

KELLANOVA - WRITTEN EVIDENCE (FDO0124)

A response from Kellanova (formerly Kellogg Company) to the House of Lords call for evidence into the role of foods, such as 'ultra-processed foods', and foods high in fat, salt and sugar, in a healthy diet and tackling obesity

Our response

1. We welcome the opportunity to participate in this call for evidence. We believe multistakeholder dialogue will advance healthy and sustainable diets and are happy to provide our perspective.
2. Kellanova believes that the classification of foods as 'ultra-processed' is confusing for consumers, industry and policymakers alike. We believe that food processing is an enabler to healthier, more accessible and more sustainable diets. We welcome the findings of the Cordova cohort study which provides evidence of a differential relationship of subgroups of foods and potential health impacts (breakfast cereal subcategory of 'ultra-processed foods' was associated with lower risk of health impacts than some other foods categories)¹¹; and intend to continue using processes like reformulation, upcycling and fortification for a healthier and more sustainable food system.

Overarching comments from Kellanova

3. For Kellanova, change in the food system must start and end with robust scientific evidence. An evidence-based approach, where there is broad academic and expert consensus, should be the cornerstone of British public policy development. It helps to ensure policies deliver impact which is measurable and demonstrably beneficial to the health of British citizens; and designed to mitigate against unintended consequences.
4. The science regarding consumption of foods categorised as 'ultra-

¹ Cordova, R., Viallon, V., Fontvieille, E., Peruchet-Noray, L., Jansana, A., Wagner, K. H., ... & Freisling, H. (2023). Consumption of ultra-processed foods and risk of multimorbidity of cancer and cardiometabolic diseases: a multinational cohort study. *The Lancet Regional Health–Europe*, 35.

processed foods' and their impacts on human health is neither sufficiently uniform nor based on evidence to be used as the basis for public policy.

5. We acknowledge the public health and obesity challenge in Britain. Meeting these challenges requires a partnership approach across the entire food system.
6. We have a long history of taking action to improve the foods we sell. Most of our foods are free from animal ingredients (our UK portfolio is over 90% plant-based); we were one of the first to reduce sodium (salt) in our foods, we've eliminated artificial colours and trans fat from our portfolio, and we continue to innovate on sugar and add fibre to our portfolio.
7. Any proposed further changes to food regulation should be very carefully thought through to ensure that (i) the anticipated health benefit is fully evidenced and meaningfully exceeds the cost of effecting the changes, and (ii) sufficient lead-in time is allowed to mitigate the cost burdens and enable product reformulation, where that is possible.
8. We recommend an approach which assesses the health impact of the recent anti-obesity legislation before further legislation is enacted. Given the costs to the food sector in implementing the current legislation, it is, in our opinion, vital that any future policy-making in this field is informed by an assessment of the cost-benefits of the current policy in terms of health objectives.

Specific responses (answering questions)

Q5: The definition of a) ultra-processed food and b) foods high in fat, sugar and salt (HFSS) and their usefulness as terminologies for describing and assessing such products

In response to question 5 a):

9. A definition is defined as "a statement of the exact meaning of a word". There is no legal definition or scientific consensus of what an 'ultra-processed food' is and as such the term "Ultra-Processed Food" doesn't meet the definition of a definition.
10. There is significant scientific and academic disagreement on what foods

would fall into that category (Gibney et al. 2018²; Braesco et al. 2019³; Braesco et al. 2022⁴). We believe it is vital for the House to acknowledge this in any conclusions or final deliberation.

11. The UK Government's Scientific Advisory Committee on Nutrition (SACN) carried out a scoping review of processed foods and health in 2022. In the conclusion of their review, they noted that uncertainties exist over the classification and lack of a conclusive definition, as well as the potential for confounding that exists when reviewing the scientific data.
12. Kellanova notes that the position of the UK Government Scientific experts is not recommending adoption of processing-based classification systems such as NOVA (which use the 'ultra-processed foods' concept), due to a lack of evidence, which echoes that of similar expert committees in Spain (AESAN opinion Spanish Agency for Food Safety and Nutrition⁵) and the Scandinavian countries (Denmark, Finland, Iceland, Norway and Sweden)⁶. To note: in France, ANSES (French Agency for Food, Environmental and Occupational Health & Safety) made a self-referral to study the impact of processed food consumption on health⁷ and the outcome is expected in 2024.
13. Evidence for the effects of consuming 'Ultra-Processed Foods' are based, to date, on epidemiological studies (which by design are only able to highlight associations and not causative links) and one randomised controlled trial with a small subject number (20 participants)⁸.

² Gibney MJ. Ultra-Processed Foods: Definitions and Policy Issues. *Curr Dev Nutr*. 2018 Sep 14;3(2):nzy077. doi: 10.1093/cdn/nzy077. PMID: 30820487; PMCID: PMC6389637: [Ultra-Processed Foods: Definitions and Policy Issues - PubMed \(nih.gov\)](https://pubmed.ncbi.nlm.nih.gov/30820487/)

³ Braesco V., Corrieu G., Feillet P., et al., (2019). Aliments dits "ultra-transformés et santé: que faut-il en penser? Publication of the Academie d'Agriculture de France.

⁴ Braesco, V., Souchon, I., Sauvant, P., et al., (2022) Ultra-processed foods: how functional is the NOVA system? *Eur J Clin Nutr* 76:1245-1253

⁵ AESAN Scientific Committee. (Working group) Talens, P., Cámara, M., Daschner, A., López, E., Marín, S., Martínez, J.A. and Morales, F.J. Informe del Comité Científico de la Agencia Española de Seguridad Alimentaria y Nutrición (AESAN) sobre el impacto del consumo de alimentos "ultra-procesados" en la salud de los consumidores. *Revista del Comité Científico de la AESAN*, 2020, 31, pp: 49-76.

⁶ Nordic Nutrition Recommendations (NNR) (2023).

<https://www.norden.org/en/publication/nordic-nutrition-recommendations-2023>

⁷ Programme de travail 2024 de l'ANSES. <https://www.anses.fr/fr/system/files/Programme-de-travail-Anses-2024.pdf>

14. In not using nutrients as the basis of a definition, NOVA (and other processing classifications) deviate from established nutrient scientific principles which use nutrient composition as the basis for classification.
15. 'Ultra-Processed Foods' are a heterogenous group; meaning not all foods classified as 'Ultra-Processed Foods' have the same health impact. In a prospective cohort study, which looked at consumption of 'Ultra-Processed Foods' and risk of developing multi-morbidities, it found that when 'ultra-processed foods' were separated into subgroups according to food category; certain 'Ultra Processed Foods subcategories' (breads, plant-based alternatives and breakfast cereals) cereals were not associated with risk. (Cordova et al. (2023))⁹
16. The act/s of processing bring many benefits, particularly when it comes to providing access to large quantities of nutrient dense food, available conveniently and at a reasonable price. Processing foods allows for foods to have a shorter cooking and preparation time at home, it can increase shelf stability allowing for foods to last longer; and it allows for the introduction of specific nutrients a population might need (fortification); as well as the use of technologies that allow for food to be made in a way that makes it more affordable to purchase.
17. Meeting notes from a roundtable discussion organised by the Government Office for Science on November 27th 2023 pointed to NOVA's lack of nuance, failing to distinguish between foods of differing nutritional value. In some cases, more processing has resulted in healthier food, e.g. in breakfast cereals fortified with nutrients. The term 'ultra-processed foods', using NOVA's definition, would encourage consumers to avoid these products altogether and would therefore be 'misaligned with public health priorities'¹⁰ In our view, many foods classified as 'ultra-processed' have their place within a balanced diet.

⁸ Hall, K. D., Ayuketah, A., Brychta, R., Cai, H., Cassimatis, T., Chen, K. Y., ... & Zhou, M. (2019). Ultra-processed diets cause excess calorie intake and weight gain: an inpatient randomized controlled trial of ad libitum food intake. *Cell metabolism*, 30(1), 67-77.

⁹ Cordova et al. (2023): [Consumption of ultra-processed foods and risk of multimorbidity of cancer and cardiometabolic diseases: a multinational cohort study - The Lancet Regional Health – Europe](https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762(23)00190-4/fulltext#appsec1) [https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762\(23\)00190-4/fulltext#appsec1](https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762(23)00190-4/fulltext#appsec1)

¹⁰ Meeting notes, 27 November 2023, chaired by Ian Young, Chief Scientific Advisor, Department of Health Northern Ireland <https://www.gov.uk/government/publications/ultra-processed-food-upfs/ultra-processed-food-html>)

¹¹ National Diet and Nutrition Survey (publishing.service.gov.uk)

18. If looking to improve consumer health, classifying foods via processing type does not provide sufficient distinction between foods within category to make it useful.
19. National Diet and Nutrition Survey (NDNS) data¹¹ show mean fibre intake in the UK remains below Government recommended amounts for all age groups; and almost 20% of 11-18 year olds have vitamin D intakes putting them at increased risk of musculoskeletal problems. Processing techniques such as fortification enable the addition of important micronutrients such as these, to commonly-consumed foods; helping to address health concerns without requiring changes in behaviour on the part of the consumer. Fortification is a processing method which would place a product into the NOVA 'ultra-processed foods' category; yet is a process which positively influences the nutritional content of the final product.
20. Processing can not only influence a product positively nutritionally, but it can also help to mitigate/decrease the environmental impact of foods. Increasing shelf stability and shelf-life helps to lower food waste.

And for question 5 b)

21. We have raised concerns about the current use and application of Foods High in Fats Sugars and Salt (HFSS) and the government's use of the nutrient profile model particularly when it comes to the treatment of breakfast cereals. Our concerns are a matter of public record and are well documented; having formed the foundation of the judicial review brought by us in 2022.
22. Notwithstanding this, we recognise Foods High in Fats Sugars and Salt has been in use in the UK for a considerable length of time, with various legislations underpinned using this, or similar nutrient-centric criteria. It is easily understood by food companies and can be applied by them.

Q6. How consumers can recognise UPF and HFSS foods, including the role of labelling, packaging and advertising

23. As mentioned above we believe that scientists, policymakers, industry and consumers would be unable to accurately and consistently identify ultra-processed food given the lack of a definition¹².

¹² Braesco, V., Souchon, I., Sauvant, P. et al. Ultra-processed foods: how functional is the NOVA system?. Eur J Clin Nutr 76, 1245–1253 (2022). <https://doi.org/10.1038/s41430-022-01099-1>

24. Research from European Institute of Innovation and Technology (EIT) shows that consumers are confused about how to identify UPF.¹³
25. We see that our role as a responsible food company is to enable people to make their own informed choices based on accessible and transparent information that we put on our food products at the point of purchase (as well making such information available in other locations such as on our and retailers' websites). As part of this, Kellanova complies with The English Food Information Regulations 2014, which sets out extensive requirements for information which is mandatory to be displayed on-pack for food and drinks sold in the UK and includes name of the food, a list of ingredients (in order of weight), allergen information, net quantity, storage conditions, date labelling ('use by' or 'best before' dates), country of origin, preparation instructions and nutritional information for energy and six other main nutrients per 100g/ml.
26. In addition, Kellanova provides voluntary information to assist consumers in their food purchasing decisions. These include providing front of pack nutrition labelling and colour coding ('traffic light labelling') on most of our cereal portfolio and use of Navilens on packaging to support equitable access to food information.
27. 'Ultra processed foods' is too ill-defined/uncertain a concept (see response to Q5 above) for it to make sense to require labelling/packaging/advertising to identify foods as UPF.
28. It is not the role of advertising to identify foods as HFSS/UPF. There are extensive nutritional information requirements for packaging/labelling, and these are sufficient - they ensure that by the time of purchase the consumer has the food information they need. Advertising is a broad concept and in most cases there is not the space to include the detailed nutritional information that is required in packaging and labelling.

Q7. The cost and availability of a) UPF and b) HFSS foods and their impact on health outcomes

29. There is no relationship between the cost of our foods and their

¹³ <https://www.eitfood.eu/news/consumers-fear-health-risks-of-ultra-processed-foods#:~:text=The%20research%2C%20combining%20a%20survey,health%20issues%20later%20in%20life.>

nutritional contribution.

Q8. The role of the food and drink industry in driving food and diet trends and on the policymaking process

30. We believe that the right approach is through partnership where all stakeholders in the food system are listened to and respected.
31. Kellanova has a history of renovating and creating products which deliver nutritional benefits voluntarily; including, as examples, sugar and salt reduction and the inclusion of fibre and vitamins and minerals of public health need.
32. Our desire to act is driven by our internal philosophy of enabling sustainable and equitable access to food through our global Better Days Promise¹⁴. A philosophy which is an intrinsically part of our business strategy and on which we publicly report progress.

Q10. The effectiveness of Government planning and policymaking processes in relation to food and drink policy and tackling obesity

33. Our response here focuses on the policymaking process as it relates to effective food and drink policy, and not obesity as that lies outside of our scope of expertise.
34. Kellanova has a history of renovating and creating products which deliver nutritional benefits voluntarily; without requiring mandatory regulation. Working voluntarily allows Kellanova to adapt products at the most effective time within the food development process, and in a gradual way which takes consumers with us.
35. Kellanova is aware of several areas where current regulations prevent us from undertaking product renovation in specific areas. These include the restrictions on sweetener usage in cereals, that impedes significant further sugar and calorie reduction work in this category. The GB Nutrition and Health claims register requires at least a 30% reduction in nutrients like sugar or fat before being allowed to communicate on pack or in advertising; meaning that reductions in fat, sugar or salt below this figure (e.g. 20%) are unable to be communicated to the consumer by us. In addition, the restrictions on making a comparative claim that require the product to be compared against an (ever-changing) competitive set, and not the previous recipe, further prevents companies from being able to accurately inform consumers about nutritional improvements to products.

¹⁴ <https://betterdayspromise.kellanova.com/commitments>

36. Kellanova sees a valuable post-Brexit opportunity exist in lifting these barriers to nutrition communication and making product innovation/renovation easier to implement and communicate to consumers.
37. We would also like to see increased investment into public health policy which tackles issues around improving nutrition education and health literacy, access to physical activity and support for healthier diets for people with lower socio-economic status.

Q11. The impact of recent policy tools and legislative measures intended to prevent obesity

38. Kellanova support and recommend a food systems approach where policies are assessed in the context of food equity, food sustainability and food access.
39. We would like to see an approach which assesses and evaluates the impact of existing policies before prescribing and implementing further action.
40. As an example; we don't yet have data showing the impact of in-store restrictions on the placement of HFSS foods, and the '9pm TV watershed' and online restrictions in relation to 'less healthy' foods (a sub- set of HFSS foods) have yet to be implemented.
41. Kellanova asks that existing approaches are correctly embedded and assessed ahead of new policies being developed and implemented, according to due scientific process, so that improvements (where seen) can be correctly attributed.

Q12. Policy tools that could prove effective in preventing obesity in the general population, including those focused on the role of the food and drink industry in tackling obesity

42. The most effective policy tools are those which encourage a positive relationship with food, a degree of social community and a moderate level of physical activity.
43. As the Foresight Report¹⁵ noted, the causes of obesity are multi-factorial

and tackling them needs a whole systems approach. A whole system approach which thinks about food and availability, but which asks itself the difficult questions about the role of education and poverty, too. Food costs are one of the leading determinants of food choice in the UK¹⁶

¹⁵ <https://www.gov.uk/government/publications/reducing-obesity-future-choices>

¹⁶ [Meeting UK dietary recommendations is associated with higher estimated consumer food costs: an analysis using the National Diet and Nutrition Survey and consumer expenditure data, 2008–2012 - PMC \(nih.gov\)](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5848749/#:~:text=Among%20the%20barriers%20to%20improving%20eating%20habits%2C%20the,importance%20for%20people%20with%20a%20lower%20income%20%285%29.)
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5848749/#:~:text=Among%20the%20barriers%20to%20improving%20eating%20habits%2C%20the,importance%20for%20people%20with%20a%20lower%20income%20%285%29.>

About Kellanova

44. Kellanova is the owner of Kellogg's and Pringles brands. Formerly known as the Kellogg Company, the business went through a restructuring in October 2023 leading to the creation of Kellanova. Built on the heritage of Kellogg Company, Kellanova brands have been in the UK for more than 100 years.
45. Today, Kellanova is the largest cereal company in the UK and the second largest savoury snacks provider; employing more than 1250 people in Britain.
46. Around seven out of ten British homes have a Kellanova product in their kitchen cupboard.
47. Kellogg's vision was to create a world in which people are not only fed but fulfilled. Kellanova takes its responsibilities in delivering that vision seriously; whether that's pioneering high fibre foods with the launch of All-Bran in the mid-1920s, being the first major food company to employ a dietitian or embarking on significant sugar and salt reduction over the last two decades.
48. We have voluntarily provided nutritional labelling to consumers since the 1930's and are an adoptee of the voluntary traffic light front-of-pack labelling in the UK.
49. Four of our five biggest selling cereals in Britain (Corn Flakes, Coco Pops, Rice Krispies and Special K Original) have been renovated to be non-HFSS (as assessed using the Government's nutrient profile model).
50. Our Better Days Promise¹⁷ is the company's commitment to advancing sustainable and equitable access to food across the globe.

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¹⁷ <https://betterdayspromise.kellanova.com/>