Inside our Quick Service Restaurants

Australia 2018



Assessment of company policies and commitments related to **obesity prevention** and **nutrition**

insideourfoodcompanies.com.au





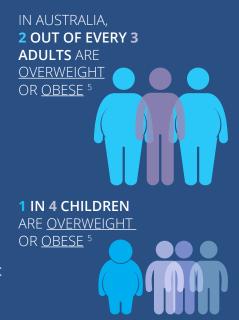


Unhealthy diets are creating a public health crisis in Australia.

Along with obesity, they are leading contributors to poor health. This has a high cost to the economy, including large impacts on the health care system and productivity. 2

Australians spend nearly 32% of their household food budget on fast food and eating out,³ and the average fast food meal contains almost half of an adult's recommended daily energy intake.⁴

The policies and actions of the quick service restaurant industry can have a significant impact on population diets.



Benchmarking company nutrition policies and commitments

This study assessed, for the first time, the largest Australian quick service restaurants (also referred to as fast food outlets) on their policies and commitments related to obesity prevention and nutrition. The objective was to highlight where Australian quick service restaurants are committing to take action in relation to addressing obesity prevention and nutrition, identify examples of best available industry commitments, and make specific recommendations for improvement.

Globally-developed assessment methods, tailored to the Australian context

Company policies and commitments related to obesity prevention and nutrition were assessed using the BIA-Obesity (Business Impact Assessment - Obesity and population nutrition) tool developed by INFORMAS, a global network of public health researchers that monitors food environments in >30 countries worldwide.⁶ The methods were adapted from the Access to Nutrition Index (ATNI) that benchmarks food company policies at the global level.⁷

The BIA-Obesity tool assesses company policies and commitments across six key domains related to obesity prevention and improving population nutrition. These include: corporate strategy, product formulation, product and menu labelling, promotion to children and adolescents, product accessibility, and relationships with external groups. Each domain includes a number of indicators, with assessment based on the **transparency**, **comprehensiveness** and **specificity** of each company's policies and commitments.

Process of assessment

The largest quick service restaurant chains (n=11) in Australia were selected for assessment. For each company, publicly available information on their policies and commitments was collected up to the end of 2017. For those companies that engaged with the assessment process, the project team liaised with company representatives to validate and supplement publicly available information. Companies were assessed across all the domains of the BIA-Obesity tool, with scores combined across domains to derive an overall score out of 100.

¹ Australian Institute of Health and Welfare 2016. Australian Burden of Disease Study (2011). AIHW: Canberra

² Colagiuri S, et al. The cost of overweight and obesity in Australia. MJA 2010; 192 (5):260-264

³ Australian Bureau of Statistics 2017. Household Expenditure Survey Australia 2015-16. ABS: Canberra

⁴ Brindal E et al. Obesity and the effects of choice at a fast food restaurant. Obes Res Clin Pract 2008; 2(2):71-142

⁵ Australian Institute of Health and Welfare 2017. Overweight and obesity. 2017. AIHW: Canberra

⁶ www.informas.org

⁷ www.accesstonutrition.org

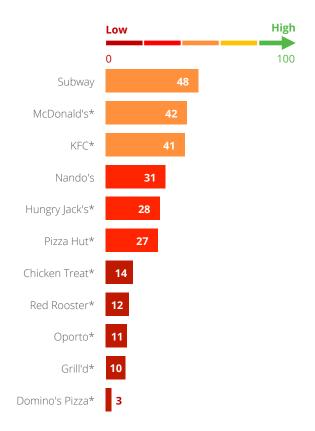
The majority of the largest quick service restaurants in Australia do not publicly identify nutrition and health as a focus area. Across the sector, there is limited disclosure of company efforts to address obesity and population nutrition issues.

- Company scores ranged from 3/100 to 48/100, with a median score of 27/100.
- Two companies (Subway and Nando's) fully engaged with the assessment process by providing internal information and feedback, while the assessment for the remaining nine companies was based on publicly available information only
- Highest performers (Subway, McDonald's, KFC) all had made some public commitment to population nutrition at the national level, and had several related policies in place
- The other companies had few public commitments related to nutrition and health issues at the national level

Areas in which a number of Australian quick service restaurants have demonstrated some commitment:

- Product formulation: Reporting having taken some action to reformulate menu items to reduce levels of nutrients of concern (5 out of 11 companies)
- Menu labelling: Committing to implement kilojoule menu board labelling across all states and territories (6 out of 11 companies)¹
- Nutrition information: Providing comprehensive nutrition information online for the majority of products (all

Assessment of quick service restaurant policies and commitments related to obesity prevention and nutrition - Australia 2018 (scores out of 100)



^{*} Assessment based on publicly available information only

Domino's Pigailf'd* Oporto* Red RoosterChicken Tre 2tžza Hut* Hun 5 11 12 14 27 companies)

¹ It is a legislative requirement for fast food outlets to display kilojoule content on menu boards in all states and territories except Tasmania, Western Australia and the Northern Territory

Key recommendations for quick service restaurants

- 1 | Corporate strategy: Prioritise obesity prevention and population nutrition as part of the overall company strategy, and align the company's obesity prevention and nutrition-related policies with global health and sustainability goals
- 2| **Product formulation:** Set measurable targets and timelines to reduce sodium, free sugars, saturated fat, artificially produced trans fat and meal portion sizes, in conjunction with government-led initiatives (e.g., Healthy Food Partnership) to improve the overall food supply
- 3| **Nutrition labelling:** Implement kilojoule labelling on menu boards across all states/ territories, and support the development of standardised interpretive nutrition labelling (e.g., using health stars or colour-coding) for menu boards

4 Promotion to children and adolescents

- Implement a policy on marketing to children that effectively restricts the exposure of children and adolescents (up to the age of 18) to the promotion of 'less healthy' foods/brands
- For companies with revenue dominated by 'less healthy' menu items, commit to not sponsor sporting and community events that are popular with children and families, and eliminate use of promotion techniques (e.g., toys in children's meals, cartoon characters, interactive games) with strong appeal to children
- **5| Product availability:** Commit to make healthier and lower kilojoule meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 6 Product affordability: Introduce a pricing strategy that positions healthier products at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives on 'less healthy' items

Conclusion and implications

- While some Australian quick service restaurants have taken positive steps as part of a societal response to unhealthy diets and obesity, there is a **much greater role for the sector to play**.
- Companies need to elevate the importance of nutrition as part of their overall strategy, and commit to implement a broad range of actions to improve the healthiness of Australian food environments. Industry associations, such as the Australian Food and Grocery Council (AFGC), and government initiatives, such as the Healthy Food Partnership, can support individual companies to adopt this report's recommendations and coordinate company action across the sector.
- Governments need to closely monitor the implementation of company policies and commitments related to obesity prevention and nutrition, and consider stronger policy intervention where voluntary company actions are insufficient. Other stakeholder groups, including investors, need to monitor company progress.

Unhealthy diets and obesity are leading contributors to poor health in Australia¹

Obesity and diet-related disease are major public health problems in Australia. Less than 7% of Australians consume diets that are consistent with the Australian Dietary Guidelines. At least 35% of the energy intake of adults and up to 41% of the energy intake of children comes from 'less healthy' food and drinks.² Two in three Australian adults and one in four children are now overweight or obese.³ Overweight and obesity contribute significantly to rates of disease (cancers, diabetes, cardiovascular disease, strokes) and death. This has a high cost to the economy, including large impacts on the health care system and productivity.⁴



Improved diets are critical for sustainable development

The United Nations (UN) Sustainable
Development Goals (SDGs) and associated
targets present an agenda for all parts of
society, including the corporate sector, to work
towards improved economic prosperity, and the
health and wellbeing of people and the planet.⁵
Internationally, many large companies and
financial investors are now increasingly focusing
on monitoring and evaluating their contributions
to the SDGs.⁶

Improving population nutrition represents an important step in achieving the SDGs. Nutrition is considered a component of all 17 SDGs⁷, and is part of, or linked to, performance targets of several SDG's including:

- SDG 2 Zero hunger
- SDG 3 Good health and wellbeing
- SDG 12 Responsible consumption and production







Quick service restaurants have an important role to play as part of efforts to address obesity and improve population diets

Tackling obesity and improving population diets requires a comprehensive societal response, including government policies, community support, and wide-scale action from the food industry. Quick service restaurants are an important component of this response, as Australians increasingly consume food away from the home, and spend nearly 32% of their household food budget on fast food and eating out.8 Due to their widespread reach (20,000 outlets nationally),9 actions from the quick service restaurant industry can have a significant impact on population diets.

The World Health Organization (WHO) has identified a number of actions that the food industry can take to improve population nutrition and create healthier food environments,¹⁰ including:

- Limiting the levels of salt, free sugars¹¹, saturated fat and trans fat in products
- Ensuring that healthy and nutritious choices are available and affordable to all consumers
- Practicing responsible marketing of foods high in salt, free sugars, and unhealthy fats, especially to children
- Providing consumers with clear, easily understood, and evidence-based nutrition information
- ¹ Australian Institute of Health and Welfare 2016. Australian Burden of Disease Study (2011). AIHW: Canberra
- ² Australian Bureau of Statistics (ABS). Australian health survey: first results, 2011–12
- ³ Australian Institute of Health and Welfare (AIHW). Overweight and obesity. 2017. AIHW: Canberra
- ⁴ Colagiuri S, et al. The cost of overweight and obesity in Australia. MJA. 2010;192(5):260–264
- 5 http://www.un.org/sustainabledevelopment/sustainabledevelopment-goals
- ⁶ Hellström E, et al. Towards a Sustainable Well-Being Society. From Principles to Applications. 2015. Sitra Working Paper 14. Available from: https://media.sitra.fi/2017/02/23221124/ Towards_a_Sustainable_Wellbeing_Society_2.pdf
- Global Nutrition Report 2017: Nourishing the SDGs. Bristol, UK: Development Initiatives
- ⁸ Australian Bureau of Statistics 2017. Household Expenditure Survey Australia 2015-16. ABS: Canberra
- Euromonitor. Fast food in Australia. Country report. 2017
 World Health Organization. Global Strategy on Diet, Physical
- activity and Health, 2004

 11 Defined by the WHO as all sugars added to foods, plus sugars naturally present in honey, syrups, and fruit juices

Supporting quick service restaurants to improve their commitments on nutrition

The goal of this study was to support Australian quick service restaurants to improve their policies and commitments related to obesity prevention and population nutrition. The objective was to highlight where Australian quick service restaurants are demonstrating leadership in relation to obesity prevention and nutrition, identify good practice examples, and make specific recommendations for improvement. Similar initiatives (e.g., the Access to Nutrition Index¹, Oxfam Behind the Brands²) have shown the effectiveness of this approach.

The study forms part of a broader initiative to assess company policies and performance across different sectors of the food industry, also including supermarkets and food and beverage manufacturers. While this study focused on policies and commitments, future phases of the initiative will investigate the performance of companies (e.g., extent and nature of food marketing to children, healthiness of menu items) and compliance with commitments made.

Assessment tool

Company policies and commitments (up to 31 December 2017) related to obesity prevention and nutrition were assessed using the BIA-Obesity (Business Impact Assessment - Obesity and population nutrition) tool developed by INFORMAS, a global network of public health researchers that monitors food environments in >30 countries worldwide.³ These methods were adapted from the Access to Nutrition Index that benchmarks the nutrition-related commitments, performance and disclosure practices of global food and beverage manufacturers. The BIA-Obesity tool includes sector specific indicators, that were tailored to the Australian context.⁴

Process for conducting the BIA-Obesity assessment

1 Select companies for inclusion in the BIA-Obesity assessment

Collect
preliminary
data (from
publiclyavailable
sources) related
to each
indicator for all
selected
companies

Liaise with company representatives to refine and supplement policy information

4Assess each company using the BIA-Obesity assessment criteria

5 Prepare prioritised recommendations for each company, in consultation with company representative:

Privately feed results back to each company along with company scorecard and benchmarking against other companies

Publicly-release results, including individual company and sector performance

¹ www.accesstonutrition.org

² www.behindthebrands.org

³ www.informas.org

⁴ Details of the BIA-Obesity tool are available at: www.insideourfoodcompanies.com.au

COMPANIES AND DOMAINS ASSESSED

Companies selected for inclusion

The largest quick service restaurants chains (n=11) in Australia were selected for assessment. These included (in order of market share)¹: McDonald's, KFC, Pizza Hut, Hungry Jack's, Subway, Domino's Pizza, Chicken Treat, Oporto, Red Rooster, Nando's, Grill'd. These companies account for approximately 67% of the relevant market share in Australia.

Domains assessed

The BIA-Obesity tool considers company policies and commitments across six key domains related to obesity prevention and nutrition. In each domain, a number of indicators were assessed based on the **transparency**, **comprehensiveness** and **specificity** of policies and commitments. Scores were combined across domains to derive an overall score out of 100 for each company.

Domain	Policy area	Key indicator categories	Weighting (out of 100) ²
A Corporate strategy	Overarching policies and commitments to addressing obesity and improving population nutrition	 ✓ Commitment to nutrition and health in corporate strategy ✓ Reporting against nutrition and health objectives and targets ✓ Key Performance Indicators (KPIs) of senior management linked to nutrition and health-related targets 	10
B Product formulation	Policies and commitments regarding product development and reformulation to reduce nutrients of concern (i.e., sodium, free sugars, saturated fat, trans fat) and energy content/portion size of menu items	 ✓ Targets and reported actions related to reduction of sodium, free sugars, saturated fat, trans fat, and energy content/portion size of menu items ✓ Engagement with government-led initiatives related to product formulation (e.g., the Healthy Food Partnership) 	25
C Nutrition labelling	Policies and commitments regarding disclosure and presentation of nutrition information on menus and online	 ✓ Commitment to implement menu board labelling for energy/kilojoules ✓ Provision of nutrition information in-store and online 	15
Promotion to children and adolescents	Policies and commitments for reducing the exposure of children and adolescents (aged <18) to promotion of 'less healthy' foods/brands	 ✓ Broadcast and non-broadcast media policy ✓ Use of marketing techniques that appeal to children and adolescents (including interactive games, toys in children's meals) 	25
E Product accessibility	Policies and commitments related to the availability and affordability of 'healthier' compared to 'less healthy' foods	✓ Default side and drink items as part of 'meal deals'✓ Pricing and discounting strategies	20
F Relationships with external groups	Policies and commitments related to support provided to external groups (e.g., professional associations, research organisations, community and industry groups) related to health and nutrition, with a focus on transparency	 ✓ Disclosure and transparency of relevant relationships ✓ Accessibility of relevant information 	5

¹ Based on Euromonitor 2016 data for Australia (as at 30 March 2017), based on retail value

² Weighting based on the relative importance of company policies in each domain, as derived from discussions with international food policy experts within INFORMAS

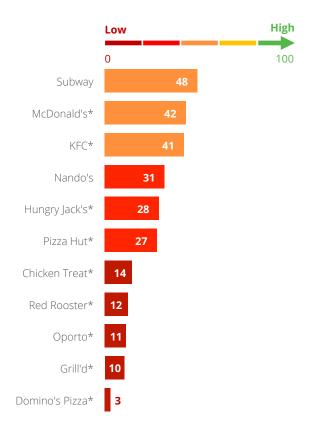
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Areas in which a number of Australian quick service restaurants have demonstrated some commitment:

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Assessment of quick service restaurant policies and commitments related to obesity prevention and nutrition - Australia 2018 (scores out of 100)



^{*} Assessment based on publicly available information only

Oporto* Red RoosterChicken Tre 212 za Hut* Hun 11 12 14 27 companies)

¹ It is a legislative requirement for fast food outlets to display kilojoule content on menu boards in all states and territories except Tasmania, Western Australia and the Northern Territory

A] Corporate strategy

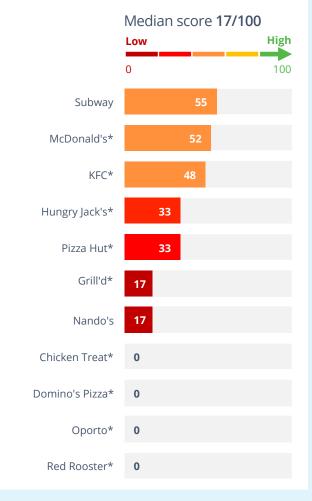
Good practice statement

The company has a strategic document or collection of documents that outline the company's overarching commitment to population nutrition and health, with relevant objectives and targets that are prioritised as part of the overall corporate strategy. These policies are publicly available, reference relevant international and national health priorities, and apply to the national context.

Key findings

Less than half of companies (5 out of 11) identified nutrition and health-related issues in publicly available corporate reporting

- Subway, McDonald's, KFC, Hungry Jack's and Pizza Hut identified nutrition issues in publicly available corporate reporting, while Nando's had made some internal commitment to nutrition and health. Grill'd identified nutrition and health as an area of focus for the company
- McDonald's, KFC, Hungry Jack's and Pizza Hut had some reporting against national level nutrition commitments, however no companies routinely reported against progress in achieving specific nutrition and health objectives and targets
- Several multinational companies (including McDonald's, Subway and Pizza Hut) had more reporting against their approach to nutrition and health at the global level, with less detail available at the national level
- The lowest performers in this domain (Chicken Treat, Red Rooster, Oporto, Domino's Pizza) made little or no mention of nutrition or health in corporate reporting



^{*}Assessment based on publicly available information only

- **Identify** population nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing
- **Refer** to relevant international priorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan) within the corporate strategy
- Report progress against specific nutrition and health-related targets and objectives on a regular basis

B] Product formulation

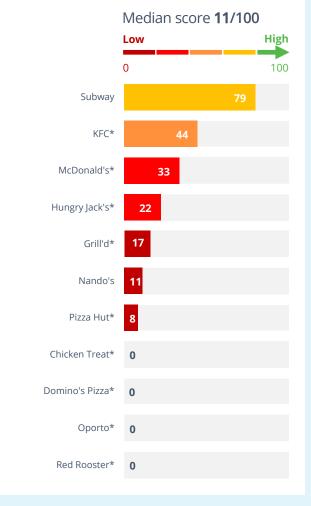
Good practice statement

The company has a set of product formulation commitments relating to new product development and reformulation of existing products to limit or reduce nutrients of concern (including sodium, free sugars, saturated fat, and trans fat), whilst increasing desirable nutrients. The company commits to reduce meal portion sizes and/or their energy content, and has set specific targets to improve the healthiness of children's meals (where relevant).

Key findings

Some companies stated they were taking action to reformulate products; however, no companies routinely reported against progress in achieving specific reformulation commitments

- Subway was the leader in this domain, having reported taken action to reformulate a number of products to reduce nutrients of concern (mainly sodium), including the removal of artificially produced trans fat across all menu items
- Subway, KFC and McDonald's, had all made a commitment to reduce several nutrients of concern across portions of their portfolio
- KFC, McDonald's and Grill'd reported using 'healthier' frying oils (i.e., non-hydrogenated / lower in saturated fat and/or trans fat). Subway did not fry foods.
- Subway was the only company to set kilojoule content targets for selected meal items
- The most common areas in which companies had reported taking some action to reduce nutrients of concern were sodium (5 out of 11 companies), fat and sugar (5 out of 11 companies), followed by trans fat (3 out of 11 companies)
- Two companies, Subway and KFC, were nominated participants of the Australian government's Healthy Food Partnership



^{*}Assessment based on publicly available information only

- **Develop** specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugars, saturated fat, and artificially produced trans fat) across the product range. Routinely report on progress in achieving reformulation targets
- **Actively** work to increase servings of core food groups (e.g., vegetables, fresh fruit, wholegrains, reduced fat dairy) across key menu items
- **Commit** to reducing meal portion sizes by reducing kilojoule content of products and offering smaller/healthier sides and drinks as the default option
- **Commit** to frying foods in non-hydrogenated, low saturated fat oils
- **Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply

C] Nutrition labelling

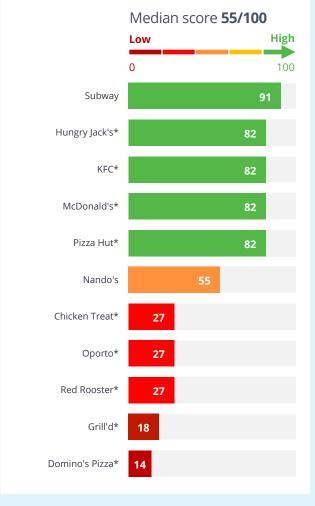
Good practice statement

The company has a set of published commitments relating to product and menu labelling that are designed to inform consumers about the nutrient composition of products, including implementation of menu board labelling and provision of comprehensive and easy-to-understand product nutrition information in-store and online.

Key findings

The majority of companies made some commitment to provide consumers with nutrition information, either online or in-store

- All companies provided online nutrition information for the majority of menu items
- The majority of companies (9 out of 11) committed to make some nutritional information available in-store, on request
- Hungry Jack's, KFC, Pizza Hut, McDonald's and Subway publicly committed to implement kilojoule menu board labelling across all states and territories¹
- Chicken Treat, Grill'd, Domino's Pizza, Nando's, Oporto and Red Rooster did not publicly disclose their position on menu board labelling¹



¹ It is a legislative requirement for fast food outlets to display kilojoule content on menu boards in all states and territories except Tasmania, Western Australia and the Northern Territory

- Provide comprehensive nutrition information for all products in-store and online
- Implement kilojoule labelling on menu boards across all states/territories, and support the
 development of standardised interpretive nutrition labelling (e.g., using health stars or colourcoding) for menu boards
- Clearly label healthier items on menu boards to make these options readily identifiable

^{*}Assessment based on publicly available information only

D] Promotion to children and adolescents

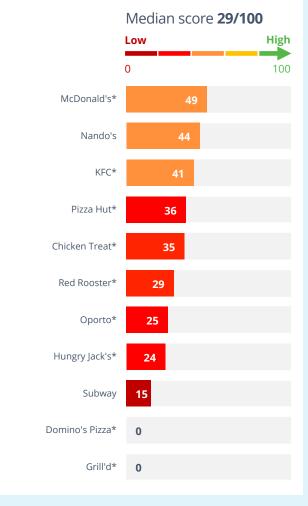
Good practice statement

The company has a comprehensive policy/commitment to reduce the exposure of children and adolescents (aged <18) to 'less healthy' food/brand marketing. This policy includes eliminating use of marketing techniques that strongly appeal to children (including toys in children's meals), applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Compliance with this policy is audited by a third party.

Key findings

The majority of companies had made some commitment to market responsibly to children under 14 years, however the policies/commitments were unlikely to effectively restrict the exposure of children and adolescents to promotion of 'less healthy' foods/brands

- Seven of the 11 companies had voluntarily signed on to the Australian Food and Grocery Council's QSR Initiative for Responsible Advertising and Marketing to Children
- All companies with a commitment in the area specified that they would not directly target children up to age 14 for promotion of 'less healthy' products. None of these policies/ commitments explicitly restricted promotion of 'less healthy' foods/brands during all times/events when a large number of children are likely to be exposed
- Subway features only healthier side and drink items in its online and in-store displays of children's meals
- KFC made a commitment to not offer toys in children's meals



*Assessment based on publicly available information only

- **Implement** a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy
- For companies with revenue dominated by 'less healthy' menu items, commit to not sponsor sporting and community events that are popular with children and families, and eliminate use of promotion techniques (e.g., cartoon characters, interactive games, toys) with strong appeal to children
- **Increase** the proportion of marketing activity that relates to healthier menu options (as compared to 'less healthy' menu options)

E] Product accessibility

Good practice statement

The company has a commitment to address the availability and affordability of healthier products relative to 'less healthy' products. This includes commitments related to increasing the availability of healthier compared to 'less healthy' products across the menu, and pricing strategies to make healthier foods relatively cheaper (or equivalent) to 'less healthy' equivalents. The company commits to provide healthier side and drink options as the default in meal deals and children's meals. The company publicly supports the position of the WHO on fiscal policies to make healthier foods relatively cheaper and 'less healthy' foods relatively more expensive.

Key findings

Companies had taken little action to restrict the accessibility of 'less healthy' foods and increase the accessibility of healthier foods

- No companies had specific commitments to restrict price promotions and incentives on 'less healthy' items
- Subway was the only company to commit to providing a healthier side and drink option as the default option in all children's meals
- Several companies provided the option of healthier drinks or sides as part of adult 'meal deals' (e.g., water as a drink, corn as a side), but not as the default
- No companies had a public position on fiscal policies to make healthier foods cheaper and 'less healthy' foods relatively more expensive



^{*}Assessment based on publicly available information only

- **Commit** to make healthier and lower kilojoule meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- **Introduce** a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and **restrict** price promotions and value deal incentives on 'less healthy' items
- **Promote** healthier menu options through price discounts, promotions and/or loyalty card bonuses for healthier items
- **Support** the position of the WHO on fiscal policies to make healthier foods relatively cheaper and 'less healthy' foods relatively more expensive, and make the company's position public

F] Relationships with external groups

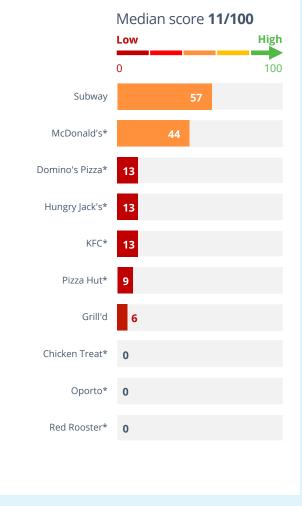
Good practice statement

The company has a policy or document(s) that outlines the types of relationships with external organisations in which the company will engage, in relation to nutrition and health. The company adopts full transparency regarding the amount and type of support provided to external organisations. This assists all stakeholders in understanding the relationships between different groups, the nature of lobbying activities, sponsorship arrangements, and potential sources of bias in research activities.

Key findings

Companies had limited disclosure around their engagement with external groups related to nutrition and health

- Subway disclosed its external group relationships with the research team
- McDonald's publicly disclosed their philanthropic activities and industry associations, while 7 other companies, excluding Chicken Treat, Oporto and Red Rooster, also had some reporting against their philanthropic activities
- Companies did not disclose funding amounts and support for external groups related to nutrition and health in a consolidated and easily accessible format



^{*}Assessment based on publicly available information only (Nando's explicitly stated that they have no relevant activity in this area and thus were not assessed in this domain)

- **Publish** all relationships (including funding and support) with external groups (e.g., professional associations, research organisations, community and industry groups) related to health and nutrition
- **Disclose** all political donations in real time, or **commit** to not make political donations

SUMMARY OF RECOMMENDED ACTIONS FOR COMPANIES

Domain	Recommendation actions	Examples of best available company commitments
A Corporate strategy	 Identify population nutrition and health as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing Refer to relevant international priorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan) within the corporate strategy Report progress against specific nutrition and health-related targets and objectives on a regular basis 	Unilever has made a strong commitment to nutrition and health at the global level, and highlights health as one of three key pillars that make up the company's Sustainable Living Plan. It sets out specific, time-bound nutrition and health targets and objectives that are routinely reported against. It aligns its approach with priorities set out by the WHO and the UN Sustainable Development Goals.
B Product formulation	 4 Develop specific, time-bound targets for the reduction of nutrients of concern (sodium, free sugars, saturated fat, artificially produced trans fat) across the product range. Routinely report on progress in achieving reformulation targets 5 Actively work to increase servings of core food groups (e.g., vegetables, fresh fruit, wholegrains, reduced fat dairy) across key menu items 6 Commit to reducing meal portion sizes by reducing kilojoule content of products and offering smaller/healthier sides and drinks as the default option 7 Commit to frying foods in non-hydrogenated, low saturated fat oils 8 Participate in / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply 	Nestlé has set specific, time-bound reformulation targets for the reduction of saturated fat, salt and added sugar across the company's global portfolio, and has reported removal of all artificially produced trans fats its products. Compliance with reformulation targets is audited and publicly disclosed on a regular basis.
C Nutrition labelling	 Provide comprehensive nutrition information for all products in-store and online Implement kilojoule labelling on menu boards across all states/territories, and support the development of standardised interpretive nutrition labelling (e.g., using health stars or colour-coding) for menu boards Clearly label healthier items on menu boards to make these options readily identifiable 	Subway Australia provides comprehensive nutrition information online and on request instore. The company implements kilojoule menu board labelling across all states/territories. Subway has developed an online nutritional information calculator which can be used to determine the nutritional information of a custom made meal. Walt Disney (US) restaurants, resorts and theme parks have introduced an icon to easily identify healthier menu items (in-store and online)

SUMMARY OF RECOMMENDED ACTIONS FOR COMPANIES

Domain	Recommendation actions	Examples of best available company commitments
D Promotion practices	 12 Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/ events when a large number of children/ adolescents are likely to be exposed. Routinely report on compliance with the policy 13 For companies with revenue dominated by 'less healthy' menu items, commit to not sponsor sporting and community events that are popular with children and families, and eliminate use of promotion techniques (e.g., toys in children's meals, cartoon characters, interactive games) with strong appeal to children 14 Increase the proportion of marketing activity that relates to healthier menu options (as compared to 'less healthy' menu options) 	Danone implements a marketing to children policy (applying to children under 12 years) that covers broadcast and non-broadcast media. It commits to not use promotional techniques that appeal to children, and does not market in the vicinity of schools, in secondary schools, or in places where children gather (e.g., day care centres, activity centres). It makes a global commitment to not use messaging that encourages a 'less healthy' lifestyle or overconsumption of any of its products. Danone reports compliance with its policies, and discloses and independently audits its marketing spending on healthy products, with a view to increase marketing spending on these products over time. Several major quick service restaurant chains have made a commitment to not offer toys in children's meals, e.g., Jack in the Box (US), KFC Australia
E Product accessibility	 15 Commit to make healthier and lower kilojoule meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals 16 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives on 'less healthy' items 17 Promote healthier menu options through price discounts, promotions and/or loyalty card bonuses on healthier items 18 Support the position of the WHO on fiscal policies to make healthier foods relatively cheaper and 'less healthy' foods relatively more expensive, and make the company's position public 	Subway Australia and US provide a healthier side and drink option as the default in its children's meals, and in the US explicitly aligns children's meals (including side and drink items) with USDA Dietary Guidelines for Americans.
F Relationships with external groups	 19 Publish all relationships (including funding and support) with external groups (e.g., professional associations, research organisations, community and industry groups) related to health and nutrition 20 Disclose all political donations in real time, or commit to not make political donations 	Coca-Cola International publishes a list of the external groups it funds/supports, including details of the nature, date and amount of support/funding given to research institutions, health professionals, scientific experts, professional organisations and partnerships related to nutrition and health. They disclose nutrition programs and active lifestyle programs with which they are affiliated, and information is updated annually.

CONCLUSION AND IMPLICATIONS

This study assessed, for the first time, the policies and commitments of major Australian quick service restaurant chains related to obesity prevention and nutrition. The results show that there is limited public commitment to address obesity and population nutrition issues across the sector.



This study identifies a number of recommended actions for quick service restaurants to contribute to societal efforts to address obesity and population nutrition issues. Government initiatives, such as the Healthy Food Partnership, and industry associations, such as the AFGC, can support individual companies to adopt this report's recommendations and coordinate company action across the sector.



Only two out of eleven companies assessed as part of this study engaged with the research process. As such, for the majority of companies, the assessment was based on publicly available information only. All companies need to improve their disclosure and transparency regarding their policies and commitments in the area.



This study assessed company **policies/commitments** and **transparency. Performance** of companies, for example, in relation to the healthiness of the company's products, or the extent and nature of 'less healthy' food marketing, **was not assessed** in this study. Those aspects will be investigated in future phases of the initiative. As part of future phases, it will be important see whether better policies and commitments also lead to better performance.



Governments need to closely monitor the policies and commitments of quick service restaurants, the extent to which they are implemented, and the healthiness of Australian food environments more generally. They need to consider stronger policy intervention where voluntary company actions are insufficient, as part of a broad strategy to improve population nutrition and address obesity. Other stakeholder groups, including investors, also need to monitor company progress.



Subway



Domain	Weighting						
A Corporate strategy	10%				55		
B Product formulation	25%					79	
C Nutrition labelling	15%					91	
D Promotion to children and adolescents	25%		15			■ Company s	score
E Product accessibility	20%	1	13			■ Highest se	ctor score
F External relationships	5%				57		
		0	20	40	60	80	100

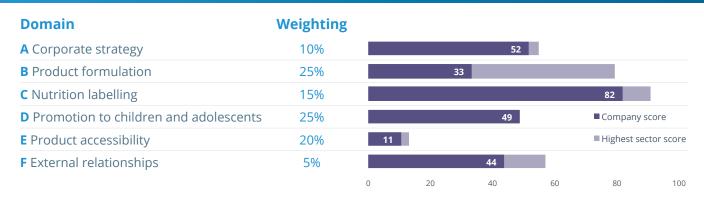
Areas of strength

- A| Corporate strategy Subway identifies nutrition and nutritious food as a key part of its business strategy. Globally, the company has some reporting against its progress in achieving health and nutrition objectives
- **B| Product formulation** Subway has reformulated its menu items to reduce levels of sodium and fat, and has eliminated artificially produced trans fat from its products. Subway commits to limit kilojoule content in several menu items. Subway is a nominated participant of the Australian government's Healthy Food Partnership
- C| Nutrition labelling Subway publicly commits to implement kilojoule menu board labelling across all states/territories, and provides comprehensive nutrition information in-store and online
- **E| Product accessibility** Subway offers only healthier side and drink items as the default in its children's meals

Prioritised recommended actions for Subway

- 1| Further **communicate** the company's approach to nutrition and health at the national level, setting clear objectives and targets that are routinely reported against
- **2| Publicise** specific targets to reduce levels of added sugar, kilojoules and saturated fat across menu items, where applicable
- 3) Extend the company's internal commitment by implementing a formal policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy
- **4 Commit** to phase out free refills on soft drinks, in stores where this is applicable
- **5| Introduce** a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and **restrict** price promotions and value deal incentives that include 'less healthy' side and/or drink items
- **6| Support** the development of standardised interpretive nutrition labelling (e.g., using health stars or colour-coding) for menu boards

McDonald's*



Areas of strength

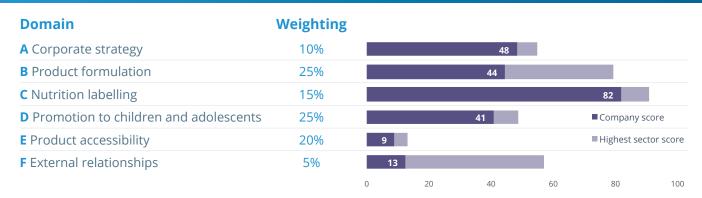
- A| Corporate strategy McDonald's identifies nutrition and health related issues in corporate reporting at the global level, and to some extent nationally
- **B| Product formulation** McDonald's reports against some of its progress to reduce sodium, fat, and sugar, and commits to use frying oils that are virtually free from trans fats
- C| Nutrition labelling McDonald's publicly commits to implement kilojoule menu board labelling across all states/territories, and provides comprehensive nutrition information in-store (including on product packaging) and online
- **D| Promotion to children and adolescents** McDonald's is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'

Prioritised recommended actions for McDonald's

- 1| Introduce regular reporting against specific nutrition and health objectives at the national level, referring to relevant international priorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan)
- 2 | Set measurable targets for the reduction of salt, added sugars, saturated fat, kilojoule content and trans fat across all relevant menu items. Routinely report on progress in achieving reformulation commitments.
- 3| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy
- **4| Eliminate** use of promotion techniques (e.g., cartoon characters, interactive games, toys in children's meals) with strong appeal to children
- **5 Commit** to not sponsor sporting and community events that are popular with children and families
- **6 Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 7 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives that include 'less healthy' side and/or drink items

^{*}Assessment based on publicly available information only

KFC*



Areas of strength

- A| Corporate strategy KFC outlines its approach to nutrition and health in corporate reporting at the national and global level. The company has some national reporting against its commitment to nutrition-related issues
- B| Product formulation KFC reports against some of its progress to reduce sodium, fat and trans fat, and makes a general commitment to reduce sugar. The company commits to introduce a healthier range of menu items and is a participant in the Australian government's Healthy Food Partnership
- C | Nutrition labelling KFC publicly commits to implement kilojoule menu board labelling across all states/territories, and provides comprehensive nutrition information in-store and online
- D| Promotion to children and adolescents
 - KFC publicly commits to not offer toys in its children's meals, and is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'

Prioritised recommended actions for KFC

- 1| Introduce regular reporting against specific nutrition and health objectives at the national level, referring to relevant international priorities (e.g., as articulated in the UN Sustainable Development Goals or the WHO Global NCD Action Plan)
- 2 | Set specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- 3| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy
- 4 Commit to not sponsor sporting and community events that are popular with children and families
- **5 Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 6 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and **restrict** price promotions and value deal incentives that include 'less healthy' side and/or drink items
- 7| **Support** the development of standardised interpretive nutrition labelling (e.g., using health stars or colour-coding) for menu boards

^{*}Assessment based on publicly available information only

Nando's



Domain	Weighting						
A Corporate strategy	10%	1	7				
B Product formulation	25%	11					
C Nutrition labelling	15%			5	5		
D Promotion to children and adolescents	25%			44		■ Company s	core
E Product accessibility	20%	13				■ Highest sec	tor score
F External relationships	5%	N/A					
		0	20	40	60	80	100

Areas of strength

- **A| Corporate strategy** Nando's has some internal commitment to health and nutrition
- **C| Nutrition labelling** Nando's implements kilojoule menu board labelling in all states/ territories, and provides nutrition information online
- **E| Product accessibility** Nando's offers healthier side and drink options as part of meal deals and children's meals

Prioritised recommended actions for Nando's

- 1| Identify health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2 Develop and publicise specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across menu items, where applicable.

 Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4) Implement a formal policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed. Routinely report on compliance with the policy
- **5 | Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 6 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives that include 'less healthy' side and/or drink items
- 7| **Support** the development of standardised interpretive nutrition labelling (e.g., using health stars or colour-coding) for menu boards





Domain	Weighting						
A Corporate strategy	10%			33			
B Product formulation	25%		22				
C Nutrition labelling	15%					82	
D Promotion to children and adolescents	25%	5				■ Company s	core
E Product accessibility	20%	0				■ Highest sec	ctor score
F External relationships	5%	13					
		0	20	40	60	80	100

Areas of strength

- **A| Corporate strategy** Hungry Jack's makes some commitment to nutrition in corporate social responsibility reporting
- **B| Product formulation** Hungry Jack's makes a general commitment to reduce levels of saturated fat, added sugar and sodium across some of its menu items
- C| Nutrition labelling Hungry Jack's publicly commits to implement kilojoule menu board labelling in all states/territories, and provides comprehensive nutrition information in-store and online
- **D**| Promotion to children and adolescents
 - Hungry Jack's is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'

Prioritised recommended actions for Hungry Jack's

- 1| Identify health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2 Develop specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed.
- 5 Commit to not sponsor sporting and community events that are popular with children and families
- **6 Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 7 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives that include 'less healthy' side and/or drink items

^{*}Assessment based on publicly available information only

Pizza Hut*



Domain	Weighting						
A Corporate strategy	10%			33			
B Product formulation	25%	8					
C Nutrition labelling	15%					82	
D Promotion to children and adolescents	25%			36		■ Company s	score
E Product accessibility	20%	0				■ Highest see	ctor score
F External relationships	5%	9					
		0	20	40	60	80	100

Areas of strength

- **A| Corporate strategy** Pizza Hut commits to reduce sodium across a number of menu items
- C| Nutrition labelling Pizza Hut publicly commits to implement kilojoule menu board labelling in all states/territories, and provides comprehensive nutrition information in-store and online
- D| Promotion to children and adolescents
 - Pizza Hut is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'

Prioritised recommended actions for Pizza Hut

- 1| Identify health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2 Develop specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed.
- 5 Commit to not sponsor sporting and community events that are popular with children and families
- **6 Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option
- 7 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and **restrict** price promotions and value deal incentives that include 'less healthy' side and/or drink items

^{*}Assessment based on publicly available information only

Chicken Treat*



Domain	Weighting						
A Corporate strategy	10%	0					
B Product formulation	25%	0					
C Nutrition labelling	15%		27				
D Promotion to children and adolescents	25%			35		■ Company s	score
E Product accessibility	20%	5				■ Highest se	ctor score
F External relationships	5%	0					
		0	20	40	60	80	100

Areas of strength

- **C| Nutrition labelling** Chicken Treat provides comprehensive nutrition information online
- D| Promotion to children and adolescents
 - Chicken Treat is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'
 - Chicken Treat had little disclosure of its approach to health and nutrition, as such, no further areas of strength were identified

Prioritised recommended actions for Chicken Treat

- 1| Identify health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2 Develop specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed
- **5 | Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 6 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives that include 'less healthy' side and/or drink items
- 7 Commit to not sponsor sporting and community events that are popular with children and families

^{*}Assessment based on publicly available information only

Red Rooster*



Domain	Weighting						
A Corporate strategy	10%	0					
B Product formulation	25%	0					
C Nutrition labelling	15%		27				
D Promotion to children and adolescents	25%		29			■ Company s	score
E Product accessibility	20%	5				■ Highest se	ctor score
F External relationships	5%	0					
		0	20	40	60	80	100

Areas of strength

- **C| Nutrition labelling** Red Rooster provides comprehensive nutrition information online
- D| Promotion to children and adolescents
 - Red Rooster is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'
 - Red Rooster had little disclosure of its approach to health and nutrition. As such, no further areas of strength were identified

Prioritised recommended actions for Red Rooster

- 1| Identify health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2 Develop specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed
- **5 Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 6 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives that include 'less healthy' side and/or drink items
- 7 Commit to not sponsor sporting and community events that are popular with children and families

^{*}Assessment based on publicly available information only

Oporto*

Domain	Weighting						
A Corporate strategy	10%	0					
B Product formulation	25%	0					
C Nutrition labelling	15%		27				
D Promotion to children and adolescents	25%		25			■ Company s	score
E Product accessibility	20%	5				■ Highest se	ctor score
F External relationships	5%	0					
		0	20	40	60	80	100

Areas of strength

- **C| Nutrition labelling** Oporto provides comprehensive nutrition information online
- D| Promotion to children and adolescents
 - Oporto is a signatory to the AFGC's 'QSR Initiative for Responsible Advertising and Marketing to Children'
 - Oporto had little disclosure of its approach to health and nutrition. As such, no further areas of strength were identified

Prioritised recommended actions for Oporto

- 1| Identify health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2 | **Develop** specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- 3 Participate in / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed
- **5 | Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option, particularly as part of children's meals
- 6 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and **restrict** price promotions and value deal incentives that include 'less healthy' side and/or drink items
- 7 | Commit to not sponsor sporting and community events that are popular with children and families

^{*}Assessment based on publicly available information only

Grill'd*

Domain	Weighting						
A Corporate strategy	10%		17				
B Product formulation	25%		17				
C Nutrition labelling	15%		18				
D Promotion to children and adolescents	25%	0				■ Company s	core
E Product accessibility	20%	8				■ Highest sec	tor score
F External relationships	5%	6					
		0	20	40	60	80	100

Areas of strength

- **A| Corporate strategy** Grill'd identifies health as a focus area for the company
- **B| Product formulation** Grill'd commits to using healthier (non-hydrogenated) frying oils, and has reduced sugar in a number of menu items
- **C| Nutrition labelling** Grill'd provides comprehensive nutrition information online
 - Grill'd had little disclosure of its approach to health and nutrition. As such, no further areas of strength were identified

Prioritised recommended actions for Grill'd

- 1| Publicly **communicate** the company's approach to nutrition and health in corporate reporting, setting clear targets and objectives that are routinely reported against
- 2 Develop specific, measurable targets for the reduction of saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| **Publish** a formal policy related to reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/ brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed.
- **5 | Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option for children's meals
- 6 | Publicly commit to implement kilojoule labelling on menu boards across all states/ territories, and support the development of standardised interpretive nutrition labelling (e.g., using health stars or colour-coding) for menu boards

^{*}Assessment based on publicly available information only

Domino's Pizza*



Domain	Weighting						
A Corporate strategy	10%	0					
B Product formulation	25%	0					
C Nutrition labelling	15%	14					
D Promotion to children and adolescents	25%	0				■ Company s	score
E Product accessibility	20%	0	I			■ Highest se	ctor score
F External relationships	5%	13					
		0	20	40	60	80	100

Areas of strength

- **C| Nutrition labelling** Domino's Pizza provides comprehensive nutrition information online
 - Domino's Pizza had little disclosure of its approach to health and nutrition. As such, no further areas of strength were identified

Prioritised recommended actions for Domino's Pizza

- 1| **Identify** health and nutrition as a priority focus area for the company, with relevant objectives, targets and appropriate resourcing. Report progress against health and nutrition objectives and targets
- 2| **Develop** specific, measurable targets for the reduction of added sugar, saturated fat, sodium and kilojoule content across relevant menu items. Routinely report against progress in achieving reformulation commitments
- **3| Participate in** / implement a strategy to adopt relevant recommendations from government-led initiatives (e.g., Healthy Food Partnership) to improve the healthiness of the food supply
- 4| Implement a policy for reducing the exposure of children and adolescents (up to the age of 18) to promotion of 'less healthy' foods/brands that applies across all media channels, and includes all times/events when a large number of children/adolescents are likely to be exposed.
- 5 Commit to not sponsor sporting and community events that are popular with children and families
- **6| Commit** to make healthier meal options (e.g., healthier sides and drinks) the default option
- 7 Introduce a pricing strategy that positions healthier menu items at a similar or lower price to 'less healthy' equivalents, and restrict price promotions and value deal incentives that include 'less healthy' side and/or drink items

^{*}Assessment based on publicly available information only

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