broader international efforts related to sustainable development.



²⁵ Ritchie, Rasao and Roser, 2022. *Environmental Impacts of Food Production*. Published online at OurWorldInData.org

²⁶ Public Health Association Australia 2021. *Climate Disruption, the Food System and Food Security* policy position statement.

²⁷ Crippa et al. *Food systems are responsible for a third of global anthropogenic GHG emissions*. *Nature Food*. 2021;2:198–209

²⁸ Livingstone and Marchese. *Is fake meat healthy? And what's actually in it?* *Journal of the Home Economics Institute of Australia*. 2022;27(2):48-49.

B | Product formulation

Good practice statement

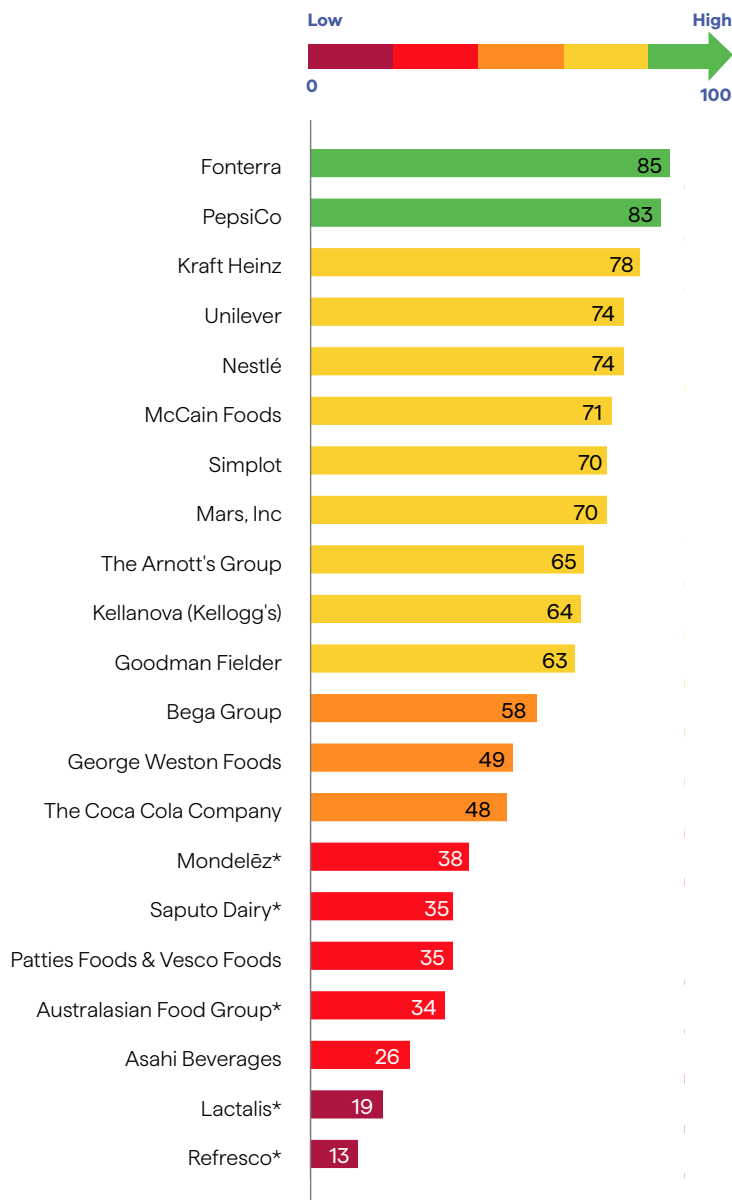
The company has a set of product formulation commitments relating to new product development and reformulation of existing products. The commitment focuses on limiting nutrients of concern (including sodium, saturated fat, trans fat and added sugars) and reduce energy content portion sizes, whilst limiting products that are discretionary. Progress towards commitments and targets are routinely reported on, with reference to government-endorsed guidelines and targets, such the Australian government's Healthy Food Partnership (HFP) Reformulation Program.

Key findings

Manufacturers have taken steps to improve the healthiness of products; although the comprehensiveness of their commitments and reporting of progress varied across the sector.

- Eight companies publicly reported on the healthiness of their overall portfolio (e.g., on the average HSR of their product portfolio), with 7 of these companies pledging specific, timebound targets to improve the overall healthiness of their portfolio.
- Top performing companies had in place comprehensive commitments to reduce levels of risk nutrients across in their product portfolios. They reported specific, timebound targets for reducing sodium, sugars and saturated fat, as well as reducing portion size/energy levels of single serve products. Several companies had vague commitments, or targets that applied only to a subset of products in their portfolio.
- 9 companies were participants in the government's Healthy Food Partnership (HFP) reformulation program or have pledged to meet HFP nutrient targets. Of these, 6 companies have publicly disclosed their participation. 4 companies reported adopting the HFP reformulation targets in their internal reformulation and product development efforts, although were not formal signatories of the program.

Mean domain score: 55 / 100



*Assessment based on publicly available information only

OVER HALF of the food and drinks in Australia's packaged food supply is **unhealthy** ('discretionary food' as per the Australian Dietary Guidelines)

70% of packaged food and drinks are **ultra-processed**

No packaged food category currently meets nutrition targets set by the government-led Healthy Food Partnership Reformulation Program

Source: The George Institute for Global Health's State of the Food Supply Report 2023

Results by domain: product formulation

Key recommendations for the packaged food manufacturing sector:

- 1 **Develop** and **publicise** specific, time-bound targets for reducing nutrients of concern (sodium, sugar, saturated fat, and artificially produced trans fat) and energy/portion sizes of products
- 2 **Reduce** energy content per serving and/or **provide** smaller package sizes in relevant product categories (e.g., single-serve snacks)
- 3 Routinely **report** on progress towards commitments and targets. For example, report the nutritional content of products, by product category, including changes over time and with reference to government reformulation targets
- 4 **Reduce** the proportion of unhealthy ultra-processed products in the company's product portfolio, for example, by adding healthy, minimally processed products and removing unhealthy product lines

Leading policy and practice examples

Key indicator category	Australian and international leading policy and practice examples
Targets and actions related to improving the overall healthiness of the portfolio, and reducing risk nutrients (sodium, saturated fat, trans fat and added sugar) and portion size/energy content across the portfolio	<ul style="list-style-type: none"> • Lidl (Germany) has committed to lower the average sales-weighted level of added sugar and added salt in their own-brand products by 20 per cent by 2025, from a baseline year of 2015. • The Arnott's Group pledges for one third of their products to have a HSR of at least 3.5 stars by 2025. In their 2023 Sustainability Report, they state that this goal has been reached. • Mars Food discloses specific, timebound targets on reformulation, including for 95% of Mars Food products to meet its adopted nutrient criteria by 2025, and to achieve a 5% reduction in sodium across the Mars Food portfolio by 2025. Mars Wrigley reports that 99% of confectionery products have portion sizes below 250 calories per portion. • Simplot has taken steps to improve the overall healthiness of their product portfolio through acquiring brands in healthy categories, and divesting from unhealthy brands.
Engagement with government-led initiatives related to product formulation (e.g., the Healthy Food Partnership)	<ul style="list-style-type: none"> • Coles reports that 78% of own-brand products at the end of FY23 met the targets set by the Healthy Food Partnership's Reformulation Program. • Fonterra pledges for all products in relevant food categories to meet Healthy Food Partnership reformulation targets by 2027. • In their 2022 Sustainability report, The Arnott's Group publicly discloses that 80% of their savoury snacks and breakfast foods meet Healthy Food Partnership voluntary targets for sodium and/or sugar.

C | Nutrition labelling and information

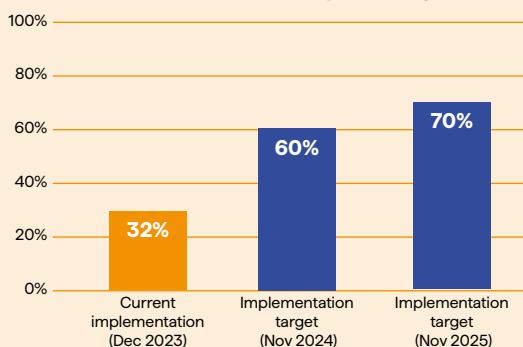
Good practice statement

The company has a set of published commitments relating to nutrition labelling that are designed to inform consumers about the nutrient composition of products in an easy-to-understand way. This includes displaying the Health Star Rating front-of-pack labelling on all eligible products, providing comprehensive product nutrition information online, providing trans fat labelling for relevant products, and responsible use of health and nutrition content claims.

Key findings

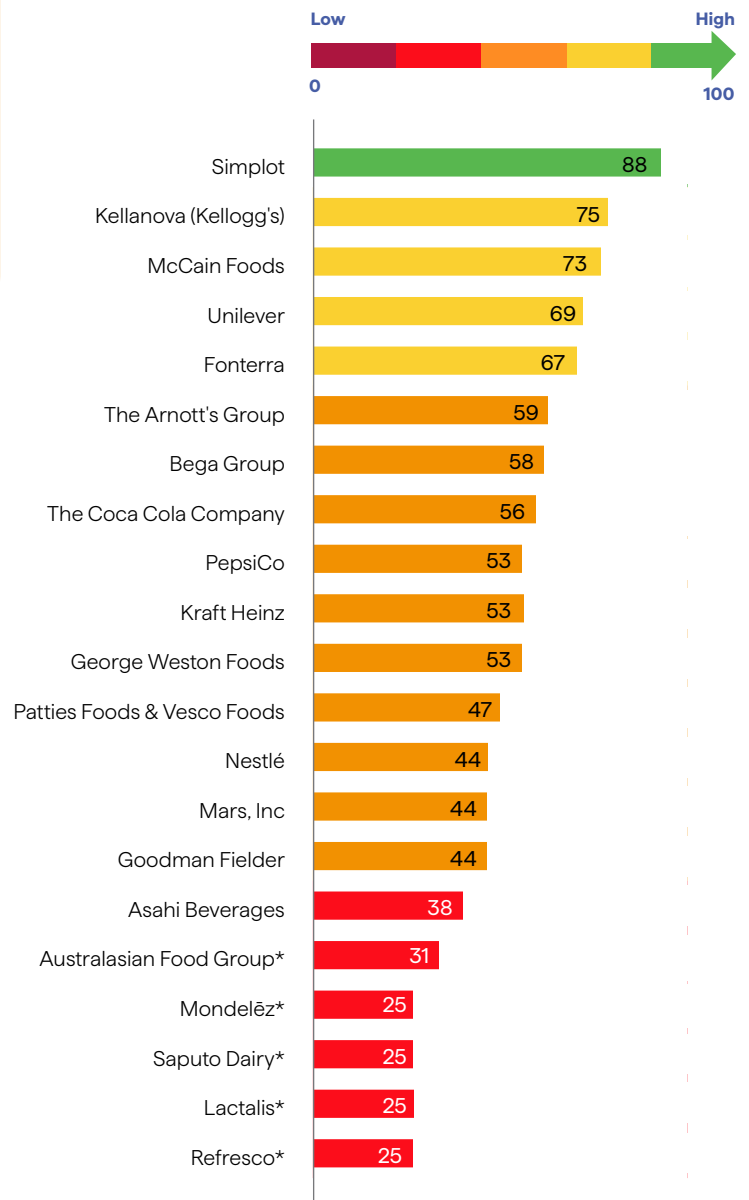
- Four companies (The Arnott's Group, McCain Foods, The Coca Cola Company and PepsiCo) have publicly committed to fully implement the Health Star Rating labelling system on all eligible products. 11 companies have either disclosed general commitments (with no targets) or set internal-only targets for implementing the HSR on products.
- Eight companies provided comprehensive nutrition information online for all products, with the remaining 13 companies providing nutrition information online for only some products.
- Internal policies to label relevant products with trans-fat content information were reported by two companies (of the 10 companies for which trans-fat is relevant to their portfolios).
- Four companies had in place a clear policy that nutrition content claims are made only on healthy products, as defined with government-endorsed guidelines. Of these companies, only Fonterra makes their pledge publicly available.

Implementation of the Health Star Rating is well below the Australian Government's uptake targets



Source: Australian Government Food Ministers' Meeting communiqué (3 May 2024)

Mean domain score: 50 / 100



*Assessment based on publicly available information only

Results by domain: nutrition labelling and information

Key recommendations for the packaged food manufacturing sector:

- 1 Commit** to full implementation of the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress
- 2 Provide** comprehensive online nutrition information for all products
- 3 Commit** to label artificially produced trans fat on all relevant products
- 4 Introduce** a policy to only make nutrient content claims (e.g., “99% fat free”) on products that are classified as ‘healthy’ (using government guidelines for classifying product healthiness)

Leading policy and practice examples

Key indicator category	Australian and international leading policy and practice examples
Commitment to implementing the Health Star Rating labelling system and reporting of progress	<ul style="list-style-type: none">• Woolworths publicly reports that 100% of eligible own-brand products display the Health Star Rating.• McCain Foods reports full adoption of the Health Star Rating labelling on eligible products. This has been verified by independent evaluations.• The Arnott's Group discloses that 100% of cereal and soup, and 88% of snack products display a Health Star Rating. The company is aiming for full implementation by end of 2024.
Provision of on-pack information on trans fat content	<ul style="list-style-type: none">• Bega Group labels trans-fat content on relevant products, including on peanut butter and plant-based cheese products.
Use of health and nutrition claims	<ul style="list-style-type: none">• Danone commits to not display nutrition content or health claims on any products with a Health Star Rating below 2.5 stars by October 2024.• Asda, Tesco and Sainsbury's (supermarkets, United Kingdom) have pledged that own-brand products that do not meet their healthiness criteria cannot display health or nutrition claims, or 'healthier' branding and logos.

D | Promotion practices

Good practice statement

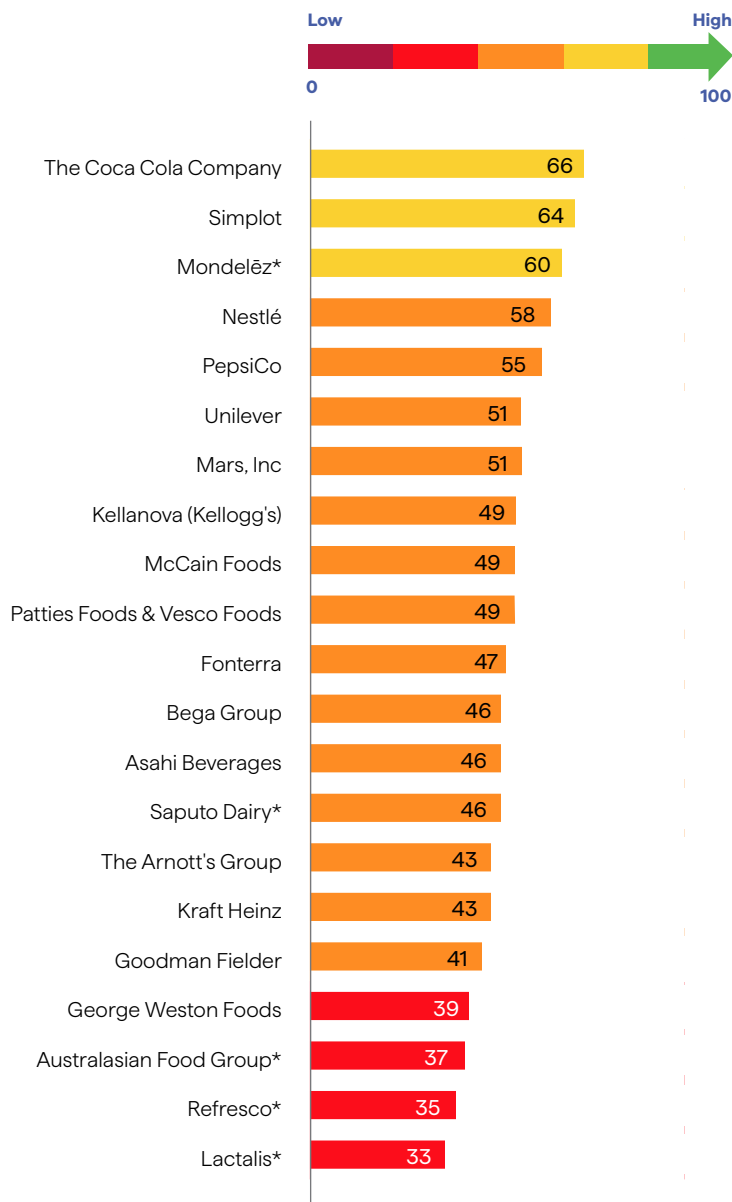
The company's policy aims to reduce the exposure of children (<18 years) to the marketing of unhealthy foods and brands, and addresses promotion in broadcast, non-broadcast media and online/digital settings. In addition, the scope of the policy includes sponsorship of events and activities that are popular with children, outdoor advertising, and marketing in settings where children gather (e.g., schools). The company reports on compliance with marketing policies, and the proportion of marketing spend directed towards healthy and unhealthy products/brands.

Key findings

The industry self-regulatory code for marketing to children of unhealthy foods was updated in November 2021 and applies to all companies, however this code still falls far short of recommended best practice, with inadequate monitoring and compliance processes.

- Eight companies had introduced some steps around responsible marketing of unhealthy foods to the general population. Five companies, including Nestlé and The Coca Cola Company, monitored or had targets around the proportion of marketing spend on promoting healthier products.
- Under the industry's self-regulatory code, all companies commit to not target children under 15 years with advertising of unhealthy products. Examples of companies that had policies that went above this code include:
 - Only one company committed to not target children under 18 years, as per World Health Organization recommendations. Nestlé and Unilever pledge to not target advertising to children under 16 years.
 - The policies of five companies, including Mondeléz, included the marketing of unhealthy brands (beyond only unhealthy products).
 - Nestlé and Kellanova commit to not advertise unhealthy products in settings where children gather, including schools, family clinic and health and care facilities.
- Most companies did not audit their compliance with marketing policies (17 out of 21 companies), and did not publicly disclose the number of incidences of non-compliance with industry marketing codes (13 out of 21).

Mean domain score: 48 / 100



*Assessment based on publicly available information only

10 per hour
Number of unhealthy food and drink promotions to which children are exposed online²⁹

37%
Proportion of community sports clubs in Victoria, Australia that have unhealthy food sponsors³⁰

94%
Products with child-directed marketing on packaging that are unhealthy³¹

²⁹ Kelly et al. Social online marketing engagement (SoMe) study of food and drink brands: Real time measurement of Australian children. Journal of Medical Internet Research. 2021;23(7).

³⁰ Martino et al. A state-wide audit of unhealthy sponsorship within junior sporting clubs in Victoria, Australia. Public Health Nutrition. 2021;24(12)

³¹ Jones et al. Chocolate unicorns and smiling teddy biscuits: analysis of the use of child-directed marketing on the packages of Australian foods. Public Health Nutrition. 2024;26(12).

Results by domain: promotion practices

Key recommendations for the packaged food manufacturing sector:

- 1 **Reduce** the exposure of children (up to age 18) to the marketing of unhealthy foods and brands, across all marketing channels (including broadcast media, online, product packaging, and outdoor advertising) and settings (including in-store settings, sports and recreational venues, and in and near areas where children gather). **Extend** current commitments to:
 - **Increase** the age of children to which commitments apply so that all children (up to 18 years of age) are protected
 - **Apply** to all digital and online marketing, including all paid advertising
 - **Apply** to the marketing of brands, beyond only the promotion of products
 - Focus on **restricting** children’s exposure to marketing, regardless of whether the marketing specifically targets children
 - **Eliminate** use of promotion techniques (e.g., cartoon characters, premium offers, interactive games) with strong appeal to children, including on product packaging and at point-of-sale
 - **Avoid** use of unhealthy products and brands in sponsorship of sports and other events/activities popular with children and families
 - **Include** public transport infrastructure and extend restrictions of advertising to within 500m (rather than 150m) near schools, as part of outdoor advertising commitments
- 2 **Routinely report** on compliance with marketing policies, audited by an independent third party
- 3 **Increase** the proportion of marketing activity and expenditure that relates to healthier products and brands, as compared to unhealthy products and brands. **Routinely report** on the marketing activities (spend and channel) of the company, by product/brand healthiness and target audience (children or adults)

Leading policy and practice examples

Key indicator category	Australian and international leading policy and practice examples
Policies to prioritise marketing practices and spend on promoting healthy products	<ul style="list-style-type: none"> • Nestlé has pledged to increase marketing expenditure to promote healthier choices, stating that in 2020 they increased the marketing spend on products that support healthier lifestyles by 106% (although the company does not report on marketing spend on unhealthy products). • The Coca Cola Company pledges that 90% of the Coca Cola brand marketing spend will feature reduced or no sugar products.
Policies to reduce the exposure of children to the unhealthy food marketing, in broadcast, digital and other settings	<ul style="list-style-type: none"> • In 2021, Morrison’s (supermarket, United Kingdom) removed all characters that appeal to children from children’s snacks that are high in fat, sugar and sodium. Similarly, Woolworths (supermarket, Australia) has pledged that by 2025 characters appealing to children will only appear on packaging of healthier products (applies to own-brand only). • Mondelēz’s global policies around limiting unhealthy food marketing directed to children (defined as under 13 years only) also includes unhealthy brands. Unhealthy brands are defined as those with more than 80% of products (or 100% of a clearly differentiated sub-brand), by revenue, that do not meet adopted nutrient criteria. • Kellanova (Kellogg’s) pledges to not advertise unhealthy products (those not meeting the Nutrient Profiling Scoring Criterion) in environments where children gather, including schools, family clinic and health facilities.

E | Product accessibility and affordability

Good practice statement

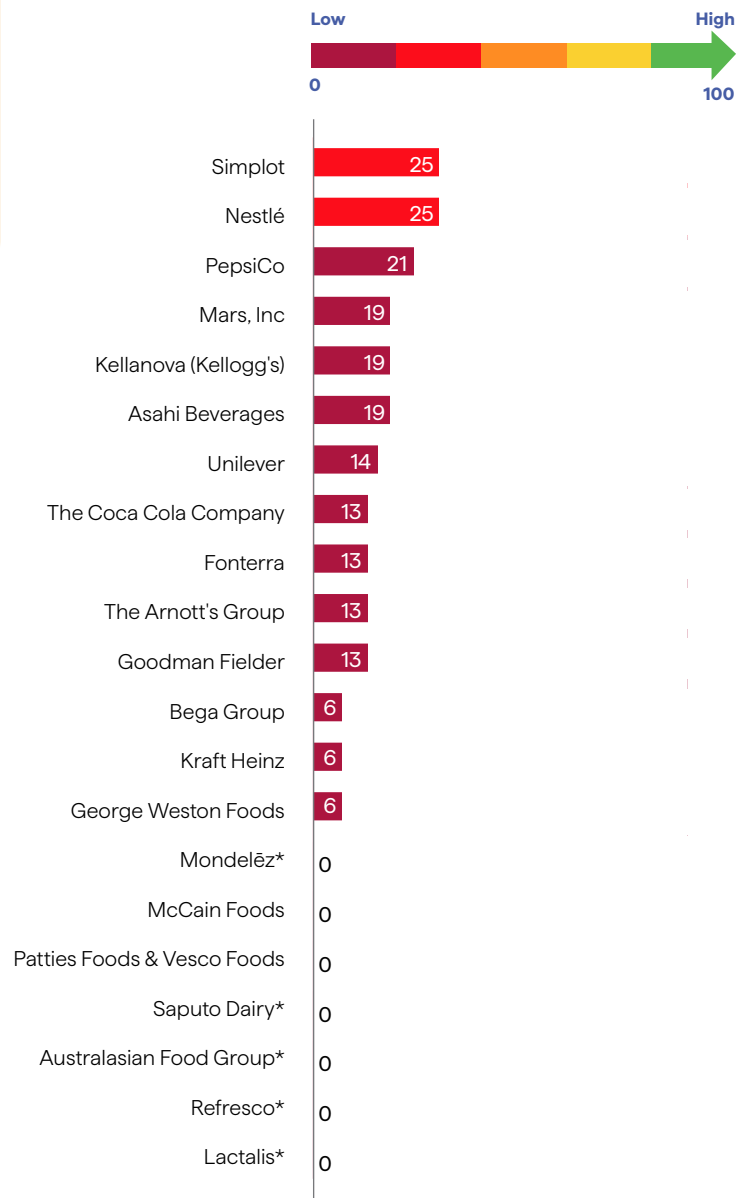
The company strives to make healthy products readily available and affordable to all population groups, with healthier products priced at similar or lower prices than less healthy alternatives, with a focus on equitable distribution of healthy products in rural and low-income communities. The company also aims to increase the availability of healthier products in key settings such as schools.

Key findings

Few companies reported clear and comprehensive actions to address the accessibility and affordability of healthy products, relative to unhealthy products.

- This was the lowest scoring domain. A third of companies (7 out of 21) did not have any commitments in this area.
- No companies reported strong efforts to ensure healthy and healthier products were widely available and equitably distributed across Australia.
- Nestlé, PepsiCo and The Coca Cola Company reported policies to limit the availability of unhealthy products (such as full sugar carbonated drinks) available for sale in schools.
- There were no examples of comprehensive company commitments to improve the affordability of healthy products. Some companies had vague commitments around improving the affordability of healthy products without further information, or mentioned efforts related to lower-income markets outside of Australia.
- Nine companies stated engaging with supermarket retailers to support consumer purchases of healthier products. For example, participating in retailer price promotions or promotional campaigns for healthier products.
- No company published policy positions in support of government fiscal policies to improve population nutrition (such as taxes on sugary beverages).

Mean domain score: 10 / 100



*Assessment based on publicly available information only

Key recommendations for the packaged food manufacturing sector:

- 1 **Work with retailers** to ensure that healthy and healthier products are widely available and equitably distributed by geographic area, including in key settings such as remote and rural communities, lower income areas and schools. For example:
 - Where less healthy products are sold (e.g., in vending machines), introduce policies to ensure healthier equivalent options are also available.
 - Commit to not directly supply any primary or high schools in Australia with unhealthy products, such as full sugar carbonated beverages.
- 2 **Work with supermarket retailers** to incentivise consumer purchases of healthy/healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products
- 3 **Increase** the relative affordability of healthy/healthier products, by ensuring that the recommended retail price of healthy/healthier products are not more expensive than 'standard' products or less healthy alternatives
- 4 **Support** evidence-based, fiscal government policies (e.g., taxes on sugary drinks), in line with recommendations by the World Health Organization.

Leading policy and practice examples

Key indicator category	Australian and international leading policy and practice examples
Increasing the availability and distribution of healthy products	<ul style="list-style-type: none"> • PepsiCo has school beverage policies that restrict the supply of unhealthy beverages (such as full sugar carbonated drinks) to primary and high schools in Australia.
Increasing the affordability of healthy products	<ul style="list-style-type: none"> • Co-op (United Kingdom, supermarket) has in place a policy that all healthier own-brand products are no more expensive than their standard equivalent product (based on price per kg). The supermarket monitors and reports on their compliance to this commitment.
Engagement with retailers on improving product accessibility and affordability	<ul style="list-style-type: none"> • Several companies noted engagement with supermarket retailers to support consumer purchases of healthier products. For example, participating in retailer price promotions or promotional campaigns for healthier products. However, no companies disclosed these efforts in publicly available reporting.
Support for government fiscal policies related to nutrition	<ul style="list-style-type: none"> • Tony's Chocoloney (The Netherlands) have published their support for a government tax on sugar-sweetened products.

F | Disclosure of relationships with external organisations

Good practice statement

The company declares that it has no relationships with external organisations related to nutrition and health, and is transparent about their lobbying and political activities. If relevant relationships with external organisations exist, the company adopts full transparency regarding the nature of these relationships (including funding amount if the support is financial in nature).

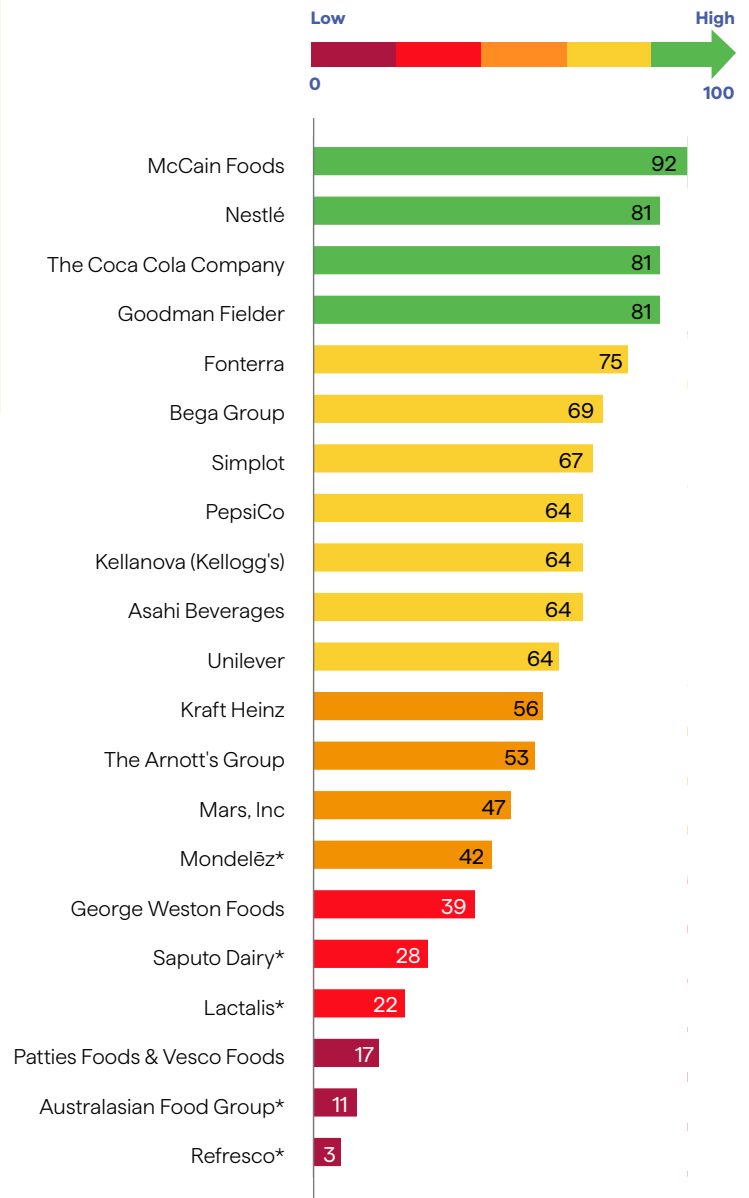
This assists all stakeholders in understanding the relationships between different groups, the nature of lobbying and political activities, sponsorship arrangements, and potential sources of bias in research activities.

Key findings

There was great variation in the transparency of company relationships with external groups related to health and nutrition.

- Leading companies in this domain declared their external relationships and political activities (if any).
- However, many companies did not disclose information in a consolidated and easily accessible format.
- Four companies (Bega, Fonterra, Mars Inc and Kraft Heinz) disclosed in public reporting that they did not make political donations in Australia in 2023, with a further two companies indicating the same in information provided to the research team.
- No company published submissions to public consultations regarding population nutrition policies (or submissions with which the company is associated, such as through industry associations).

Mean domain score: 53 / 100



*Assessment based on publicly available information only

Results by domain: disclosure of relationships

Key recommendations for the packaged food manufacturing sector:

- 1 Publish** all relationships (including funding and support) with external groups (e.g., professional organisations, research organisations, community and industry groups) related to health and nutrition
- 2 Disclose** all political donations in real time, or commit to not make political donations
- 3 Disclose** submissions made to public consultations regarding population nutrition policies (e.g., nutrition labelling proposals), including submissions by industry associations of which they are a member

Leading policy and practice examples

Key indicator category	Australian and international leading policy and practice examples
Disclosure and transparency of relationships with organisations related to health and nutrition, and lobbying practices	<ul style="list-style-type: none">• Bega, Fonterra, Mars Inc and Kraft Heinz declare publicly that they did not make political donations in Australia in 2023.• Walmart publishes a searchable database of grants (over \$25,000) provided to organisations over the past 2 years, listing the organisation and size of grant provided.• PepsiCo reports their support for philanthropic groups provided through their PepsiCo Foundation in a consolidated, publicly available document, including with details of the organisations supported and amount donated.• Unilever discloses a comprehensive list of research publications related to nutrition (between 2009-2022) that have been supported by the company.

Comparison to 2018 assessment

Domain	Mean score (out of 100) of assessed companies across each domain	
	2018	2024
A Corporate strategy	56	62
B Product formulation	46	55
C Nutrition labelling & information	46	50
D Promotion practices	35	48
E Product accessibility & affordability	14	10
F Disclosure of external relationships	54	53

The overall mean score increased from 42/100 in 2018 to 50/100 in 2024. There was also an increase in the mean domain scores in four of the six assessed domains, and a rise in the lowest score achieved by a company (from 3/100 in 2018, to 23/100 in 2024). These results indicate some improvements in the nutrition policies and practices of Australian food manufacturers.

Key sector-level changes that have occurred since the initial assessment in 2018 include:

- A greater number of companies (from 11/19 in 2018, to 16/21 in 2024) engaged with the assessment process to verify the evidence collected, and provide additional information (including of policies and practices that were not publicly available)
- Stronger reporting of progress in healthier reformulation, including participation in the Healthy Food Partnership Reformulation Program and/or adoption of reformulation targets
- Updates to the industry's self-regulatory code on marketing to children, including that the code's classification of unhealthy products is now based on the Food Standards Australia New Zealand's Nutrient Profiling Score Criterion. The code now applies to all advertisers and companies.

Summary of recommended actions for the Australian packaged food manufacturing sector

Domain	Recommended actions
A Corporate strategy	<ul style="list-style-type: none"> • Identify population nutrition and health as a priority focus area for the company, in line with national and international government priorities, with relevant goals, objectives, reporting of performance and appropriate resourcing • Set a target to increase the proportion of sales from healthy products, and publicly report progress against this target each year • Adopt government-endorsed standards for defining healthy and unhealthy foods and brands (for example, the Health Star Rating or Australian Dietary Guidelines) • Report on governance arrangements that assign accountability for the company's nutrition-related commitments, policies and practices
B Product formulation	<ul style="list-style-type: none"> • Develop and publicise specific, time-bound targets for reducing nutrients of concern (sodium, sugar, saturated fat, and artificially produced trans fat) and energy/portion sizes of products • Reduce energy content per serving and/or provide smaller package sizes in relevant product categories (e.g., single-serve snacks) • Routinely report on progress towards commitments and targets. For example, report the nutritional content of products, by product category, including changes over time and with reference to government reformulation targets • Reduce the proportion of unhealthy ultra-processed products in the company's product portfolio, for example, by adding healthy, minimally processed products and removing unhealthy product lines
C Nutrition labelling & information	<ul style="list-style-type: none"> • Commit to full implementation of the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress • Provide comprehensive online nutrition information for all products • Commit to label artificially produced trans fat on all relevant products • Introduce a policy to only make nutrient content claims (e.g., "99% fat free") on products that are classified as 'healthy' (using government guidelines for classifying product healthiness)
D Promotion practices	<ul style="list-style-type: none"> • Implement policies to effectively reduce the exposure of children (up to age 18) to the marketing of the unhealthy foods and brands, across all marketing channels (including broadcast media, online, product packaging, and outdoor advertising) and settings (including in-store settings, sports and recreational venues, and in and near areas where children gather). In particular, extend the commitments of current voluntary industry self-regulatory codes to: <ul style="list-style-type: none"> – Increase the age of children to which commitments apply so that all children (up to 18 years of age) are protected – Apply to all digital and online marketing, including all paid advertising – Apply to the marketing of brands, beyond only the promotion of products – Focus on restricting children's exposure to marketing, regardless of whether the marketing specifically targets children – Eliminate use of promotion techniques (e.g., cartoon characters, premium offers, interactive games) with strong appeal to children, including on product packaging and at point-of-sale – Avoid use of unhealthy products and brands in sponsorship of sports and other events/activities popular with children and families – Include public transport infrastructure and extend restrictions of advertising to within 500m (rather than 150m) near schools, as part of outdoor advertising commitments • Routinely report on compliance with marketing policies, audited by an independent third party • Increase the proportion of marketing activity and expenditure that relates to healthier products and brands, as compared to unhealthy products and brands. Routinely report on the marketing activities (spend and channel) of the company, by product/brand healthiness and target audience (children or adults)

Summary of recommended actions for the Australian packaged food manufacturing sector (cont)

Domain	Recommended actions
E Product accessibility & affordability	<ul style="list-style-type: none"> ● Work with retailers to ensure that healthy and healthier products are widely available and equitably distributed by geographic area, including in key settings such as remote and rural communities, lower income areas and schools. For example: <ul style="list-style-type: none"> – Where less healthy products are sold (e.g., in vending machines), introduce policies to ensure healthier equivalent options are also available – Commit to not directly supply any primary or high schools in Australia with unhealthy products, such as full sugar carbonated beverages ● Work with supermarket retailers to incentivise consumer purchases of healthy/healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products ● Increase the relative affordability of healthy/healthier products, by ensuring that the recommended retail price of healthy/healthier products are not more expensive than 'standard' products or less healthy alternatives ● Support evidence-based, fiscal government policies (e.g., taxes on sugary drinks), in line with recommendations by the World Health Organization
F Disclosure of relationships with external groups	<ul style="list-style-type: none"> ● Publish all relationships (including funding and support) with external groups (e.g., professional organisations, research organisations, community and industry groups) related to health and nutrition ● Disclose all political donations in real time, or commit to not make political donations ● Disclose submissions made to public consultations regarding population nutrition policies (e.g., nutrition labelling proposals), including submissions made by industry association groups of which they are a member

Conclusions and implications

This study benchmarked the nutrition policies and practices of major food and beverage manufacturers in Australia, as a repeat of the 2018 evaluation. The results show that there continues to be large variation in the nutrition policies and practices across the sector, with company actions falling short of global best practice.

Implications for Australian food manufacturers

- There are increasing expectations for manufacturers of packaged foods and beverages to take stronger action on nutrition and health.
- While the packaged food sector acknowledges their role in efforts to improve population diets, there is considerable variation in policies and practices across the sector. More significant action is needed from all major packaged food and beverage manufacturers to improve the healthiness of Australia's packaged food supply and the extent to which Australian food environments promote health.
- It is recommended that all food and beverage manufacturing companies set company-wide targets to increase the proportion of overall sales from healthy products, and publicly report progress against this target each year.
- Stronger policies to reduce the exposure of children to the marketing of unhealthy products and brands are also urgently needed.
- Food manufacturers can play a key role in supporting government efforts to improve population health, such as by publicly supporting implementation of globally recommended public health recommendations, being early adopters of voluntary government-led schemes, and refraining from lobbying activities that oppose or delay evidence-based public health initiatives.

Implications for Australian governments (Federal, State/Territory and local)

- Australian governments are currently relying on voluntary industry action in key areas, such as marketing to children, nutrition labelling and product development. However, voluntary actions are not going nearly far enough, with insufficient improvements over time.

- In line with key priorities specified in the National Obesity Strategy (2022-2032) and the National Preventive Health Strategy (2021-2030), **stronger government action is needed**. Key areas for action include comprehensive and consistent national legislation to restrict the exposure of children to the marketing of unhealthy foods and brands, and mandatory implementation of the Health Star Rating labelling scheme.
- Ongoing monitoring of food company policies and practices is essential, including the extent to which company commitments are implemented in practice. Mandatory company reporting using evidence-based, nutrition-related metrics would facilitate improved monitoring and accountability.

Implications for the public health and research community

- Conduct repeat assessments of food industry policies and practices to monitor progress over time compared with global best practice benchmarks.
- Increase collaboration between public health, research and civil society groups (including those from the responsible investment community) to strengthen efforts to hold industry to account.

Implications for civil society and the broader community

- Use individual purchasing power to support companies that make it easier for Australians to access and choose healthy foods and beverages.
- Be vocal in encouraging food manufacturers to commit to healthy policies, and to make sure that they are implemented in practice.
- Contact local Senators and Members of Parliament to advocate for effective policy change to create food environments that support good health and nutrition.

Appendix: Company scorecards

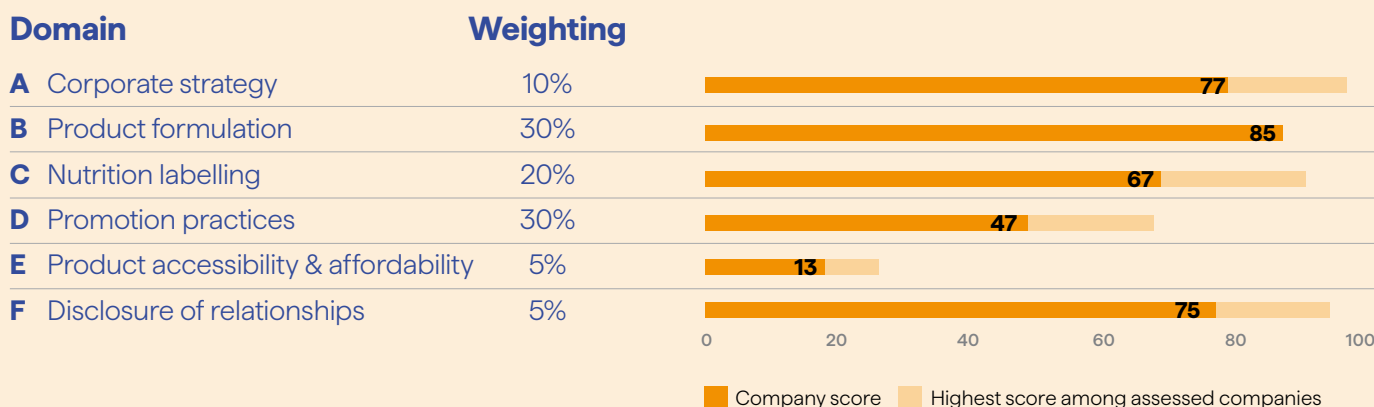
Fonterra

1st

OUT OF 21
MANUFACTURERS

65

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Fonterra’s commitment to improving population health is linked to priorities laid out in the UN Sustainable Development Goals and is disclosed in publicly in annual sustainability reports.
- Fonterra publishes specific, timebound targets for improving the healthiness of products and reducing sodium, saturated fat and energy levels in some products. In addition, Fonterra indicates that they have eliminated all sources of industrially produced trans fats in their products.
- Fonterra commits to not make nutrition content or health claims on discretionary products.
- Fonterra reports that they do not make political donations and publishes comprehensive details of the philanthropic groups it supports.

Recommended actions for Fonterra

- **Set and disclose** a clear and specific target to increase the proportion of sales from healthy products (as defined using government-endorsed definitions of healthiness), and publicly report progress against this target each year.
- **Apply** existing targets for sodium, saturated fat and energy level reduction to all products in the company’s portfolio. Routinely **report** on average levels of risk nutrients by category (on a per 100g/100ml basis), including changes over time and with reference to the government’s Healthy Food Partnership reformulation targets.
- **Commit** to fully implement the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- **Collaborate** with retailers to encourage consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.1	24%	48%	24%	0.0%

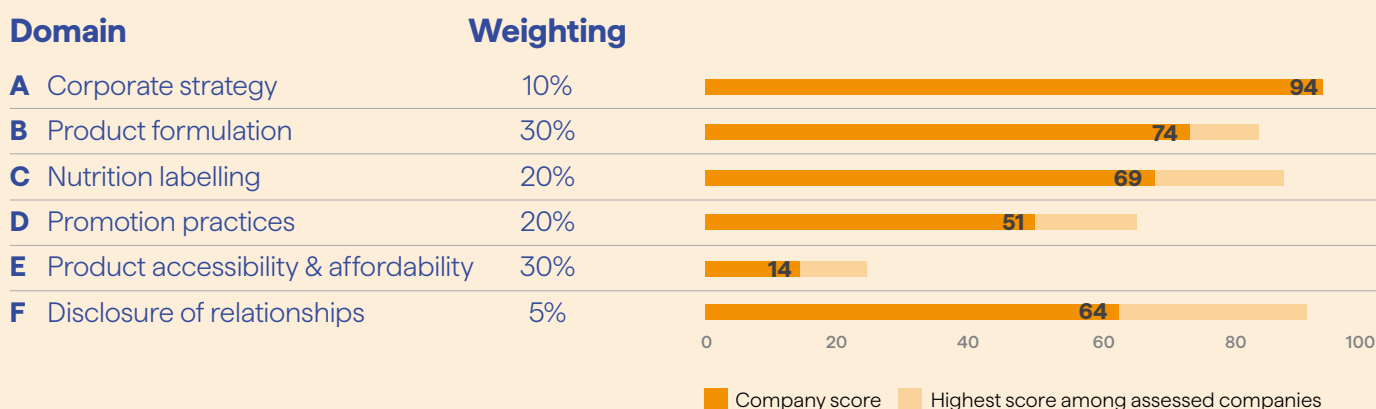
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Unilever

2nd OUT OF 21
MANUFACTURERS

64 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Unilever reports on the proportion of sales from healthy foods against several international government-led nutrient classification models, including the Health Star Rating (HSR) system. Their assessment reports on the global sales and is also segmented by the countries in which they operate, including Australia.
- Unilever publishes specific, timebound targets for improving the healthiness of products and reducing sodium, saturated fat and sugar levels in their products. For example, for 85% of their portfolio to meet their adopted nutrition criteria by 2028. Progress against these targets is publicly disclosed on an annual basis.
- Unilever notes that as of January 2024, 61% of eligible products displayed HSR labelling. This will increase to at least 69% by the end of 2024.
- Unilever commits to not make political donations and publishes comprehensive details of philanthropic groups it supports.

Recommended actions for Unilever

- Routinely **report** average levels of sodium, sugar, and saturated fat by category, including with changes over time and with reference to the Australian government's Healthy Food Partnership reformulation targets.
- Communicate** specific, time-bound targets to achieve full implementation of the HSR system across eligible products in all categories, with a specific roll-out plan and routine reporting of progress.
- Strengthen** current policies to effectively reduce the exposure of children (**up to 18 years**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **committing** to not promote unhealthy products/brands in schools (including fundraising activities and displays), and using techniques that appeal to children (e.g., animated characters) on product packaging and point-of-sale material. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- Engage** with retailers to reduce promotions (e.g. price discounts, promotional displays) for unhealthy products, whilst incentivising consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions).

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.4	34.1%	60.1%	90.6%	39.0%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

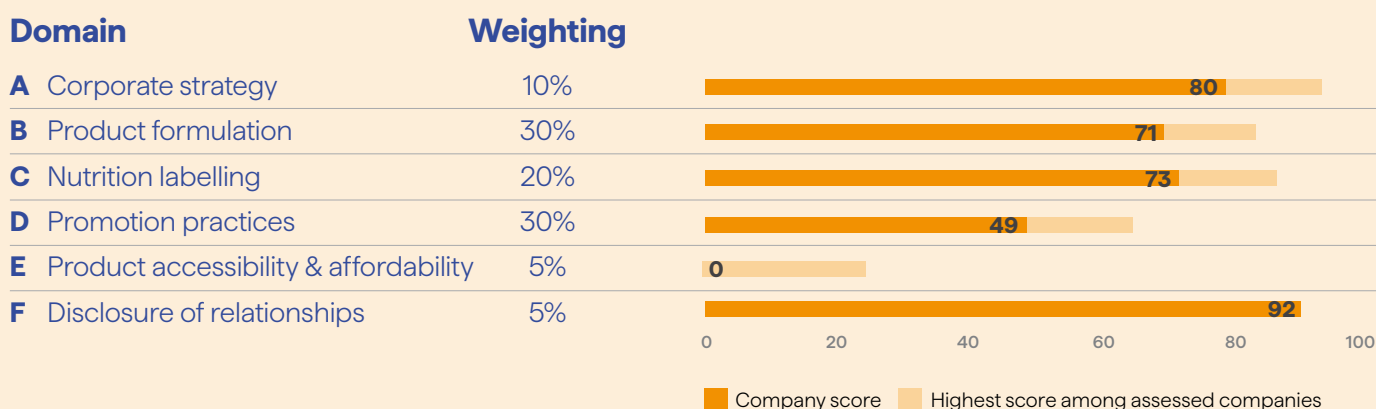
McCain Foods

3rd

OUT OF 21
MANUFACTURERS

63

OVERALL SCORE
(OUT OF 100)



Areas of strength

- McCain identifies health and nutrition as a key area of focus in their corporate strategy. They report on the average Health Star Rating (HSR) of their portfolio and proportion products with a HSR \geq 3.5 in annual global reports.
- McCain publishes specific, timebound targets to reduce sodium levels in their potato products. In support of World Health Organization recommendations, they report having eliminated the use of partially hydrogenated vegetable oils.
- McCain reports full adoption of the HSR labelling on all eligible products. Comprehensive nutrition information is provided online for all products.
- McCain Australia reports that they do not make political donations, and have no activity with external nutrition education and active lifestyle programs.

Recommended actions for McCain Foods

- **Set and disclose** a target to increase the proportion of sales from healthy products (as defined using government-endorsed definitions of healthiness), and publicly report progress at the national-level against this target each year.
- **Develop** specific, time-bound targets for saturated fat reduction across the company's product portfolio, in line with government reformulation targets. Routinely **report** average sodium and saturated fat levels of products in Australia by category, including with changes over time.
- **Strengthen** current policies to effectively reduce the exposure of children to the marketing of unhealthy products and brands, across all channels and settings. For example, by applying to children **up to 18 years**, and **committing** to not sponsor events popular with children and families (e.g., sporting events) using unhealthy foods/brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Engage** with retailers to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR \geq 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
3.6	75.6%	34.4%	87.8%	100%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

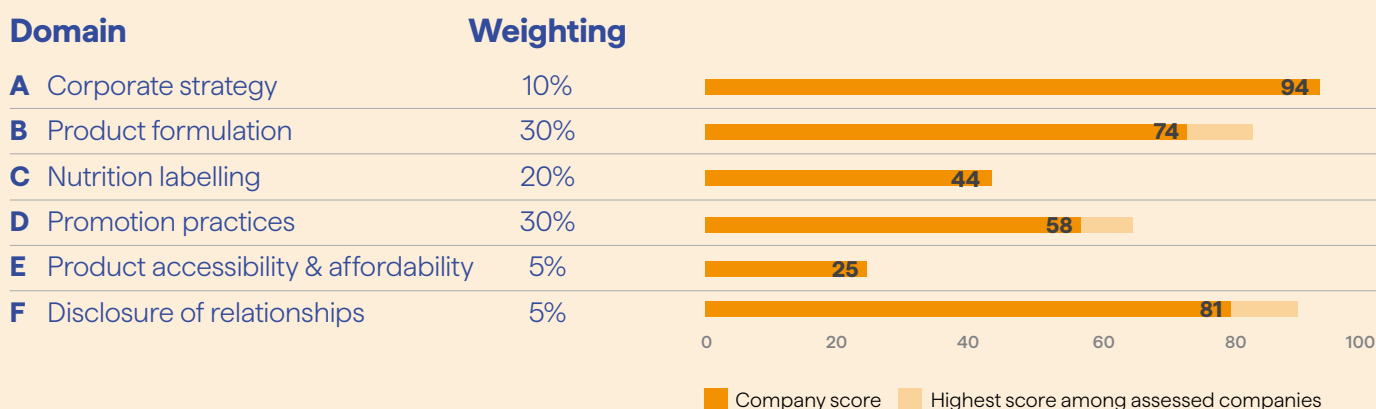
Nestlé

4th

OUT OF 21
MANUFACTURERS

63

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Nestlé has a comprehensive strategy in place around nutrition, including a commitment to increase sales from healthier products by 50% by 2030, and public reporting on the proportion of sales from products with a Health Star Rating (HSR) of at least 3.5.
- Nestlé commits to achieving the sugar and sodium reduction targets of the government's Healthy Food Partnership (HFP) reformulation program. In addition, they have pledged to meet industry-led maximum limits for sodium across several product categories, with targets to achieve by 2025 and 2030.
- Nestlé reports some efforts to increase the proportion of marketing spend to promoting healthier products.
- Nestlé have comprehensive reporting on their relationships with professional, philanthropic and industry organisations related to nutrition.

Recommended actions for Nestlé

- Routinely **report** on the sodium, sugar, saturated fat and energy content of the company's product portfolio (by category), including changes over time and with reference to government reformulation targets.
- Publicly **report** on the proportion of eligible products displaying HSR labelling.
- Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all marketing channels and settings. For example, by **eliminating** the use of marketing techniques that appeal to children, such as animated characters on product packaging, in relation to unhealthy products and brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.2	31.0%	68.7%	95.0%	55.0%

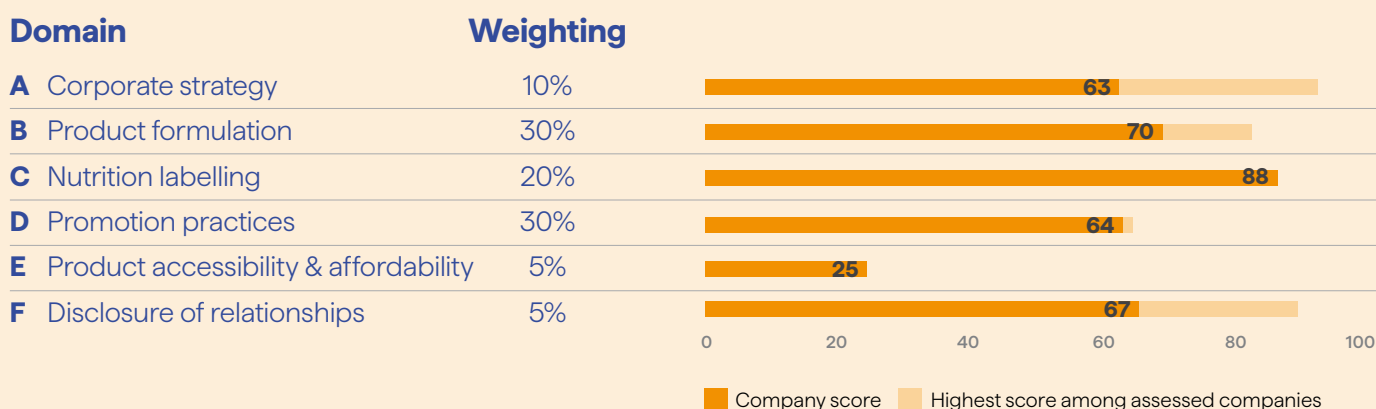
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Simplot

5th OUT OF 21
MANUFACTURERS

63 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Simplot identifies nutrition and health as a focus area for the company. Their commitment is publicly disclosed and refers to the Australian Dietary Guidelines.
- Simplot's nutrient criteria, used for reformulation and product development efforts, incorporate targets set by the government's Healthy Food Partnership (HFP) reformulation program. Simplot reports all products comply with the HFP portion size recommendations. In addition, they have taken steps to improve the overall healthiness of their product portfolio through brand acquisitions and divestments.
- In addition to displaying the Health Star Rating (HSR) on most products, Simplot has implemented a policy to ensure nutrition content claims are made only on products that are 'healthy', as defined by government guidelines.
- Simplot reports working with retail partners to promote healthier products (with HSR of at least 3.5).
- Simplot does make political donations in Australia.

Recommended actions for Simplot

- **Disclose** the company's progress towards nutrition-related commitments in regular and public reporting, including the governance arrangements that assign accountability for their nutrition commitments.
- **Set and disclose** a target to increase the proportion of sales from healthy products, and publicly report progress against this target each year.
- **Develop** specific, time-bound targets for sodium, saturated fat and sugar reduction across the company's product portfolio, in line with government reformulation targets. Routinely **report** average nutrient levels by category, including with changes over time.
- **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to reduce promotions (e.g. price discounts, promotional displays) for unhealthy products, whilst continuing to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions).

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
4.1	91.4%	24.5%	34.4%	93.0%

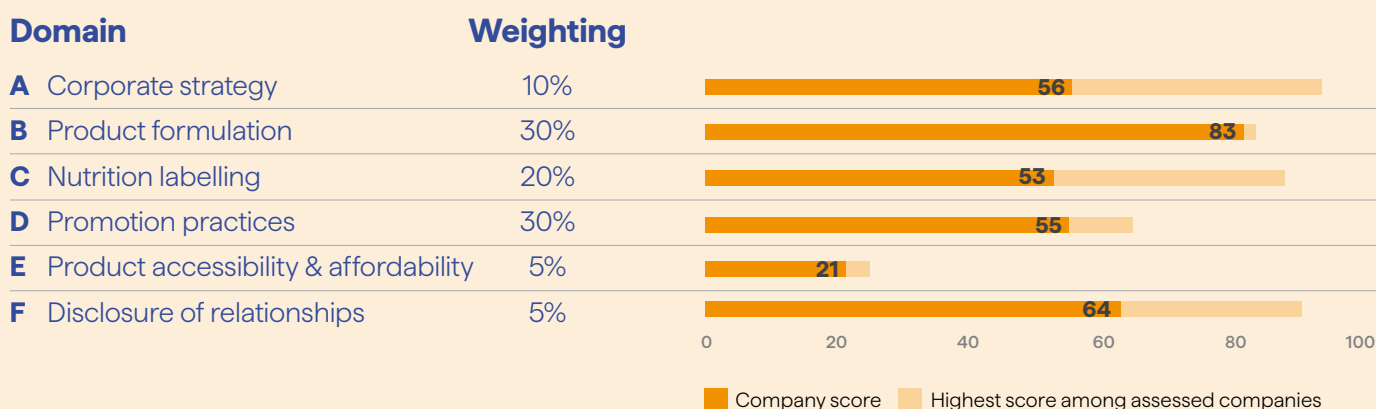
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

PepsiCo
Smiths Snackfoods

6th OUT OF 21
MANUFACTURERS

62 OVERALL SCORE
(OUT OF 100)



Areas of strength

- PepsiCo have a commitment to improve population nutrition, publicly available in strategic documents.
- PepsiCo makes several specific, time-bound targets to reduce sodium, saturated fat, added sugars and trans fats across their portfolio. In addition, they have an overall target to achieve 30% of their snacks range in Australia with a Health Star Rating (HSR) of 3.5 or above by 2030.
- PepsiCo have committed to display the HSR labelling on all snacks and beverage products.
- PepsiCo have a policy to not directly supply schools in Australia with full sugar carbonated beverages.
- PepsiCo reports not sponsoring health-related professional organisations, nutrition education and active lifestyle programs in Australia.

Recommended actions for PepsiCo

- **Set** a target to increase the proportion of **sales** from healthier products, and publicly report progress against this target each year.
- Routinely and publicly **report** on the sodium, saturated fat, sugar and energy content of the company's product portfolio (on a per 100g basis), including changes over time and with reference to government reformulation targets.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, **limiting** advertising of unhealthy products and brands in events and settings popular with children and families (e.g., sporting events and sponsorships, childcare settings). **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.6	27.3%	87.3%	92.7%	97.7%

[^]Assesses PepsiCo and Smiths Snack Foods. This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Data based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

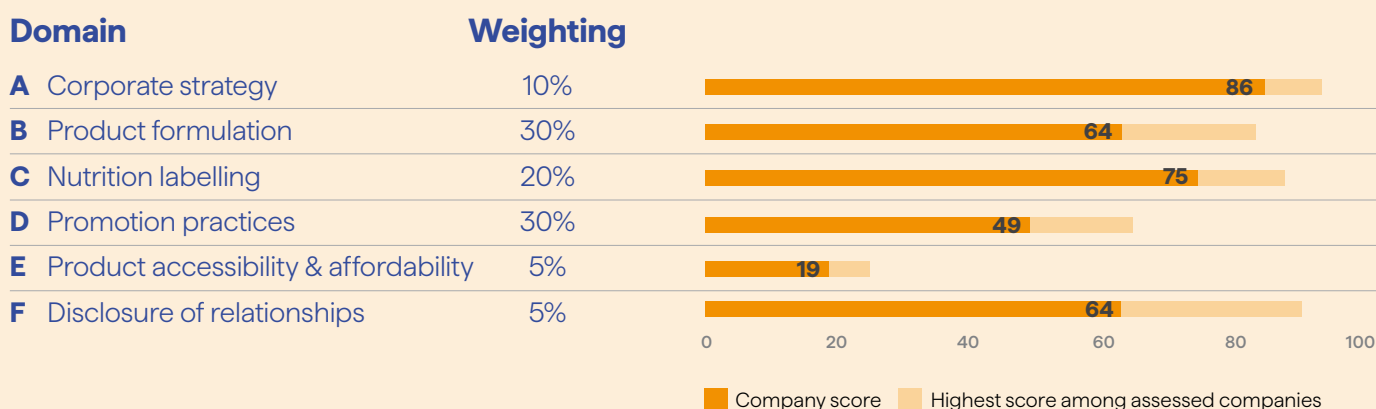
Kellanova Kellogg's

7th

OUT OF 21
MANUFACTURERS

62

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Kellanova makes national and global commitments to nutrition, with reference to priorities of the UN Sustainable Development Goals.
- Kellanova reports progress in reducing levels of sugar, saturated fat and sodium in their breakfast cereals. The company limit trans-fats in products to limits in line with World Health Organization recommendations.
- Kellanova reports using nutrition content claims only on healthy breakfast cereals, as defined by those meeting the government's Nutrition Profiling Scoring Criteria (NPSC).
- Kellanova pledges to not advertise unhealthy products (those not meeting the NPSC) in environments where children gather, including schools, family clinic and health facilities.

Recommended actions for Kellanova

- **Set and disclose** a clear and specific target to increase the proportion of sales from healthy products (as defined using government-endorsed definitions of healthiness), and publicly report progress against this target each year.
- **Develop** specific, time-bound targets for sodium, saturated fat and sugar reduction across the company's product portfolio, in line with government reformulation targets. Routinely **report** average nutrient levels of products in Australia by category, including with changes over time.
- **Publish** a commitment to fully implement HSR labelling across eligible products in all categories, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **eliminating** the use of marketing techniques that appeal to children, such as animated characters on product packaging, in relation to unhealthy products and brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to reduce promotions (e.g. price discounts, promotional displays) for unhealthy products, whilst continuing to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions).

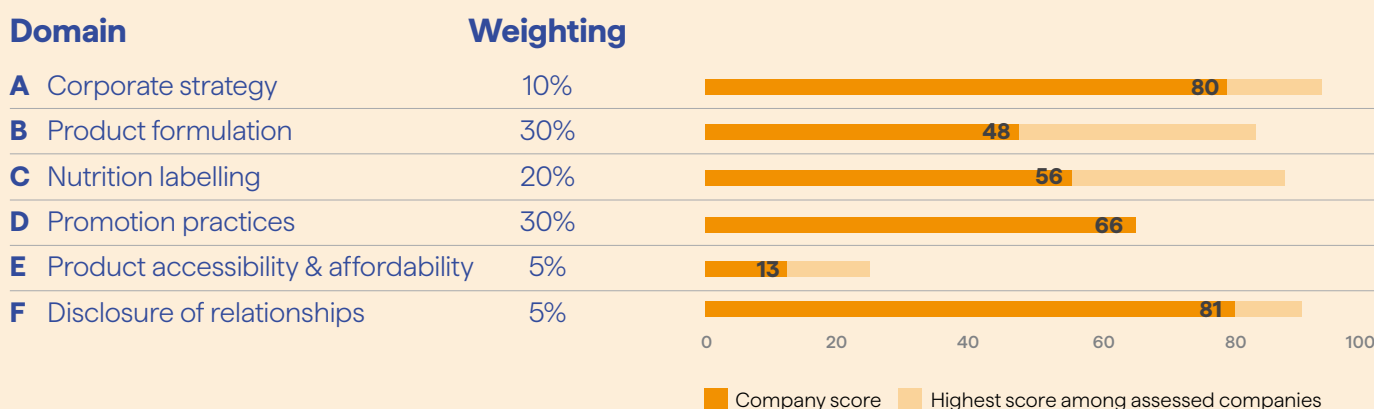
HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.9	45.6%	49.4%	98.7%	61.5%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

The Coca Cola Company **8th** OUT OF 21 MANUFACTURERS **58** OVERALL SCORE (OUT OF 100)



Areas of strength

- Coca Cola publishes a commitment to improving population nutrition and health. In addition, they publicly report on the overall proportion of global sales volumes from low and no sugar products.
- Coca Cola publicly discloses specific, time-bound targets to reduce added sugars and kilojoule content across their portfolio, including to offer smaller package sizes. Coca Cola has also set a commitment for all new products released to be low or no sugar options.
- Coca Cola have committed to display the Health Star Rating labelling on all non-alcoholic drinks in Australia.
- Coca Cola pledges that 90% of their marketing spend for the Coca Cola brand will feature low and no sugar products. They also commit to not directly target children under 15 years of age with product and brand advertising in all media channels, including on product packaging, and prohibit advertising within 300 metres of schools.

Recommended actions for The Coca Cola Company

- **Set** a target to increase the proportion of sales from healthier products (such as low or no sugar products), and publicly report progress against this target each year.
- Routinely **report** on the sugar content of the company's product portfolio, including changes over time and with reference to government reformulation targets
- **Participate** in the government's Healthy Food Partnership reformulation program and pledge to comply with their targets on sugar reduction.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to 18 years**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **committing** to not sponsor events popular with children and families (e.g., sporting events) using unhealthy foods/brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Commit** to not directly supply any primary or high schools in Australia with full sugar carbonated beverages.
- **Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.7	54.3%	92.8%	94.2%	69.0%

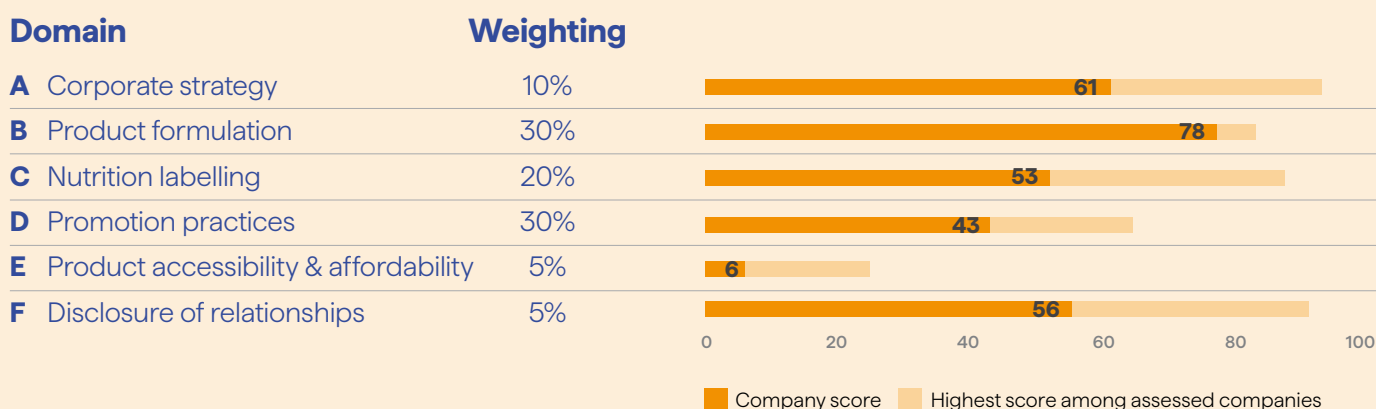
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Kraft Heinz

9th OUT OF 21
MANUFACTURERS

56 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Kraft Heinz's commitment to improving population health and nutrition refers to key priorities set out in UN Sustainable Development Goals and World Health Organization action plans.
- Kraft Heinz has specific, timebound targets for improving the healthiness of their portfolio, including for 85% of their portfolio to meet their nutrition criteria by 2025. The company is participating in the government's Healthy Food Partnership (HFP) reformulation program, and pledges to meet HFP targets on sodium, saturated fat and sugar reduction.
- Kraft Heinz Australia does not make political donations, and reports on their relationships with industry associations, public-private partnerships and philanthropic funding in a detailed and consolidated manner.

Recommended actions for Kraft Heinz

- **Set and disclose** a target to increase the proportion of sales from healthy products (defined using government-endorsed classification systems). Publicly **report** progress in Australia against this target each year.
- Routinely **report** average levels of sodium, sugar and saturated fat by category, including with changes over time and with reference to HFP targets.
- **Publish** a commitment to full implementation of the Health Star Rating system across eligible products in all categories, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **eliminating** the use of marketing techniques that appeal to children, such as animated characters on product packaging, in relation to unhealthy products and brands. Disclose detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
3.1	62.4%	36.6%	88.1%	37.0%

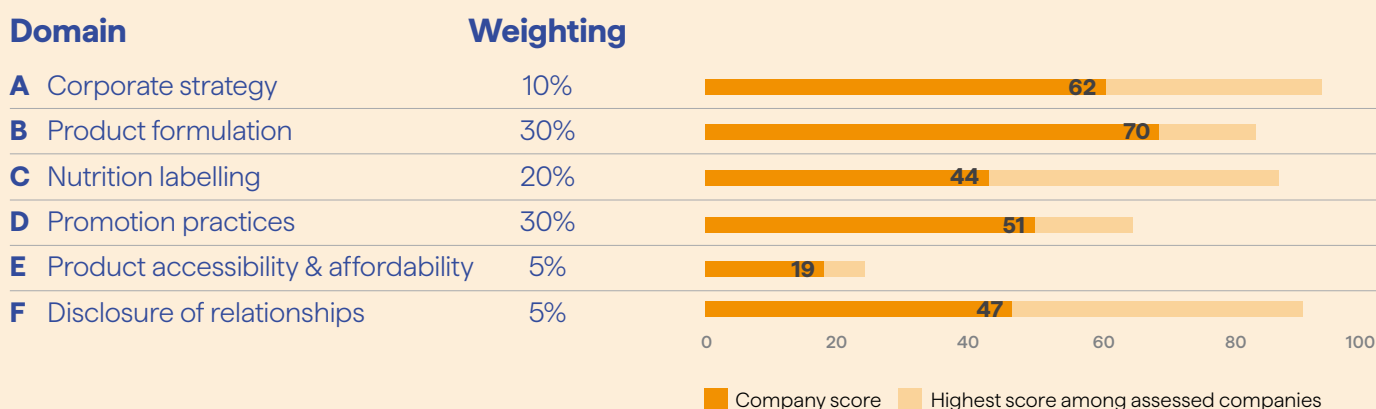
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Mars, Inc Mars Wrigley and Mars Food

10th OUT OF 21
MANUFACTURERS

54 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Mars identifies nutrition and health as a priority focus area for the company, communicated through national and global company reporting.
- Mars publishes specific, timebound targets for improving product healthiness in some areas of its portfolio. For example, for 95% of Mars Food products to meet its adopted nutrient criteria by 2025, and to achieve a 5% reduction in sodium across the Mars Food portfolio by 2025.
- Mars' compliance to its global responsible marketing code is conducted by third-party auditors, with performance reported on an annual basis.

Recommended actions for Mars, Inc

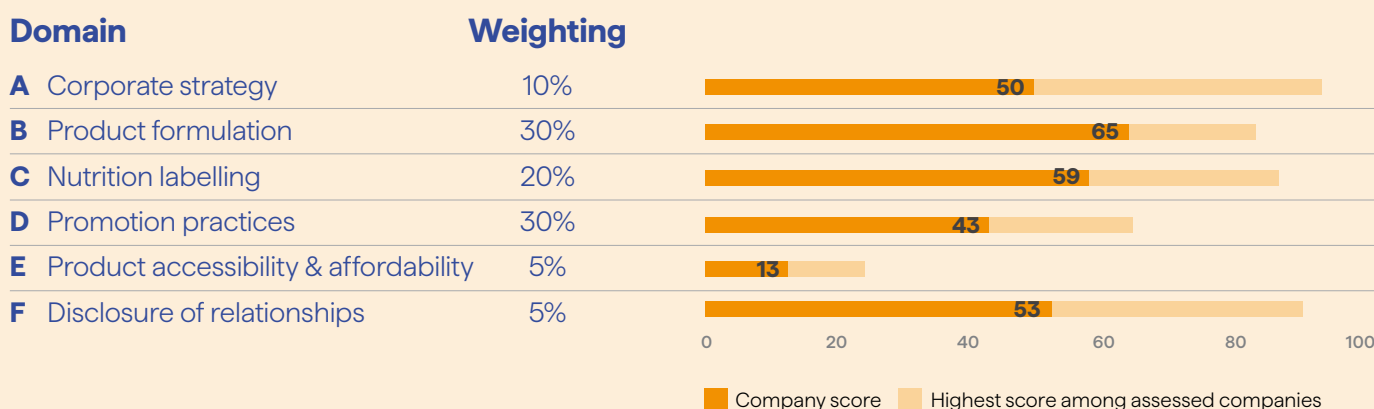
- **Set and disclose** a clear and specific target to increase the overall proportion of sales from healthy products (as defined using government-endorsed definitions of healthiness), and publicly report progress against this target each year.
- **Develop** specific, timebound targets to reduce saturated fat and sugar levels across the company's chocolate and confectionery portfolio. Routinely **report** average nutrient levels of products by category across the entire portfolio, including with changes over time.
- **Publish** a commitment to fully implement the Health Star Rating labelling system across all eligible products in its portfolio, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **eliminating** the use of marketing techniques that appeal to children, such as animated characters on product packaging, in relation to unhealthy products and brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Engage** with retailers to incentivise consumer purchases of healthier products (e.g., strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, displaying in high-traffic areas such as checkouts) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.3	34.8%	85.7%	97.1%	57.0%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

The Arnott's Group **11th** OUT OF 21 MANUFACTURERS **53** OVERALL SCORE (OUT OF 100)



Areas of strength

- Arnott's highlights nutrition as an area of focus for the company and reports on progress towards nutrition-related commitments in annual, publicly available sustainability reports.
- Arnott's publicly states a target for one third of products in their portfolio to have a Health Star Rating (HSR) of at least 3.5. Arnott's report that 80% of savoury snack and breakfast products in Australia meet the government's Healthy Food Partnership (HFP) reformulation targets for sugar and sodium. They also have a target to increase the proportion of snacks available in portion-controlled packs by 20% by 2025.
- Arnott's commits to full implementation of HSR labelling across products by the end of 2024, and report annually on progress.
- Arnott's publishes a consolidated list of philanthropic originations it supports, and does not make political donations.

Recommended actions for The Arnott's Group

- **Set** and **disclose** a target to increase the proportion of sales from healthier products, and publicly report progress against this target each year.
- **Develop** specific, time-bound targets for sodium, sugar, saturated fat and trans fat reduction across the company's product portfolio, in line with government reformulation targets. Routinely **report** average levels of risk nutrients by category, including with changes over time.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **eliminating** the use of marketing techniques that appeal to children, such as animated characters on product packaging, in relation to unhealthy products and brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to reduce promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.6	41.7%	66.1%	99.6%	79.0%

[^]Analysis includes the following brands: Arnott's, Campbell's, V8, Good Food Partners (Freedom, Messy Monkeys, Sam's Pantry)
 This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Data based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

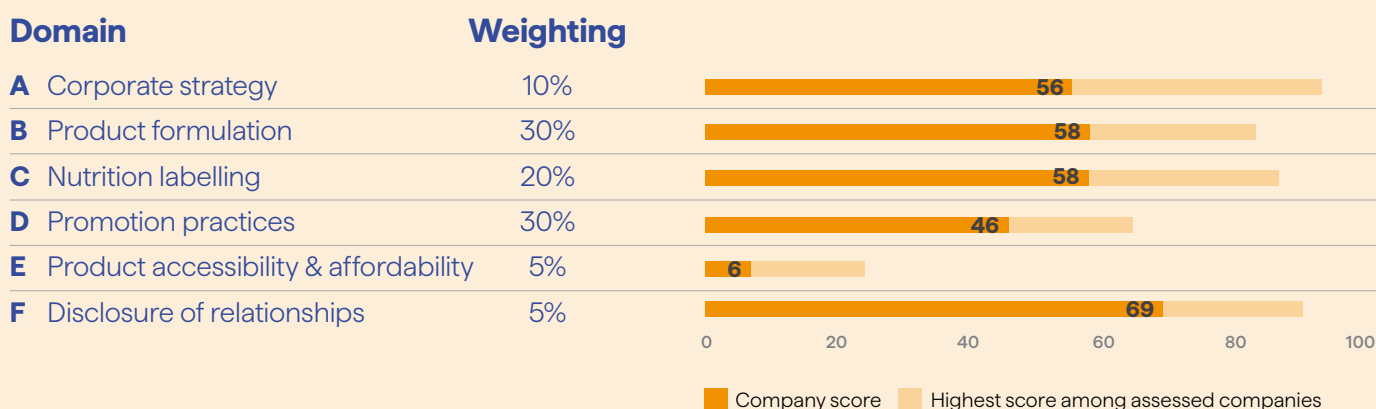
The Bega Group

12th

OUT OF 21
MANUFACTURERS

52

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Bega identifies population health and nutrition as a key focus area. Bega's progress towards their nutrition commitments is published in annual, publicly released sustainability reports and is independently audited.
- Bega publishes specific, timebound goals to improve the healthiness of their portfolio, and to reduce sugar and sodium in some products.
- Bega provides on-pack information on trans fat content on all relevant products.
- Bega has targets to increase marketing spend on healthier products.
- Bega commits to not make political donations and publishes comprehensive details of philanthropic groups it supports.

Recommended actions for The Bega Group

- **Set** a target to increase the proportion of **sales** from healthier products (as defined using government-endorsed classifications), and publicly report progress against this target each year.
- **Develop** specific, time-bound targets for sodium and added sugar reduction across the company's product portfolio, in line with government reformulation targets. Routinely **report** average nutrient levels by category, including with changes over time.
- **Publish** a commitment to fully implement the Health Star Rating labelling system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., reduced fat and sugar options) with strategic placement and price promotions, whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
3.1	50.2%	23.8%	65.7%	53.0%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

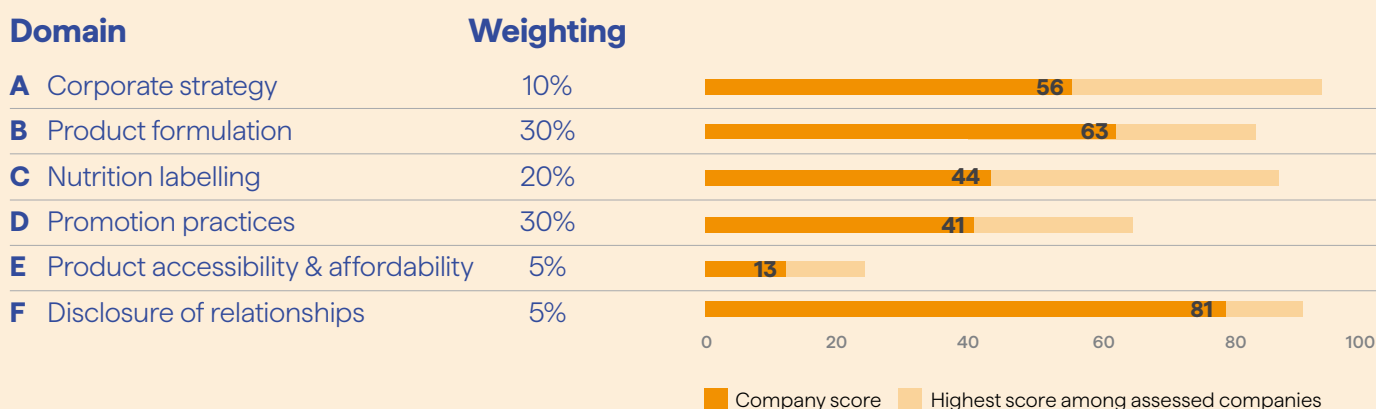
Goodman Fielder

13th

OUT OF 21
MANUFACTURERS

50

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Goodman Fielder publicly states a commitment to improving nutrition and health in their corporate reporting.
- Goodman Fielder publishes general commitments around saturated fat, sodium and sugar reduction in their products, with a target for 70% of their 'everyday' product portfolio to have a Health Star Rating (HSR) of at least 3.5 by the end of 2025. The company states that at the end of 2023, the average HSR of their portfolio was 2.7, with 43% of products having a HSR of at least 3.5.
- Goodman Fielder states 50% of eligible products displayed a HSR at the end of 2023. The company aims to increase this to 70% of products by 2025.
- Goodman Fielder reports that they do not make political donations, and have no activity with external nutrition education and active lifestyle programs.

Recommended actions for Goodman Fielder

- **Publish** a target to increase the proportion of overall sales from healthy products (product healthiness defined with government-endorsed classification systems), and publicly report progress against this target each year.
- **Disclose** specific, time-bound targets for sodium, saturated fat and sugar reduction across the company's product portfolio, in line with government reformulation targets. Routinely **report** average nutrient levels by category, including with changes over time.
- **Commit** to full implementation of the Health Star Rating (HSR) system across eligible products in all categories, with routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Engage** with retailers to incentivise consumer purchases of healthier products (e.g., reduced sugar or fat options), such as through strategic placement and product discounts.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.7	38.5%	51.4%	83.2%	28.5%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Data based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). Analysis excludes sugar products, which are not intended to carry a HSR. HSR = Health Star Rating

Appendix: Company scorecards

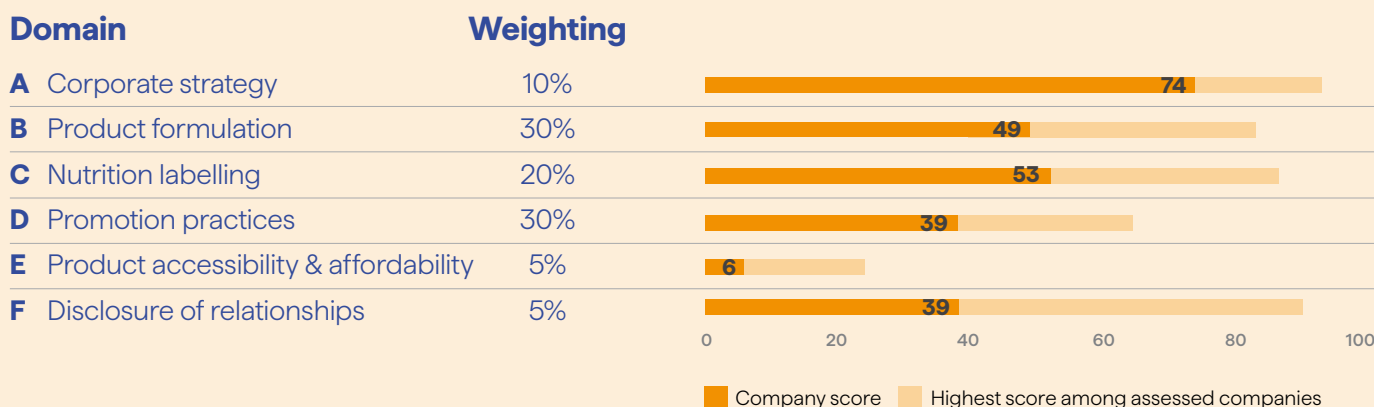
George Weston Foods

14th

OUT OF 21
MANUFACTURERS

47

OVERALL SCORE
(OUT OF 100)



Areas of strength

- George Weston Foods makes a commitment to improving population nutrition in their corporate reporting.
- The Tip Top brand of George Weston Foods commits to meet sodium reduction targets set by the government's Healthy Food Partnership reformulation program. They publicly report that 50% of Tip Top sales volume currently meet the targets, with a goal of 80% by June 2024.
- George Weston Foods publishes detailed information of support provided to philanthropic organisations, industry groups and public-private partnerships related to health and nutrition.

Recommended actions for George Weston Foods

- **Set** a target to increase the proportion of overall sales across all brands from healthy products (as based on government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- **Develop** specific, time-bound targets for sodium, saturated fat and sugar reduction for all brands in the company's product portfolio, in line with government reformulation targets. Routinely **report** average nutrient levels by category, including with changes over time.
- **Commit** to full implementation of the Health Star Rating (HSR) system across eligible products in all brands, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Engage** with retailers to incentivise consumer purchases of healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.8	48.7%	60.1%	75.3%	37.0%

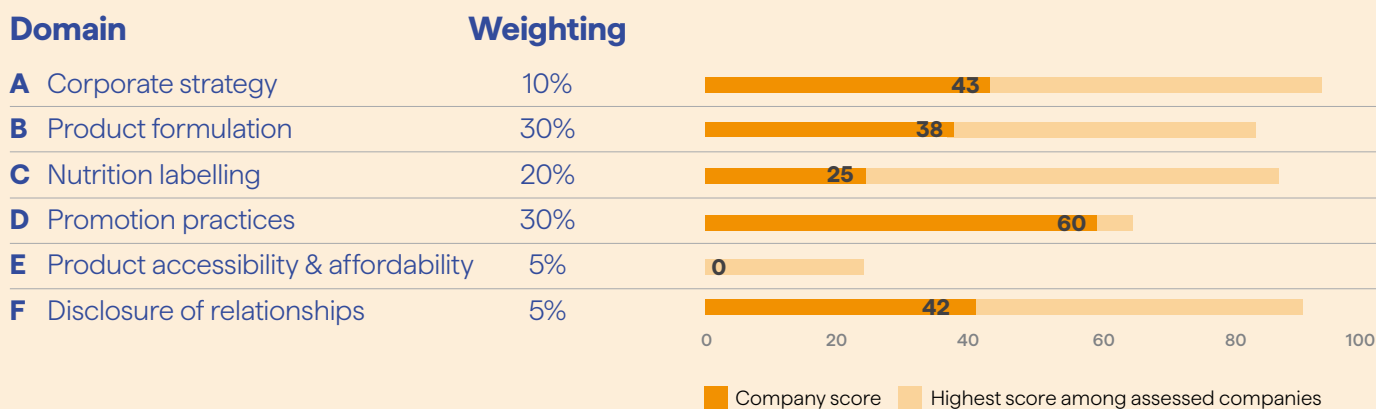
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Mondelēz*

15th OUT OF 21
MANUFACTURERS

41 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Mondelēz identifies nutrition as a focus in their global corporate strategy.
- Mondelēz has a target for 100% of net revenue by 2025 to come from 'Mindful Portion Snacks', although this includes products with either portion controlled serving sizes or with 'mindful portion' on-pack labelling.
- Mondelēz's global policies around limiting unhealthy food marketing directed to children includes unhealthy brands, defined as those with less than 80% of products (or 100% of a clearly differentiated sub-brand), by revenue, that do not meet the company's adopted nutrient criteria. However, the global policies apply to children up to 13 years old only.

Recommended actions for Mondelēz

- **Set** a target to increase the proportion of overall sales across all brands from healthy products (as based on government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- **Develop** specific, time-bound targets for sugar, saturated fat and sugar reduction for all brands in the company's product portfolio, in line with Australian government reformulation targets. Routinely **report** average nutrient levels by category, including with changes over time.
- **Commit** to full implementation of the Health Star Rating (HSR) system across eligible products in all brands, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **eliminating** the use of marketing techniques that appeal to children, such as animated characters on product packaging, in relation to unhealthy products and brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to reduce promotions (e.g. price discounts, promotional displays) for unhealthy products.

*Based on publicly available information only

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
1.0	1.3%	93.9%	95.3%	0.0%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

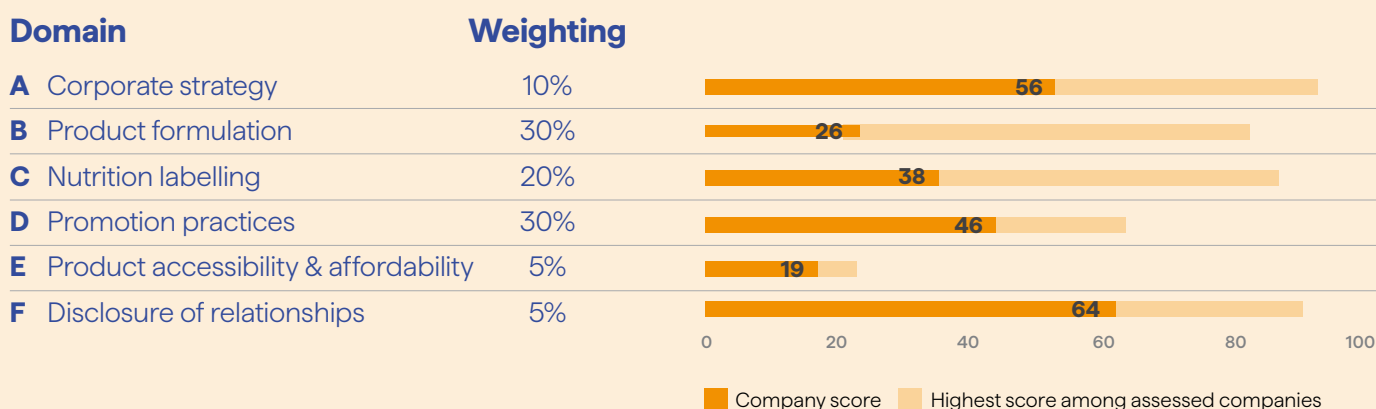
Asahi Beverages

16th

OUT OF 21
MANUFACTURERS

39

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Asahi's commitment to improving health is disclosed publicly in annual Sustainability reports.
- Asahi has pledged to reduce sugar content in their non-alcoholic beverage portfolio by 25% by 2025, as part of industry-led targets.
- Asahi publishes comprehensive information of support provided to philanthropic organisations, industry groups and public-private partnerships.

Recommended actions for Asahi Beverages

- Set** a target to increase the proportion of sales from healthier products, and publicly report progress against this target each year.
- Routinely **report** on the sugar and energy content of the company's product portfolio (on a per 100g/100ml basis), including changes over time and with reference to government reformulation targets.
- Publish** a commitment to fully implement the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- Commit** to not directly supply any school in Australia with full sugar carbonated beverages.
- Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.6	50.4%	92.0%	94.2%	22.0%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

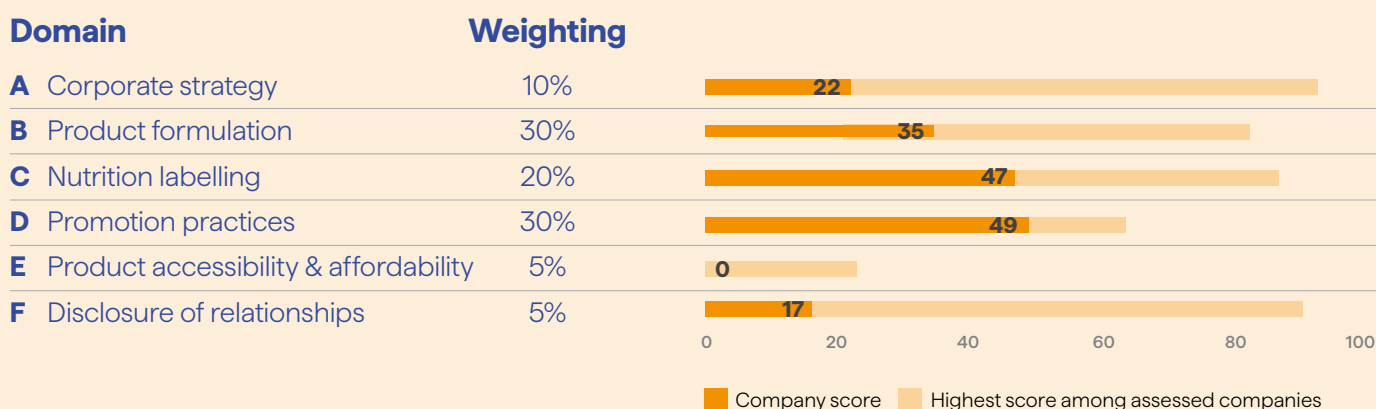
Patties Foods & Vesco Foods

17th

OUT OF 21
MANUFACTURERS

38

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Patties makes some commitments to reduce levels of sodium, sugar and saturated fat in some products within their portfolio.
- Comprehensive nutrition information is provided online for all products.

Recommended actions for Patties Foods

- **Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing.
- **Set** a target to increase the proportion of sales from healthy products (as defined with government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- **Participate** in the government's HFP reformulation program. **Develop** specific, timebound targets to reduce sodium, saturated fat, sugar and energy levels across the portfolio, and report average nutrient levels by category.
- **Publish** a commitment to fully implement Health Star Rating labelling across eligible products in all categories, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **committing** to not sponsor events popular with children and families (e.g., sporting events) using unhealthy foods/brands. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
3.1	60.3%	40.4%	100.0%	55.4%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

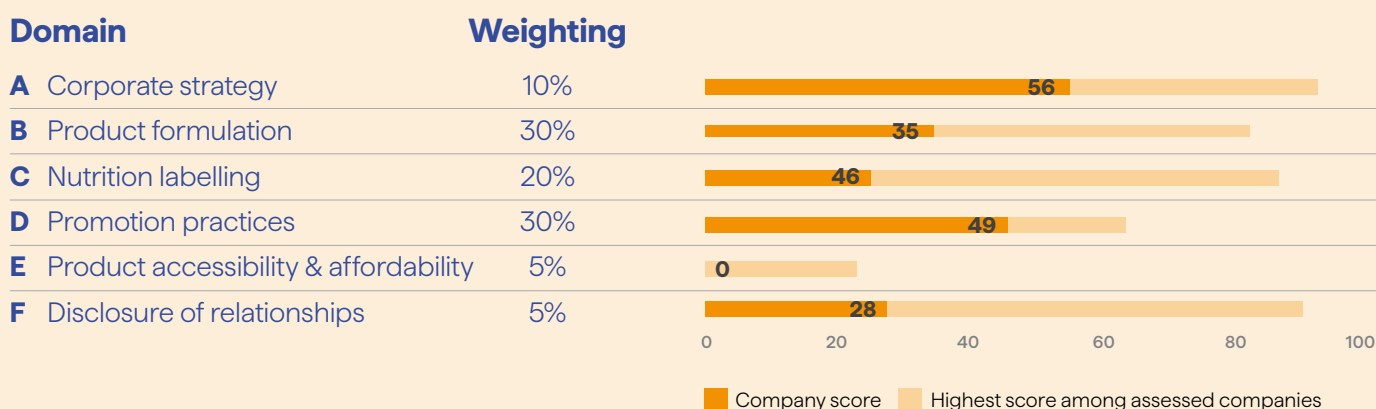
Saputo Dairy*

18th

OUT OF 21
MANUFACTURERS

36

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Saputo publishes a commitment to improving population nutrition and health, outlined in publicly accessible company sustainability reports.
- Saputo has commitments around improving the healthiness of their products, including a global target for 84% of products to meet their adopted nutrient criteria by 2024, and annual reports their performance.
- Beyond the industry's self-regulatory commitments around marketing of unhealthy foods to children, Saputo does not advertise butter, cream and ice cream products to children (aged under 15 years), regardless of the product's nutritional content.

Recommended actions for Saputo

- **Set** a target to increase the proportion of sales from healthy products (as defined with government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- **Develop** specific, timebound targets to reduce sodium, saturated fat, sugar and energy levels across the portfolio, in line with government reformulation targets. **Report** average nutrient levels by category.
- **Publish** a commitment to fully implement Health Star Rating labelling across eligible products in all categories, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. For example, by **auditing** compliance to marketing policies and routinely **disclosing** their performance in the Australian context.
- **Develop** a policy to ensure product distribution into schools allows only healthy products (e.g., milk beverages with no added sugar, in appropriate portion sizes).
- **Work** with supermarket retailers to incentivise consumer purchases of healthy/healthier products (e.g., through shelf space, strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products

*Based on publicly available information only

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
2.7	40.2%	7.1%	7.1%	0.0%

[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

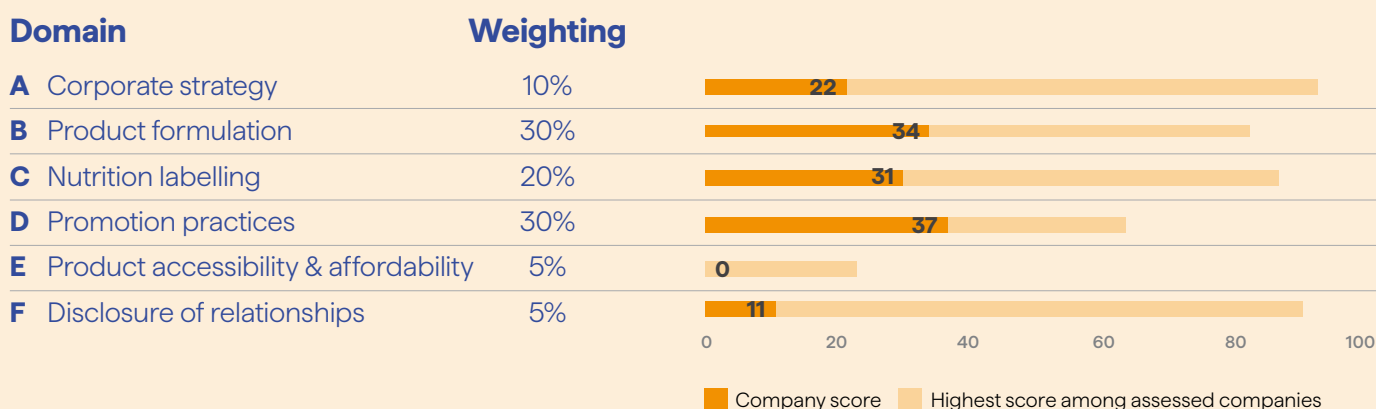
Australasian Food Group* Peters Ice Cream

19th

OUT OF 21
MANUFACTURERS

30

OVERALL SCORE
(OUT OF 100)



Areas of strength

- Peters report that at the end of 2022, all products in their children's food portfolio met their adopted nutrient criteria, which outlines maximum limits on sugar, saturated fat and energy per serving.
- Comprehensive nutrition information is provided online for all products.

The Australasian Food Group had little disclosure of its approach to nutrition and health. As such, no further areas of strength were identified.

Recommended actions for Australasian Food Group

- **Identify** nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing.
- **Set** a target to increase the proportion of sales from healthy products (as defined with government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- **Develop** specific, timebound targets to reduce saturated fat, sugar and energy levels, and portion sizes, across the overall portfolio. Routinely **report** on progress towards these targets, including changes over time and with reference to government reformulation targets.
- **Publish** a commitment to fully implement the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Collaborate** with retailers to incentivise consumer purchases of healthier products (e.g., strategic placement and product promotions), whilst reducing promotions (e.g. price discounts, promotional displays) for unhealthy products.

*Based on publicly available information only

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
1.4	0.0%	100%	100%	0.0%

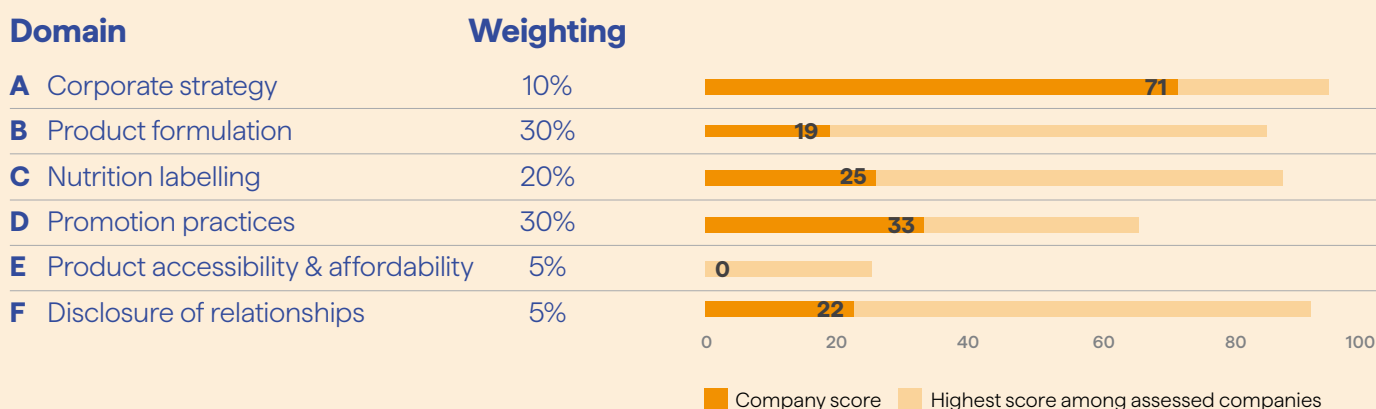
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Lactalis*

20th OUT OF 21
MANUFACTURERS

29 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Lactalis publish a company commitment to improve population nutrition and makes references to UN Sustainable Development Goals related to nutrition.
- Lactalis report on the global proportion (by volume sold) of milk and chilled dairy products that meet their adopted sugar limits, and of products in their processed cheese categories that meet internal sodium guidelines.
- Lactalis provides examples of reformulation efforts to lower added sugar and saturated fat in some products.

Lactalis had little disclosure of its approach to nutrition and health. As such, no further areas of strength were identified.

Recommended actions for Lactalis

- Set** a national-level target to increase the proportion of sales from healthy products (as defined with government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- Develop** specific, timebound targets to reduce added sugar and energy levels/portion sizes of products across the overall portfolio. Routinely **report** on progress towards these targets, including changes over time and with reference to Healthy Food Partnership reformulation targets.
- Publish** a commitment to fully implement the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- Develop** a policy to ensure product distribution into schools allows only healthy products (e.g., milk beverages with no added sugar, in appropriate portion sizes).

*Based on publicly available information only

HEALTHINESS OF PRODUCT PORTFOLIO[^]

Nutrient profiling summary score		Australian Dietary Guidelines	Extent of processing	Nutrition labelling
Average HSR (out of 5 stars)	Proportion HSR ≥ 3.5 (%)	Proportion discretionary (%)	Proportion ultra-processed (%)	HSR uptake for intended products (%)
3.4	67.9%	19.7%	53.3%	0.0%

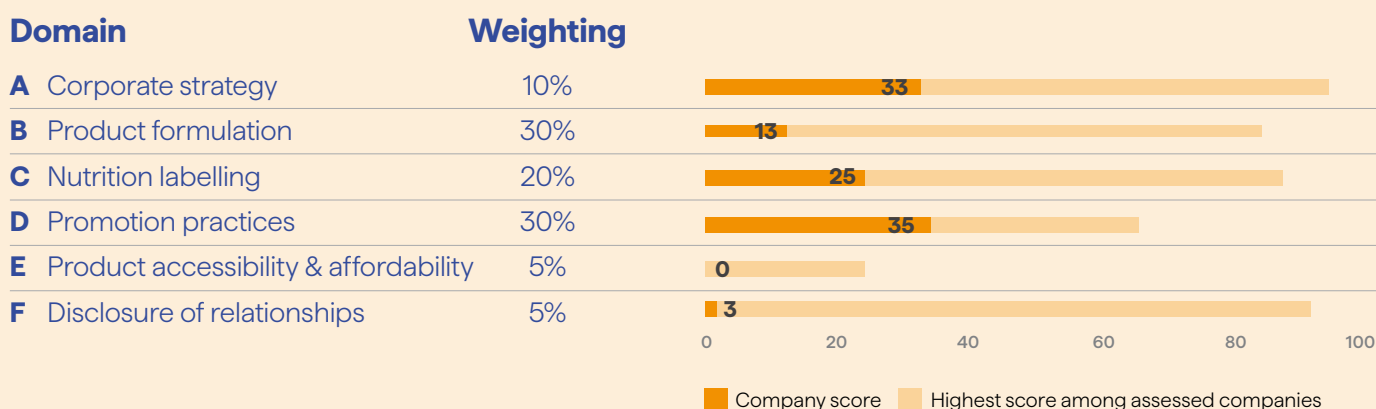
[^]This information is provided to add context around the assessed company; this analysis was not included in the assessment of nutrition policies. Results based on data collected by The George Institute for Global Health in March-June 2023 and published in [The State of the Food Supply Report 2023](#). HSR = Health Star Rating

Appendix: Company scorecards

Refresco*
Tru Blu Beverages

21st OUT OF 21
MANUFACTURERS

23 OVERALL SCORE
(OUT OF 100)



Areas of strength

- Refresco's sustainability strategy refers to health and nutrition, with a focus on manufacturing some beverage choices with reduced energy and sugar.

Refresco had little disclosure of its approach to nutrition and health. As such, no further areas of strength were identified.

Recommended actions for Refresco

- **Develop** and **communicate** a robust nutrition strategy with relevant objectives, targets and appropriate resourcing.
- **Set** a target to increase the proportion of **sales** from healthy products (as defined with government-endorsed classifications of product healthiness), and publicly report progress against this target each year.
- **Develop** specific, timebound targets to reduce levels of added sugar and energy across the product portfolio. Routinely **report** on progress towards these targets, including changes over time and with reference to Healthy Food Partnership reformulation targets.
- **Publish** a commitment to fully implement the Health Star Rating system across all eligible products, with a specific roll-out plan and routine reporting of progress.
- **Strengthen** current policies to effectively reduce the exposure of children (**up to age 18**) to the marketing of unhealthy products and brands, across all channels and settings. **Disclose** detailed reporting of marketing spend by channel, audience and product healthiness.
- **Disclose** relationships with external organisations (including professional organisations, industry associations and research partnerships) and lobbying practices related to health and nutrition. Publicly **report** any political donations made in Australia.
- **Work** with retailers to incentivise consumer purchases of healthier products (e.g., strategic placement and product promotions of no or low sugar beverages), whilst reducing promotions (e.g. price discounts, promotional displays) for full sugar beverages.

*Based on publicly available information only

HEALTHINESS OF PRODUCT PORTFOLIO[^]

No data were available as part of The George Institute for Global Health's data collection to assess the healthiness of the company's product portfolio.

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The research was carried out as part of INFORMAS (International Network for Food and Obesity/NCDs Research, Monitoring and Action Support), a global network of public-interest organisations and researchers that seek to monitor and benchmark actions to create healthy food environments and reduce obesity and non-communicable diseases (NCDs) globally. Dr Lana Vanderlee and Alexa Gaucher-Holm provided expert guidance to the project as part of INFORMAS. The project team would like to thank the many representatives from food companies who participated in the research process.

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This report includes data on product composition that was provided by The George Institute for Global Health.

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