

## **NOMAD FOODS - WRITTEN EVIDENCE (FDO0112)**

### **Executive introduction and summary**

1. Nomad Foods is Europe's leading frozen foods company. We have a wide-ranging portfolio of brands including Birds Eye, Aunt Bessie's, Steamfresh and Goodfella's in the UK, with our products covering fish and seafood, vegetables, plant-based foods and chicken; including our iconic Birds Eye Peas and Fish Fingers.
2. We are headquartered in the UK, with our largest UK factory based in Lowestoft, employing approximately 800 colleagues. In Hull, we pack and freeze peas from 250 farmers in the Yorkshire, Humber and Lincolnshire region. We have 16 production sites spread across Europe, and our brands are sold across 22 European markets.
3. This year marks the 100-year anniversary since flash-freezing was first invented by Clarence Birdseye, in 1924. Since then, frozen food has played a critical role in bringing great tasting, nutritious, affordable food to consumers, being both convenient and helping to reduce food waste.
4. We are proud to provide healthy, affordable meals to our customers; over 93% of our portfolio (by sales and volume sold) are foods not high in fat, sugar or salt (non-HFSS), as defined by the Government's Nutrient Profile Model. We have a target to increase this year on year, and we publicly report on whether we have achieved this.
5. Nomad Foods is deeply concerned about the definition and usage of UPF as a health classification. The NOVA classification system was designed to measure the level of processing of a product, not to measure nutrition.
6. Processing can make food safer and more nutritious. Improving the nutritional profile of a product to make it better for you may make it more processed – for example using plant-based spreads as an alternative to butter or lard.
7. We are concerned that the UPF definition has the potential to threaten public health outcomes and effectively demonise key avenues of

healthy eating, particularly given that it positions all industry-processed food as unhealthy.

8. Nomad Foods follows the HFSS classification, based on nutrition science. By using this categorisation, food and drink manufacturers have a clear pathway to improve the nutritional value of their products, through developing the types and ratios of ingredients.

## **Our response to the Committee's key issues**

### **Key trends in food, diet and obesity, and the evidential base for identifying these trends.**

1. From our marketing insights, we know that consumers across the UK and continental Europe want healthier food options that are affordable and convenient. However, there are competing factors that shape consumer diets. These include affordability, taste, texture and the consumer's familiarity with a brand - all of which play an important role in influencing consumers' purchasing decisions.
2. We recognise that the UK is facing a serious obesity challenge. In England, the Government reports that 63% of adults are above a healthy weight, whilst in primary schools, 1 in 3 children leave school overweight<sup>1</sup>.
3. As the largest frozen food manufacturer in Europe, we have a responsibility to contribute to public health improvement, by enabling positive choices. For Nomad Foods, we are proud that over 93% of our portfolio sold are considered foods not high in fat, sugar and salt (i.e., non-HFSS).

### **The definition of a) ultra-processed food (UPF) and b) foods high in fat, sugar and salt (HFSS) and their usefulness as terminologies for describing and assessing such products.**

4. As a leader in nutrition, we have a clear strategy to reformulate our existing products to improve their nutritional profile, whilst simultaneously bringing new healthy products to market. Our work is highlighted by our achievement of a 100% Health and Nutrition score on the Dow Jones Sustainability Index for five consecutive years,

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<sup>1</sup> <https://fingertips.phe.org.uk/profile/national-child-measurement-programme>

measuring our nutrition credentials across our strategy, governance, healthy portfolio, and responsible marketing approach.

### Nomad Foods' perspective of the UPF definition

5. Our strategy is rooted in robust nutrition science. The NOVA classification of ultra-processed foods is not.
6. The NOVA classification focuses solely on the nature and amount of processing a food or drink has undergone, with varying definitions of what constitutes a UPF. A food could be classified as UPF if it contains four or more ingredients, if it contains certain ingredients which have been determined safe for food use by EFSA, and even if it is simply wrapped in plastic for sale.
7. Most worrying of all, it does not factor in nutritional profiling. Yet, nutritional profiling and nutritional density are the leading recognised indicators of quality controls for diets globally, utilised by the World Health Organisation, the Food and Agriculture Organisation of the United Nations (FAO) and the UK Scientific Advisory Committee on Nutrition.
8. The NOVA classification splits food and drink into four simple categories. These were intended to group products with similar levels of processing not similar levels of nutrition.

### *NOVA System:*

- Group 1: Unprocessed/minimally processed foods (i.e., plain vegetables, meat and fish).
  - Group 2: Processed culinary ingredients (i.e., sugar, butter, oil, lard, salt etc).
  - Group 3: Processed foods, manufactured by combining Group 2 foods to Group 1 foods, with maximum 2-3 ingredients in total (i.e., ham, cheese, canned fish, fresh bread).
  - Group 4: Ultra-processed foods, involving 'industrial formulations' created through various processing steps, usually with 4+ ingredients (i.e., all other foods and drinks).
9. Moreover, there is not one single aligned definition of UPF. It instead appears 'open to interpretation', varying from products manufactured at an industrial scale, to products with 4+ ingredients, to products containing any non-store cupboard ingredients for example.
  10. These wide-ranging classifications assume that processing is detrimental, when processing can in fact make food safer and

healthier. For example, lard is rated as NOVA group 2, whilst plant butter spreads would be NOVA group 4 – ‘Ultra-processed’ – despite being more nutritious alternative with a healthier fatty acid profile. Several hummus recipes would also be classed as Ultra Processed, again despite this being a healthier product.

11. As an example, within our own portfolio, products like fish fingers, mixed prepared vegetables and chicken grills would be classified as ‘ultra-processed’ according to NOVA, despite delivering convenient nutrition with healthy nutrient profiles. Children especially may be discouraged from eating healthy processed foods (like fish fingers) as a result, instead opting for a less processed alternative with a worse nutrient profile in its place.
12. At Nomad Foods, we strongly support the UK Scientific Advisory Committee’s 2023 opinion<sup>2</sup> that more good quality research is needed before any conclusions are drawn. Taking the recent publication of a World Health Organisation-backed study<sup>3</sup> in the Lancet (2023) that looked at the diets of over 260,000 Europeans, the report argues that linking all processed foods to adverse health outcomes is inaccurate. Some negative health outcomes were associated with specific groups of ultra-processed foods; however, it was not the case for all UPF products, and these specific groups of UPFs overall would have worse nutrient profiles.
13. Therefore, the NOVA definition of UPF risks both demonising food that should be eaten as part of a balanced diet and leaving consumers confused as to what foods they should be eating. It strikes us as very problematic for any future policy making.

#### Nomad Foods’ perspective on the HFSS classification

14. As highlighted above, the UPF categorisation is extremely broad, and does not place any value on nutritional content. The HFSS classification, however, is based on nutrition science, focusing on the nutritional composition of foods.
15. The HFSS classification has so far been the most effective pathway for companies to improve popular products nutritionally. This system is starkly different to the NOVA classification system, which

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<sup>2</sup> <https://www.gov.uk/government/publications/sacn-statement-on-processed-foods-and-health>

<sup>3</sup> [https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762\(23\)00190-4/fulltext](https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762(23)00190-4/fulltext)

would make any future product renovation exceedingly difficult to achieve given that nutritional profile is not taken into account.

16. The HFSS classification has been the benchmark in helping Nomad Foods achieve tangible consumer health benefits – none of which would be achievable under the UPF banner. Importantly, it underpins the definition of present food health policies, including the current restrictions on where HFSS foods can be stocked in a retailer.
17. HFSS policies will also form the foundation of incoming regulation around banning HFSS adverts online and on TV.

### **How consumers can recognise UPF and HFSS foods, including the role of labelling, packaging and advertising.**

18. We believe transparent nutrition labelling is critical for our customers, and it is central to Nomad Foods' nutrition strategy. We apply a range of nutrition labelling systems in various national markets across Europe, including the UK, going beyond the mandatory nutrition labelling requirements of the Food Information to Consumers Regulation.
19. Firstly, we adopt the voluntary labelling of Reference Intakes (RIs) on front of pack in those markets where consumers are familiar with RIs. We label the amount of each of the key nutrients of public health concern (energy, fat, saturates, sugars and salt) in a portion of a product, across all markets where legally permitted, and this helps customers to be better informed about our products.
20. We adopt additional voluntary labelling of fibre across all markets we operate in, and where we can, we use nationally recognised front of pack nutrition labelling schemes to allow for better informed consumer choices.
21. This includes Nutri-Score labelling in France, Germany, Netherlands, Belgium, Spain, Portugal, and Switzerland; applying the Keyhole logo in Sweden, Norway and Denmark; and for the UK and Ireland, applying the Multiple Traffic Light labelling. These schemes help to signpost healthier options and allow consumers to easily understand the overall nutritional profile of the product.
22. Multiple Traffic Light labelling, as well as the Nutri-Score labelling system, employ a scale. The better the nutritional profile of

the product, the better the reflective score (or colour) is. These scalable systems – where products can be reformulated to become healthier and achieve better scores (or more desirable colours) – has played a critical part in Nomad Foods’ journey to provide our customers with healthier products.

23. We therefore advise the Government to fully back the HFSS definition, as it ensures that food and drink manufacturers remain incentivised to provide the best version of products they can.

### **The role of the food and drink industry in driving food and diet trends and on the policymaking process.**

24. Reformulation is a positive opportunity for industry to improve the nutritional value of products, and Nomad Foods proudly leads in this area.
25. When we acquired Goodfella’s pizza in 2018, only 17% of sales were from non-HFSS products. Today however, 100% of our Goodfella’s pizza recipes are non-HFSS. We have done this through innovation and nutritional improvement, reformulating bases and sauces, and choosing healthier toppings and amending ratios.
26. Beyond pizza, we have significantly reduced the saturated fat in our entire portfolio by replacing saturated fats and oils with healthier rapeseed oil.
27. We have had an ambitious salt reduction strategy since 2017 - for example, we have removed 220 tonnes of salt from our portfolio between 2020 and 2022 alone. Over time, we have reduced salt by 21% in our iconic cod fish fingers, and by 28% in our classic potato waffles.
28. We are founding signatories of the Action on Fibre campaign, and we regularly convene a fibre working group to drive fibre increases in the business. For example, in 2022 in the UK alone, our renovated products added more than 113 million portions of fibre to the nation’s plate.
29. For most of our product categories, we have found it is possible to nutritionally improve products to achieve HFSS compliance, or at very least to achieve reduced saturated fat, sugar or salt, or increased fibre. This is to the benefit of our customers, who have consistently responded well to product reformulation.
30. We therefore strongly believe the Government should encourage food and drink reformulation, as it delivers immediate nutrition benefits for consumers.

## **Lessons learned from international policy and practice, and from the devolved administrations, on diet-related obesity prevention.**

31. In October 2017, Nutri-Score, a European front-of-pack labelling system based on the UK Government's Nutrient Profiling model, was brought into operation in France.
32. By using an easy-to-understand colour and letter scale, Nutri-Score allows customers, who are not nutritional experts, to understand what is nutritionally better for them and compare products in the same category; to drive healthier purchasing decisions.
33. Since 2017, a growing number of food manufacturers in France have taken advantage of Nutri-Score. In July 2018, 70 manufacturers were enrolled in Nutri-Score, and by September 2020, 500 operators had enrolled in the system.<sup>4</sup> Today, Nutri-Score is widespread throughout French food and beverage retail.
34. Nutri-Score has been shown to be the most efficient way to improve the nutritional quality of purchasing intentions in the population. In a large study conducted in 60 supermarkets, the Nutri-Score label had a positive impact on the nutritional quality of food purchases from all subgroups of the population,<sup>5</sup> and since a positive roll-out in France, it has also been implemented throughout wider European countries, including Belgium, Germany, Luxembourg, the Netherlands, Spain, and Switzerland.
35. We would encourage the UK Government to consider this evidence, noting that it has not yet responded to its consultation on whether to introduce mandatory front of pack nutrition labelling, and which form of front of pack nutrition labelling should be applied in the UK.
36. We would also encourage that whatever the UK Devolved Administrations do, they act in unison. This helps governments, retailers and food companies more easily convey the message to the consumer, which in turn enables the food industry to supply products more efficiently to customers, using the same packaging; ultimately reducing costs for the consumer.

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<sup>4</sup> [https://sante.gouv.fr/IMG/pdf/nutri-score\\_follow-up\\_report\\_3\\_years\\_26juillet2021.pdf](https://sante.gouv.fr/IMG/pdf/nutri-score_follow-up_report_3_years_26juillet2021.pdf)

<sup>5</sup> [https://sante.gouv.fr/IMG/pdf/nutri-score\\_follow-up\\_report\\_3\\_years\\_26juillet2021.pdf](https://sante.gouv.fr/IMG/pdf/nutri-score_follow-up_report_3_years_26juillet2021.pdf)

**Policy tools that could prove effective in preventing obesity amongst the general population, including those focussed on the role of the food and drink industry in tackling obesity.**

37. Nomad Foods supports the Food Data Transparency Partnership project – a partnership between Government, industry and experts, aimed to improve the availability, quality and comparability of data in the food supply chain, to create positive change in the food system – in which we are involved as a Health Working Group member.
38. We also support the ban on advertising HFSS foods online and on TV before 9pm, set to come into force in October 2025.
39. Building on that, there is more that can be done to drive real change:
  - a. The food and beverage reformulation programme, started under the current Government but not followed through, should be evolved. The majority of food categories can be nutritionally improved to achieve HFSS compliance, therefore industry needs support from Government that is encouraging and enables industry to improve products in real time, without compromising on taste and texture.
  - b. The well-accepted UK Eatwell Guide is due for an update with its last revision 8 years ago, and an update would provide opportunity to include a stronger focus on sustainable diets and cultural diets. The way that the Guide is depicted, on a single plate, needs simpler and more practical explanation and could benefit from behavioural change insights such as the application of the COM-B model. We believe that the launch of an updated Guide should be underpinned by a nationwide UK promotional campaign.
  - c. The UK Government had deferred the implementation of restrictions on the volume-based promotion element of its policy in England by two years, from 2023 to 2025. Going forwards, the date needs to be locked in, communicated and aligned for the whole of the UK. For the food industry, it is challenging to plan for different rules across the Devolved Administrations, and it increases complexity and cost. It also makes it harder to get simple messages out to consumers across the UK.
  - d. Voluntary labelling exists in the UK, to which Nomad Foods participates (the Multiple Traffic Light Labelling), however the Government should come to a view on implementing mandatory



front of pack labelling. We support labelling that is based on nutrition science, which encourages positive reformulation, and which is easy for consumers to understand.

Taken together, our suggested package of policies would provide:

- a. A nation with greater awareness about what constitutes a healthy and sustainable diet.
- b. A restriction on the key channels for the promotion of HFSS foods, reducing exposure to unhealthy food marketing.
- c. A driver for wholesale industry nutrition reformulation in product categories where this is possible.
- d. More investment in healthier food options and innovations, and the marketing of these from industry.

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