

WM MORRISON SUPERMARKETS LIMITED -

WRITTEN EVIDENCE (FDO0127)

Written evidence from Introduction

As a food maker and retailer we recognise our responsibility to help customers achieve a healthy, balanced diet.

We present customers with a wide-ranging choice of food and drink and are committed to helping shoppers navigate this environment and find the products that are right for them. It is important that customers can easily identify healthier options and we have supported this for many years with front of pack 'traffic light' nutritional labelling on own brand products. We also have a long history of reformulation to steadily reduce levels of salt, calories and sugar.

While such measures alone are not enough, they can contribute significantly to making healthier, sustainable products more accessible and affordable to customers. We believe genuine progress can be made on obesity with a coordinated whole food system approach which is underpinned by clear and balanced information for consumers. We have focused our contribution to this inquiry on those areas we feel most qualified to comment upon.

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

There is currently no accepted definition of ultra-processed food. The closest we have is the NOVA food classification system which was developed by researchers at the University of São Paulo, Brazil. UPFs are broadly considered to be foods which contain additives and ingredients not commonly found in household kitchens (e.g. preservatives, emulsifiers) or which have been produced using industrial processes which cannot be replicated at home.

This is complicated to define and there is a danger that the term (and its pejorative use) overlooks the important role processing plays in delivering consumer benefits related to shelf-life, safety, quality and convenience. As the British Retail Consortium (BRC) describes in its written evidence to the Committee, there are a number of important reasons why food is processed, including:

- To turn raw ingredients into safe, edible foodstuffs
- To extend the shelf life of products
- To reduce or eliminate microbiological risks
- To preserve nutrition composition post-harvest
- To provide consumers with convenience
- To improve the composition of food products
- To improve food texture and palatability
- To provide a wider range of options meeting different dietary requirements
- To support innovation which improves sustainability and environmental outcomes

We welcome more research to improve the evidence base and encourage a balanced debate on UPF and the link to particular health outcomes. There is direct evidence to show the role of fat, salt and sugar in obesity but we are not aware of any direct evidence that temperature processing or additives declared as safe by the Food Standards Agency contribute to obesity. Current research is predominantly of an observational nature and fails to address the association between different degrees of processing and the effect of additives currently approved for use in foods.

There is no doubt that fruits, vegetables, whole grains, pulses, nuts, seeds, fish, lean meats and dairy products (classified as unprocessed or minimally processed) are the foundation of established dietary guidelines which have been developed to support positive health outcomes. Morrisons is committed to selling affordable fresh food and ingredients which encourage people to home cook and maintain a healthy diet. Indeed, our top 20 best selling products would fall into the category above. However, we recognise that many households are not in a position to prepare the majority of their meals – much less the staple foodstuffs which undergo processing, such as butter or bread – from scratch. The vast majority of households rely on processed foods including UPF to some extent.

We understand the benefits of home cooking and the point made in Henry Dimbleby's National Food Strategy that, "Eating well is much easier if you know how to cook from scratch." We would endorse the view in the BRC written evidence that education and culinary skills are crucial to improving diets and the Government has a role to ensure that children leave school with an ability to cook some basic dishes.

The current debate around UPF (classified only by processing technique rather than nutrients) as a descriptor for less healthy foods is adding complexity (and potentially confusion) given that there are a number of foods that are considered UPF that would not be classed as HFSS.

Based on current policy, we favour the Nutrient Profiling Model (NPM)

2004 when classifying the majority of foods and drinks. A food or drink is identified as HFSS or Non HFSS using a simple scoring system that balances its amounts of fat, salt and sugar against more positive components of the diet, that is fruit and veg content, fibre and protein. Generally speaking, this approach supports a level playing field as it allows businesses to work toward a common denominator.

Reducing consumption of HFSS products has been the cornerstone of the Government's current promotions and placement restrictions, and the future restriction on the advertising of HFSS food on TV and online, which has further improved understanding and usage of the approach.

However, we acknowledge that the model is far from perfect. There is a lack of distinction in some categories. For example all oils are classified as HFSS which means the model doesn't guide customers to the healthiest options within the category. And the system can produce unintended consequences. For example, many cakes will have an inherently high sugar content and even a 20% reduction would not affect their classification as HFSS. This limits the incentive to change the recipe and deliver a 'healthier' version of the product. Some calculations, such as those to establish the quantity of fruit and vegetables in some products, can be complicated. However, a review of current guidance could help overcome some of these challenges. In addition, as more research comes to light on UPF, and for example the impact of additional non-nutritive components such as additives, the nutrient profiling model could be adapted to include thresholds for such components which will allow the model to evolve over time.

How can consumers recognise UPF and HFSS foods

We are committed to helping customers understand product information in an easy to understand and accessible format. All food labels feature a clear declaration of composite ingredients, including additives. Labels also include detailed back of pack nutrition information and relevant nutrition information is presented in an easy to understand traffic light format on the front of packs. The provision of this information enables the consumer to make speedy and informed choices to support a healthy, balanced diet.

However, it is less clear how the application of a UPF classification would encourage positive dietary behaviour since UPF (specifically the NOVA food classification system) was not designed for consumer use or as a policy instrument. Furthermore, developing and implementing UPF information onto product labels or in customer campaigns will be challenging particularly as such foods form over 50% of the current UK diet. Research (Dickens et al, 2024) suggests labelling should be carefully considered to avoid presenting a complex public health message and defeat the purpose of allowing consumers to make quick and informed

choices about foods.

Furthermore, we need to consider the impact of customers ruling out different foods based on whether or not they are ultra-processed i.e. potentially denying sources of nutrients in significant amounts, for example fibre in wholemeal bread and micronutrients in breakfast cereals.

Future policy tools that could prove effective in preventing obesity

We endorse the points made in the BRC's written evidence, including the importance of a comprehensive, collective approach to addressing obesity and health inequalities which involves the full spectrum of food businesses: large and small, catering and hospitality, supermarkets and the out of home sector. Obesity regulation should apply universally, in the same way as other food health regulations such as those relating to allergens.

Previous obesity strategies have relied heavily on voluntary agreements including the Public Health Responsibility Deal under which Morrisons and other retailers adopted government recommended nutrition labelling, salt reformulation targets and other initiatives to promote healthier choices. While many food companies embraced this new approach, a lack of support from the wider food industry stymied progress and put businesses who participated in the Responsibility Deal at a competitive disadvantage to those who ignored it. One of the lessons that might be drawn from this experience is that to effectively tackle obesity and improve public health governments need to ensure policy and regulation is universally applied. This will deliver genuine change in the food market and ensure a level playing field for all food businesses.

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