

NICE guidance on the prevention of CVD at population level

Evidence from the Co-operative Group

1. About the Co-operative Group

The Co-operative Group is the biggest consumer co-operative in the world and operates a range of businesses including food stores and community pharmacy branches at the heart of local communities. The Co-operative Group's outreach into thousands of diverse communities be they urban, rural or suburban is unique. We employ over 80,000 members of staff and have over 3.2 million members.

The Co-operative Group is the largest community food retailer in the UK with over 2200 stores at the heart of local communities. We serve some 12 million customers each week and our average shopper visits their local store 44 times each year – more frequently than any other UK grocery retailer. The food retail operation also has a buying alliance with other co-operative societies across the UK, and therefore the reach for food retail stores increases to 4,000 stores.

Our co-operative values are embedded in our business. The Co-operative Group and its businesses have led the way in developing responsible retailing initiatives that have pioneered the interests of consumers. At the end of 2007 we launched the Co-operative Food Ethical Policy consultation; the world's largest consumer poll on ethics. Over 100,000 members came forward to endorse the adoption of our Food Ethical Policy and give their backing to a range of commitments which cover issues such as food quality, diet and health, animal welfare, the environment and fair trade.

2. The Co-operative Group response to health (including CVD) concerns

The Co-operative Group believes the health and wellbeing of the nation is one of the great challenges of 21st century Britain and has long been committed to making it easier for customers to make healthier lifestyle choices. Over the years we have consistently led the industry and interpreted the law in the best interest of the consumer. We have broken ranks with the rest of industry and on occasion even broken the law when it has been in the interest of the consumer and, if necessary, we will do so again in the future. The information included in Appendix 1 is intended to give an overview of the type of activity we have undertaken over the last two decades.

As the largest community retailer in the UK we are determined to play our part in tackling the health inequalities attributable to poor diet by helping our customers and colleagues make healthier food choices for themselves and their families. To address this we have developed policies and initiatives around the following four areas:

- Product composition
- Nutrition labelling
- Advertising and promotions
- Communications and campaigns

2.1 Product composition

The Nutrition Task Force (NTF), established by Department of Health in 1994¹, challenged industry to reduce fat, saturated fat and salt to help reduce deaths from coronary heart disease and stroke. In 1995 the Co-op challenged its suppliers to reduce the amount of fat and salt in Co-op brand products to help achieve the NTF targets. This has led to progressive salt and fat reductions across a wide range of products which is still ongoing.

Product reformulation is a key focus for both our product development teams and supply base. Strict brand standards ensure that when products are reformulated or resourced there must be no increase in saturated fat or salt. Following publication of the Food Standards Agency's 2010 salt targets² in March 2006 compliance with the targets became mandatory for all Co-operative products. The Co-operative Group already meets the majority of the FSA's current salt targets and is on line to reformulate the remaining handful of lines by the end of 2009. In the absence of specific targets for saturated fat it is our intention to reduce the saturated fat content of all products wherever possible.

In order to drive reformulation we have established a product improvement programme which has as its overall objective the delivery of individual products and ranges with a better health profile. This involves consideration of the salt, fat, saturated fat and sugar levels for all products. In all cases reductions are sought, subject to safety and quality considerations. Reducing saturated fat in products is particularly challenging and may involve not only the use of alternative ingredients and recipes but new technology and methods of production.

One example of a category where concerted effort on the part of our product development team and suppliers has resulted in a change to the health profile of a large number of products is our chilled Indian range. Using low fat ingredients and baking rather than frying has resulted in the majority of the products now being low in saturated fat. Other individual successes include:

- Canned spaghetti and spaghetti rings in tomato sauce with 10% less sugar.
- Chinese cook-in sauces with 36% less sugar.
- Carbonara pasta sauce where a change in the type of cream and the combination of cheeses used resulted in a product with the same great eating quality but with 29% less saturated fat.
- Cheese cakes where changes to the proportions of base, cream and soft cheese has resulted in products with better eating quality and 12.5% reduction in saturated fat.

We believe that good value healthy food should be within everyone's reach and to help deliver this we are committed to ensuring our Healthy Living and Reduced products are no more expensive than standard equivalent products, and that fat, saturated fat, sugar and salt levels are no higher in value lines than in equivalent standard lines.

¹ Department of Health, *Eat Well!: An action plan from the Nutrition Task Force to achieve the Health of the Nation targets on diet and Nutrition*. London: Department of Health, 1994.

² <http://www.food.gov.uk/news/pressreleases/2006/mar/targets>

2.2 Nutrition Labelling

The Co-operative Group has been at the forefront of nutrition labelling for over twenty years and made a commitment to include nutrition labelling on all products as far back as 1985. Recognising that consumers had difficulty in making sense of the technical information contained within the nutrition panel we lobbied the Government to introduce a standardised, consumer friendly approach to nutrition labelling. When this was unsuccessful we introduced our own scheme using the terms HIGH, MEDIUM and LOW in the nutrition panel in 1986.

Over the next few years we refined the scheme and in 1992 in conjunction with the Coronary Prevention Group (CPG) launched a new labelling scheme based on the proportion of food energy provided by each nutrient. In 1995 we were the first retailer to include a front of pack summary of Calories and Fat per serving on all of our products with salt being included in 1998. For more than a decade we were the only retailer to have both a consistent front of pack nutrition summary and to use HIGH, MEDIUM and LOW indicators in the nutrition panel. At a corporate level we continued to lobby for an industry wide, consistent, standardised front of pack scheme.

In March 2006 the FSA's recommendations for a voluntary, front of pack, multiple traffic light labelling scheme were published³. Having lobbied for such a scheme for so long we fully supported the recommendations and adopted them in full. The recommendations coincided with our business rebranding from Co-op to Co-operative and the multiple traffic light became a fundamental element of our redesigned packaging. In September 2006 the first products to be labelled with the traffic light were launched.

Since launching the scheme we have relabelled all FSA priority categories including sandwiches, ready meals, meal centres, burgers, sausages, pies, quiches, breaded and coated meat and fish, pizzas and breakfast cereals. Last summer, in the interest of our consumers, we made the decision to roll out the scheme beyond these first priority categories to all processed products. The first cakes, canned products, soft drinks, sweet pies and deserts are already on shelf.

In what we believe is the first example of its kind in the UK our newly launched Food to Go range of in-store prepared sandwiches and loose bakery items includes traffic light labelling on the price ticket. We have also recently launched coffee bars in thirteen of our larger stores and where they serve products from our Food to Go range traffic light information is also available for those products. The provision of front of pack nutrition information is a key part of our honest labelling policy and we are continually looking for practical ways to extend this principle to more of our loose offering.

The Co-operative Group is committed to increasing the number of healthier choices available in store. To increase the visibility of these products we are supporting the information contained in the traffic light with front of pack nutrition claims such as 'low fat', 'low saturated fat' and 'high fibre'. Rather than develop a new sub-brand of 'healthier' products and risk alienating customers that, for one reason or another, might not be inclined to buy overt healthy branded products we are simply highlighting the claims within a green dot on the packaging of all relevant products irrespective of segmentation.

³ <http://www.food.gov.uk/news/pressreleases/2006/mar/signpostingmarch>

The messages in green dots are based on approved nutrition claims under the Nutrition and Health Claims Regulation (EC) 1924/2006 plus Omega 3, Wholegrain and 5 A Day claims and will only be applied to products that are not HIGH for fat, saturated fat, salt or sugar. The one exception being for certain reduced products which may still be high in a particular nutrient despite being 50% less in relation to the reduced nutrient e.g. reduced fat cheese will still be high for salt.

2.3 Advertising and promotion

We are currently half way through a major refit program that will see all 2200 stores refitted within two years which is due to finish by the end of this year. As part of the refit we have made significant investment in refrigeration to allow us to give greater prominence to fresh foods, placing produce and fresh meat and fish on entry and in the first aisle of stores.

We trade within thousands of diverse communities and across a wide socio-economic base which means some of our stores are in areas where we are the only provider of fresh food. Investment of the kind described above can be critical to the long term sustainability of a community. Our intention, in all of our stores, is to encourage customers to shop with us for fresh products to form the basis of simple, fresh and healthy meals. To make this easier we are giving greater in store prominence to fresh and healthy promotions and are dedicating a third of off shelf space around the store to healthy lines. In practice this means that one in three promotional bins will carry bread or other healthy bakery items, produce and ambient grocery lines rather than confectionery or other sweet or fatty snacks and every third 'Deal of the Week' will be for a healthy product.

As well as increasing the visibility of healthy promotions in store we monitor the whole of our promotional program to ensure customers have access to a range of attractive, good quality, healthy deals and are committed to increasing the total number of healthy promotions and require that no less than 25% of our total food promotions are for 'healthy' products. Our definition of 'healthy' includes all fruit and vegetables and other products as assessed under the FSA nutritional profiling model.

In 2000 our Blackmail inquiry highlighted parental concerns about the impact of TV advertising of food and drink products on children's diets. As a result we committed ourselves to a voluntary ban on the advertising of high fat, salt, sugar food or drink during children's TV hours and called on others in the food chain to follow our lead and press the then Independent Television Commission (ITC) to impose a ban. At the same time we promised our customers we would never use cartoon characters on high fat, salt, sugar foods and reconfirmed our ban on the promotion of child oriented HFSS food and drink at checkouts.

2.4 Campaigns

We are constantly looking for the best ways to communicate healthy eating messages to our customer. As well as using product packaging we also use our in-store radio and digital till screen network, leaflets and point of sale to communicate healthy messages and choice. Additional cut through is achieved by direct mail, smart coupons and our website. Customers wanting further information, support or advice are encouraged to contact to our Customer Relations Department via the Freephone number printed on all of our packaging and marketing material.

Green Dot Campaign - 2009

The Co-operative Group's ambition for 2009 is to make it easier for our customers to make healthier food choices and play our part in improving public health. In support of this we are committed to:

- Introducing new healthier products
- Ensuring good distribution of healthier products
- Promoting recipes and meal suggestions to drive interest
- Ensuring strong value deals all year on healthier products
- All TV adverts will feature fresh own label foods
- Using every communications opportunity for health messaging e.g. till screens, radio, bags and till receipts

Our 'green dot' products featured in a heavy weight TV campaign in January and will be brought to life all year round in store through the use of exciting and vibrant point of sale encouraging customers to 'look for the green dot'. We want to incentivise and reward our customers for choosing healthier products and address the perception that choosing the healthier option costs more. This was kicked off in January by the use of double membership points on all green dot products and offering key lines at half price. We plan to repeat double points three times in 2009 and will be promoting healthier choices all year.

As a food retailer we recognise the most significant contribution we can make in support of the Government's agenda on obesity is through the products we sell. However, we are also concerned about other aspects of a healthy lifestyle. That's why in March 2009 we are launching a virtual Health Club, which will provide healthy recipe ideas, hints and tips around cooking, shopping and exercising a bit more. Later in 2009 we will be launching a fun challenge to encourage colleagues to participate in a little more exercise.

We are also looking at how we can use direct marketing to positively influence purchasing behaviour. Our overall aim being to increase the penetration of healthier products particularly fresh fruit and vegetables within those groups of customers who do not currently shop with us for these items.

Big 5 Campaign - 2009

January also saw the start of our year long Big 5 promotion – that's five different single price produce deals over and above our usual promotional lines, every month of the year. Big 5 will feature in TV advertising during February.

Mix Your Colours Campaign - 2008

In 2008 the Co-operative launched an integrated 5 A Day campaign designed to increase customer's consumption of fruit and vegetables and thereby help improve the nation's health. The campaign was strongly supported by half-price deals running throughout the year and led to a sustained uplift in sales of fruit and vegetables by an average of 9%. The significant impact of the campaign stemmed from the use of consistent, bright and engaging visuals in-store highlighting 5 A Day messages and an external campaign using national TV, newspapers, direct mail and PR.

Farm to Fork Programme - ongoing

We are in the unique position of being one of the UK's largest farmer as well as a food retailer and have set up the Co-operative Farm to Fork programme to enable children from primary schools to visit a working farm, providing them with a learning experience that promotes a much better understanding of where their food comes from. The programme, which started on The Co-operative Farms Stoughton Estate at Oadby, near Leicester in 2005 is now running across seven sites across the UK. So far 10,000 children have taken part with plans to double this to 20,000 in 2009. Evaluation of the programme has shown that 49% of parents have seen a lasting improvement in their children's attitude to food, and that 90% of teachers reported improvement in classroom learning as a result of the visit.

Healthy Living Events - ongoing

Co-operative Membership teams hold regular Healthy Living Events across the UK to promote healthy eating. Events provide nutritional advice and include a cookery demonstration followed, at some events, by a 'hands-on' workshop. So far 8300 customers, members and their families have participated in the events. Feedback from attendees revealed that 73% of adult respondents consider their lifestyle to be healthier and 74% are now preparing more dishes from scratch, using fresh foods, as a result of attending the events. Respondents reported that attendance at the events had more influence on them than TV programmes, press articles, their GP, friends and family or celebrity chefs.

Government Campaigns - ongoing

The Co-operative Group is committed to support the Food Standards Agency and Department of Health in delivering key health messages. We have partnered the FSA on its salt campaign for the last few years and this year are partners on the saturated fat campaign and the DH Change4Life campaign.

We are running specially created Change4life adverts across our 2200 store network, on over 7000 till screens and Co-operative radio in most stores. As customers approach the tills they have chance to see the short TV ad warning them that '9 out of 10 of our kids risk growing up with dangerous amounts of fat in their bodies'. There are 14 million transactions at The Co-operative every week and with the ad being shown every three minutes there's a great chance for a large proportion of the UK's population to see them. Customers also get to hear the Change4Life radio ad played over Co-operative radio. Played once an hour, this longer ad gives information to customers about the link between fat in the body and an increased risk of serious illnesses.

3. How the Co-operative Group implement FSA health policies and directives.

As a national food retailer the Co-operative Group is experienced in implementing regulation and voluntary initiatives in the area of food composition, labelling and health. We have a close relationship with the Food Standards Agency and Department of Health and have worked with them on many occasions to deliver campaign messages and as partners in voluntary initiatives. We have close links with many non-governmental organisations and have a Responsible Retailing Advisory Panel made up of experts from outside the business to help us formulate our response to ethical challenges. Our co-operative values and the expectation of our members drive our business to constantly examine its policies and practices in the light of ethical demands including those highlighted by this review.

February 2009