

UNILEVER - WRITTEN EVIDENCE (FDO0134)

Introduction

This paper provides Unilever's response to the request from the House of Lords Food, Diet and Obesity Committee for feedback on its inquiry 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. This paper has been structured around the issues identified in the Committee's call for evidence, with Unilever providing responses on those issues with which we are directly familiar as a food producer.

About Unilever

Unilever is a global consumer goods company and is listed on the FTSE100. Our annual contribution to UK GDP is around £1.5bn, with approximately 6,000 people employed across 15 sites. More information on our contribution to the UK can be found [here](#).

Unilever has five global Business Groups – Beauty & Wellbeing, Personal Care, Home Care, Nutrition and Ice Cream. The evidence we are submitting reflects the work currently done in our Nutrition and Ice Cream Business Groups. On 19th March 2024 Unilever announced that our Ice Cream Business Group will be separated and will become a standalone business. Separation activity has now begun, with full separation expected by the end of 2025.

Our UK factories make some of the most iconic British food brands including Marmite, Colman's and Pot Noodle, as well as global brands such as Hellmann's and Wall's Ice Cream. Around 70% of the products manufactured by Unilever in the UK are sold in the UK.

As one of the largest consumer goods companies in the world, Unilever provides products that are safe, fulfil our high standards for quality and meet all regulatory requirements. We continuously improve the nutrient quality of our food and beverage portfolio by reducing nutrients of concern, such as salt, sugar and fat and by increasing positive nutrients. This is on top of the introduction of <110Kcal calorie caps on our children's ice creams in 2013 and <250Kcal calorie caps across the rest of our ice cream portfolio. We have more recently ensured that all our children's ice creams are Non HFSS.

Unilever believes consumers should have access to good food that is affordable. Through our Future Foods strategy we offer healthier foods,

including products that provide positive nutrition through micronutrients and fortification, and more plant-based foods. And by working with partners, we are tackling the complex and interconnected environmental issues facing our food system.

Role of the food and drink industry

The UK food and drink industry is one of the most competitive and dynamic in the world, with consumers enjoying a huge amount of choice. The industry is already heavily regulated, with regulators having a key role in ensuring the safety and providence of the food we consume. To be effective regulation must incorporate robust scientific advice and be the product of extensive consultation with industry, through which regulators can properly assess the practicality of proposed regulation and work with industry to manage its implementation in a way that minimises disruption.

Our view is that Government and other stakeholders should take a holistic approach to promoting healthy, affordable diets that also tackle sedentary lifestyles, holiday hunger and food education. Food and drink manufacturers like Unilever can support this approach through offering consumers healthier choices and providing consumers with the information they need to make informed decisions about the food they buy and the meals they prepare. There are several ways to achieve this, whether it is through reformulation, portion size, helping consumers with scratch cooking, or nudging consumers towards lower fat or lower salt alternatives of the same product. At Unilever, this commitment is reflected in how we have introduced new lower sugar, lower calorie brands such as Ben and Jerry's Lighten Up, Marmite Reduced Salt and Hellmann's Light, enabling consumers to choose healthier versions of some of our most-loved products. Many of our products are also available in a range of portions and sizes. In 2021, we extended our ice cream minis range, introducing new smaller sized ranges of key brands like Cornetto, Wall's and Magnum. Elsewhere, our Graze range has successfully reduced the sugar level of its flapjack portfolio by 30-50% and we have also reduced saturated fat in our Pot Noodle range by 70% through a switch to using sunflower oil.

Unilever continues to reformulate our existing foods to comply with the Unilever Science based Nutrition Standards (USNC), planning to double the number of our products that can deliver positive nutritional value by 2025. Furthermore, many of our products are scratch cooking aids (i.e. stock cubes, seasonings etc.) and these can inspire people to create nutritious, affordable meals and avoid food waste with the help of our recipes – with 35,000 of these recipes available on dedicated websites, our brands' pages and on products' back of pack, as well as being provided to our professional customers. We have also directly promoted the use of our products as scratch cooking aids in our advertising, partnering with celebrity chefs as

part of our Knorr 'Cheat on Meat' campaign and Hellmann's 'Cook Clever Waste Less' campaign.

Ultra Processed Foods (UPF)

Almost all food and drinks require some form of processing before consumption be that at home, in a restaurant or by a processor. Food is processed for many reasons – to make it safe, edible and to keep it at consistent nutritional quality. Food processing also provides wider availability and convenience, and through preservation it reduces food loss and waste. The use of additives can be important to maintain and/or improve the safety and freshness, taste, texture and appearance of foods. The use of additives is strictly regulated by governmental bodies to safeguard the use in foods and beverages, with producers required to declare what additives have been included in products.

We believe that the healthiness of all foods, whether fresh, prepared at home, or processed in a factory, should be evaluated on evidence-based factors such as nutrient quality, portion size and dietary role. At present in the UK there is no agreed definition for UPF and the concept remains poorly defined with around eight definitions in use globally. We are concerned that this lack of clarity means that the use of the term marginalises foods that are nutrient dense, while at the same time confusing the consumer.

The studies that have been undertaken on UPF are largely observational and therefore, by design, cannot demonstrate cause and effect. This has been reflected in the assessment of the UK Government's Scientific Advisory Committee on Nutrition (SACN) which found in July 2023 that there are "uncertainties around the quality of evidence available" on the health impacts of UPF and as such no recommendations have been made to amend current dietary guidelines. As much of the research into the impact of UPFs is observational, good quality studies on possible mechanisms by which particular risk factors (i.e. aspects of processing, food texture, or packaging types) may impact health are needed. Unilever fully supports the need for further research to understand this in more detail and we are actively supporting further research in this area, co funding the [Restructure project](#) with Wageningen University and other organisations.

Responsible marketing

Unilever has a long-standing commitment to responsible marketing and advertising of our products. In 2003 we were one of the first companies to apply principles for marketing food to children that included not targeting any paid marketing communication to those aged under 16. In addition, our 'Responsibly Made For Kids' promise sets out our commitment to develop ice cream products that adhere carefully to healthier nutritional standards. Every ice cream in our 'Responsibly Made For Kids' range is non-HFSS and below

110 kcal per serving. We have played a major role in promoting industry-wide voluntary initiatives to advocate responsible marketing of foods and beverages.

HFSS and reporting

Science and dietary guidance underpin our Unilever Nutrition Standards and we have two standards that guide our portfolio improvement. The first is our Unilever Science Based Nutrition Criteria (USNC), which is intended to cap certain ingredients in our products. The second is our Positive Nutrition Standards (PNS), which aims to increase the amount of beneficial nutrients and ingredients in our products. You can find more about our approach [here](#) on the Unilever website.

Unilever was the first company to assess and [publicly report](#) our portfolio against six government-endorsed Nutrient Profile Models (NPM), as well as our own Unilever Science-based Nutrition Criteria (USNC). These NPMs include that developed by the Food Standards Agency (FSA) in 2004-2005 and against which the concept of foods high in fat, salt and sugar (HFSS) has been defined.

While Unilever welcomes regulation that aims to create a healthier food environment, we also want to encourage greater dialogue around the use of the NPM as an appropriate mechanism for underpinning obesity legislation. We remain concerned that the NPM does not consider portion size and so penalises some foods as if they were consumed in 100g portions e.g. Mustard, mint sauce and Marmite. It also can potentially make it more difficult to nudge consumers towards healthier options. For example, all 3 variants of Hellmann's Mayonnaise are HFSS despite very different composition from 79% fat (core) to 3% fat (lighter than light). The use of the NPM also takes no account of innovations around smaller portion sizes, for example the 'minis' in our ice cream ranges, that provide consumers with smaller, healthier alternatives to traditionally sized products.

Informing consumers

Food and drink manufacturers like Unilever play an important role in providing clear nutrition information on food labels and through digital channels that enables consumers to make informed decisions. Unilever recognizes the importance of transparency and providing consumers with the information they need in order to enjoy a balanced diet. We have seen that simple and accessible nutritional labelling has been effective in guiding consumers choices over recent years. However, this has been the result of a sustained programme of public education, and we are aware that new labelling requirements can often have a counterproductive effect and confuse consumers.

UK government advice and labelling strategy do not consider UPF or HFSS. While the concept of 'UPF' has become more widely recognized by consumers, it remains poorly defined – as set out above – and therefore any attempt to classify foods according to the level of processing would require a robust definition of what constitutes UPF to have any impact on consumer behaviour. It is also misleading to conflate UPF and HFSS, as the level of processing of a product in no way determines the proportion of fat, salt or sugar that the product contains. Indeed, conflating these two concepts would be likely to make it more difficult for consumers to identify the information they require to choose foods that contribute to a healthy, balanced diet.

Conclusion

Developing new healthier alternatives and promoting smaller portion sizes of some products is a key part of our offer to consumers. We support the Government's ambition to halve childhood obesity by 2030 and see an opportunity for food producers to play a positive role in helping to deliver this. We believe that achieving this ambition will require government to take a holistic and collaborative approach, incorporating robust scientific advice and consulting effectively with industry.

3 May 2024