

# 2023

# BENCHMARKING FOOD AND BEVERAGE COMPANY POLICIES TO SUPPORT HEALTHIER FOOD ENVIRONMENTS IN CANADA

FOOD AND BEVERAGE MANUFACTURING SECTOR

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## Declarations

Authors declare no competing interests.

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# EXECUTIVE SUMMARY

## BACKGROUND

Food environments heavily shape dietary patterns, and are a key intervention point for reducing diet-related noncommunicable diseases. Food manufacturers play a multi-faceted role in improving food environments, by implementing health-promoting strategies, policies and practices. Monitoring company policies and commitments is a key element of increasing accountability among companies to improve their health-promoting practices.

## METHODS

This report assesses the policies and commitments of the largest ( $\geq 1\%$  market share) food and beverage manufacturing companies in Canada as of October 2023. Using the BIA-Obesity (Business Impact Assessment - obesity and population nutrition) tool (implemented in  $>10$  countries), publicly available information was collected across 6 policy domains:

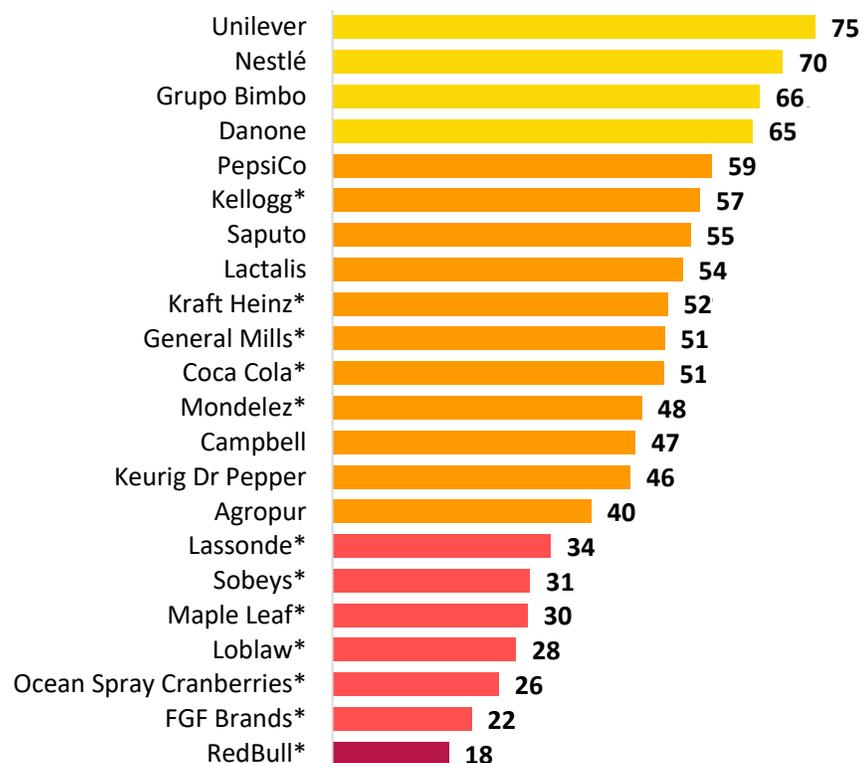
- corporate nutrition strategy
- product (re)formulation
- nutrition labelling and information
- product and brand promotion
- product accessibility
- disclosure of relationships.

Companies were contacted and provided the opportunity to verify and supplement the information collected. Company policies and commitments were assessed for each domain, using criteria adapted to the Canadian regulatory context, to establish the extent to which companies were meeting recommended best practices. Scores were weighted to provide an overall score assessing each company's policies and commitments to support healthier diets related to diet-related noncommunicable disease prevention.

## RESULTS

A summary of the overall results is shown in the figure below. There was a wide range in scores between companies, from 18 to 75 points out of 100, with a median score of 49 points. Scores were highest in the areas of 'corporate nutrition strategy' and 'product (re)formulation', and lowest in 'product accessibility.' Scores in 2023 represented an increase since a previous evaluation in 2018, largely due to improvements in the industry-wide pledge for food marketing restrictions.

**Overall BIA-Obesity Canada scores for policies and commitments of the largest food manufacturers in Canada**



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

# EXECUTIVE SUMMARY

## Key recommendations for companies to improve their approach to improving the healthiness of food environments include:

- **Set** a target for the proportion of sales from healthier products, and publicly **report** against this target annually at a national level.
- **Commit** to specific, measurable, achievable, relevant, time-bound (SMART) targets for key nutrients of public health concern (sodium, free/added sugars, saturated fat) and an indicator of overall healthfulness for all products in the company portfolio.
- **Refrain** from using nutrient content claims or general health claims on products that are required to carry a front-of-package nutrition symbol for foods high in saturated fat, sugars and/or sodium.
- **Eliminate** the promotion of less healthy foods and beverages and brands on all broadcast and non-broadcast media including digital media† to which children up to the age of 18 years may be exposed, and in settings where children gather, including techniques targeting children.
- **Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.
- **Publish** a complete list of relationships with and support for external organizations and all political donations.

## The results of the BIA-Obesity 2023 program of research have important implications for a variety of actors in the Canadian food system:

- **Food companies** can increase their transparency and reporting on their policies and actions related to nutrition. Companies must follow through on identified commitments with concrete actions and changes to existing practices to support transformational change in the food system and enable healthier diets.
- **Governments** can introduce mandatory reporting on key nutrition-related metrics and introduce comprehensive regulations to ensure all companies are contributing to healthier food environments.
- **Researchers** can monitor and evaluate if companies are fulfilling commitments that result in meaningful improvements to food environments and evaluate if these changes are influencing dietary patterns and population health, increasing accountability of food industry actors.
- **Civil society** can contribute their voice to support policy development that will encourage action across all companies, support organizations who are pushing for improved government policy, and use their purchasing power to support companies making strides in creating healthier food environments.

## Next steps towards healthier food environments

Critical next steps in this program of research are to continue to monitor and evaluate company actions over time, including assessing the extent to which the commitments and policies of food manufacturers in Canada are creating healthier food environments.

# BACKGROUND

Diet-related noncommunicable diseases, including obesity, represent some of the most pressing health challenges of this generation. Unhealthy dietary patterns are the leading cause of death and disability worldwide.<sup>1</sup> In Canada, overall diet quality is poor among both adults and children, with little improvement over time and persistent inequities across the socioeconomic spectrum.<sup>2,3</sup> The majority of people in Canada do not consume five servings of fruits and vegetables daily.<sup>4</sup> Overall, 58% of people in Canada consume more sodium than the upper limit of 2,300 mg,<sup>5</sup> and 66% consume more than 10% of their energy from free sugars.<sup>6</sup> In short, significant changes in the dietary patterns of Canadians are necessary to prevent diet-related noncommunicable disease.

The **food environment** represents the broad environmental factors that shape what consumers purchase and consume.<sup>7</sup> Food environments in Canada are dominated by unhealthy foods that are heavily marketed, highly accessible and often relatively inexpensive, thus negatively influencing dietary patterns.<sup>5,8-11</sup>

Multifaceted, systemic changes are needed to shift food environments so that they promote health and provide equitable access to healthy foods.<sup>12,13</sup> The World Health Organization (WHO) has identified the food industry as playing a key role in creating healthier food environments and subsequently, improved diet at a population level.<sup>14</sup>

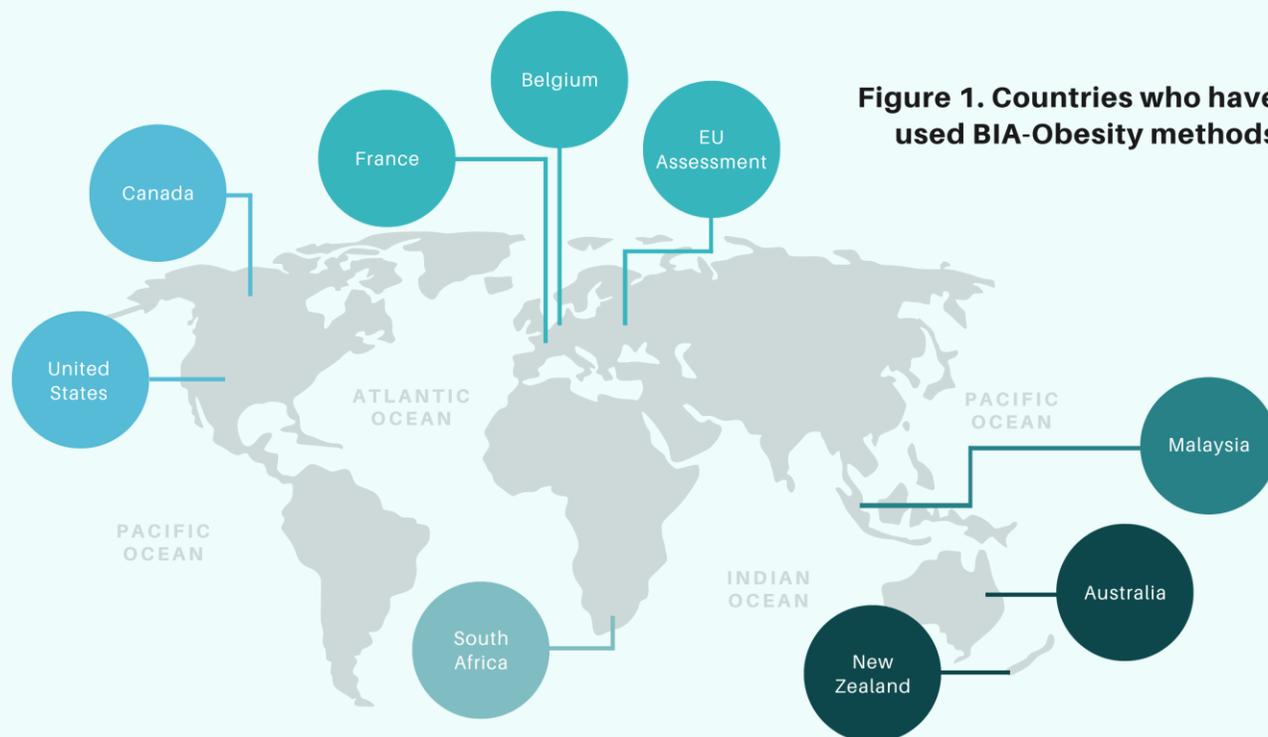
Food industry actions have been acknowledged as critically important in achieving the United Nations' Sustainable Development Goals, in particular Goal 2 (Zero Hunger), Goal 3 (Good Health and Well-being) and Goal 12 (Responsible Production and Consumption).<sup>15</sup>



Nutrition regulatory environments are shifting and evolving as governments implement policies aimed at improving the healthiness of food environments. Food companies have an important role to play in implementing these policies. At the same time, companies have the ability to act even in the absence of regulation, giving them a tremendous opportunity to contribute to better health and noncommunicable disease prevention at a population level.<sup>16,17</sup>

“**Multifaceted, systemic changes are needed to shift food environments so that they promote health and provide equitable access to healthy foods**”

# BACKGROUND



**Figure 1. Countries who have used BIA-Obesity methods**

Globally, various efforts have been underway to evaluate food industry efforts and actions in improving food environments to promote healthy, sustainable diets and prevent noncommunicable disease. Civil society monitoring efforts such as the Access to Nutrition Initiative (ATNI), the [World Benchmarking Alliance](#) and the [UK's Food Foundation](#) have developed methods for global monitoring of food industry practices.

INFORMAS has developed the Business Impact Assessment – Obesity and population-level nutrition (BIA-Obesity) to assess food company policies, commitments and actions at a country-level.<sup>17</sup> Developed in collaboration with an international group of public health nutrition policy experts, the tool has now been used or adapted for use in eight countries and at the regional level for Europe<sup>18-25</sup>, including in Canada in 2018<sup>25</sup>, with additional evaluations currently underway (see Figure 1).

While these tools use slightly different approaches, their primary aim is to increase transparency regarding industry practices as they relate to public health nutrition. They aim to evaluate and benchmark industry progress against promising practices where industry is innovating to promote health among their consumer base. Monitoring has been identified as a critical element of increasing accountability among all of the major actors who influence food environments.<sup>26,27</sup>

The results of the assessment and associated recommendations provide an opportunity to identify shifts that are occurring in food company practices and opportunities for improvement based upon public health research and international industry practice.



The International Network for Food and Obesity and noncommunicable disease Research, Monitoring and Action Support ([INFORMAS](#)) is a global research network that has developed various sets of research methods to evaluate critical characteristics of food environments.<sup>7</sup> Active in more than 58 countries and 85 institutions, INFORMAS represents international efforts to provide evidence that can inform the development of effective food environment policy and action.<sup>27</sup>

# BACKGROUND

## What are the actions that companies can take to improve food environments?

As manufacturers of a large proportion of the foods consumed by people in Canada, food manufacturers play a significant role in deciding which foods get produced, marketed, sold and consumed. Ways that companies can support healthier food environments can be summarized across six areas of action<sup>17</sup>:

### 1 Commit to population-level health and good nutrition for all

Food companies can contribute to efforts to improve population diets by having nutrition as a central component of their corporate strategy. Food companies can develop overall strategies to increase the proportion of sales from healthy products relative to unhealthy products, resulting in consumers having healthier foods and beverages in their grocery carts and in their homes. Company commitments should be comprehensive, publicly disclosed and with routine reporting of progress, to ensure they lead to meaningful improvements in food environments. Responsibility for these commitments needs to be assigned at the highest levels of accountability within company structures to ensure accountability in meeting those targets.

### 3 Create supportive nutrition information environments

Food labels in Canada not only provide consumers with important mandatory nutrition information on nutritional content, but also display a variety of promotional techniques on products that influence consumer purchasing and consumption. Companies can ensure that they are practicing responsible labelling and providing Canadian consumers with clear and consistent information to make informed choices. In an increasingly digital age, companies can ensure that consumers are receiving the same nutrition information when purchasing foods online as they would if they were purchasing a product in stores.

### 2 Improve the nutritional quality of food and beverage products for sale

Companies can set clear, SMART targets (specific, measurable, achievable, relevant and time-bound) for all products across their portfolios to improve their nutritional quality. Targets need to have the potential to meaningfully change dietary patterns, including substantial changes among the products that are the most commonly sold, and should have particular considerations for the nutrients of public health concern, namely added sugars, sodium and saturated fats.

### 4 Eliminate children's exposure to marketing of unhealthy food

Children are particularly susceptible to unhealthy food marketing, which influences their food preferences and consumption patterns.<sup>28,29</sup> Recommendations from the World Health Organization suggest that limiting any exposure to marketing of unhealthy foods to children up to the age of 18 is a population health priority.<sup>30</sup> Companies can limit the marketing of their products on media that children may be exposed to, can restrict marketing in environments where children are present, and can limit the marketing techniques that might appeal to children on their own product packaging. 5

# BACKGROUND

## 5 Increase physical and economic accessibility to healthier products

The physical availability of healthier foods within one's environment and the cost of healthier foods are major barriers to healthier dietary patterns. In concert with retailers, food manufacturers can create strategies and commitments to ensure that healthier products are widely distributed and thus available next to less healthy products on store shelves, and can encourage the provision of healthier product lines in key settings. Companies can also work to create healthier products that are available at the same or a lesser cost, increasing financial access to healthier products.

## 6 Be fully transparent about partnerships and political activity

Companies partner with many different types of community organizations, researchers and research institutions, and industry-led initiatives in an effort to increase corporate social responsibility. Complete transparency is necessary to ensure that these efforts are not solely being used to create a more favourable public opinion and stall governmental efforts to implement more systemic changes. Corporate political activity, including lobbying, public policy positions and responses to government consultations, also require transparency to ensure such forces do not unduly influence public health policy.

## The Canadian food policy context



Food companies in Canada operate within a regulatory context that influences some of these areas for action. In Canada, the Healthy Eating Strategy represents the federal government's approach to improve food environments and population diet.<sup>31</sup> The strategy has proposed and implemented a number of regulatory changes that influence food industry practices.

The Food and Drug Act and the associated Food and Drug Regulations shape elements of food labelling and food marketing.<sup>32,33</sup> Recent changes to the Food and Drugs Act include symbols on the front of food and beverage packaging that are considered 'high in' sodium, sugars and saturated fat, which will be mandatory by January 2026.<sup>34</sup> Health Canada banned the use of partially hydrogenated oils (industrially-produced trans fats) in products as of 2018<sup>35</sup>, and has also published voluntary sodium targets for the majority of packaged food products, most recently updated in 2020, to guide industry reformulation.<sup>36</sup> While current regulations restrict misleading marketing of foods and beverages, there are no broad federal restrictions on the marketing of less healthy food products. A set of proposed restrictions from Health Canada were published in 2023, which includes restrictions on advertising for less healthy foods that are targeted to children.<sup>37</sup> If implemented, these regulations would represent progress but still fall short of recent WHO recommendations<sup>30</sup>, as they focus solely on child-targeted promotions and advertising and are restricted to television and digital media. As of June 28<sup>th</sup> 2023, the self-regulatory industry Code for the Responsible Advertising of Food and Beverage Products to Children ([CCFBA](#)) restricts marketing of less healthy foods to children under the age of 13 years in Canada.<sup>38</sup>

To increase governmental transparency, Canada has a Registry of Lobbyists<sup>39</sup> that provides transparency by requiring regular reporting of governmental meetings with paid lobbyists, including the number of individuals contacted and high-level summaries of topics of discussion. As part of the Healthy Eating Strategy, Health Canada has a requirement to post the dates, topics, organizations and documents exchanged for all meetings and correspondence regarding the Healthy Eating Strategy on a publicly available website.<sup>40</sup>

# METHODS

This study adapted the BIA-Obesity methods developed by INFORMAS to evaluate and benchmark the nutrition-related policies and commitments of the most prominent food and beverage manufacturers in Canada as of 2023.<sup>17</sup> The process is described below and summarized in Figure 2.

## Adaptation of the BIA-Obesity tool to the Canadian context and current international recommendations

The BIA-Obesity tool was developed to be adapted to the national context to best reflect country-level regulatory and market-driven factors. To adapt to current labelling regulations, the BIA-Obesity Canada 2023 scoring did not assess front-of-package labelling practices and policies, given the transitional period for [mandatory front-of-package labelling](#) which will be required on food industry products as of January 1, 2026. Recommendations for the use of a government-endorsed nutrient profiling system using the thresholds for foods high in sodium, total sugars and saturated fats as per front-of-package nutritional labelling regulations were also incorporated. Marketing criteria and scoring were also updated, based on the most recent World Health Organization recommendations.

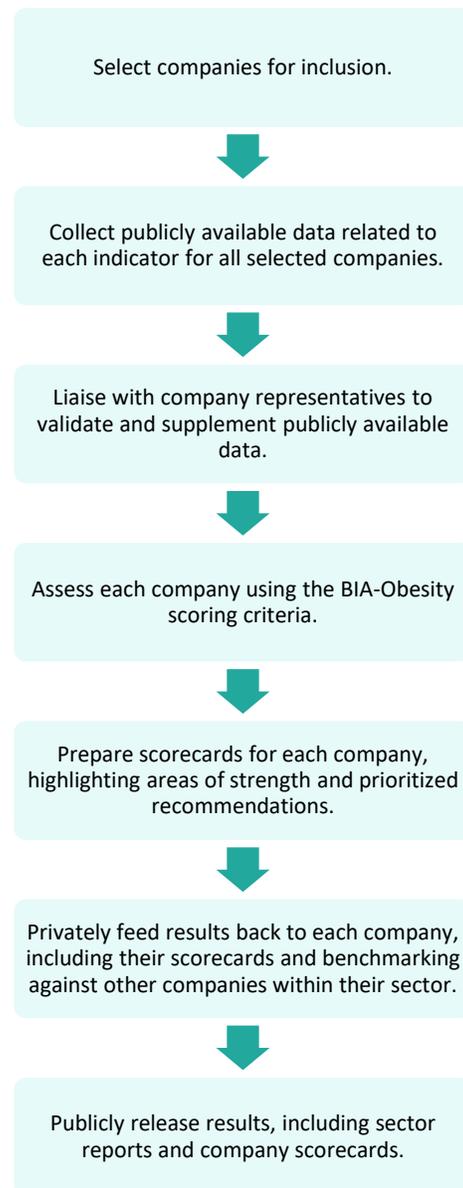
## Selection of companies

Leading companies within the manufacturing sector were selected based on the most recent market share data available on Passport by Euromonitor International, and a national market structure analysis.<sup>41, 42</sup> Packaged food and non-alcoholic beverage manufacturers were selected if they accounted for  $\geq 1\%$  of shares as of 2020 and 2021 respectively, and/or if they had been included in the previous Canadian BIA-Obesity assessment conducted in 2018. Two companies were excluded due to the lack of relevance of their product portfolios (i.e., bottled water and dry pasta manufacturers).

## Data collection

Data related to the policies and commitments of each selected company related to 6 key policy domains (corporate population nutrition strategy; product (re)formulation; nutrition labelling and information; product and brand promotion; product accessibility; and disclosure of relationships with external organizations and lobbying) were collated via publicly available sources such as company websites and Corporate Social Responsibility/Environmental, Social and Governance (ESG) reports as well as industry association websites between August 2022 and June 2023. A secondary scan of company websites was conducted to ensure that reports published by the end of the data collection period were included (if applicable).

Figure 2. BIA-Obesity Canada 2023 process<sup>17,25</sup>



† Full scoring criteria is available upon request to the research team.

# METHODS

## Data validation

Companies were contacted between June and August 2023 and invited to supplement, correct and validate the publicly available data collated by the research team. Companies received a prefilled data collection template composed of a series of questions for each of the 6 aforementioned domains. Information provided by companies was requested to be substantiated with appropriate documentation. At a company's request, non-disclosure agreements were signed to ensure proprietary data would remain confidential. Companies were provided with a minimum of 3 weeks to validate the collated data; all information received by the research team by October 2023 was taken into account.

## Scoring of company policies and commitments

The strength, comprehensiveness and transparency of company policies and commitments was assessed using the BIA-Obesity scoring criteria, adapted to the current Canadian policy context. Companies were attributed scores for each of the 6 domains. Domains were then weighted based on their relevance to population health and nutrition to yield an overall score out of 100 points. A full list of domains and indicators can be found in Table 1<sup>†</sup>. A subsample of companies were scored by two researchers, and any discrepancies were discussed and resolved, in consultation with the broader international research team. Issues or adaptations to scoring practices that were identified during the double-coding process were then retroactively applied to the rest of the scoring, which was completed by one researcher.

## Identification of promising practices

A series of promising practices were identified by assessing the practices of the highest scoring companies in the BIA-Obesity evaluation. Practices of highest-scoring companies for each indicator and domain were examined to identify where company practices aligned with domain descriptions and theoretical best practices. In addition, national and international news media and consultation with international colleagues working on BIA-Obesity and related projects identified key practices occurring outside of Canada that are likely to support public health initiatives.

## Comparison of changes in BIA-Obesity Canada scores over time

A previous assessment of the Canadian packaged food and beverage manufacturers was conducted in 2018.<sup>25</sup> The results in 2023 were compared to the results obtained in 2018 to examine changes in company policies and practices over time. Several changes were made to the scoring in 2023 due to the changing regulatory environment and evolution of promising practices being implemented by companies. This evolution in criteria and scoring is an inherent part of the benchmarking process.<sup>27</sup> Despite these changes, a comparison of these scores is still reflective of changes in company policy and commitments in relation to what is happening in the broader context.

<sup>†</sup> Full scoring criteria is available upon request to the research team.

## Table 1. BIA-Obesity domains and indicators<sup>†</sup>

Domain	Domain description	Indicator category	Weight
<b>A. Corporate population nutrition strategy</b>	Overarching commitment to improving population nutrition for obesity and NCD prevention.	<ul style="list-style-type: none"> <li>— Commitment to nutrition and health in corporate strategy</li> <li>— Reporting against specific, measurable, achievable, relevant and time-bound (SMART) nutrition and health objectives and targets</li> <li>— Key Performance Indicators and remuneration of management linked to nutrition and health-related targets</li> <li>— Reporting on the percent sales volume of healthier products</li> </ul>	10
<b>B. Product (re) formulation</b>	Commitment to addressing nutrients of concern (sodium, saturated fat, added/free sugars) and portion size in the development and reformulation of products.	<ul style="list-style-type: none"> <li>— Commitment to addressing the healthfulness of products and brands, and targets related to sodium, free/added sugars, saturated fat, and portion size/energy content (where relevant)</li> <li>— Engagement with initiatives related to product formulation (e.g., Health Canada's 2025 sodium reduction targets)</li> </ul>	30
<b>C. Nutrition labelling and information</b>	Commitment to providing comprehensive nutrition information on-pack and online.	<ul style="list-style-type: none"> <li>— Voluntary use of front-of-pack labelling<sup>‡</sup></li> <li>— Provision of added sugar information</li> <li>— Provision of online nutrition information</li> <li>— Use of nutrient content claims</li> </ul>	20
<b>D. Product and brand promotion</b>	Commitment to reducing the promotion of less healthy products on broadcast and non-broadcast media including digital media and in settings where children gather.	<ul style="list-style-type: none"> <li>— Policies restricting marketing to which children are exposed on broadcast and non-broadcast media including digital media and in settings where children gather and the use of marketing techniques that appeal to children and adolescents</li> <li>— Support for government policies restricting food and beverage marketing to which children are exposed</li> <li>— Policies restricting less healthy product and brand promotion to the general population</li> <li>— Disclosure of marketing expenditures for healthier and less healthy foods and beverages to children, adolescents and adults</li> </ul>	30
<b>E. Product accessibility</b>	Commitment towards addressing the availability, affordability and distribution of healthier and less healthy products.	<ul style="list-style-type: none"> <li>— Commitment towards addressing the availability of healthier and less healthy products</li> <li>— Commitment towards addressing the price of healthier and less healthy products</li> <li>— Support for government fiscal policies</li> </ul>	5
<b>F. Disclosure of relationships with external organizations and lobbying</b>	Policies and disclosures regarding funding or support for professional organizations, external research, philanthropic groups, nutrition programs, active lifestyle programs, and political donations.	<ul style="list-style-type: none"> <li>— Transparency of support for external organizations and lobbying practices</li> </ul>	5

<sup>†</sup> Table adapted from Sacks G, Vanderlee L, Robinson E, et al. *Obesity Reviews*. 2019; 20(S2): 78–89.

<sup>‡</sup> Information collected, but not scored in light of new front-of-pack labelling regulations in Canada.



# RESULTS



# COMPANY PARTICIPATION

A total of 22 companies were selected for inclusion, of which 10 (45%) participated\* in the data validation process.

## Companies selected for inclusion

Selected companies represented ~49% of the packaged food manufacturing sector, and ~75% of the non-alcoholic beverage manufacturing sector in Canada.†

### Packaged food (and non-alcoholic beverage) manufacturers

- Agropur Cooperative
- Campbell Soup Co (Campbell Company of Canada)
- Danone SA (Danone Canada Inc)
- Grupo Bimbo SAB de CV (Bimbo Canada)
- FGF Brands Inc‡\*
- General Mills Inc\* (General Mills Canada Corp)
- Groupe Lactalis (Lactalis Canada Inc)
- Kellogg Co\* (Kellogg Canada Inc)
- Kraft Heinz Co\* (Kraft Heinz Canada ULC)
- Loblaw Cos Ltd\*
- Maple Leaf Foods Inc\*
- Mondelez International Inc\* (Mondelez Canada Inc)
- Nestlé SA (Nestlé Canada Inc)
- PepsiCo Inc (PepsiCo Canada)
- Saputo Inc
- Sobeys Inc/Empire Co Ltd\*
- Unilever PLC (Unilever Canada Inc)

### Non-alcoholic beverage manufacturers

- Coca-Cola Co\* (Coca Cola Ltd)
- Keurig Dr Pepper Inc (Keurig Dr Pepper Canada)
- Lassonde Industries Inc\*
- Ocean Spray Cranberries Inc\*
- Red Bull GmbH\* (Red Bull Canada Ltd)

## Market structure in Canada

As part of INFORMAS Canada's private sector module, an [analysis](#) of the structure of packaged food and non-alcoholic beverage manufacturing and retailing sectors and markets identified leading companies in Canada, and analyzed the structure of markets and sectors in which companies operate, focusing on market concentration and common ownership.<sup>42</sup>

Canadian packaged food and non-alcoholic beverage manufacturing sectors were demonstrated to consist of a combination of oligopolistic and more competitive product markets, with significant multinational company presence, including a large presence of foreign-owned multinational companies. Overall, the non-alcoholic beverage sector was found to be highly concentrated.

This study highlighted that a small number of large corporations have a considerable amount of power to influence Canadian food environments. This work underscores the importance of monitoring the policies and practices of these companies to better understand how they are shaping food environments and contributing to dietary patterns of the Canadian population.<sup>42</sup>

\* Represents companies that did not participate in the data validation process.

† Based on Canadian 2020/21 company share data from Passport, by Euromonitor International.<sup>25</sup>

‡ In 2021, George Weston sold its fresh and frozen bakery business to FGF Brands; Wonderbrands is part of FGF Brands and groups brands such as Wonder, D'Italiano, Casa Mendosa, Gadoua and Country Harvest.

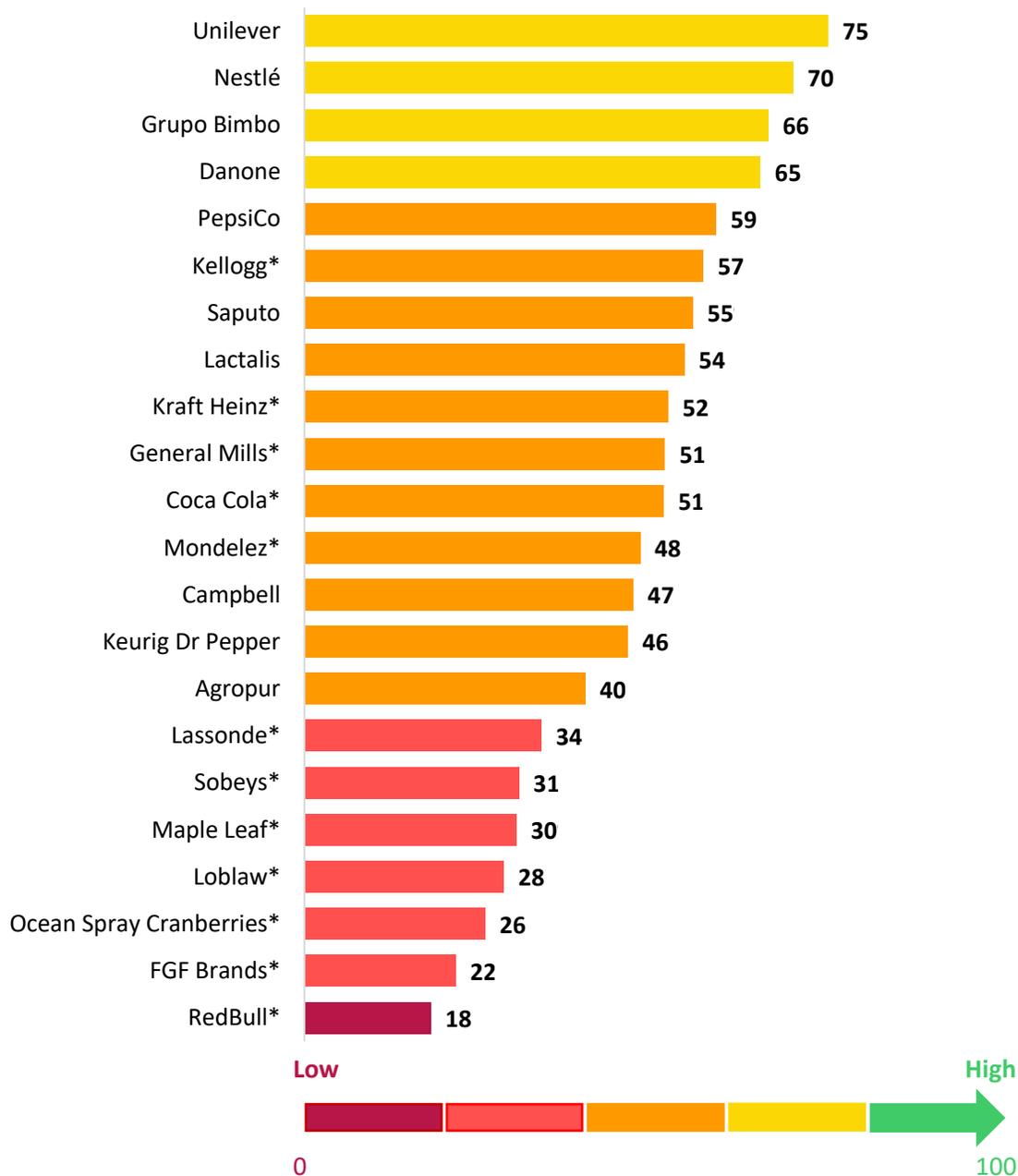
# OVERALL RESULTS

## Overall index score

**Median score: 49**

There was substantial variability in the strength, comprehensiveness and transparency of company policies, commitments and practices related to population nutrition and health, with company scores ranging from 18 to 75 out of 100 (see Figure 3). Company-specific scores for each domain and associated company recommendations can be found in Appendix A.

**Figure 3. BIA-Obesity Canada 2023 company overall scores**



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

# OVERALL RESULTS

## Domain-specific scores

The company scores for each domain are shown in Figure 4 (in order of descending overall score). The highest scoring domains were 'product (re)formulation' and 'corporate nutrition strategy', and the lowest scoring domain was 'product accessibility.'

**Figure 4. Summary table of the BIA-Obesity Canada 2023 scores for policies and commitments of the largest food manufacturers in Canada in all domains**



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

# A. CORPORATE NUTRITION STRATEGY

## Good practice statement

The company has a clear overarching commitment to population nutrition and health, which references relevant international (e.g., The UN Sustainable Development Goals or the World Health Organization recommendations) and national (e.g., Health Canada’s Healthy Eating Strategy) priorities. This commitment, and associated policies and metrics are reported on annually, publicly and at the national level.

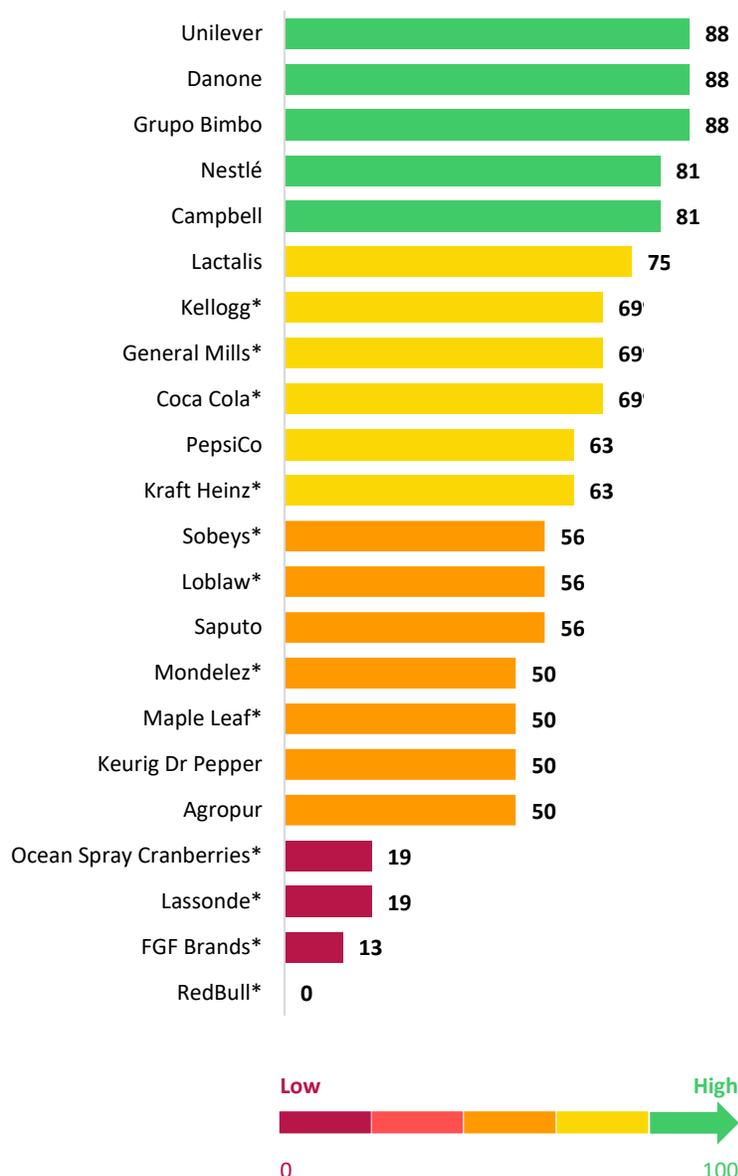
## Key findings

**Median score: 59**

Most companies acknowledged the importance of health and nutrition in corporate strategies and statements; however, few had comprehensive, national-level reporting of commitments, policies and practices to support population nutrition, and associated accountability mechanisms (see Figure 5).

- 21/22 companies made some mention of nutrition and health in their corporate strategy
- 18/22 companies published national or global reports that included at least some nutrition-related information
  - 5/22 companies published reports that included national-level reporting on nutrition-related objectives and targets
  - 8/22 companies published reports that included global-level reporting on nutrition-related objectives and targets, but no national-level reporting
- 6/22 companies explicitly linked nutrition-related key performance indicators to executive/leadership compensation<sup>†</sup>
- 8/22 companies had some reporting on their sales volume of healthier products
  - 5/22 companies used  $\geq 1$  government-endorsed nutrient profiling model to report on the percent sales volume of healthier products
    - 2/22 companies (Danone and Unilever) had targets to increase sales volumes of healthier products<sup>‡</sup>

Figure 5. BIA-Obesity Canada 2023 company scores for the ‘corporate nutrition strategy’ domain



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

<sup>†</sup> Additional companies had commitments regarding linking Environment, Social, Governance (ESG) metrics to executive/leadership compensation, however, it was unclear if and how population nutrition and NCD related metrics would be considered.

<sup>‡</sup> A third company (Nestlé) published an associated target after the initial data collection period. This will be taken into account in future assessments.

# Priority recommendations

- 1 **Incorporate** nutrition within the company’s reporting strategy (e.g., within annual corporate social responsibility reports), and include national level reporting on nutrition-related metrics for Canada.
- 2 **Establish** nutrition-related key performance indicators specific to diet-related noncommunicable disease, and link these to executive compensation to ensure **accountability** for nutrition-related commitments, policies and practices.
- 3 **Set** a target for the percentage volume of sales of healthier products and publicly **report** against these targets annually at a national level†.

## Promising policy and practice examples

Indicator category	Canadian and international promising policy and practice examples
Commitment to nutrition and health in corporate strategy	<p><b>Unilever</b> has a clear commitment to tackling obesity, and a comprehensive set of nutrition objectives outlined in its <a href="#">Future Foods Positive Nutrition Action Plan</a> applicable to all markets. The company’s strategy <a href="#">references</a> the UN SDGs, and the WHO Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2020.</p>
Reporting against specific and measurable nutrition and health objectives and targets	<p><b>Danone</b> publishes annual <a href="#">global corporate social responsibility reports</a> and <a href="#">investor reports</a> that include consolidated reporting on nutrition-related topics, goals and associated progress. The company also reports on nutrition initiatives in Canada within <a href="#">national corporate social responsibility reports</a>.</p> <p><b>Grupo Bimbo</b> publishes annual <a href="#">global corporate social responsibility reports</a> with comprehensive reporting on nutrition topics and metrics, including national-level reporting on progress related to product reformulation, and partnerships. The company also reports on nutrition initiatives in Canada on its national website.</p>
Key Performance Indicators (KPIs) and remuneration of management linked to nutrition and health-related targets	<p><b>Kraft Heinz</b> <a href="#">links</a> all Environmental, Social and Governance (ESG) initiatives to CEO and leadership compensation.</p>
Reporting on the percent sales volume of healthier product categories	<p><b>Danone</b> <a href="#">reports</a> on the healthfulness of its product portfolio using various definitions for what constitutes ‘healthy’, including government-endorsed systems. The company has many <a href="#">targets</a> to increase the percent sales volume of healthier products, such as a target for at least 85% of volumes sold of dairy, plant-based beverages, water and “aquadrinks” to have a Health Star Rating of at least 3.5 by 2025.</p> <p><b>Unilever</b> <a href="#">reports</a> on the percent sales volume of products meeting various government-endorsed nutrient profiling systems as well as Unilever Science-based Nutrition Criteria at the global level, and for certain markets. The company has associated <a href="#">targets</a> to increase sales of healthier products, such as for 85% of servings sold to comply with the Unilever Science-based Nutrition Criteria by 2028.</p>

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [proposed nutrient thresholds for foods that would be restricted to be marketed to children as they are not ‘low in’ sodium, sugars and saturated fats](#).

# B. PRODUCT (RE)FORMULATION

## Good practice statement

The company has specific, measurable, time-sensitive, public, and nationally-applicable product (re)formulation commitments and targets to limit and/or reduce nutrients of public health concern, including sodium/salt, saturated fat, added sugars and energy density/portion size, across their product portfolio. Progress towards commitments and targets is reported on annually at the national level, with reference to government-endorsed guidelines and/or nutrition profiling models, as applicable.

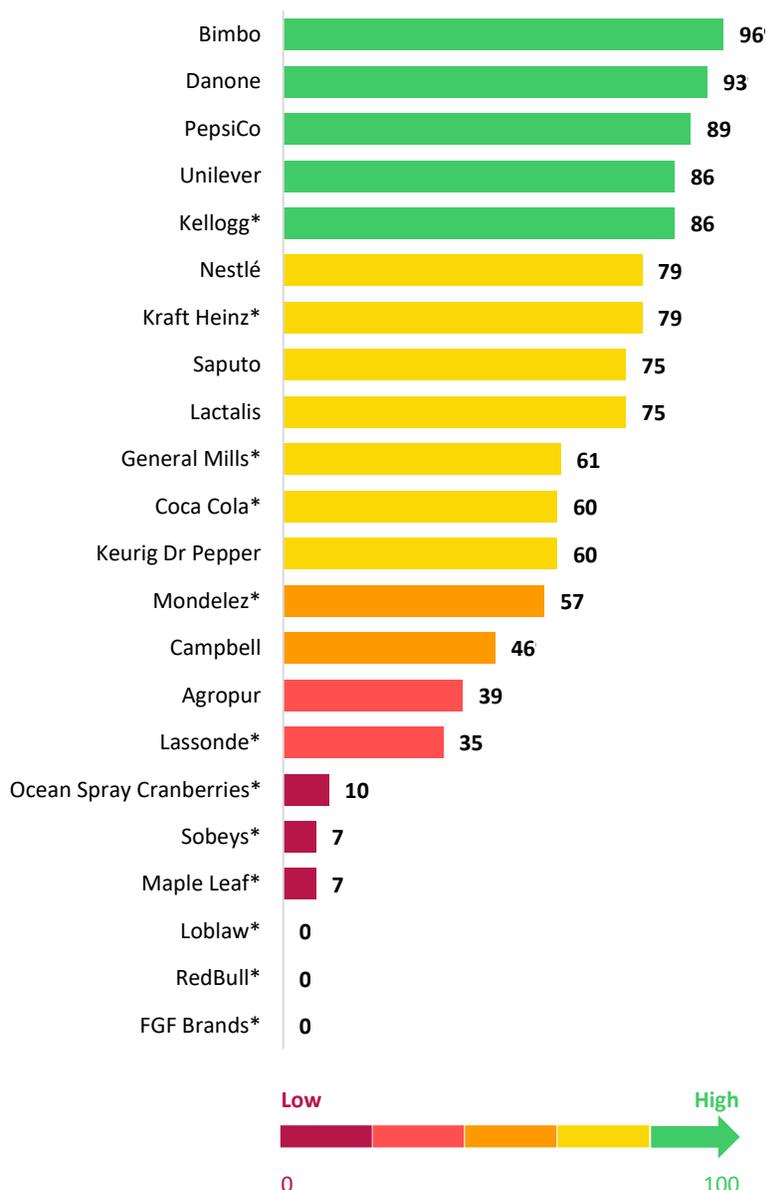
## Key findings

**Median score: 60**

Most companies had commitments or demonstrated action towards product (re)formulation for nutrients of public health concern (see Figure 6).

- 16/22 companies had a publicly available overarching national and/or global commitment related to the nutritional composition of their product portfolio.
  - 3/22 companies had no public commitments regarding product (re)formulation
- Many companies had targets or thresholds to address nutrients of public health concern in their product portfolio<sup>†</sup>:
  - Sodium: 13/17
  - Saturated fat: 11/17
  - Sugars: 15/22
  - Energy/portion size: 12/22
- Nutrition profiling methods differed across companies
  - 4/22 companies published a nutrient profiling model/classification system, or the scientific basis behind their classification system in peer-reviewed literature.
  - 4/22 companies used a government endorsed classification system covering all nutrients of public health concern (Health Canada [Front-of-packaging labelling thresholds](#), [Health Star Rating](#), or others).

Figure 6. BIA-Obesity Canada 2023 company scores for the 'product (re)formulation' domain



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

† Denominators are based on the number of companies that would be expected to have targets according to their respective product portfolios.

# Priority recommendations

- 1 **Commit to specific, measurable, achievable, relevant, time-bound (SMART) targets** for ALL key nutrients of public health concern (salt, free/added sugars, saturated fat) and energy reduction (where applicable), as well as an indicator of overall healthfulness for all products in the company portfolio.
- 2 **Report** routinely on the nutritional content of the product portfolio, by product category, including changes over time at a national level. Reporting should reference government reformulation targets or nutrition criteria, where applicable.
- 3 Publicly **commit** to Health Canada’s 2020-2025 sodium reduction targets, where applicable.

# Promising policy and practice examples

Indicator category	Canadian and international promising policy and practice examples
Commitment to addressing nutrients of concern (sodium, saturated fat, added/free sugars) and portion size in the development and reformulation of products	Up to 2022, <b>Grupo Bimbo</b> had SMART targets to reach thresholds for nutrients of public health concern for products for daily consumption, and nutritional guidelines for products for occasional consumption. Reporting on progress overall and for each nutrient was made publicly available in the <a href="#">global corporate social responsibility report</a> , including national level data. The Grupo Bimbo strategy has evolved to include SMART targets, based on <a href="#">Health Star Rating</a> thresholds, guiding the reformulation of products for daily and occasional consumption, for both 2025 and 2030.
Engagement with initiatives related to product formulation	<p><b>Lactalis</b> has publicly <a href="#">committed</a> to Health Canada’s sodium reduction targets for cottage cheese, processed cheese, natural cheese and butter and is currently assessing its portfolio against Health Canada’s front-of-package labelling for sugar and saturated fat.</p> <p><b>Woolworths</b>, an Australian retailer, has a SMART target for their own-brand products to meet voluntary sodium, sugar and saturated fat guidelines set out in the Australian Government’s Healthy Food Partnership, and associated reporting on progress within their <a href="#">corporate social responsibility report</a>.</p>

# C. NUTRITION LABELLING AND INFORMATION

## Good practice statement

The company commits to providing comprehensive nutrition information to consumers in online settings, and to limit the use of nutrient content claims on products that will be required to carry a front-of-package nutrition symbol in Canada for foods high in sodium, sugars, saturated fat, or any combination of these.

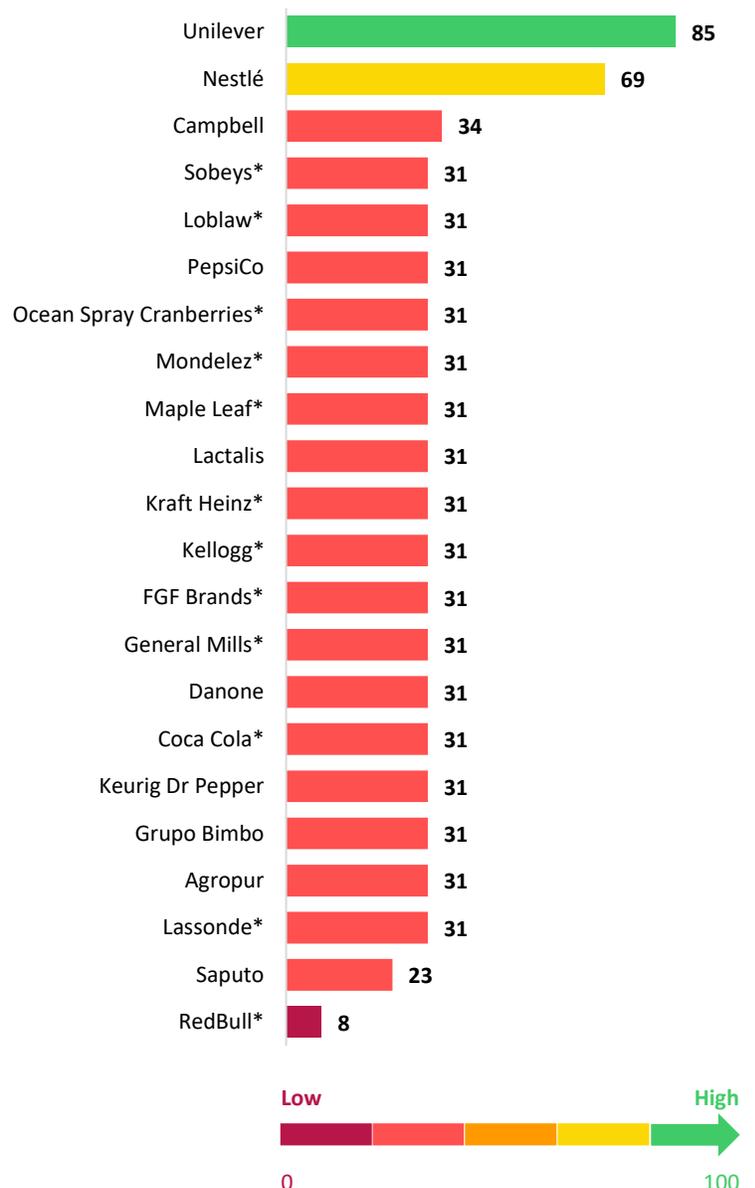
## Key findings

**Median score: 31<sup>†</sup>**

Most companies displayed comprehensive online nutrition information. Few had policies regarding the use of nutrient content claims on less healthy products, such as those which will be required to carry a front-of-package symbol in Canada (see Figure 7).

- 21/22 companies provided comprehensive nutrition information online for most or all products and brands.
- 21/22 companies did not provide added sugar information for products.
- 20/22 companies did not have a policy regarding the use of nutrition claims on 'healthier' products.
  - Unilever and Nestlé were the only companies to have a policy related to the use of nutrition claims on 'healthier' products.
  - No company had a commitment to only display nutrition claims, and specifically nutrient content claims, on products which will not be required to carry a front-of-pack nutrition symbol in Canada for foods high in sodium, sugars, saturated fat.

Figure 7. BIA-Obesity Canada company scores for the 'nutrition labelling and information' domain



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

† In BIA-Obesity Canada 2023, there was no scoring for current front-of-package labelling practices and policies given the transitional period for [mandatory front-of-package labelling](#) which will be required on food industry products as of January 1, 2026.

# Priority recommendations

- 1 Introduce** a policy to not include nutrient content claims or general health claims on own-brand products that are required to carry a front-of-package nutrition symbol.
- 2 Identify** ways to provide additional information pertaining to added sugars to consumers on food packages or in online settings.
- 3 Work with retailers** to ensure that nutrition information is available at all online points of consumer purchase.

## Promising policy and practice examples

Indicator category	Canadian and international promising policy and practice examples
Provision of added sugar information	<b>Campbell</b> provides added sugar information for some products <a href="#">online</a> (Information was not available for all products, however, this was the only company identified as providing such information).
Provision of online nutrition information	<b>Keurig Dr Pepper</b> provides complete nutrition information online in a user-friendly format. Nutrition information is available for pre-packaged products, and for <a href="#">fountain beverages</a> , which can be customized (e.g., quantity, proportion of the drink which is composed of ice cubes...).
Use of nutrient content claims	In October 2023, <b>Danone</b> <a href="#">committed</a> to not displaying nutrition or health claims on products with a <a href="#">Health Star Rating</a> below 2.5 stars. A transition period will take place until October 2024.†

† Policy published after the BIA-Obesity Canada 2023 data collection period, and not taken into account within the company's score for the 2023 assessment.

# D. PRODUCT AND BRAND PROMOTION

## Good practice statement

The company has a comprehensive strategy to reduce children’s exposure to marketing of less healthy foods and beverages, that is independently audited on a regular basis. This policy covers marketing to which children under the age of 18 are exposed and marketing techniques that appeal to children, on all broadcast and non-broadcast media including digital media and in settings where children gather, including product/brand sponsorship, and product packaging.

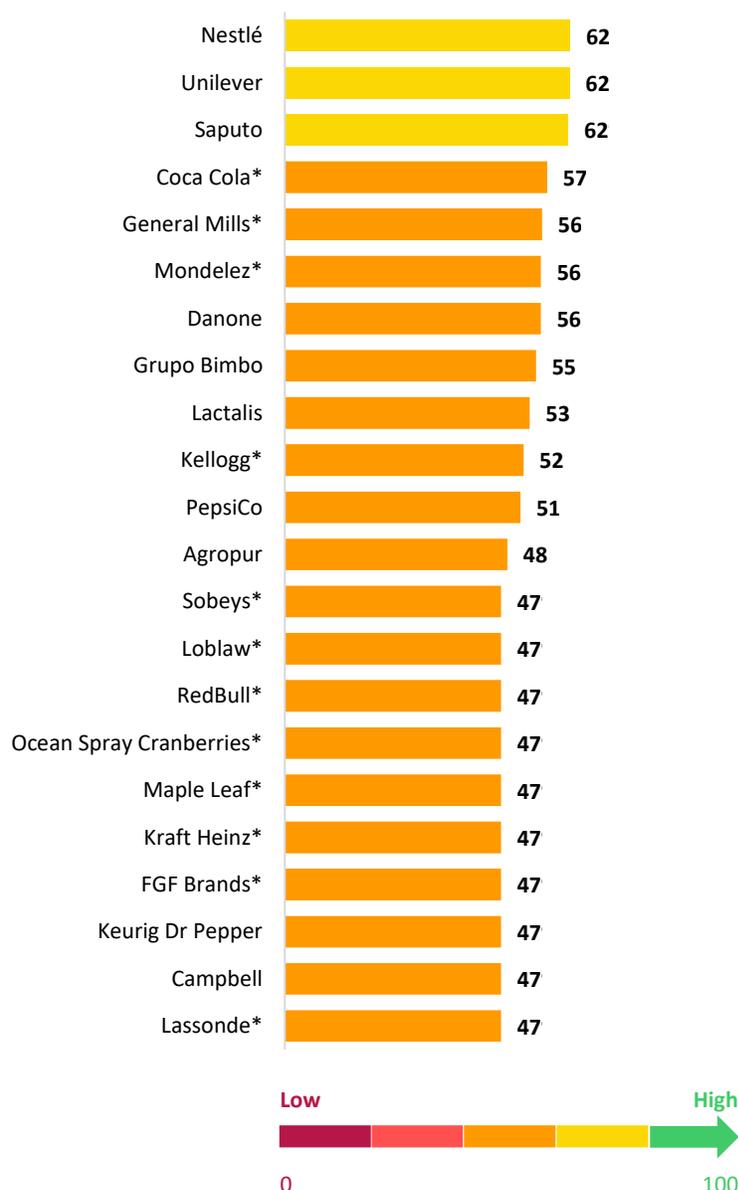
## Key findings

### Median score: 50

All companies committed to restricting child-directed advertising via the new industry Code for the Responsible Advertising of Food and Beverage Products to Children in Canada (CCFBA) as of June 28<sup>th</sup>, 2023<sup>†</sup>, and some companies went beyond the CCFBA (see Figure 8).

- 10/22 companies had company-specific policies to decrease the marketing of less healthy foods and beverages to children beyond the CCFBA.
  - 3/22 companies used an age threshold above 13 years.
  - 8/22 companies had provisions covering the use of child appealing or child directed marketing techniques on product packaging.
- No company had a public policy position demonstrating support for government policies aimed at restricting the power and exposure of less healthy food marketing to children.
- No company had targets and associated reporting related to the proportion of marketing expenditures spent on healthier vs less healthy products.

Figure 8. BIA-Obesity Canada 2023 company scores for the ‘product and brand promotion’ domain



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

† The Code for the Responsible Advertising of Food and Beverage products to Children (CCFBA) restricts child-directed advertising of foods and beverages that do not meet specific nutrition criteria. (i.e., ‘low in’ criteria set out in the Table of Permitted Nutrient Content Statements and Claims). The Code covers children under the age of 13 years and applies an audience threshold of 15%. It is administered by Ad Standards, which offers preclearance services to advertisers.

# Priority recommendations

**1 Eliminate** the promotion of less healthy foods and beverages and brands on all broadcast and non-broadcast media including digital media† to which children up to the age of 18 years may be exposed, and in settings where children gather, including techniques targeting children, as per WHO guidelines.

In addition, it is recommended to:

- Ensure the definition of ‘children’ includes those under 18 years of age,
- Define promotion broadly and ensure it captures all forms of advertising including brand marketing,
- Ensure children are protected in all media and settings where they are exposed to food promotion including on social media, food packaging, and through sponsorship,
- Avoid marketing collaborations with celebrities and social media influencers popular with children under 18,
- Restrict brand sponsorship, in addition to product sponsorship for sports or events that children may attend,
- Conduct compliance audits at a national level with independent third-party assurance.

**2 Establish targets** for the proportion of marketing expenditures spent on healthier vs. less healthy products and **annually report** on progress.

**3 Support** government policies recommended by the World Health Organization to improve food environments, including restrictions on the marketing of less healthy foods and beverages to which children are exposed.

## Promising policy and practice examples

Indicator category	Canadian and international promising policy and practice examples
Policies restricting marketing to which children are exposed on broadcast and non-broadcast media including digital media and in settings where children gather and the use of marketing techniques that appeal to children and adolescents	<p><b>Saputo <a href="#">restricts</a></b> marketing to children under the age of 15 years on all media (with an audience threshold of 30%) and settings, including packaging and point-of sale marketing. Saputo will only market products that meet their level 1 (most stringent) publicly available nutrition criteria to children, and will not market butter, cream and ice cream.</p> <p><b>Nestlé <a href="#">restricts</a></b> marketing to children under 16 on TV and online media (with an audience threshold of 25%). The policy applies nutrition criteria determined by nationally or regionally agreed-upon pledges, and prohibits direct advertising of confectionery, ice cream and water-based beverages with added sugars to children under 16.</p> <p><b>Unilever <a href="#">restricts</a></b> marketing to children under the age of 16 on traditional and digital media (with an audience threshold of 25%). Different nutrition criteria apply depending on the media/setting (i.e., all products/Highest Nutritional Standards/Responsibly Made for Kids).</p>
Disclosure of marketing expenditures for healthier and less healthy foods and beverages to children, adolescents and adults	<p><b>Nestlé <a href="#">commits</a></b> to increasing the proportion of their marketing spend to promote healthier choices. In 2020, the company reported a 106% increase in marketing spend dedicated to products that support healthier lifestyles (however, there is no reporting on marketing spend of less healthy products).</p>

† This would be achieved by watershed bans on television from 6 am to 10 pm when children may be exposed and complete bans on digital marketing of less healthy foods.

# E. PRODUCT ACCESSIBILITY

## Good practice statement

The company has a clear strategy and specific time-bound targets to address the price and availability of healthier products relative to less healthy products in Canada. The policy improves the relative access to healthier products across settings such as schools, recreation centers and remote communities.

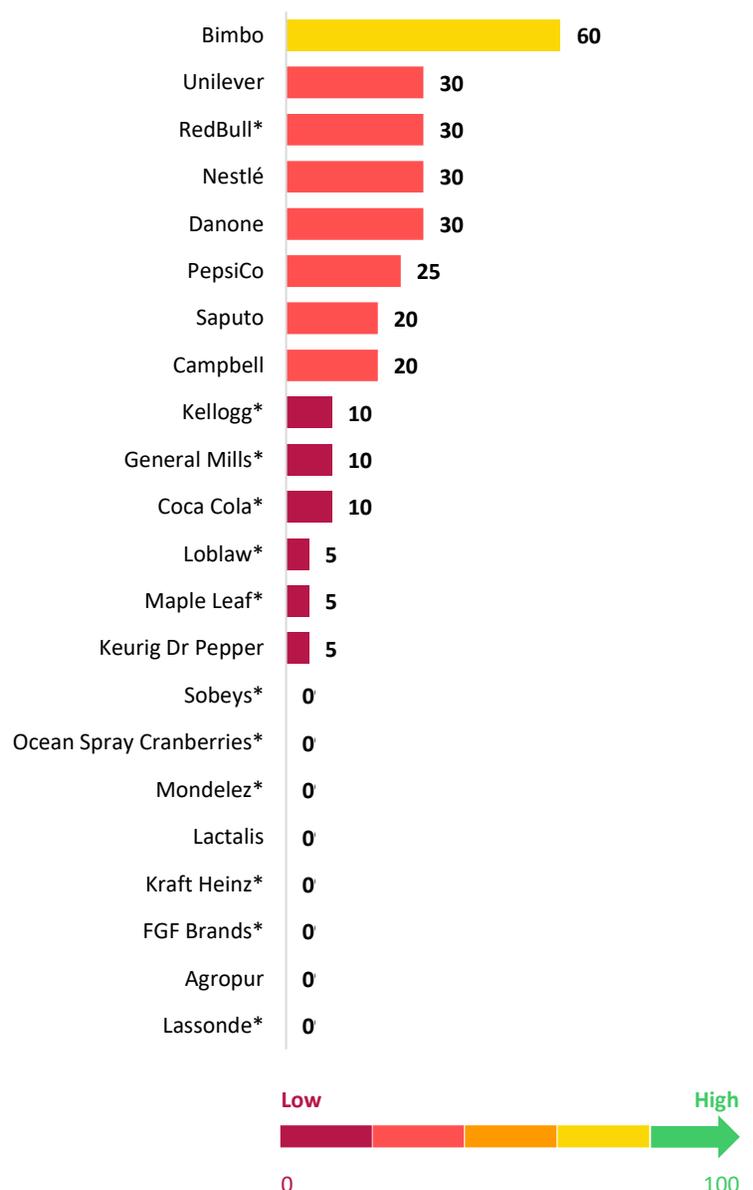
## Key findings

### Median score: 8

Few companies have a clear strategy and associated targets to address the price and availability of healthier and less healthy products across settings, beyond philanthropy (see Figure 9).

- 4/22 companies had policies regarding the sale of healthier and less healthy products in schools.
- 8/22 companies did not have any policies or commitments relating to product accessibility, including both availability and price.
- No company had a public policy position supporting fiscal policies to make healthier foods and beverages relatively cheaper compared to less healthy foods and beverages (e.g., a tax on sugar-sweetened beverages).

Figure 9. BIA-Obesity Canada company scores for the 'product accessibility' domain



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

# Priority recommendations

- 1 Create** programs, partnerships (beyond philanthropy) and infrastructure that will increase the availability of healthier foods and beverages and decrease the availability of less healthy foods and beverages within key settings, including remote communities and settings, schools, hospitals and community spaces (e.g., recreation centers). For example:
  - Wherever less healthy products are available (e.g., in vending machines, recreation centres), commit to also providing 'equivalent' healthier options (where possible).
  - Work with schools to limit the supply of less healthy products in schools.
- 2 Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.
- 3 Support** government policies recommended by the World Health Organization to improve food environments, including sugary drink taxes.

## Promising policy and practice examples

Indicator category	Canadian and international promising policy and practice examples
Commitment towards addressing the availability of healthier and less healthy products	<b>Nestlé</b> <a href="#">commits</a> to only selling products that meet the Nestlé Marketing Communication to Children Policy Nutrition Criteria in primary and secondary schools.
Commitment towards addressing the price of healthier and less healthy products	<b>Grupo Bimbo</b> <a href="#">aims</a> to launch $\geq 1$ program per sales region to support vulnerable populations through accessible (products with a wide-distribution range) and affordable (price $\geq 5\%$ under the category average) products with positive nutrition by 2025.
Support for government fiscal policies	<b>Tony's Chocolonely</b> , a confectionery company in the Netherlands, has <a href="#">published</a> their support for a government tax on sugar-sweetened products.

# F. DISCLOSURE OF RELATIONSHIPS AND LOBBYING

## Good practice statement

The company is fully transparent regarding support provided to external organizations, including professional organizations, scientific events, research activities, public-private partners, philanthropic/community organizations, as well as trade and industry associations, and discloses its political contributions and submissions to public consultations.

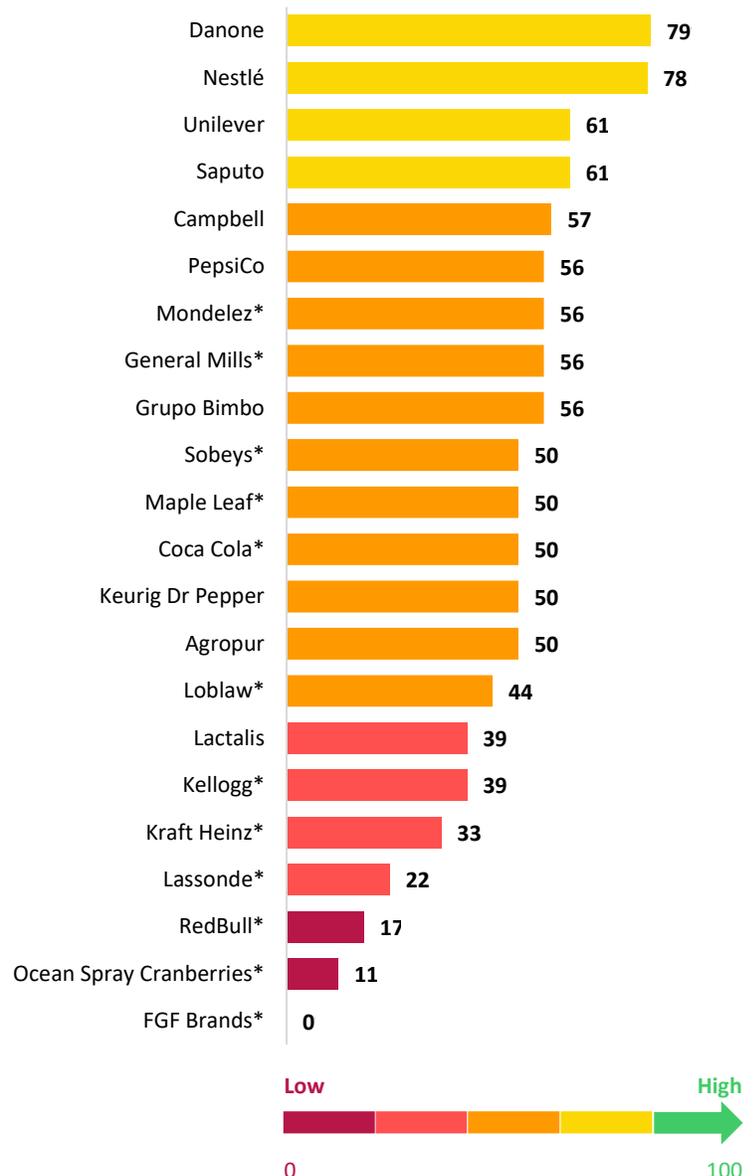
## Key findings

### Median score: 50

Most companies had some transparency regarding philanthropic support provided to community/charitable organizations; however, few were fully transparent about their research support, political donations and submissions to consultations beyond what is required by law (see Figure 10).

- 21/22 companies disclosed philanthropic activities and support for community organizations at a national or global level.
- 8/22 companies disclosed funding and support for professional organisations and/or scientific events (e.g., conferences) at a national or global level.
- 5/22 companies had up-to-date databases consolidating support for research (e.g., database in which publications supported by the company are listed).
- 8/22 companies had a commitment to publish details or not make political contributions in Canada which was public or disclosed to the research team.
- 18/22 companies published some information regarding their membership/support for/ownership of industry associations, think tanks, interest groups, or other organizations that lobby in relation to population nutrition and/or obesity and NCDs issues
  - 9/22 had comprehensive and cumulative lists which included national (or North American) information.
- No companies had a commitment to disclose submissions to public consultations online (beyond what is required through the [Meetings and Correspondences on Healthy Eating](#) database).

Figure 10. BIA-Obesity Canada company scores for the 'disclosure of relationships and lobbying' domain



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.

# Priority recommendations

- 1 Publish** a comprehensive and consolidated list of relationships with and support for external organizations including:
- Professional organizations
  - Scientific events
  - Research organizations and publications
  - Philanthropic and community organizations, including those related to nutrition and physical activity
  - Trade and industry organizations that lobby on topics related to nutrition
  - Political contributions and submissions to public consultations

## Promising policy and practice examples

Indicator category	Canadian and international promising policy and practice examples
Transparency of support for external organizations and lobbying practices	<p><b>Nestlé</b> discloses support provided to community/philanthropic organizations in a consolidated manner within <a href="#">national corporate social responsibility reports</a>. The company discloses <a href="#">public private partnerships</a>, and <a href="#">industry partners</a> in a consolidated way on its global website. The company also publicly <a href="#">commits</a> to not make political contributions, with the exception of the parent company, within its country of origin.</p> <p><b>Danone</b> discloses community engagement-related goals and achievements in a consolidated manner within a table in <a href="#">national corporate social responsibility reports</a>. Collaborations with professional organizations to promote health education are also consolidated within the report. Project grants provided by the Danone Institute North America are consolidated and described <a href="#">online</a>.</p> <p>The <b>PepsiCo</b> Foundation (through which most of PepsiCo's philanthropic efforts are directed) consolidates its support for philanthropic groups within a publicly available <a href="#">document</a>, which includes the name of the organization supported, amount donated, program, focus area and beneficiary country. The PepsiCo Health and Nutrition Sciences team publishes its research on its <a href="#">website</a> in a consolidated manner, by topic area.</p> <p><b>Unilever</b> <a href="#">publishes</a> a consolidated list of nutrition publications (2009-2022) supported by the company. Unilever also publicly <a href="#">commits</a> to not support or make political contributions to political parties, candidates or groups endorsing party interests.</p>

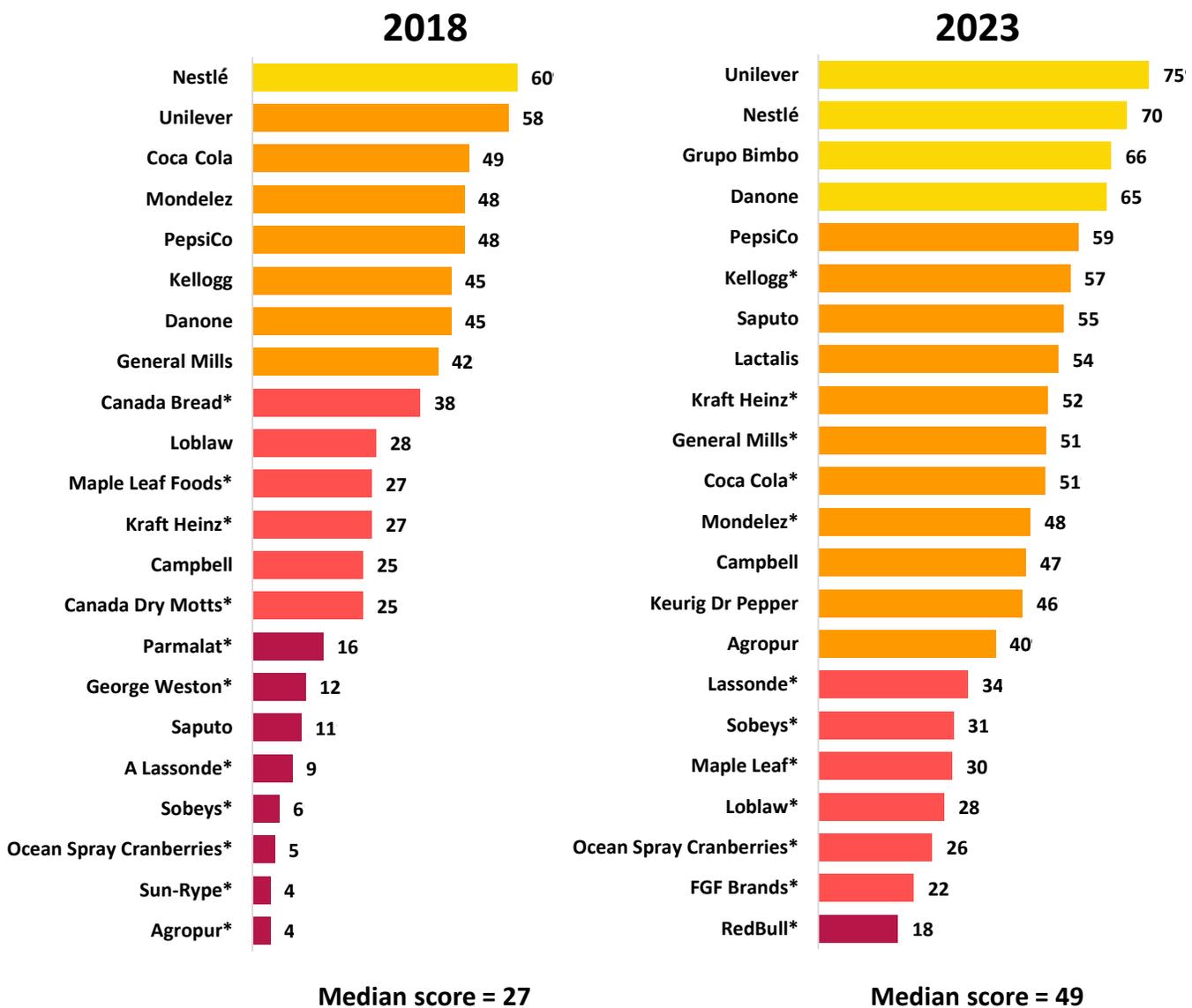
# CHANGES IN OVERALL SCORES SINCE PREVIOUS BIA-OBESITY CANADA EVALUATION

Results in 2023 were compared to the results in the previous BIA-Obesity Canada evaluation in 2018<sup>25</sup> (see Figure 11). A similar proportion of companies participated in 2018 and 2023. Although modifications to the BIA-Obesity Canada tool were made between 2018 and 2023 to reflect the current policy context in Canada, changes over time included:

- Stronger/more corporate nutrition strategies and policies.
- Sector-wide improvements in terms of product and brand promotion due to the CCFBA.
- Notable improvements amongst major dairy companies.

The evaluation showed increases in both the highest scoring company as well as an increase in the median score from 27% to 49%. Overall, these results suggest progress in commitments and policies of the major food and beverage manufacturing companies in Canada between 2018 and 2023.

Figure 11. Comparison of BIA-Obesity Canada company overall scores in 2018 and 2023.



\* Company did not participate in the BIA-Obesity validation process, and assessments are based on publicly available information only.



# CONCLUSION AND IMPLICATIONS

# Summary of findings

## This exercise in scoring of company policies and commitments in Canada has identified several key findings:

- A broad range of overall scores (18 to 75%) indicates that some companies have very little focus on food and nutrition from a health and diet-related noncommunicable disease prevention perspective, while others have more elaborate efforts in this area. This may be associated with resources and capacity of companies but underscores a need for increased public health nutrition capacity and leadership among many Canadian food manufacturers.
- Overall BIA-Obesity scores have increased since previous evaluations, largely as a result of the industry-wide pledge related to product and brand promotion. The impact of the commitments has yet to be assessed; however, self-regulation of food marketing to children has a poor track record both in Canada and internationally. Evaluations of the impact of these commitments are ongoing.
- Companies performed best within the ‘corporate strategy’ and ‘product (re)formulation’ domains. In both of these areas, progress and public reporting on achieving these commitments are essential to ensure that companies are committing in good faith to effecting meaningful change.
- ‘Product accessibility’ was the poorest scoring domain. Innovation is needed to identify ways that food manufacturers can meaningfully contribute to improving the accessibility (including both the availability and prices) of healthier foods in existing food environments.
- Less than half (45%) of food and beverage manufacturing companies participated in the data validation process for BIA-Obesity Canada 2023. This may reflect a lack of capacity and a lack of transparency among the major manufacturing companies in Canada to focus on public health nutrition efforts. This lack of transparency limits the ability of the public to hold companies to account for their commitments.

**If companies’ actions align with current commitments and policies, there is the potential for overall improvements in the healthiness of Canadian food environments.**

**Not all companies are transparently and proactively working towards healthier food environments.**

**There are numerous major opportunities for companies to acknowledge their role in the current food system and act to transparently and openly improve food environments.**

# Implications for key actors

The results of the BIA-Obesity Canada 2023 program of research have important implications for a variety of actors in the Canadian food system.

## For industry ‡

Increase transparency by improving reporting practices at a national level to support monitoring of industry practices in Canada.

Follow through on identified commitments with concrete actions and changes to existing practices to support transformational change.

Support government actions to regulate key food environment policy areas that can level the playing field for all companies to innovate and act to support public health.

## For researchers

Evaluate if companies are fulfilling commitments that result in meaningful improvements to food environments.

Evaluate if subsequent food environments are positively influencing downstream dietary patterns and population health.

Conduct repeat evaluations of industry policies and practices and monitor progress over time to hold industry actors to account.

## For government

Regulate mandatory reporting of nutrition metrics, similar to requirements for sustainability reporting, to support monitoring efforts.

Introduce targets and guidelines for additional nutrients of concern, such as added sugars and saturated fats to support industry efforts to reformulate products.

In the absence of comprehensive industry action, introduce comprehensive regulations to create a level playing field. For example, restrict marketing on product packaging, as some companies are already doing, to ensure industry-wide implementation.

## For civil society

Use individual purchasing power to support companies who are making strides in creating supportive food environments.

Identify and advocate for opportunities to get involved in and support local food systems.

Contribute to government consultations to support policy development that will encourage equivalent action across all companies.

‡ A complete set of broad, industry-wide recommendations can be found in Appendix B.

# Strengths and limitations

The BIA-Obesity Canada 2023 evaluation has a number of strengths and limitations to acknowledge.

## STRENGTHS of the study include...

- The evaluation of companies that represent a large proportion of the market share of packaged food and non-alcoholic beverage manufacturing sectors, representing the main contributors to the Canadian packaged food and beverage supply.
- The evaluation of company commitments, which is critical for establishing accountability of major food manufacturers to change their practices.
- The use of internationally recognized methods adapted to the Canadian policy context.
- Providing an opportunity for engagement with companies evaluated providing increased transparency in the research process and increasing the validity of the findings.

## LIMITATIONS of the study include...

- A low participation rate from companies in the validation process, which may result in more conservative estimates of practices for companies that did not participate.
- Lack of assessment of the healthfulness of company product portfolios or the marketing practices of companies. Future studies should assess whether or not the actions and commitments being made by companies are translating into meaningful changes in the Canadian food environment to support healthier dietary patterns and reduce diet-related noncommunicable diseases, and this requires further research.

## Next steps

Critical next steps in this program of research are to analyze whether the commitments and policies of food manufacturers in Canada are translating into healthier food environments. Research is needed to ensure that companies are indeed following through with their commitments and improving their nutrition-related practices. Previous research in Canada has indicated that voluntary company commitments to reformulate their food products have not resulted in overall healthier nutritional profiles of company portfolios.<sup>43,44</sup> Analyzing the nutritional composition of these company portfolios will be of continued importance as the composition of the food supply is a cornerstone to healthier food environments. Other critical company actions to be evaluated include marketing practices, lobbying and transparency of companies in their corporate political activity. The next step of BIA-Obesity Canada research aims to evaluate the overall nutritional profiles of products for sale in Canada and the marketing practices of companies.

Ongoing benchmarking of food environments in Canada over time as part of comprehensive national surveillance will also inform key actors on the healthiness of Canadian food environments, identify priority areas for action, and will hold food industry actors accountable for meeting their commitments and contributing to the health and wellness of all those in Canada.

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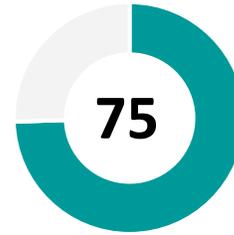


# APPENDIX A

## COMPANY SCORECARDS

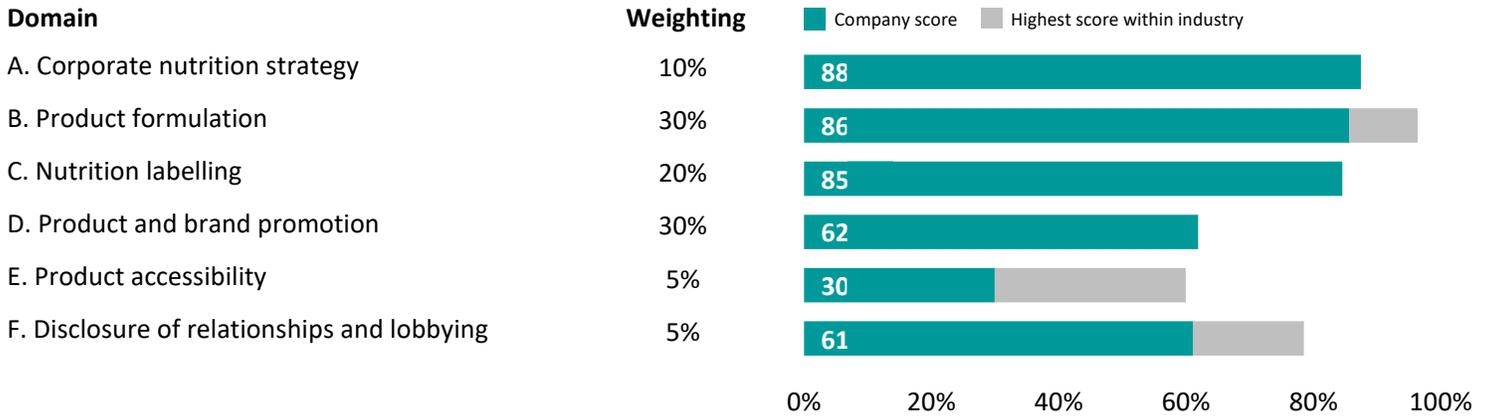


RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

## Score by domain



## Areas of strength

- Unilever has a clear commitment to population nutrition outlined in its [Future Foods Positive Nutrition Action Plan](#); commitments outlined in the action plan explicitly apply to all markets.
- Unilever clearly describes accountability mechanisms for nutrition-related initiatives and links certain nutrition KPIs to the remuneration of leaders.
- Unilever [reports](#) on the percentage sales volumes meeting different government-endorsed nutrient profiling models and has multiple SMART targets that reference sales volumes including: 1) doubling products sold that deliver positive nutrition by 2025, 2) reaching \$1.5 billion annual sales from plant-based meat and dairy alternatives by 2025–2027, 3) having 85% of servings sold meet the Unilever Science-based Nutrition Criteria by 2028.
- Evidence behind the development of Unilever’s product formulation strategy is [published](#) in peer-reviewed literature.
- Unilever has a [published](#) health and nutrition claims policy.
- Unilever [restricts](#) marketing to children under the age of 16 on traditional and digital media. The policy restricts marketing techniques such as the use of influencers, licensed cartoon and brand equity characters, gifts/toys/premiums and giveaways in marketing communications and point of sale marketing, for all products or if products meet their Highest Nutritional Standards or Responsibly Made for Kids nutritional criteria, depending on the case.
- Unilever [lists](#) nutrition publications from 2009–2022 within a publicly available document on its corporate website.

## Recommendations

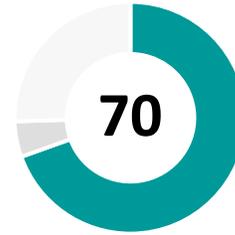
**Include** country-specific reporting of nutrition-related metrics for Canada, in addition to current global reporting.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

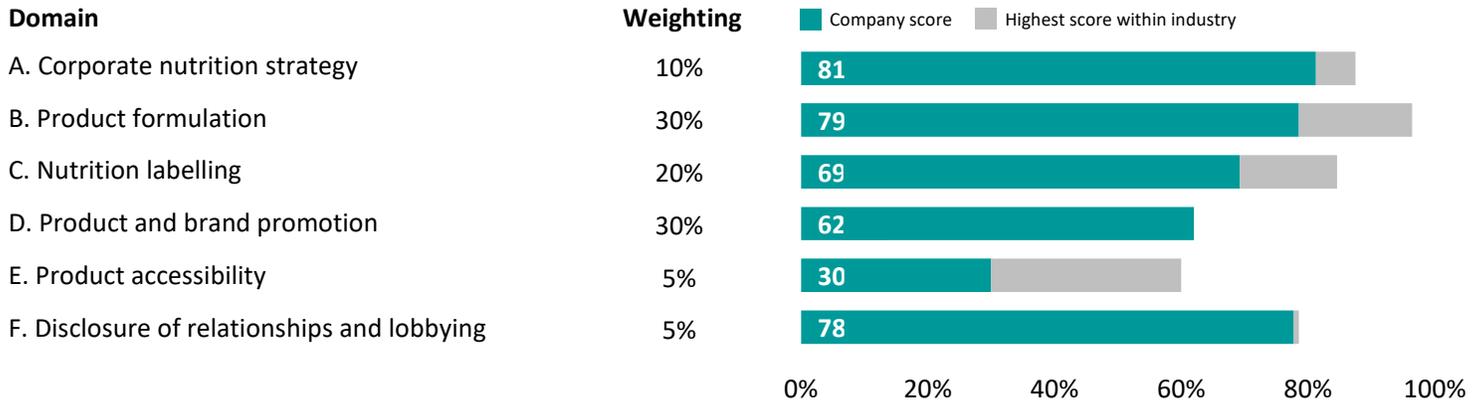
**Establish** targets for the proportion on marketing expenditures spent on healthier vs. less healthy products and annually report on progress.

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers) in Canada.

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.



## Score by domain



## Areas of strength

- [National](#) and [global](#) corporate social responsibility reports are publicly available online, with independent auditing of select metrics.
- Nestlé reports on the percentage of sales volumes of healthier foods using government endorsed nutrient profiling models, including global reporting using the Health Star Rating. Methodology for reporting is published online.<sup>†</sup>
- Nestlé has a clear strategy for addressing nutrients of concern in products, including a public commitment to the International Food and Beverage Association sodium reduction targets.
- The Nestlé Nutritional Profiling System, which has been [published](#) in peer-reviewed literature, includes product composition targets for all nutrients of public health concern.
- Nestlé’s global marketing to children [policy](#) restricts marketing to children under 16 on TV and online media. Nestlé also prohibits direct advertising of confectionery, ice cream and water-based beverages with added sugars to children under 16.
- Products sold in primary and secondary schools must meet the Nestlé Marketing Communication to Children Policy Nutrition Criteria.

## Recommendations

**Establish** targets for the proportion on marketing expenditures spent on healthier vs. less healthy products and annually **report** on progress.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada (extending the existing policy for health claims).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, hospitals, and community spaces (e.g., recreation centers) in Canada. This could **build upon** Nestlé’s existing policy to address the availability of healthier products in schools.

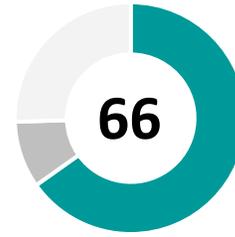
**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

<sup>†</sup> After the initial data collection period, Nestlé [published](#) SMART sales volume targets for products aligning with a government-endorsed nutrient profiling model (i.e., the Health Star Rating). This will be included in future evaluations.

# GRUPO BIMBO

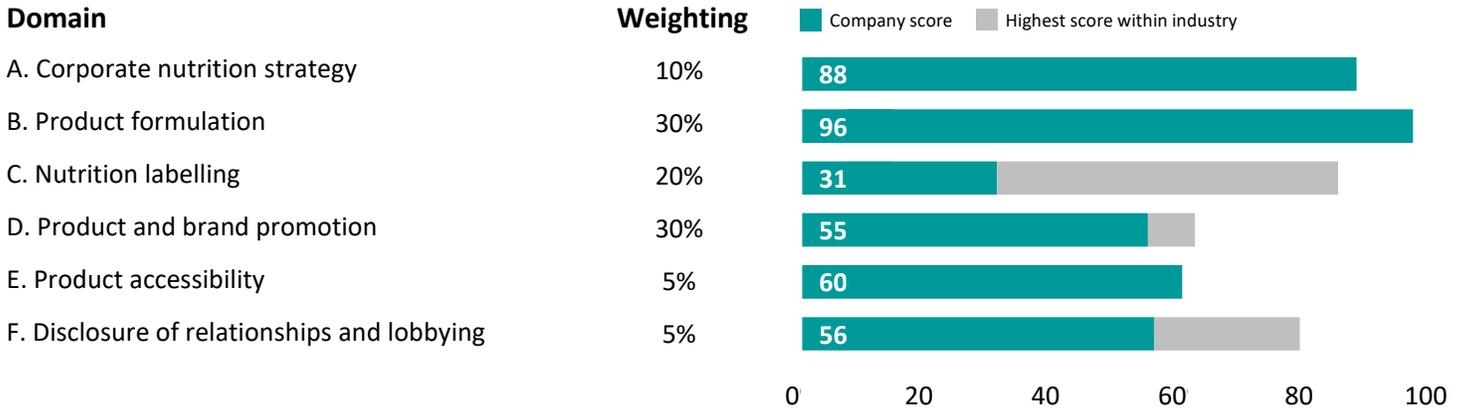
3

RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

## Score by domain



## Areas of strength

- Bimbo has a clear national and global commitment to nutrition in alignment with the World Health Organization’s Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2020.
- Bimbo reports on nutrition-related targets and progress at both the national and global level.
- Bimbo reports on the percentage of global sales compliant with different HSR thresholds, by portfolio type.
- Bimbo has a comprehensive publicly available nutrition reformulation strategy that includes forward-looking SMART targets for products for daily consumption and occasional consumption, for 2025 and 2030. These targets are based on HSR thresholds outlined in the [Positive Nutrition](#) report and guided by the principles outlined in the [Nutriguides V3.0](#).
- Bimbo commits to not market to children under 13 years regardless of the products’ nutritional profile in Canada.
- Bimbo has SMART targets to increase the affordability and availability of healthier products. Product healthfulness will be measured using the HSR from 2025.

## Recommendations

**Build on** current reporting of percentage of sales compliant with HSR thresholds and set a target for the percentage volume of sales of healthier products, with public report against these targets annually at a national level.

**Introduce** a policy to not include nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

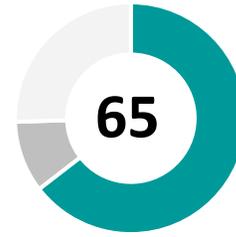
**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Publish** a complete list of relationships with, and support for, professional organizations, scientific activities and research contributions.

# DANONE

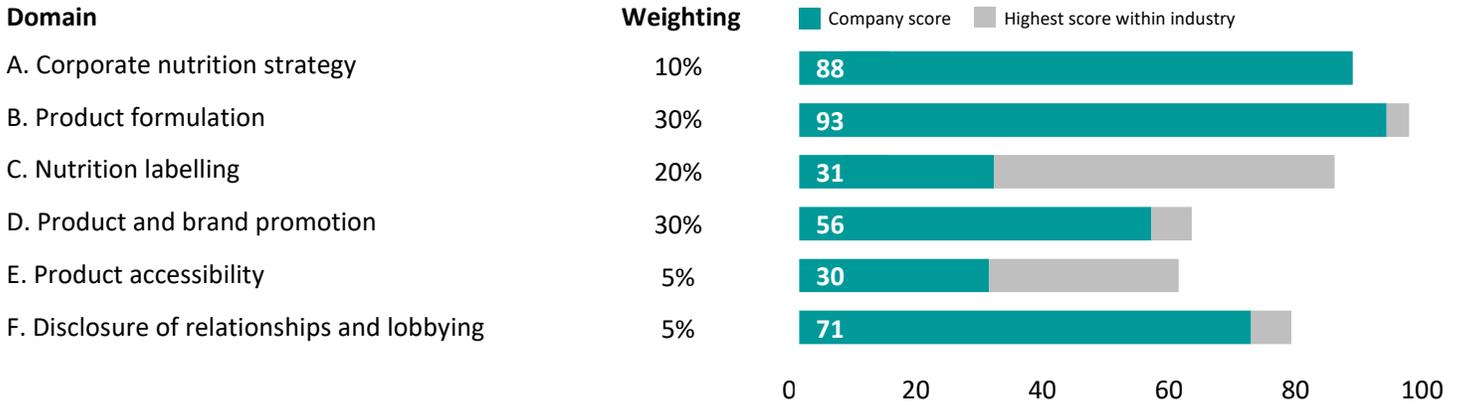
4

RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

## Score by domain



## Areas of strength

- Danone publishes both national and global reports which include reporting on progress related to nutrition objectives.
- Danone [reports](#) on the volume of products sold (at a global level) meeting different definitions of healthiness, including ‘healthy categories,’ the volume of products sold without added sugars, as well as the % of volumes sold meeting NUTRI-SCORE A or B and HSR ≥3.5. Select indicators are externally validated.
  - o Danone also has a global SMART target for at least 85% of the volume of dairy, plant-based, water and ‘aqua drinks’ to have a HSR of ≥3.5 by 2025.
- Product (re)formulation is guided by the company’s 4<sup>th</sup> edition of publicly available [global nutritional targets](#) which address all nutrients of public health concern and apply to Canada.
- Research projects supported through the Danone Institute North America are consolidated and publicly listed online.

## Recommendations

**Make explicit** how nutrition-related KPIs are taken into account in executive compensation.

**Introduce** a policy to not include nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.<sup>†</sup>

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).<sup>†</sup>

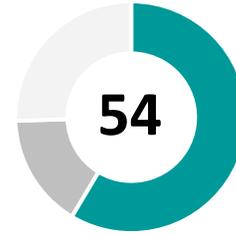
**Develop** a policy that healthier products are available at the same (or lower) price vs less healthy alternatives.

<sup>†</sup> After the initial data collection, Danone [published](#) a policy regarding the use of nutrition and health claims (in October 2023); Danone now commits to not displaying nutrition or health claims on products with a Health Star Rating below 2.5 stars. This would be counted in future evaluations. Danone also [published](#) a document describing its accessibility strategy (in October 2023) which describes the company’s approach to understanding nutritional needs and market realities to frame their strategy, as well as their “Route to Market” approach to facilitating distribution channels and increasing points of sales for improved access.

# PEPSICO

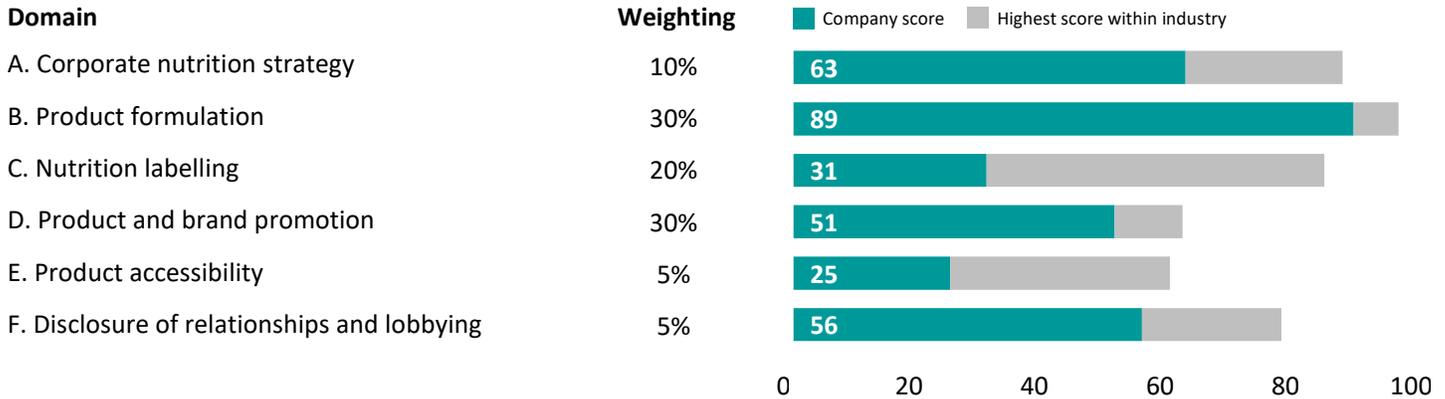
5

RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

## Score by domain



## Areas of strength

- PepsiCo publishes yearly reports which include ESG Performance Metrics including progress on nutrition (particularly formulation) metrics since 2016. Some Canadian factsheets are also available (last published: 2020).
- PepsiCo has SMART targets to reduce added sugars in beverages, and sodium and saturated fats in foods by 2025, with a 2020 baseline. PepsiCo Nutrition Criteria, the company’s nutritional profiling model used to guide product development, has been [published](#) in peer-reviewed literature.
- PepsiCo commits to only sell healthier beverages in primary schools, with a focus on water, juice, milk and alternatives, and low-calorie beverages (with ≤10% kcals from added sugars). A similar policy applies to secondary schools, with the following beverages also permitted: beverages with ≤40 kcals/240 ml, and sports drinks.
- The PepsiCo Health and Nutrition Sciences [publishes](#) its research in a consolidated manner, by topic area.
- The PepsiCo Foundation (through which most of PepsiCo’s philanthropic efforts are directed) consolidates its support for philanthropic groups within a publicly available [document](#), which includes the name of the organization supported, amount donated, program, focus area and beneficiary country.

## Recommendations

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level.<sup>†</sup>

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

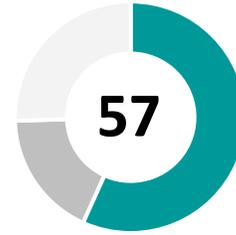
**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and beverages and decrease the availability of less healthy foods and beverages within key settings, including remote communities, hospitals, and community spaces (e.g., recreation centers) in Canada. This could build upon the company’s existing school sales policy.

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

<sup>†</sup> Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

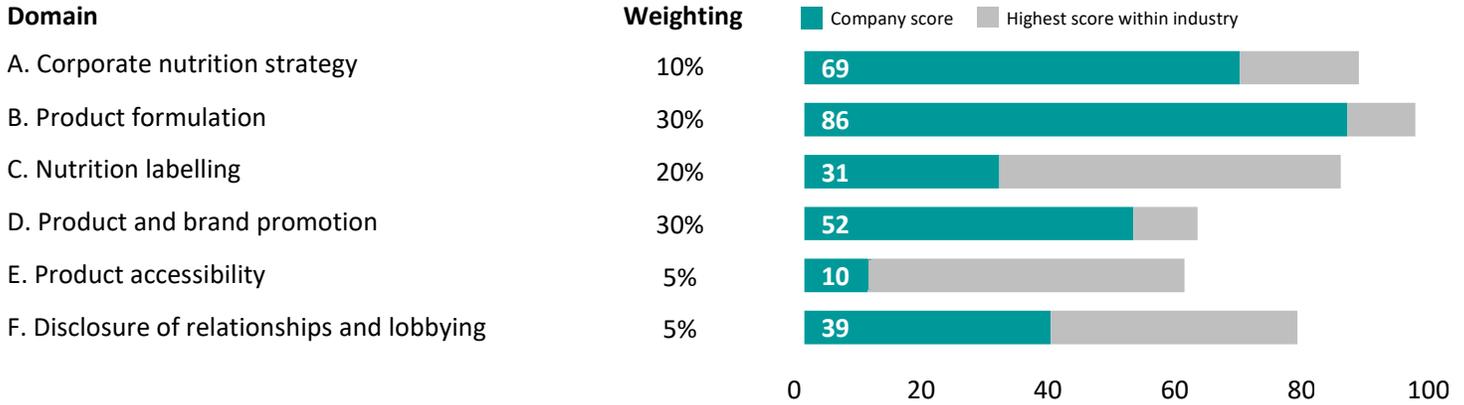


RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

## Score by domain



## Areas of strength

- Kellogg has a public SMART target, which is based on the sales volume of foods meeting the Kellogg Global Nutrition Criteria.
- Kellogg has a public global commitment to address nutrients of public health concern and publishes its nutrition criteria online. Kellogg commits to the SMART IFBA sodium reduction targets.
- Kellogg monitors and publicly reports on compliance with US and Canadian advertising to children pledges.

## Recommendations

**Include** country-specific reporting of nutrition-related metrics for Canada, in addition to global reporting. For reporting in Canada, use a government endorsed system.<sup>†</sup>

**Make explicit** how nutrition-related KPIs are taken into account in executive compensation.

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

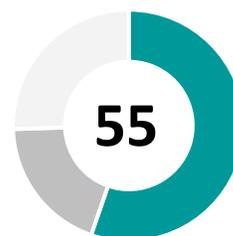
# The Kellogg Company split into Kellanova and WK Kellogg in October 2023.

\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

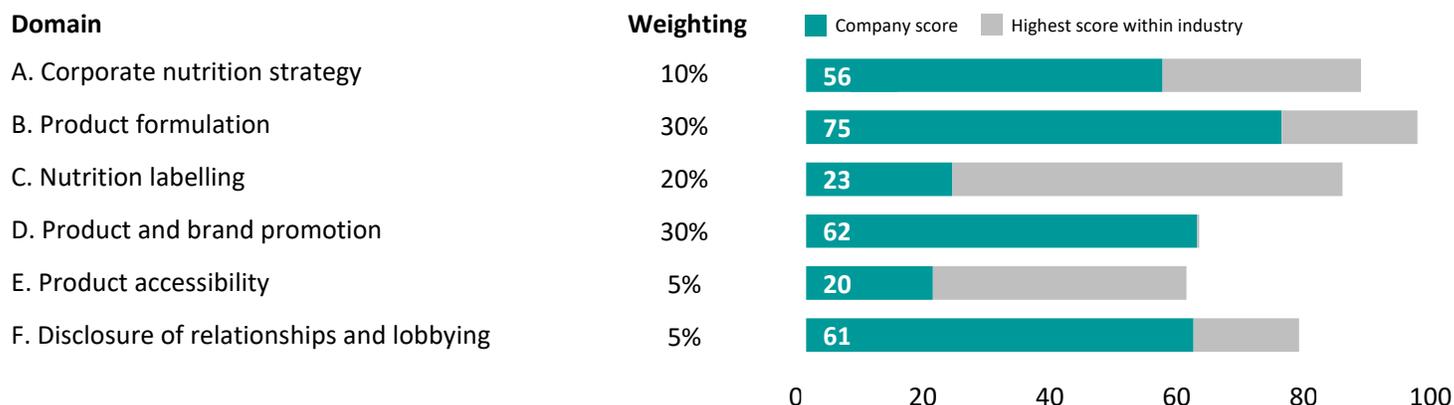


RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

## Score by domain



## Areas of strength

- Saputo has a global public commitment to address population nutrition that explicitly acknowledges unbalanced diets and obesity and is linked to SDGs 2 and 3.
- Saputo commits to improving the nutritional quality of its portfolio with a SMART target of having 84% of products meet the Saputo nutrient profiling model by 2025.
- The [Saputo Nutrient Profiling Model](#) is publicly available, applies to the entire global portfolio, has 3 categories of products with varying ‘healthiness’, and addresses calories, saturated fats, total and added sugars, sodium, protein, calcium and vitamin D.
- Saputo has a publicly disclosed global marketing [policy](#) that applies to all media and settings, including packaging and point-of sale marketing. Saputo will only market products that meet their level 1 (most stringent) publicly available nutrition criteria to children, and will not market butter, cream and ice cream. The policy covers children under the age of 15.
- Saputo publicly commits to increasing market penetration of their healthier products.

## Recommendations

**Build on** current reporting of the healthfulness of products and report routinely on the nutritional content of the company’s product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level.<sup>†</sup>

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Publish** details on programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

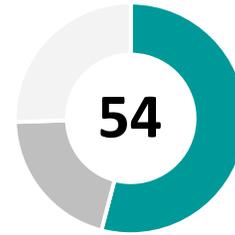
**Develop** a policy that healthier products are available at the same (or lower) price as less healthy alternatives for categories where there is flexibility in pricing, in particular yogurts and frozen products.

<sup>†</sup> Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# LACTALIS

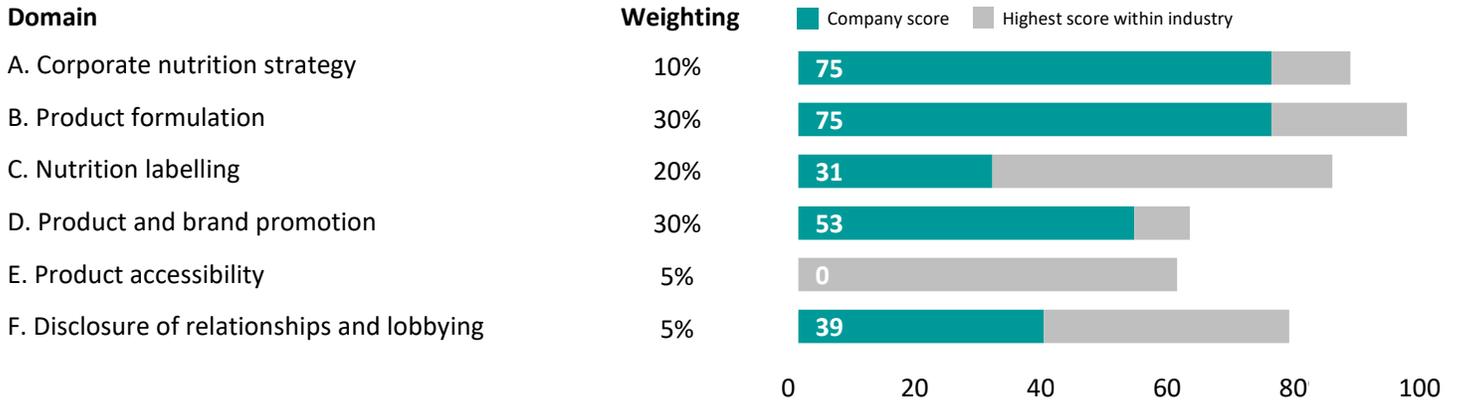
8

RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

## Score by domain



## Areas of strength

- Lactalis publishes annual national [corporate social responsibility reports](#), which include reporting on nutrition targets, associated progress, and future outlook.
- Lactalis holds leadership accountable for nutrition initiatives—health and nutrition are part of senior manager KPIs.
- Lactalis has a clear product reformulation strategy in alignment with Health Canada recommendations:
  - Lactalis has a commitment to reach Health Canada’s sodium reduction targets for cottage cheese, processed cheese, natural cheese and butter by 2026 and is currently assessing its portfolio against Health Canada’s front-of-package labelling for sugar and saturated fat.
  - Lactalis also has a SMART target to reduce sugar in milkshakes and flavored milks.
- Lactalis publishes consolidated national-level information on its support for community initiatives, including philanthropic, physical activity and nutrition programs, in its corporate social responsibility report.

## Recommendations

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level.<sup>†</sup>

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that healthier products are available at the same (or lower) price as less healthy alternatives for categories where there is flexibility in pricing, in particular yogurts and frozen products.

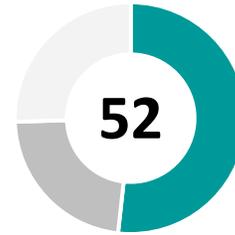
**Publish** a consolidated list of support for professional associations, scientific events, research contributions, public-private partnerships and industry associations.

<sup>†</sup> Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# KRAFT HEINZ



RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

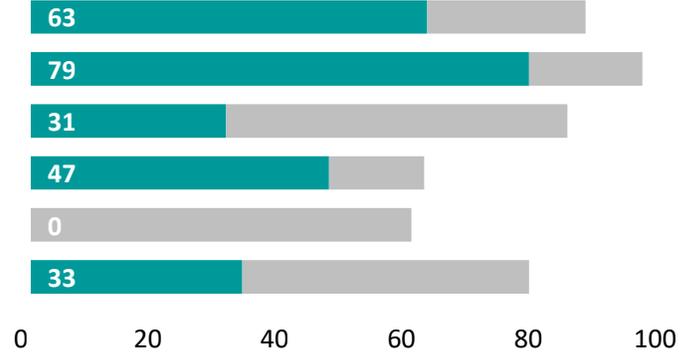
## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting

Company score Highest score within industry



## Areas of strength

- Kraft Heinz annually reports on progress with nutrition-related ESG initiatives, including compliance (%) with [Kraft Heinz Global Nutrition Guidelines](#) (inclusive of all countries), amount (pounds) of sugar reduced in products, amount (%) of sodium reduced in BBQ sauce and dressings in North America, as well as meals provided to people in need.
- Kraft Heinz holds leadership accountable for nutrition-related initiatives; all ESG initiatives are linked to remuneration.
- Kraft Heinz has a public global SMART targets to address nutrients of concern across its portfolio; the company aims to achieve 85% compliance with [Kraft Heinz Global Nutrition Guidelines](#) by 2025. Targets have been [published](#) in peer-reviewed literature.

## Recommendations

**Include** country-specific reporting of nutrition-related metrics.

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level. †

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

**Publish** a consolidated list of relationships with, and support for, external organizations (e.g., professional organizations, scientific events, public-private partnerships, and industry associations).

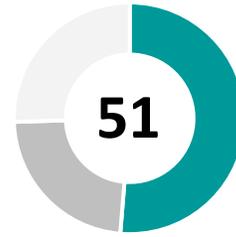
\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# GENERAL MILLS

10

RANK OUT OF 22 COMPANIES



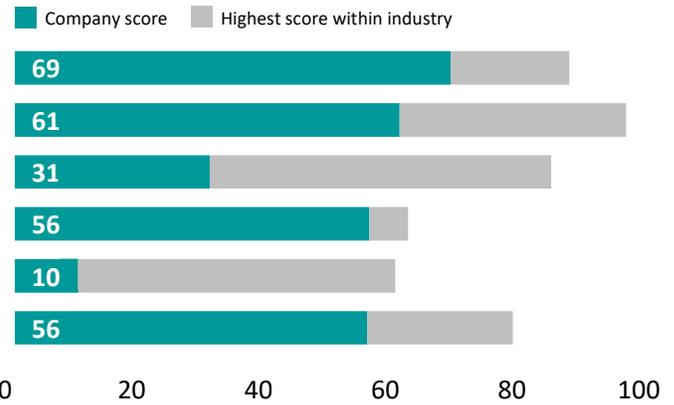
OVERALL SCORE\* (OUT OF 100)

## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting



## Areas of strength

- General Mills has a clear public commitment to improving population nutrition, including a commitment to addressing the burden of noncommunicable diseases, and alignment with the SDGs including SDGs 2 and 3.
- General Mills reports on the proportion of their global sales volume that meets their [Nutrition Forward Criteria](#), which includes the proportion meeting the US Food and Drug Association’s criteria for health products.
- General Mills has a clear commitment to [IFBA SMART targets](#) for sodium.
- Global partnerships pertaining to Nutrition & Food Safety, including professional societies, consumer communication, research organizations, councils, coalitions and round tables are publicly listed in a consolidated format [online](#).

## Recommendations

**Publish** SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat, and calories).

**Report** routinely on the nutritional content of the company’s product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant. †

**Introduce** a policy to not include nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers) in Canada.

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

**Ensure** that databases disclosing support for scientific activities and research contributions are regularly updated.

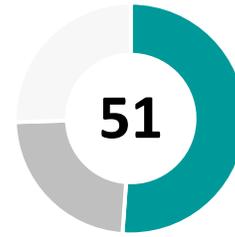
\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# COCA COLA

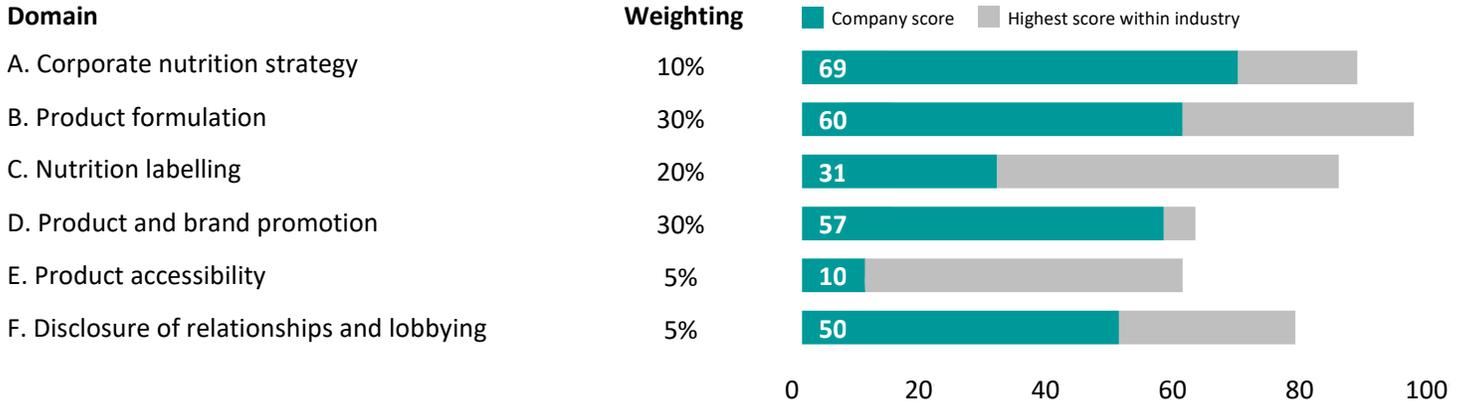
11

RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

## Score by domain



## Areas of strength

- Coca Cola (global) reports on the % sales volume from low or no calorie beverages in its ESG report.
- Coca Cola has a public commitment to the [Balanced Calorie Initiative](#) with the Canadian Beverage Association.
- Coca Cola has a [policy](#) that restricts the marketing of all products to children under 13 in all media as well as point-of sale materials and packaging of products.
- Coca Cola commits to only selling water, 100% juices/smoothies, dairy and plant-based drinks based on specific nutrition criteria in primary schools and ensuring that healthier options are available in secondary schools.

## Recommendations

**Set** a target for the percentage volume of sales of healthier products and publicly report on progress. <sup>†</sup>

**Commit** to SMART targets for key nutrients of public health concern (free/added sugars, energy/portion size) and an indicator of overall healthfulness for all products in the company portfolio. <sup>†</sup>

**Introduce** a policy to not include nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers) in Canada. We see evidence of this in the US, but progress in Canada remains unclear.

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

**Publish** an updated national [database](#) of relationships with, and support for, external organizations.

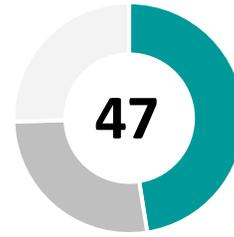
\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

<sup>†</sup> Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# MONDELEZ

12

RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

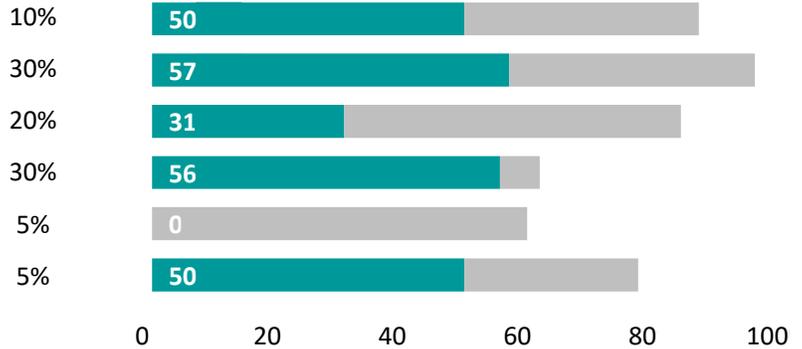
## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting

Company score Highest score within industry



## Areas of strength

- Mondelez publishes yearly global [corporate social responsibility reports](#) online which include reporting on nutrition commitments and metrics.
- Mondelez publishes a SMART sales volume target for mindful portion snacks, including yearly progress reporting.
- Mondelez has a global commitment to continue to reduce saturated fats and sodium in products and offer options with less sugar.
- Mondelez does not [advertise](#) products on broadcast (TV, radio), digital/internet (advergaming, social media, own and 3rd party websites), and other non-broadcast media (such as print and DVD/video) to children under 13 regardless of nutritional profile. Point-of-sale and on-pack promotions/premiums may only be used for products meeting the Mondelez Nutritional Criteria.

## Recommendations

**Include** Canada-specific reporting of nutrition-related metrics within the global corporate social responsibility report, or within national infographics; the last published Canadian infographic dates back from 2019.

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level (beyond mindful portion snacks).<sup>†</sup>

**Commit** to SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat) and an indicator of overall healthfulness for all products in the company portfolio.

**Report** routinely on the nutritional content of the company's product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.<sup>†</sup>

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

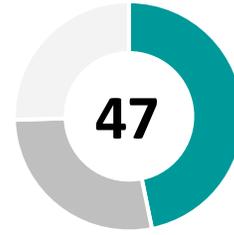
\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# CAMPBELL

13

RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

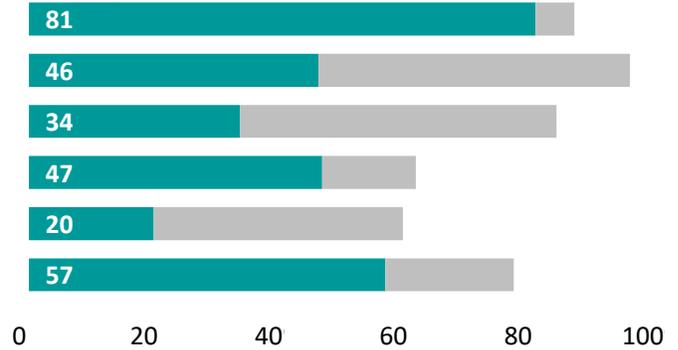
## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting

■ Company score ■ Highest score within industry



## Areas of strength

- Campbell has a clear corporate population nutrition strategy; the company annually [reports](#) on nutrition metrics at the global level, and select indicators are externally validated.
- Campbell ties all of its ESG goals with its incentive compensation program; this includes KPIs related to increasing food access, providing nutrition education, and investing in improving school food environments.
- Campbell reports on the percentage of global sales meeting the Campbell [Nutrition Focused Foods](#) criteria.
- Campbell has publicly available global guidelines for product composition, which include maximum thresholds for nutrients of concern (added sugar, sodium, saturated fat, and calories).

## Recommendations

**Include** country-specific reporting of nutrition-related metrics (in addition to existing global reporting)

**Build** upon current reporting on the percentage of sales from healthier products and set a public SMART target for the percentage volume of sales of healthier products. †

**Commit** to SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat). These targets could build upon the existing guidelines and should incorporate sodium reformulation targets from Health Canada.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers) in Canada. We see evidence of this in the US, but progress in Canada remains unclear.

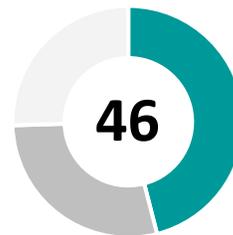
**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# KEURIG DR PEPPER

14

RANK OUT OF 22 COMPANIES



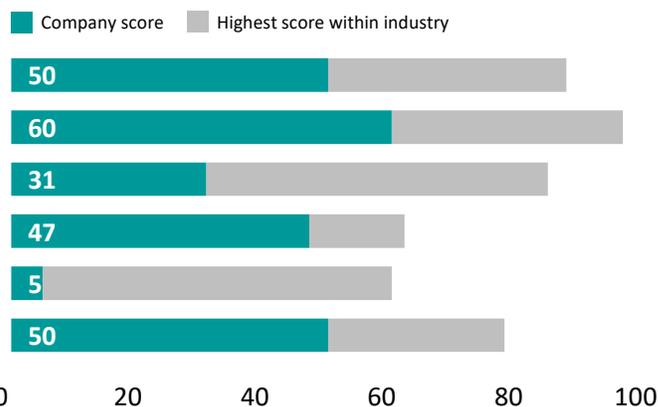
OVERALL SCORE (OUT OF 100)

## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting



## Areas of strength

- Keurig Dr Pepper has a clear commitment to population nutrition via a focus on innovations to increase the number of better-for-you beverage options in their portfolio, expanding distribution of those offerings and providing transparency. The company’s global corporate social responsibility strategy has been developed to align with UN SDGs, including SDGs 2 and 3.
- Keurig Dr Pepper has a public commitment to the [Balanced Calorie Initiative](#) with the Canadian Beverage Association.
- Keurig Dr Pepper provides complete, user-friendly nutrition information [online](#). For instance, fountain beverages can be selected and customized, including the % of the drink composed of ice cubes.

## Recommendations

**Publish** a corporate nutrition strategy for Canada, aligning with national and international priorities, with relevant goals and sufficient resources.

**Set** a target for the percentage volume of sales of healthier products and publicly report on progress. †

**Commit** to SMART targets for key nutrients of public health concern (free/added sugars, energy/portion size) and an indicator of overall healthfulness for all products in the company portfolio.

**Go beyond** current marketing commitments, and **eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

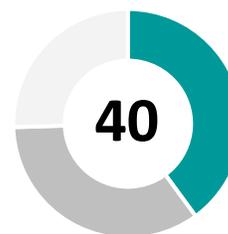
**Develop** a policy that healthier products are available at the same (or lower) price vs less healthy alternatives.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# AGROPUR

15

RANK OUT OF  
22 COMPANIES



OVERALL SCORE  
(OUT OF 100)

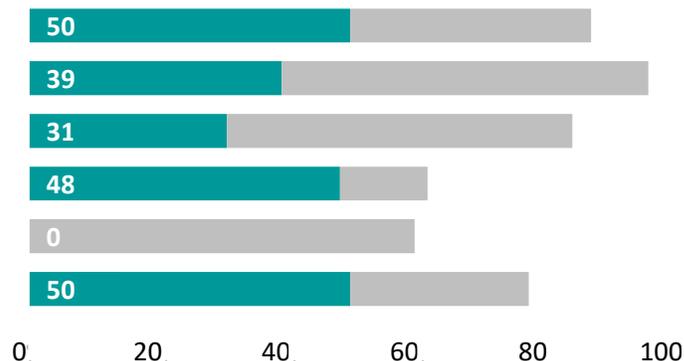
## Score by domain

### Domain

A. Corporate nutrition strategy	10%
B. Product formulation	30%
C. Nutrition labelling	20%
D. Product and brand promotion	30%
E. Product accessibility	5%
F. Disclosure of relationships and lobbying	5%

### Weighting

■ Company score ■ Highest score within industry sector



## Areas of strength

- Agropur has a clear corporate population nutrition strategy that integrates “nutritional value and density”, “recipe design”, “high quality flavor”, “accessibility” and “open and transparent communication”.
- Agropur has an internal nutritional composition strategy that includes reformulation of certain products based on Health Canada’s front-of-package labelling nutrient thresholds for sugar.
- Agropur provides nutrition information online in the form of nutrition facts tables on [brand websites](#).
- Agropur commits to responsibly promoting products that are in line with Health Canada and US Department of Agriculture nutritional recommendations.

## Recommendations

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level. †

**Publish** SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat) and routinely report on the nutritional content of the company’s product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant. †

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

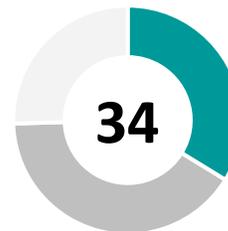
**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# LASSONDE

16

RANK OUT OF 22 COMPANIES



OVERALL SCORE (OUT OF 100)

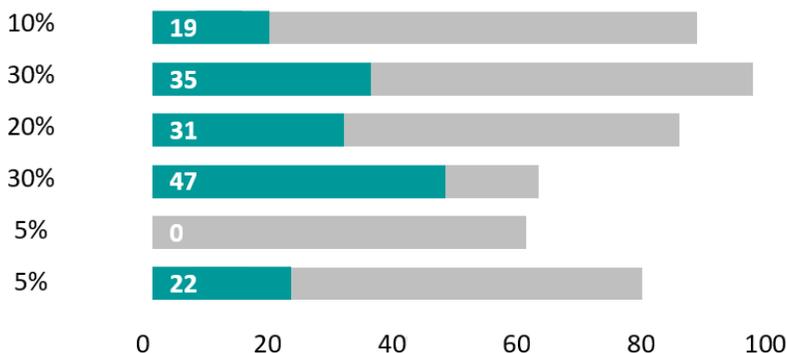
## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting

■ Company score ■ Highest score within industry sector



## Areas of strength

- Lassonde published a SMART sugar reduction target for 2025.<sup>#</sup>
- Lassonde provides product nutrition information [online](#).
- Lassonde publishes some information on its support for community activities such as philanthropic, nutrition and physical activity-related activities.

## Recommendations

**Incorporate** nutrition as a priority focus area in corporate strategies, aligning with national and international priorities, with relevant goals and sufficient resources, and **integrate** nutrition within the company's reporting strategy (e.g., within annual corporate social responsibility reports).

**Set a target** for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level.<sup>†</sup>

**Report routinely** on the nutritional content of the company's product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that would make healthier products available at the same (or lower) price as less healthy alternatives.

\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

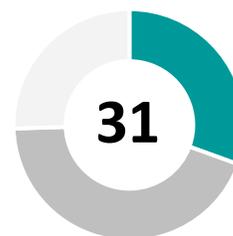
<sup>#</sup>The identified target was removed from the company website before the end of the data collection period (August 2022 – June 2023).

<sup>†</sup> Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# SOBEYS

17

RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

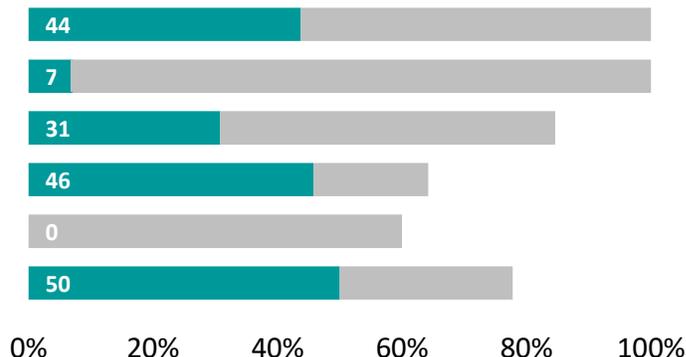
## Score by domain

### Domain

Domain	Weighting
A. Corporate nutrition strategy	10%
B. Product formulation	30%
C. Nutrition labelling	20%
D. Product and brand promotion	30%
E. Product accessibility	5%
F. Disclosure of relationships and lobbying	5%

### Weighting

Company score Highest score within industry



## Areas of strength

- Sobey's has a clear commitment to population health and nutrition via its aim to "make it easier for [their] customers to make healthier and more nutritious choices, helping to nurture healthy bodies and minds across Canada."
- *Compliments* brand products are designed to meet nutrition guidelines (e.g., Health Canada's 2016 sodium reduction guidelines).
- Comprehensive nutrition information is displayed online on own-brand product websites (i.e., for [Compliments](#) and [Panache](#) brands), and on the [Voilà by IGA](#) online grocery ordering platform.
- Sobey's publicly [discloses](#) its support for community initiatives in a table of ESG-related metrics, including organizations supported, and funds donated as corporate contributions and from fundraising by fiscal year.

## Recommendations

**Incorporate** nutrition metrics within the company's public reporting strategy (e.g., within the yearly ESG report, and/or within the company's ESG Metrics Table).

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually. †

**Publish** SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat) and an indicator of overall healthfulness in all own-brand products in the company portfolio.

**Report** routinely on the nutritional content of the company's own-brand product portfolio, by product category, including changes over time. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant. †

**Ensure** promotional activities (e.g., price promotions displayed in catalogues/circulars, and loyalty program rewards) incentivize the purchase of healthier foods over less healthy options. #

**Explore** and report on programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within remote communities and settings.

**Commit** to dedicating a minimum amount of shelf/floor space to healthier foods and limit the placement of less healthy foods in high traffic areas including checkouts and end-of-aisle displays. #

**Ensure** pricing strategies (e.g., size and nature of discounts and multi-buy specials or value-size packaging) incentivize the purchase of healthier foods over less healthy options. #

\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

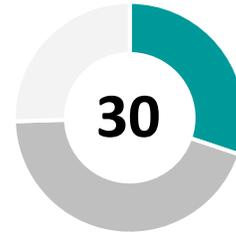
† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# Company assessed as a manufacturer and retailer in the context of BIA-Obesity Canada 2023. Italicized recommendations reflect findings from the retailer assessment.

# MAPLE LEAF

18

RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

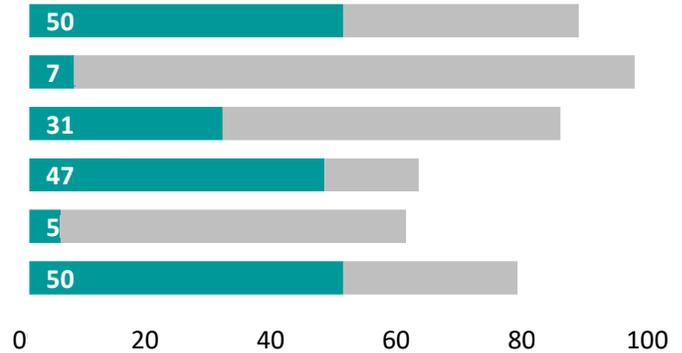
## Score by domain

### Domain

A. Corporate nutrition strategy	10%
B. Product formulation	30%
C. Nutrition labelling	20%
D. Product and brand promotion	30%
E. Product accessibility	5%
F. Disclosure of relationships and lobbying	5%

### Weighting

■ Company score ■ Highest score within industry



## Areas of strength

- Maple Leaf has a clear public commitment to addressing population health and diet-related issues through providing healthy, affordable and sustainable food.
- Maple Leaf discloses comprehensive product nutrition information [online](#).
- Support for community organizations through the Maple Leaf Center for Food Security are consolidated on a map (of Canada) within the [corporate social responsibility report](#), and spotlights describe other philanthropic activities supported by the company.

## Recommendations

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level. †

**Introduce** a policy to not display nutrient content claims or general health claims on products that are required to carry a FOP nutrition symbol in Canada.

**Commit** to SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat) and an indicator of overall healthfulness for all products in the company portfolio.

**Report** routinely on the nutritional content of the company's product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

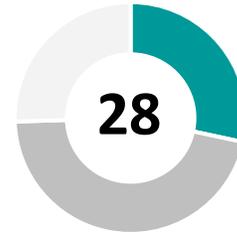
**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

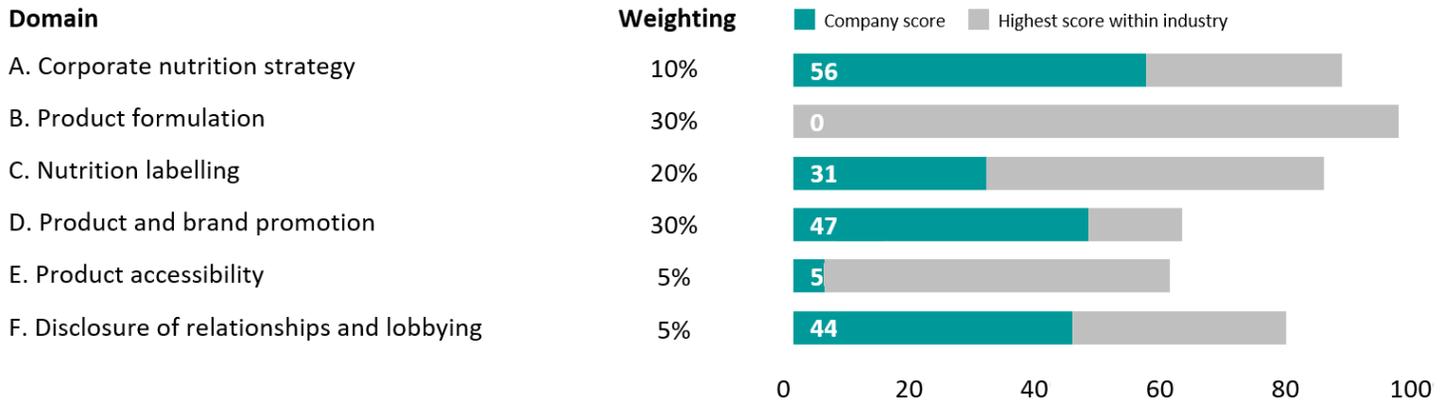


RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

## Score by domain - manufacturing



## Areas of strength

- Loblaw has a clear commitment to population health and nutrition, which explicitly recognizes the UN SDGs.
- Loblaw provides comprehensive and consistent nutrition information online via its grocery retailing [websites](#).
- Loblaw offers in-person and online individualized nutrition services. Nutrition services are also featured via the PC Health App.
- Loblaw consolidates its support for community initiatives within its [ESG report](#) including organizations supported, and funds donated from corporate contributions and fundraising activities. A consolidated list of partner organizations is also publicly available [online](#).

## Recommendations

In addition to current disclosures pertaining to climate change and advancing social equity, **incorporate** nutrition as a priority focus within the company's public reporting strategy (e.g., within the yearly ESG reports).

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually.<sup>†</sup>

**Publish** SMART targets for key nutrients of public health concern (salt, free/added sugars, saturated fat) and an indicator of overall healthfulness in all own-brand products in the company portfolio.

**Report** routinely on the nutritional content of the company's own-brand product portfolio, by product category, including changes over time. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.<sup>†</sup>

**Ensure** promotional activities (e.g., price promotions displayed in catalogues/circulars, and loyalty program rewards) incentivize the purchase of healthier foods over less healthy options.<sup>#</sup>

**Explore** and report on programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within remote communities and settings.

**Commit** to dedicating a minimum amount of shelf/floor space to healthier foods and limit the placement of less healthy foods in high traffic areas including checkouts and end-of-aisle displays.<sup>#</sup>

**Ensure** pricing strategies (e.g., size and nature of discounts and multi-buy specials or value-size packaging) incentivize the purchase of healthier foods over less healthy options.<sup>#</sup>

\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

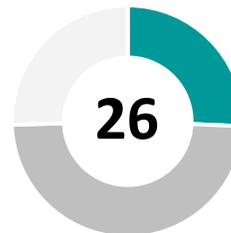
† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# Company assessed as a manufacturer and retailer in the context of BIA-Obesity Canada 2023. Italicized recommendations reflect findings from the retailer assessment.

# OCEAN SPRAY CRANBERRIES

20

RANK OUT OF  
22 COMPANIES



OVERALL SCORE\*  
(OUT OF 100)

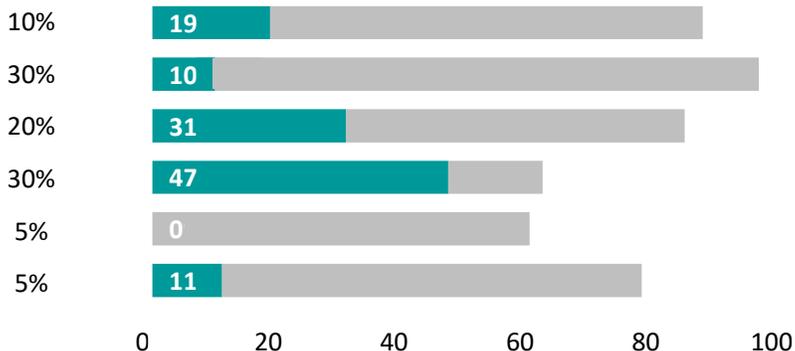
## Score by domain

### Domain

- A. Corporate nutrition strategy
- B. Product formulation
- C. Nutrition labelling
- D. Product and brand promotion
- E. Product accessibility
- F. Disclosure of relationships and lobbying

### Weighting

Company score Highest score within industry



## Areas of strength

- Ocean Spray has a commitment to population nutrition and health acknowledged within its purpose.
- Ocean Spray published its first [Corporate Social Responsibility report](#) in 2023 which acknowledges the UN SDGs, including SDG3.
- Ocean Spray provides product nutrition information online in the form of nutrition facts tables.

## Recommendations

**Incorporate** nutrition within the company's reporting strategy (e.g., within the corporate social responsibility report).

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level.<sup>†</sup>

**Commit** to SMART targets for key nutrients of public health concern (free/added sugars, calories/portion size) and an indicator of overall healthfulness for all products in the company portfolio.

**Report** routinely on the nutritional content of the company's product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

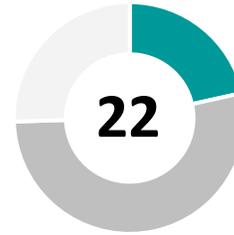
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† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada's [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# FGF BRANDS

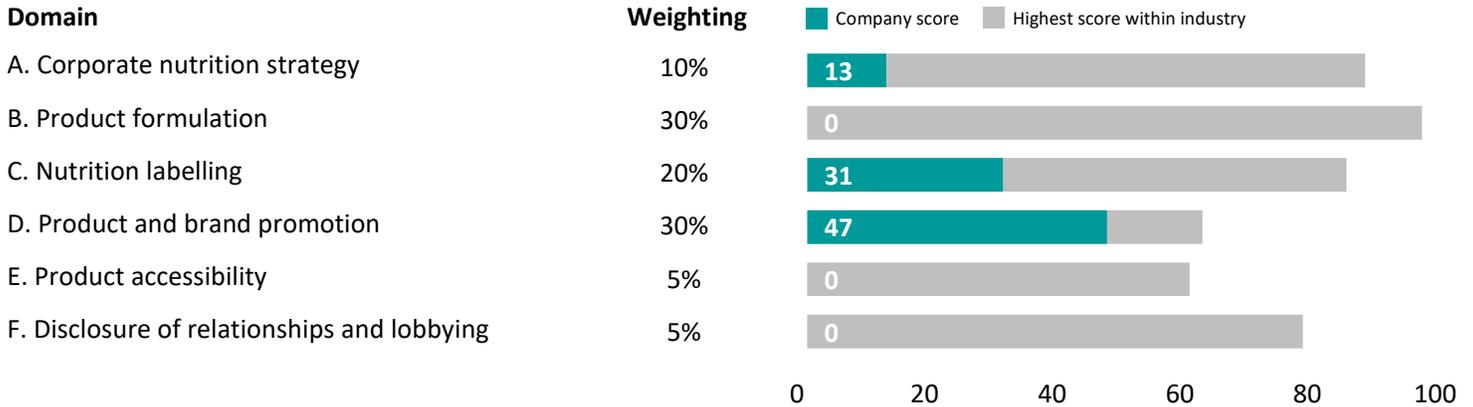
21

RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

## Score by domain



## Areas of strength

- FGF Brands discloses comprehensive product nutrition information online.

## Recommendations

**Incorporate** nutrition as a priority focus area in corporate strategies, aligning with national and international priorities, with relevant goals and sufficient resources.

**Set** a target for the percentage volume of sales of healthier products and publicly report against these targets annually at a national level. †

**Commit** to SMART targets for key nutrients of public health concern (free/added sugars, calories/portion size) and an indicator of overall healthfulness for all products in the company portfolio.

**Report** routinely on the nutritional content of the company’s product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children as per [WHO guidelines](#).

**Create** programs, partnerships and infrastructure that will increase the availability of healthier foods and decrease the availability of less healthy foods within key settings, including remote communities, schools, hospitals, and community spaces (e.g., recreation centers).

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

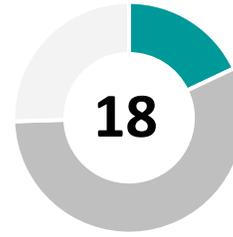
\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.

† Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

# REDBULL

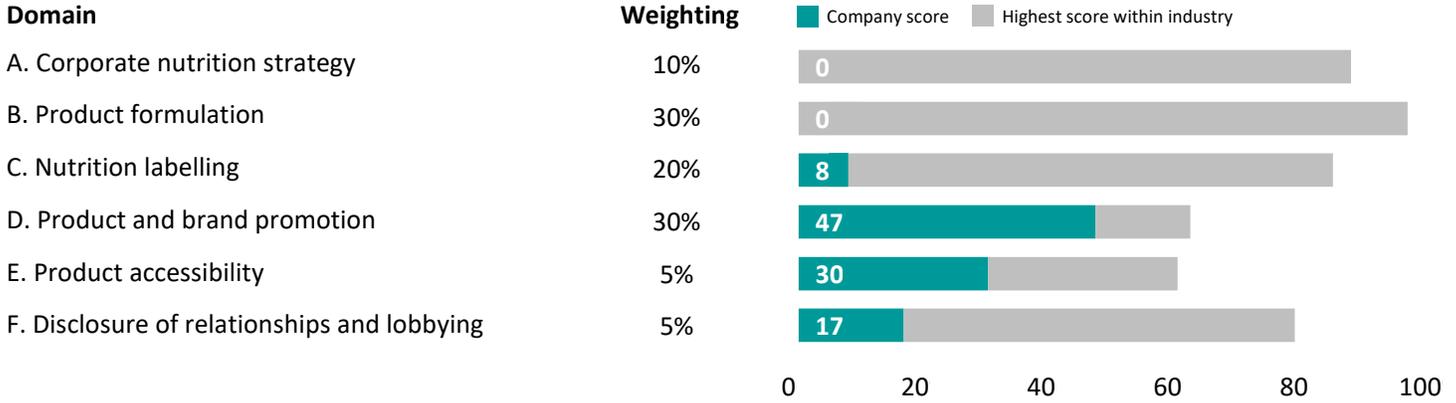


RANK OUT OF 22 COMPANIES



OVERALL SCORE\* (OUT OF 100)

## Score by domain



## Areas of strength

- Per the [Energy Drinks Marketing Code](#), as a member of the Canadian Beverage Association, Red Bull does not sell energy drinks in elementary, middle and secondary schools.

## Recommendations

**Incorporate** nutrition as a priority focus area in corporate strategies, aligning with national and international priorities, with relevant goals and sufficient resources.

**Commit** to SMART targets for key nutrients of public health concern (free/added sugars, calories/portion size) and an indicator of overall healthfulness for all products in the company portfolio.

**Report** routinely on the nutritional content of the company’s product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where relevant.

**Provide** comprehensive online nutrition information for all products.

**Eliminate** the promotion of less healthy foods, beverages and brands in any settings and on broadcast and internet/digital media to which children up to the age of 18 years may be exposed, including techniques targeting children and sports sponsorship as per [WHO guidelines](#).

**Develop** a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.

\* Company did not participate in the BIA-Obesity validation process; assessment is based on publicly available information only.



# APPENDIX B

## LIST OF RECOMMENDATIONS

# APPENDIX B. LIST OF RECOMMENDATIONS

*Complete list of recommendations for packaged food and non-alcoholic beverage manufacturers by domain and indicator category.*

## Corporate nutrition strategy

Indicator category	Recommendation
Commitment to nutrition and health in corporate strategy	<b>Incorporate</b> nutrition as a priority focus area in corporate strategies, aligning with national (e.g., Health Canada’s Healthy Eating Strategy) and international (e.g., The UN Sustainable Development Goals or the World Health Organization recommendations) priorities, with relevant goals and sufficient resources.
Reporting against specific and measurable nutrition and health objectives and targets	<b>Incorporate</b> nutrition within the company’s reporting strategy (e.g., within annual corporate social responsibility reports).  <b>Report</b> on nutrition-related metrics for Canada.
Key Performance Indicators (KPIs) and remuneration of management linked to nutrition and health-related targets	<b>Establish</b> nutrition-related key performance indicators specific to diet-related non-communicable disease and, and link these to executive compensation to ensure <b>accountability</b> for nutrition-related commitments, policies and practices.
Reporting on the percent sales volume of healthier product categories	<b>Set</b> a target for the percentage volume of sales of healthier products and publicly <b>report</b> against these targets annually at a national level*

## Product (re)formulation

Indicator category	Recommendation
Commitment to addressing nutrients of concern (sodium, saturated fat, added/free sugars) and portion size in the development and reformulation of products	<b>Commit to specific, measurable, achievable, relevant, time-bound (SMART) targets</b> for ALL key nutrients of public health concern (sodium, free/added sugars, saturated fat) and energy reduction (where applicable), as well as an indicator of overall healthfulness for all products in the company portfolio.  <b>Report</b> routinely on the nutritional content of the company’s product portfolio, by product category, including changes over time at a national level. Reporting should reference relevant government reformulation targets or nutrition criteria, where applicable.
Engagement with initiatives related to product formulation	<b>Commit</b> to Health Canada’s 2020-2025 sodium reduction targets (where applicable).

\* Healthier products should be defined using a government-endorsed nutrient profiling system. In Canada, this could mean alignment with Health Canada’s [front-of-package labelling cut-offs](#) or [cut-offs for foods that contribute to excess intakes of sodium, sugars, and saturated fat](#).

## Product labelling

Indicator category	Recommendation
Provision of added sugar information	<b>Identify</b> ways to provide additional information pertaining to added sugars to consumers on food packages or in online settings.
Provision of online nutrition information	<b>Provide</b> comprehensive online nutrition information for all products, including nutrition facts tables and symbols for foods high in salt, sugar and saturated fat.  <b>Work with retailers</b> to ensure that nutrition information is available at all online points of consumer purchase.
Use of nutrient content claims	<b>Introduce</b> a policy to not include nutrient content claims or general health claims on products that are required to carry a front-of-package nutrition symbol.

## Product and brand promotion

Indicator category	Recommendation
Policies restricting marketing to which children are exposed on broadcast, digital and other non-broadcast media, and the use of marketing techniques that appeal to children and adolescents	<b>Eliminate</b> the promotion of less healthy foods and beverages and brands on all broadcast and non-broadcast media including digital media† to which children up to the age of 18 years may be exposed, and in settings where children gather, including techniques targeting children, as per WHO guidelines.  In addition, it is recommended to: <ul style="list-style-type: none"> <li>— Ensure the definition of ‘children’ includes <b>those under 18 years of age</b>,</li> <li>— Define promotion broadly and ensure it captures all forms of advertising including brand marketing,</li> <li>— Ensure children are protected in all media and settings where they are exposed to food promotion including on social media, <b>food packaging</b>, and through <b>sponsorship</b></li> <li>— Avoid marketing collaborations with <b>celebrities and social media influencers</b> popular with children under 18,</li> <li>— Restrict brand sponsorship, in addition to product sponsorship for sports or events that children may attend,</li> <li>— Conduct compliance <b>audits</b> at a national level with <b>independent third-party assurance</b>.</li> </ul>
Support for government policies restricting food and beverage marketing to which children are exposed	<b>Support</b> government policies endorsed by the World Health Organization to improve food environments, including restrictions on the marketing of less healthy foods and beverages to which children are exposed.
Disclosure of marketing expenditures for healthier and less healthy foods and beverages to children, adolescents and adults	<b>Establish</b> targets for the proportion on marketing expenditures spent on healthier vs. less healthy products and <b>annually report</b> on progress.

\* This would be achieved by watershed bans on television from 6 am to 10 pm when children may be exposed and complete bans on digital marketing of less healthy foods.

## Product accessibility

Indicator category	Recommendation
Commitment towards addressing the availability of healthier and less healthy products	<p><b>Create</b> programs, partnerships (beyond philanthropy) and infrastructure that will increase the availability of healthier foods and beverages and decrease the availability of less healthy foods and beverages within key settings, including remote communities and settings, schools, hospitals and community spaces (e.g., recreation centers).</p> <p>For example:</p> <ul style="list-style-type: none"><li>— Wherever less healthy products are available (e.g., in vending machines, recreation centres), commit to also providing 'equivalent' healthier options (where possible).</li><li>— Work with schools to limit the supply of less healthy products in schools</li></ul>
Commitment towards addressing the price of healthier and less healthy products	<p><b>Develop</b> a policy that healthier products will be available at the same (or lower) price as less healthy alternatives.</p>
Support for government fiscal policies	<p><b>Support</b> government policies endorsed by the World Health Organization to improve food environments, including sugary drink taxes.</p>

## Disclosure of relationships with external organizations and lobbying

Indicator category	Recommendation
Transparency of support for external organizations and lobbying practices	<p><b>Publish</b> a complete list of relationships with and support for external organizations including:</p> <ul style="list-style-type: none"><li>— Professional organizations</li><li>— Scientific events</li><li>— Research organizations and publications</li><li>— Philanthropic and community organizations, including those related to nutrition and physical activity</li><li>— Trade and industry organizations that lobby on topics related to nutrition</li><li>— Political contributions and submissions to public consultations</li></ul>



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