

WAITROSE - WRITTEN EVIDENCE (FDO0137)

1. Waitrose & Partners is a trading brand of the John Lewis Partnership and has 331 shops in England, Scotland, Wales and the Channel Islands, including 59 convenience branches, 27 shops at Welcome Break locations, and Waitrose.com. The retailer combines the convenience of a supermarket with the expertise and service of a specialist shop - dedicated to offering quality food that has been responsibly sourced, combined with high standards of customer service. As part of an employee-owned business, all Partners have a say in how the business is run.
2. Waitrose plays an active role in helping its customers, Partners (employees), suppliers and the communities in which it operates, lead healthier, happier lives. This has been particularly important due to increasing demands on people's time, coupled with ongoing pressure on finances, both of which have impacted lifestyles which can pose risks to obesity and mental health. A healthy, varied diet is fundamental to a healthy, happy life and will be vital in ensuring lower levels of obesity and diet-related ill health. As trusted experts in nutrition, health and wellbeing, we aim to inspire our customers to make good choices by providing and signposting healthier products, offering relevant services, information, and inspiration.
3. Food production can also contribute to nature and biodiversity loss and is a significant contributor to climate change. The positive news is that Waitrose is determined to focus on diets that are good for people and also good for the planet.
4. In our written submission, we have focused our response on those questions we feel are most relevant to comment on, along with the additional questions posed by the committee.
- 5. 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.**
 - a. The Committee has heard from the experts who developed the UPF and HFSS definitions who have provided useful

insights. For some products there is an overlap as they could be considered UPF and HFSS e.g. confectionery; there are others that would be considered to be UPF but not HFSS e.g. wholegrain supermarket bread; and those that would be HFSS but not UPF e.g. olive oil. From a retailer perspective, this causes complexity and we know that our customers find it a difficult area to be guided on too.

- b. Practically, we would need to categorise foods as HFSS and/or UPF consistently for the purposes of compliance and so we can monitor and report on the balance of sales and the assortment. Whereas HFSS is an objective assessment based on the nutrient content of a food or drink, and a HFSS status is simple to determine, UPF status is a far more subjective measure which considers ingredient content and motivation for developing a product; this leads to various opinions of a manufactured food's UPF status. The establishment of a definitive UPF definition is at a less developed stage and is not currently as clear cut - this is something that will need to be addressed and an evidence based solution developed.

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

- a. Transparency with customers is crucial, and we provide them with clear information to help them make informed choices. We were one of the first retailers to introduce the Government's front of pack traffic light scheme in 2005 and we have continued to follow the guidelines for our labelling our products since, providing customers with informative and clear nutrition information. All Waitrose food and drink is required to have front of pack nutrition labels with few exceptions (e.g. single ingredient unprocessed foods or where the space on pack is very limited).
- b. We have over 2000 'Good Health' food and drink products in our assortment. 'Good Health' is a label we introduced to help our customers to identify nutritious food. These are mostly minimally processed foods, such as fruit, vegetables, eggs and

fish and more processed products which meet our robust criteria (products must be both non-HFSS and carry no red traffic lights and have a specific nutritional benefit e.g. high in fibre). Many of these Good Health products carry a Good Health logo on the pack or are grouped together on our website. We want to make it clear and simple for our customers to choose nutritious products and the logo alongside Front of Pack labelling, helps guide their choices.

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

- a. We understand the role that price and availability plays in supporting customers to make healthier choices and we know shoppers are experiencing financial pressures. We want to respond in the most considered way to ensure we offer good value for money on our most popular products across all of our ranges. Our Essential Waitrose range is popular with customers looking for outstanding value and quality.

It is the most extensive value range of any UK supermarket but doesn't compromise on quality, welfare or ethics. 350 Waitrose Essential lines are Good Health branded making it one of our healthier sub brands. Last year we invested £100m in lowering our prices which has meant significant savings across the whole shop. On average 50% of the products included met our Good Health criteria such as fruit, vegetables, fish and eggs.

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

- a. Retailers have a role to play in inspiring and enabling customers to make healthier choices and prepare delicious and nutritious meals. We actively promote cooking skills, publishing around 100 recipes a month in our magazine, newspaper, recipe cards and online and we are the only major food retailer to have a cookery school.

We are also keen to support community engagement programmes to increase cooking skills for children, young

people and other vulnerable members of society for example through our Healthy Happy Home programme with Home Start which provides training for volunteers so they can give families support and advice about feeding their family healthy food.

- b. Nutrition is considered from the very start of Waitrose's product development process with nutritional criteria for levels of calories, saturates, sugar and salt for all our prepared foods. We are adding more vegetables, and other fibre-rich ingredients, to more products and we are increasing our plant-based range. We have set a healthy product sales target which is additionally influencing how we sell and promote food and drink. We disclose progress against these targets, and what proportion of our total sales are HFSS, on our corporate website.
- c. For future Government policy to have a greater impact, the actions of multiple stakeholders across society will need to be coordinated. The policy development process should engage all those with a role to play. Retailers can input customer insight and opinion which can help to understand and overcome the intention/action gap (observed when customer actions do not align with stated intention on healthy behaviours). A collaborative and holistic approach will be important.

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

- a. Many of the government-backed measures to address obesity are voluntary programmes (reformulation, labelling). There has been wide adoption of these by the retail sector and most own label retailer products, including Waitrose own label products, display clear front of pack labelling. The formulation of the product has also taken into consideration the government-published salt, calorie and sugar targets. Take up

of these programmes across the wider, non-retail, food and drink industry have been less consistent, so the impact has been lessened and resulted in an uneven playing field.

- b. The Soft Drinks Industry Levy has been highly effective in reducing sugar intakes from a whole category of drinks as there were few technical barriers to switch from sugar to sweeteners. However, sweeteners are not universally accepted by all consumers and there is a concern that there may yet be other adverse health outcomes associated with the greater intake of sweeteners.
- c. We have complied fully with the recent HFSS location legislation and, although in its early days, we are expecting to see an impact on the balance of HFSS vs non-HFSS sales. Enforcement of such a complex piece of legislation does appear to be challenging and in order for it to have the greatest impact, more focus should be put on identifying and supporting those businesses who are being slower to fully adopt the measures.

10. 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.

- a. Any product related policy tools need an agreed definition of a healthy product. At the moment there is inconsistency between front of pack labelling criteria and the nutrient profile model which causes confusion in terms of reporting. It would also be timely to review the Nutrition and Health claims legislation to make sure that the marketing and advertising of healthier products is aligned with current understanding of a healthy, sustainable dietary pattern.
- b. There should be a whole industry approach to future policy implementation - smaller businesses should be supported to comply with product, advertising and merchandising restrictions rather than being exempted from them to ensure that the whole food environment is improved.

- c. We have seen from the salt reformulation programme that the slow and steady stealth reductions allows customers' tastes to adapt to less salt flavours, supporting longer-term and longer-lasting adjustments to diets. Further programmes to support product reformulation need to apply across the whole industry and there should be clear incentives for companies to comply.
- d. We are huge supporters of transparency in the food sector and as part of this will continue to make our data on healthy and plant-based sales available to help drive positive change. The Food Data Transparency Partnership, to which we are an active contributor, stands to be a very useful tool to monitor compliance and improvements and participation should be made mandatory.

11. We would also be grateful for your suggestions as to what role supermarkets could play in helping people eat more healthily.

- a. We have shared lots of the ways in which we are supporting our customers to improve the balance of their diets and this is an area we will continue to develop. Waitrose provides a wide range of fresh, seasonal produce and we actively promote easy-to-prepare midweek meals through simple recipe inspiration (e.g. Meal Maths recipes) and balanced meal deal promotions (e.g. our stir fry meal deal). We are one of the only retailers to maintain our fresh counters where customers can buy as much as they need and chat to a qualified Waitrose Specialist for advice and inspiration.
- b. We will continue to make improvements to the nutritional value of foods and drinks we sell (increasing fibre and reducing calories, salt, saturates and sugar) and have published targets to grow our sales of healthier and plant based foods. We have also put in place food donation schemes for surplus stock, much of which is fresh, nutritious produce, through our partnership with Fareshare that has seen us donate 20m meals.

- c. There is scope to explore the use of loyalty incentives to support healthy behaviour change and to use digital platforms to facilitate the selection of healthy products through filters and product suggestions.

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