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Partnership for a healthier diet Mid-term report 2019

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Preface

Fafo has been commissioned by the Directorate of Health to evaluate the Letter of Intent for facilitating a healthier diet. The agreement is between the health authorities and the food industry. The evaluation includes an annual self-report from the parties who have signed the agreement, and in addition, we will carry out a mid-term and a final evaluation. This memorandum is the mid-term report from the project.

We thank the co-ordination group of the letter of intent for the valuable input in the process.

Oslo, 26th October 2020
Anne Hatløy, Ketil Bråthen, Svein Erik Stave and Anne Inga Hilsen

1 Mid-term report 2017-19

The letter of intent on facilitating a healthier diet was signed by the Ministry of Health and Care Services in December 2016 The agreement has been signed by almost 100 participants, and aims for a collaboration between the agreement partners to lead to a reduced intake of salt, added sugar and saturated fat in the population, as well as increase the intake of fruits, berries, vegetables, whole grains products, fish and seafood. The letter of intent also aims to contribute to a more comprehensive and overall collaboration between the food industry and the health authorities to make it easier for consumers to make healthier choices.

Fafo has been commissioned to do a follow-up evaluation on the agreement. The main purpose of the evaluation is to look at the relationship between the letter of intent and the initiatives and adjustments that the various parties implement to meet the agreement. It is both the agreement itself, and the experiences with it, that are to be evaluated, and the evaluation concentrates on the following three questions:

1. What measures are taken in connection with the agreement by the various parties, measured through annual self-reporting.
2. Whether the letter of intent is an effective way to make the Norwegian diet healthier.
3. Whether the parties perceive the letter of intent as a sensible tool to promote a good diet.

This is the third reporting in Fafo's follow-up evaluation of this agreement. The first two reports have been annual self-reports from the agreement partners on measures implemented in 2017 and 2018, as well as an assessment of the agreement.[1] This mid-term report contains a similar self-report from 2019, as well as the results of an in-depth study that focused on whether the parties perceive the letter of intent as a sensible tool to promote a good diet.

1.1 Organisation of the letter of intent

The letter of intent is organised by the Ministry of Health and Care Services' *business group,* which is chaired by the Minister of Health. In the period January 2018 to January 2020, it was the Minister for the Elderly and Public Health who led this work, as during this time period there were two ministers in the Ministry of Health. The overall responsibility for coordinating the work on the letter of intent lies with *the coordination group*. This group consists of representatives of the participants:

- Virke (the Enterprise Federation of Norway)/NorgesGruppen - 2 representatives
- NHO Service og Handel (Norwegian Federation of Service Industries and Retail Trade)/Rema - 2 representatives

[1] Hatløy A, Bråthen K, Stave SE and Hilsen AI (2019) The letter of intent for a healthier diet - Annual report 2017. Fafo memorandum 2019:09. ISSN 0804-5135. Oslo: Fafo
Hatløy A, Bråthen K, Stave SE and Hilsen AI (2019) The letter of intent for a healthier diet - Annual report 2018. Fafo memorandum 2019:25. ISSN 0804-5135. Oslo: Fafo

- Coop - 2 representatives
- Sjømat Norge (Norwegian Seafood Federation) - 1 representative
- Norges Frukt- og Grønnsaksgrossisters Forbund (Norwegian Fruit and Vegetable Wholesalers' Association) - 1 representative
- NHO Mat og Drikke (FoodDrinkNorway)/food and beverage manufacturers - 4 representatives
- NHO reiseliv (The Norwegian Hospitality Association) - 1 representative
- Virke KBS (kiosk, petrol and service trade industry) - 1 representative
- Norwegian health authorities - 2 representatives

The Directorate of Health is the secretariat for the letter of intent. The head of the secretariat meets with the coordination group.

1.2 Evaluation method

The method used for self-reporting was the same in 2019 as the two previous years. An electronic questionnaire was used which was sent out to all agreement partners who were registered in the Norwegian Directorate of Health's overview (see Appendix 3). The number of agreement partners varies somewhat from year to year, both because the catering industry was added in 2018, and because some participants merged, and some withdrew from the agreement - the total number who received the questionnaire varies between 85 and 97. The questionnaire consists of two parts, one that deals with measures within each individual focus area, and one that is a more general assessment of the agreement (see Appendix 1). The questionnaire has been prepared by Fafo and has been presented and approved by the coordination group for the letter of intent.

Response rate

In the 2017 and 2018 self-reports, about 60 percent of the agreement partners who signed the agreement responded to the self-report (see Table 2 below and Table 3 in Appendix 4). As a relatively large proportion abstained from reporting, there was a desire from the coordination group to include even more in this round, and also to analyse why some may not want to respond. It was therefore agreed that multiple reminders should be sent and through more channels than is usual for such reports. The first invitation to participate in the self-report was sent on 4 March 2020 to all 94 participants[2] who had signed the agreement as of March 2020. In the first week there were 34 responses and on 12 March, a first reminder was sent to those who had not responded. The original plan was to send out two reminders via e-mail to those who had not responded. One from Fafo and one from the Norwegian Directorate of Health, then send out reminders via SMS and finally call those who had not answered to get a justification for why they did not want to respond. The plan was for the survey to be completed in early April.

The Covid-19 pandemic, and all the measures introduced on 12 March to limit it, changed these plans, and it is easy to understand that the agreement partners had

[2] The Norwegian Directorate of Health's website states that there are 99 participants. With regard to self-reporting, the agreement partners are calculated on the basis of who responds. Some participants responded on behalf of others, *Cernova* also responded for *Mesterbakeren* and *Nærbakst AS* and *Kavli* is responded for O. *Kavli* and *Q-meieriene* – the five agreement partners are therefore only considered as two participants in the self-reporting. In addition, one of the agreement partners that is still on the Norwegian Directorate of Health's list, *Ingebrigtsen Kjøtt AS* has left the agreement.

other things to do than respond to the self-report during this time. The follow-up was therefore put on hold until 28 April, and the follow-up and number of responses to each question is shown in Table 1.

Table 1 Sending of self-report

Method of sending	Date sent	Number of responses
Mail from Fafo	04 March 2020	
Mail from Fafo	12 March 2020	34
Mail from Fafo	28 April 2020	43
Mail from HDir	14 May 2020	49
Text from Fafo	26 May 2020	50
Mail from Fafo with message about call	4 June	50
Phone call to those who had not responded [1]	First week in July	59
Total number of responses	Last response received July 29	69

[1] Of 35 no responses, 25 were called - industry organisations omitted and those who had only signed Priority area 2

Of the 35 agreement partners who did not respond, seven only signed *Priority area 2: Reduction of added sugar in foods and reduction of the population's intake of added sugar.* This priority area has been put on hold since July 2018 as a result of the increase of the excise duties on chocolate and sugar products and on non-alcoholic beverages in the 2018 state budget. There were also 3, out of a total of 9, industry organisations on this list - none of these 3 have responded to any of the reports before. Of the remaining 15 who did not respond, there were 6 we could not get in contact with, all of whom received a new personal text message or message on the answering machine. Those who responded, said it was mainly due to the fact that they did not have time for this type of activity, and some were also unsure of who in the company was responsible for completing it. None of the agreement partners had corona-related reasons for not responding. This final response rate to the Self-Reporting 2019 was 79 percent, an increase of about 20 percent from the previous two years which was 61 and 58 percent (see Table 2).

Table 2 Participants and response rate

	Participants who have signed the agreement			Self-report responses			Response rate		
	2017	2018	2019[3]	2017	2018	2019	2017	2018	2019
Priority area 1: Salt	46	60	56	29	37	45	63 %	62 %	80 %
Priority area 2: Sugar[1]	34	45	45	-	-	-	-	-	-
Priority area 3: Fat	40	50	48	21	28	29	55 %	56 %	60 %
Priority area 4: #MerAv (MoreOf)	58	72	69	33	33	53	57 %	46 %	77 %
Total without sugar[2]	71	84	85	43	49	67	61 %	58 %	79 %

[1]Priority area 2: 'As a result of the increase in the excise duties on chocolate and sugar products and on non-alcoholic beverages in the 2018 state budget, co-operation on reducing added sugar has been suspended since July 2018. Some of the agreement partners who have signed this priority area have nevertheless responded to the self-report, but the data in this area of interest have not been analysed. The 9 agreement partners who have only signed the agreement under priority area 2 have been excluded from the total.

[2]The total deviates from what has been reported in 2017 and 2018 due to the fact that several of the agreement partners who have signed the agreement have chosen to submit joint responses - in this overview they are counted as one participant - for details see appendix 3

[3]For 2019, it is indicated as only one mailing if a participant has responded on behalf of several - this explains the decline in the number of mailings from 2018

1.3 Weighting and analysis

The agreement partners who responded to the survey are very different in size. Based on turnover figures, we have, in the self-reports for 2017 and 2018, made an attempt to weight the results so that the biggest agreement partners play a greater role in the analysis than the smaller agreement partners. The weighting has to a certain extent meant that a somewhat higher number of measures are reported than if the results had not been weighted. There is also a relatively high degree of uncertainty associated with the turnover figures by which the agreement partners are weighted. One third of the respondents in this year's reporting have chosen not to answer the question. As previously mentioned, there are also some agreement partners who respond on behalf of several, and it is therefore unclear which turnover figures should be the basis for a weighting.

In this mid-term evaluation, we therefore choose not to weight the figures, and state unweighted figures from all three self-reports. In the past, the measure figures have been weighted, while the attitude questions have always been reported unweighted.

It is worth noting that even with an increased response rate, there are relatively few respondents in the sample. Responses from a single agreement partner will therefore be given great weight, and the confidence levels for the individual responses are great. Responses from a single agreement partner can in some contexts count up to 5 percent. In the current text, we are careful to draw clear conclusions about differences, but point to trends. In appendix 4, there are tables that show whether there are big differences between different answers. Student t-tests have been performed between the answers from the different years, and between measures in 2019.

Reporting form

In the self-report, the agreement partners are asked to report which measures they have implemented in the previous year (see questionnaire Appendix 1). These are the same measures that they have been asked about in each report. They are asked to report on each area of focus they have signed:

- **Development of new product(s)** – completely new products that the participant has developed/used in the past year to achieve the objective of the letter of intent;
- **Optimisation of existing product(s)** – change of existing products that the participant has implemented in the past year to achieve the objectives of the letter of intent, e.g. reduce the salt and/or fat content of an existing product, or increase the proportion of wholemeal flour;
- **Changed packaging or portion size (with the intention of influencing healthier choices)** –- facilitate a greater consumption of foods that satisfy the objectives of the letter of intent through targeted packaging sizes, e.g. fruits and vegetables in small packaging;
- **Change of packaging design (with the intention of influencing healthier choices)** – design of the packaging that makes healthier choices more attractive;
- **Marketing measures** – various marketing measures with a view to achieving the objectives of the letter of intent;
- **Changed product placement (with the intention of influencing healthier choices)** – this applies especially to outlets and eateries where e.g. placement of fruits and vegetables early, has been shown to influence customer choice;
- **Changed catering offer** – this option was added for self-reporting from 2018, after participants from the catering industry had also signed the agreement;
- **An open question** about others measures, and the opportunity to clarify this.

For each individual priority area, the agreement partners are asked to assess which measure was most effective and justify why it was effective in open-ended questions. All agreement partners are then asked to evaluate the agreement and justify what they get the most from and what they think is particularly demanding. They are also asked to assess the health authorities' efforts in relation to the letter of intent.

We have used some of the participants answers to the open questions in this report - they are then marked as indented in the text and written in *italics*.

In-depth study

In an in-depth study conducted in the period December 2019 to January 2020, participants from different categories, small and large manufacturers, retailers, industry organisations, authorities, as well as some participants close to the agreement, but not part of it. The following participants were included: NorgesGruppen, REMA, Orkla, Svanøy Røykeri, Lerøy Seafood, NHO food and beverage, VIRKE, the Ministry of Health and Care Services, the Brewers' Association and the Consumer Council.

The methodological approach was an open, qualitative study in which we were interested in hearing the agreement partners' perceptions and experiences with the agreement. The research question for this mid-term evaluation was: "Whether the parties perceive the letter of intent as a sensible tool to promote a good diet."

The interview guide (see Appendix 2) was a guide for the interviews but was not followed closely. The interviews took approximately 1 hour. No quotes or direct references are used to who said what in this presentation. The interviewees also gave consent for it to be stated which companies were interviewed, but not which people in the company.

2 The agreement parties' measures

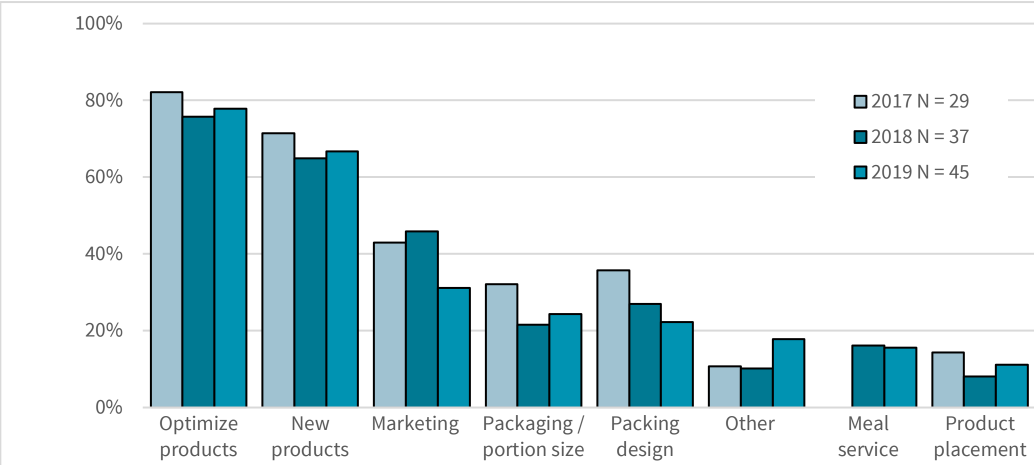
2.1 Measures for the individual priority areas

Priority area 1: Reduction of salt content in foods and the reduction of salt intake in the population through the Salt partnership.

- 45 out of 56 participants who signed responded
- 29 with their own goals, 24 measure themselves
- 31 have attended meetings, seminars or workshops during 2019

Optimising existing products and developing new ones are the two measures that are most important for the agreement partners to reduce the intake of salt in the population and salt content in food (see Figure 1 and Table 4 in Appendix 4). These two measures have been reported as the most important in all three years the letter of intent has been in force. In addition, marketing is also an important measure that about a third of the agreement partners had used in 2019. None of the measures differed significantly in the different years. As most of the agreement partners are manufacturers, measures related to production and marketing are the most important measures, while measures that are directly used for trade and catering (i.e. changed product placement and changed catering offerings) become numerically less visible.

Figure 1 Measures within priority area 1: Reduction in salt implemented in 2017, 2018 and 2019



	Optimize products	New products	Marketing	Packaging / portion size	Packing design	Other	Meal service	Product placement
2017 N = 29	82%	71%	43%	32%	36%	11%		14%
2018 N = 37	76%	65%	46%	22%	27%	10%	16%	8%
2019 N = 45	78%	67%	31%	24%	22%	18%	16%	11%

In a clarification of the other measures the agreement partners had used, there was an increased awareness among chefs, increased monitoring and influence of manufacturers, and salt had been made less available at buffets and on tables.

For salt, the agreement partners have consistently said that small, gradual changes in large volume products are the measure that gives the best effect in the long term. Part of the salt reduction can take place gradually and has primarily an effect on taste. Consumers can gradually get used to a less salty taste in the products. To a certain extent, this can be compensated by using other spices and seasonings with a lower salt content. On the other hand, salt can have an effect on the consistency and durability of the products. Therefore, optimisation of existing products can be challenging, because *much of the potential for reduction has been done already,* as one of the agreement partners stated.

Other effective measures point to increased awareness both among suppliers, those who prepare food and among customers and guests. In a clarification of the most effective measures, some of the agreement partners replied:

> *Challenged our suppliers and manufacturers to take measures with salt reduction in several products.*
>
> *Review the product range and compare typical finished products and switch to a similar product with a lower salt content. We have done this in addition to increased awareness among our chefs about added salt in the food.*
>
> *Ask the customer if it should be seasoned.*

In an assessment of why these measures are effective, it is emphasized that it gives good results for the consumer, in that there is a significant decrease in salt consumption without consumers noticing it. The result when this happens in large volume products is a significant decrease in salt consumption.

Priority area 2: Reduction of added sugar in foods and reduction in the population's intake of added sugar

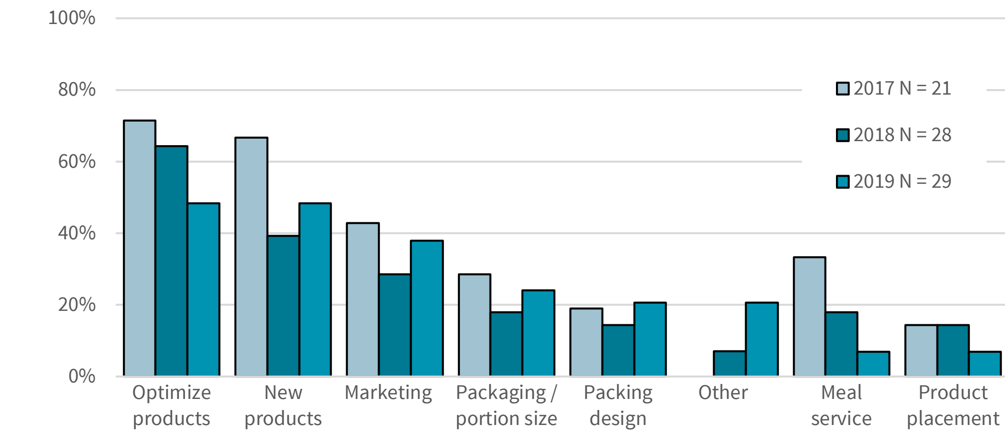
As in the annual reports for 2017 and 2018, priority area 2 is omitted in this report. After the excise duties on chocolate and sugar products and on non-alcoholic beverages increased in the state budget for 2018, the collaboration on reducing added sugar was put on hold. One of the consequences is that food and beverage producers do not report activities for this priority area.

Priority area 3: Reduction of saturated fat in foods and reduction of the population's intake of saturated fat

- 29 out of 48 participants who signed responded
- 12 with their own goals, all measure themselves
- 18 have attended meetings, seminars or workshops during 2019

This priority area is the one with the lowest response rate among participants who have signed the agreement. The two most important measures within priority area 3 are optimisation of existing products and development of new products, closely followed by marketing - the first two measures are significantly more reported on than the other measures in the years (see Figur 2 and Table 4 in appendix 4). Other measures that are highlighted are the implementation of campaigns, increased awareness of the use of products, and a transition to cleaner raw materials and less use of minced products.

Figure 2 Measures within priority area 3: Reduction in saturated fat carried out in 2017, 2018 and 2019



	Optimize products	New products	Marketing	Packaging / portion size	Packing design	Other	Meal service	Product placement
2017 N = 21	71%	67%	43%	29%	19%		33%	14%
2018 N = 28	64%	39%	29%	18%	14%	7%	18%	14%
2019 N = 29	48%	48%	38%	24%	21%	21%	7%	7%

This priority area differs from the others with the type of measures that are possible to implement. While priority areas 1 and 2 are about reducing a product that is added, and priority area 4 is about increasing the intake of certain foods, priority area 3 is a lot about reducing a nutrient that is naturally found in the raw materials.

Several of the agreement partners pointed out that the most effective measures they had implemented were a transition from animal to more plant-based alternatives. Others highlighted the use of the right fat, both in the preparation of their own dishes, and in marketing campaigns.

Some of the agreement partners point out that it has been effective to make small changes to existing volume products that reach a large part of the population - this has resulted in many tonnes of reduction of saturated fat. It is perceived as more difficult to bring new products with less saturated fat on the market, and therefore more challenging to achieve a great effect.

Priority area 4: Increase the population's intake of fruit and berries, vegetables, whole grain products and seafood by 20 percent by 2021

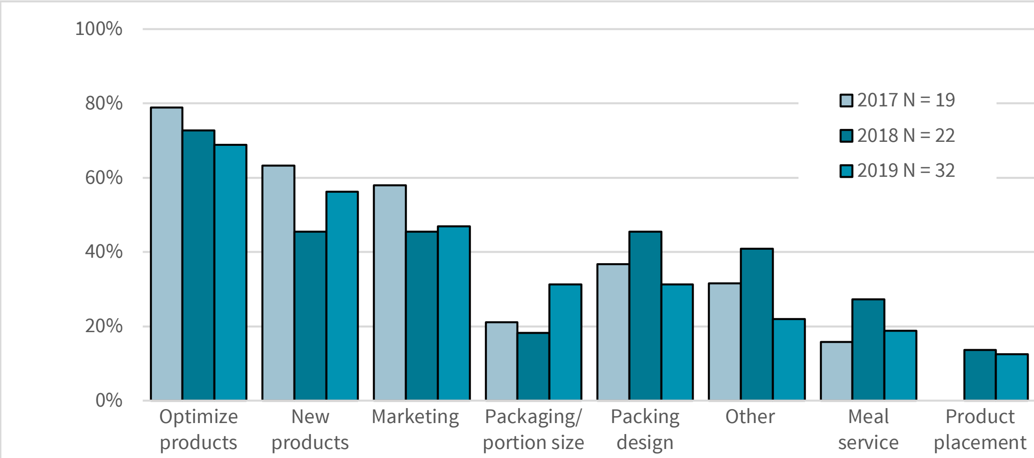
Priority area 4 is divided into three different sub-areas that report separately, namely 1) Fruit, berries and vegetables, 2) whole grain products and 3) fish and seafood. This priority area differs from 1-3 in that it is about a desired **increased** consumption of a **food** and not **reduced** consumption of a **nutrient**. Priority area 4 is often referred to by a common term such as #MerAv (More Of).

Fruits, berries and vegetables

- 32 respondents
- 13 with their own goals, 10 measure themselves
- 20 have attended meetings, seminars or workshops during 2019

The most frequently reported measures related to increased intake of fruit, berries and vegetables are the development of new products, marketing and optimisation of existing products, the first two being significantly more reported than almost all the other measures. Under 'Other measures', there are several who mention various forms of information campaigns to their own employees, be it chefs, canteen employees or store employees (Figure 3 and Table 4 in Appendix 4).

Figure 3 Measures within Priority area 4: Increased intake of fruit, berries and vegetables completed in 2017, 2018 and 2019



	Optimize products	New products	Marketing	Packaging/ portion size	Packing design	Other	Meal service	Product placement
2017 N = 19	79%	63%	58%	21%	37%	32%	16%	
2018 N = 22	73%	46%	46%	18%	46%	41%	27%	14%
2019 N = 32	69%	56%	47%	31%	31%	22%	19%	13%

The agreement partners point out a large number of different measures as the most effective. Training is considered important:

> *Own internal project to increase the quality and sales of fruit and vegetables in own stores, i.e. training of own employees and improvement of in-store exposure.*

Information and marketing are highlighted by others, many say that improved quality of fruit and vegetables is the most important measure, others mention changing packaging as the most important, while some say that it is the combination of all measures together that gives the best effect. Despite the fact that a number of different measures are considered the most important, the contractual partners are largely in agreement as to why the various measures were effective - they made it easier for consumers and they led to higher sales.

> *With active awareness raising among both employees and customers with the use of campaigns and theme weeks, the focus on vegetables and fruit is great. You can see that this contributes to customers wanting to eat more fruit and vegetables.*

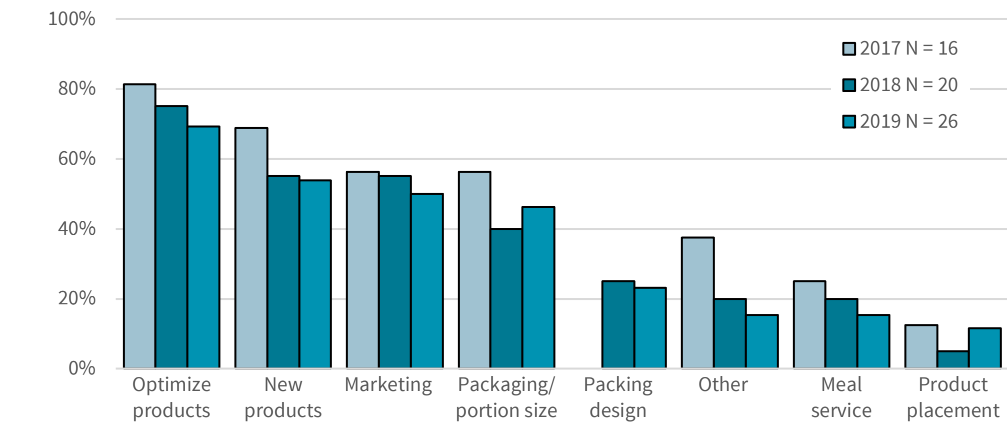
Whole grain products

- 26 respondents
- 12 with their own goals, 7 measure themselves
- 18 have attended meetings, seminars or workshops during 2019

The overview of measures related to increased intake of whole grain products, shows that the development of new products, marketing, optimisation of existing products and design changes on packaging are the most common (Figure 4 and Table 4 in

Appendix 4). Other measures include raising awareness among both employees and customers.

Figure 4 Measures within Priority area 4: Increased intake of whole grain foods in 2017, 2018 and 2019



	Optimize products	New products	Marketing	Packaging/ portion size	Packing design	Other	Meal service	Product placement
2017 N = 16	81%	69%	56%	56%		38%	25%	13%
2018 N = 20	75%	55%	55%	40%	25%	20%	20%	5%
2019 N = 26	69%	54%	50%	46%	23%	15%	15%	12%

When the respondents were asked in open-ended questions about what was the most effective measure they had taken in 2019, they largely agreed that the two most effective measures are related to the launch of new products and an awareness of the use of wholegrain products, here many point out the benefit of the Brødskalaen (Bread Scale):

> *We have raised awareness when we develop the products, to ensure that the products are as wholegrain as possible in terms of the bread scale.*
>
> *Launched several wholemeal bread products and flour varieties.*

The measures are considered successful both because they have led to more sales of wholegrain products, they have made it easier for the customer to choose wholegrain, at the same time there has also been an increased attention to information:

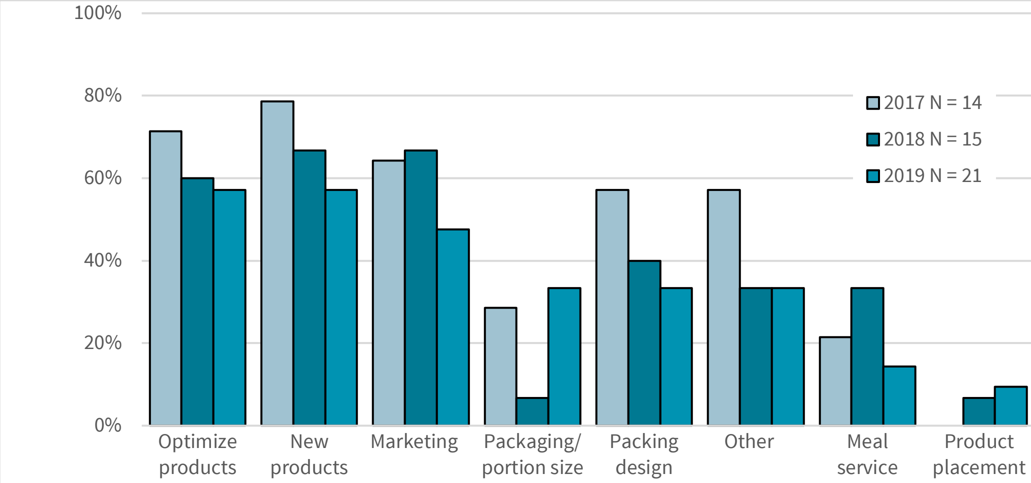
> *Communication directly to the consumer on large surfaces, such as the back of the packaging, is expected to have an effect.*

Fish and seafood

- 21 respondents
- 10 with their own goals, all measure themselves
- 13 have attended meetings, seminars or workshops during 2019

With regard to the measures for an increased consumption of fish and seafood, there seems to be a relatively broad use of a number of different measures (see **Error! Reference source not found.** and Table 4 in Appendix 4). This is the area with the fewest participants, and it is therefore here that it is most difficult to draw conclusions about differences. In addition to the measures presented in the figure below, the agreement partners also mention other measures such as participation in trade fairs, serving fish to visiting school classes and various campaigns that have been carried out.

Figure 5 Measures within Priority area 4: Increased intake of fish and seafood in 2017, 2018 and 2019



	Optimize products	New products	Marketing	Packaging/ portion size	Packing design	Other	Meal service	Product placement
2017 N = 14	71%	79%	64%	29%	57%	57%	21%	
2018 N = 15	60%	67%	67%	7%	40%	33%	33%	7%
2019 N = 21	57%	57%	48%	33%	33%	33%	14%	10%

In an assessment of what were the most important measures, one of the contracting partners said that it was the complete package that was the most important:

> *Complete package: Training of own employees + product development focus + design changes + marketing measures to increase consumption.*

Most agreement partners mentioned individual measures related to direct contact with consumers through trade fairs and campaigns, and also through the development of new products:

> *More options for the customer that make it easier to eat more fish and seafood.*

> *Because it is direct face to face that makes it very credible. The fact that people also get to taste is triggering a purchase.*

One of the agreement partners reported that they had not had any effective measures in 2019 due to high fish prices:

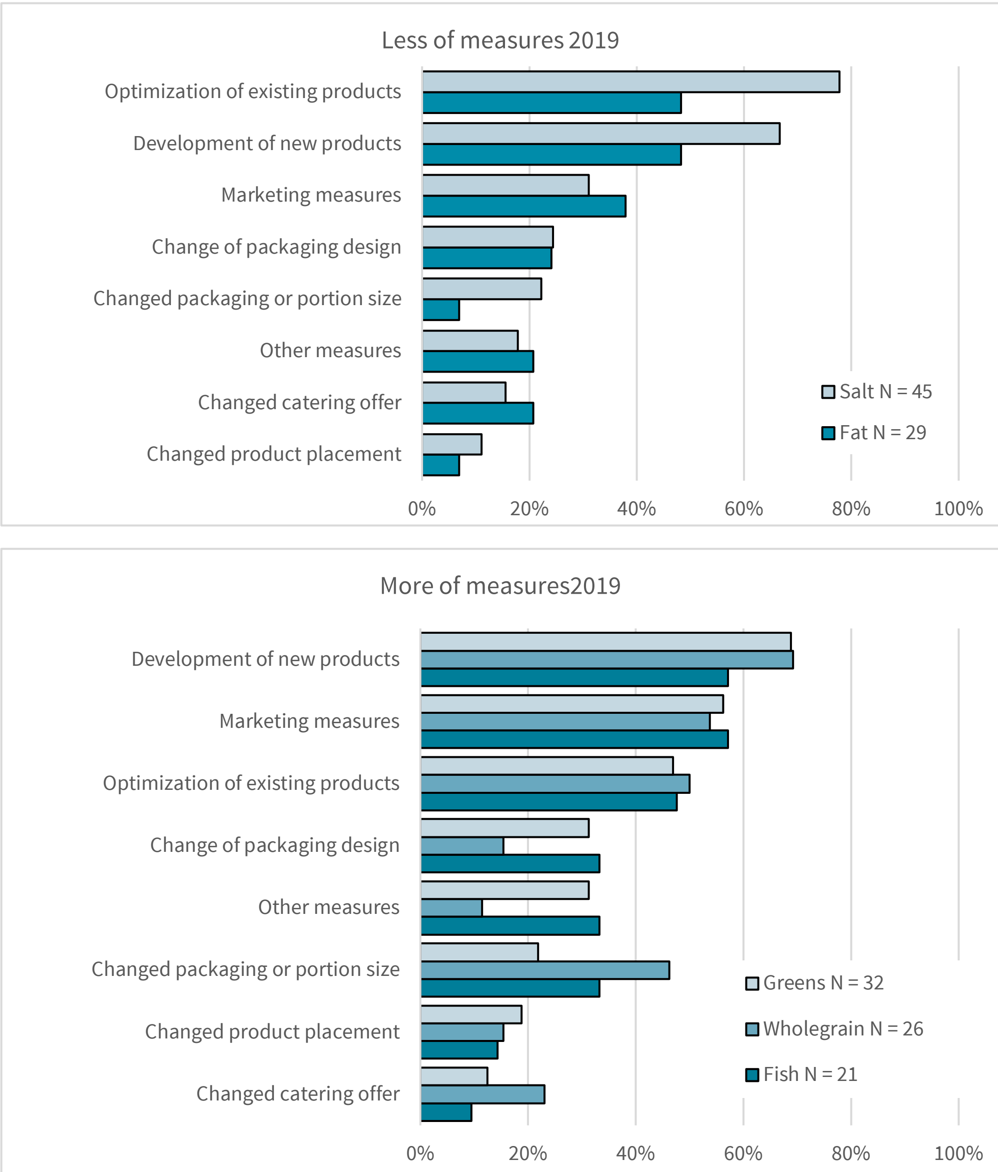
> *Unfortunately, we did not achieve any effective measures in 2019 regarding increased intake of fish. We believe this is due to generally high fish prices and a particularly large increase in the price of red fish. Red fish is a popular fish in connection with lunch and with the high prices we saw in 2019, we did not have the opportunity to offer our customers the same volume of red fish as in previous years. In 2017 and 2018, fish accounted for 10 percent of total raw material use in our canteens and this decreased to 9 percent in 2019.*

2.2 The agreement partners' measures summarized

For measures within priority areas 1 and 3, the so-called *MindreAv (LessOf)* areas, the optimisation of existing products and development of new products were the two most important measures in 2019 (see figure 6). These are the same measures that have been most important in 2017 and 2018 as well (see fiure 1 and figure 2).

For priority area 4, *#MerAv (MoreOf)*, a wider range of measures have been used throughout (see figure 6), in addition to the development of new products and optimisation of existing ones, marketing is widely used both in 2019 and also in previous years (see figure 3, figure 4 and figure 5). Additionally, emphasis is placed on changing the packaging of the food products, both in terms of changed portion sizes and design changes.

Figure 6 Overall overview of measures within all the priority areas.



In an assessment of which participants use which measures, it is important to be aware that different groups of participants have different measures to act with. An initiative that changed product placement, for example, is most relevant for those agreement partners who have direct contact with customers such as the retail and catering industry. These constitute a minority of the agreement partners who have responded and will therefore appear to be less used in this reporting. However, one should be aware that these agreement partners have a very wide network to act with, but the use of measures in the individual store or at the individual eateries is beyond the scope of this report to consider.

2.3 The Keyhole symbol

Of all the 69 respondents, 22 report that they had products with the keyhole symbol in their 2019 range. One third of these agreement partners had less than 10 products, one third between 10 and 25 products, and the last third between 25 and 1500 products. Only three participants have more than 100 keyhole-labelled products, one of which has more than 1000. In total, the agreement partners reported 2578 keyhole-labelled products in their range. It is not possible to say whether these are unique products, but it is likely that several participants may have reported on the same product.

There were 19 agreement partners who had keyhole-labelled products of the company's own brands. A total of 952 such products of the company's own brands were reported. This means that about a third (37 percent) of all keyhole-labelled products are of the companies' own brands.

There were 11 of the agreement partners who reported new products with the keyhole symbol in 2019. In total, they reported 81 new products, about 3 percent new products. This also with the proviso that we do not know if several participants have reported on the same product.

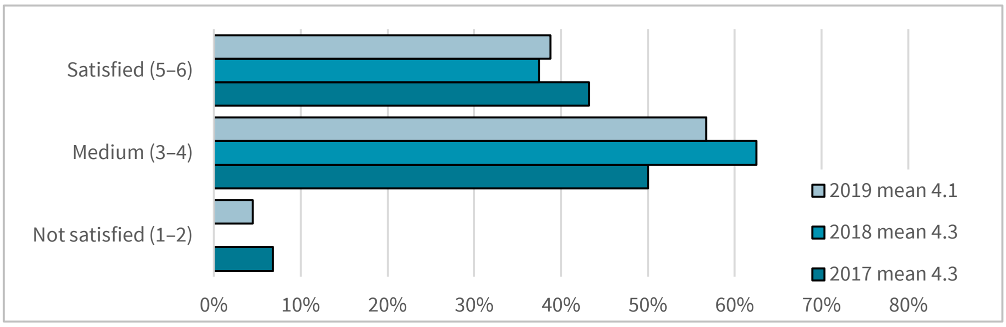
3 The agreement partners' assessments

3.1 Assessment of the agreement

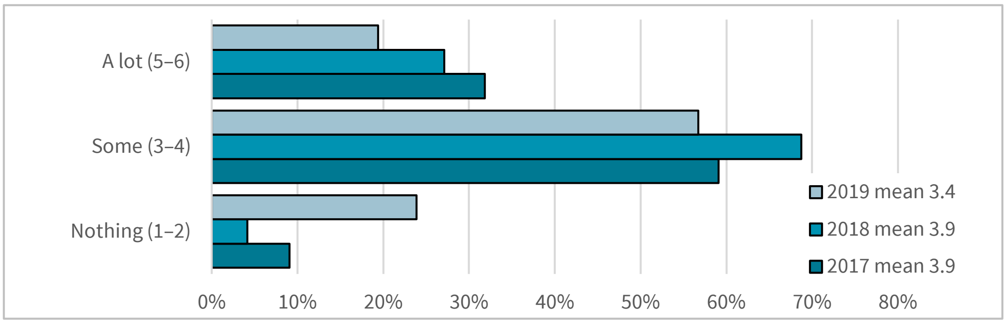
The agreement partners are asked to assess the agreement overall on three points - how satisfied they are with the agreement for their own company, whether they feel they get something in return for the agreement, and how difficult it is for their company to achieve the goals in the agreement.

Figure 7 Assessment of the agreement 2017 (n=44), 2018 (n=48) and 2019 (n=69)

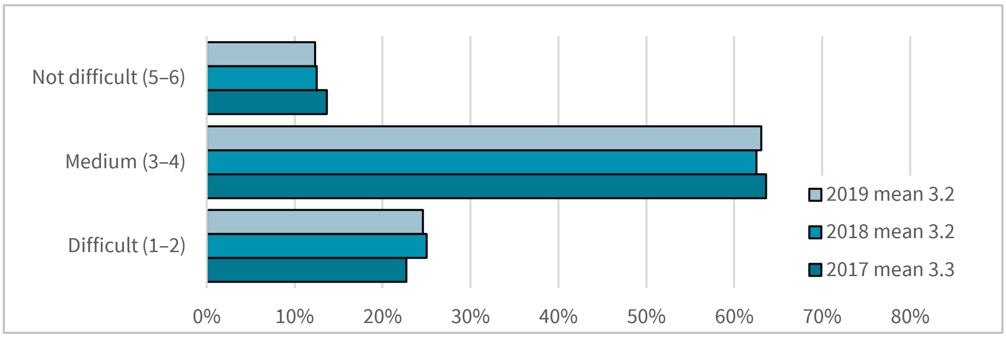
How satisfied is your company with the agreement?



Do you feel you are gaining something from the agreement?



How difficult is it to achieve the goals of the agreement for your business?



As shown in Figure 7 and in Table 5 in Appendix 4, the agreement partners are quite satisfied with the agreement, 4.1 on a scale from 1 to 6. They think they get relatively much in return for it, 3.4 on the same scale. But they think it is somewhat more difficult to achieve the agreement's goal, 3.2. These are similar rankings that were reported in 2017 and 2018, but a somewhat lower score for how much they get back for the agreement than the two previous years. There is also a greater spread in how satisfied the agreement partners are. For the first time, there are two agreement partners who score 'Not satisfied' when they evaluate the agreement, and six agreement partners say that they do not get anything out of the agreement. It could be that such agreement partners, who are mainly negative, did not take the time to respond before but that we have now also gathered them. On the other hand, there are a few more than before who say that it is not difficult for their company to achieve the goals in the agreement.

Motivation: When asked about the main motivation for the agreement partners to be part of the agreement, many point out that it is the companies' social responsibility to be involved in promoting public health. At the same time, there are also several who point out that being part of the agreement is important for the reputation, and to increase the competitiveness of the company. These are the same motivations that have also been focused on in the self-reports in 2017 and 2018.

Exchange: As in previous years, the agreement partners place great emphasis on the value of the letter of intent representing a common goal and providing an increased focus. Common goals within the industry and between the industry and the authorities are seen by many as very important. Several emphasize the importance of the fact that by everyone going in the same direction, consumers' taste preferences can change over time. Another aspect of the collaboration is the opportunity to learn from each other.

The agreement is also seen as important for internal information work, both the fact that the management commits itself and that clear objectives make it easier to set up more targeted work. The external information work is also seen as positive, several point out that the campaigns run by the Norwegian Directorate of Health are important.

Challenge: Optimization of existing products by a gradual reduction of salt, sugar or fat is highlighted by many as demanding in the agreement. Many of the agreement partners point out that there is a limit to how far one can go to reduce before it goes beyond the properties of products that are not only related to taste. An example that is highlighted is ice cream - sugar and fat have technical properties that make it possible to consume ice cream in the frozen state. The same applies to many products.

For the #MerAv (MoreOf) area, the challenges are different, here are products to eat more of. Several point out that declining fish consumption may be due to high consumer prices for fish. From this area, it is also pointed out that some product groups are prioritized - e.g. some of the agreement partners perceive that the agreement primarily focuses on fresh vegetables, fruit and berries, while the producers of frozen varieties from this group are not focused on and marketed.

Another area that is pointed out is monitoring results. The ultimate goal of the agreement is for consumers to change their intake. There are challenges associated with measuring these changes.

There is still a focus on the excise duties on chocolate and sugar products and on non-alcoholic beverages. Some participants say that when there is such a tax also on sugar-free products, they lose motivation.

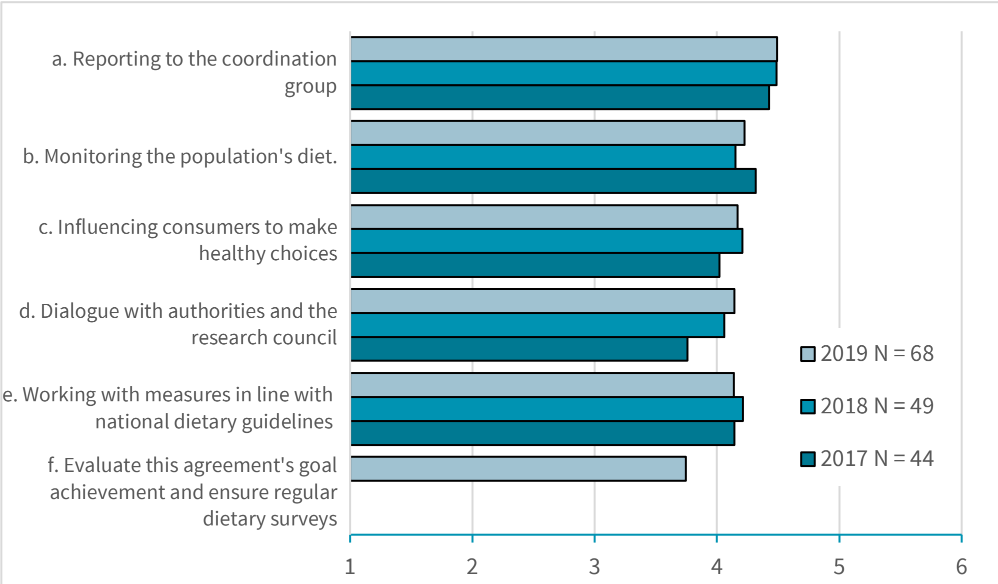
3.2 Assessment by the health authorities

The authorities at the Ministry of Health and Care Services have committed to six points in the Letter of Intent on healthier diets:

a) Reporting to the coordination group on activities and overall goal achievement
b) Monitoring the population's diet
c) Influencing consumers through communication and implementing other systematic measures to make healthy choices easier
d) Participating in dialogue and interaction with other relevant authorities and the Research Council related to the objectives of the letter of intent.
e) Working with systematic measures that promote public health in general and increase the proportion of the population who have a diet that is in line with the national dietary guidelines.
f) Obtaining data to evaluate this agreement's goal achievement and work to ensure that regular representative dietary surveys are conducted.

Every year, we have asked the contractual partners to assess the health authorities' efforts, and rank each of the individual obligations on a scale from 1 to 6, where 6 is very good and 1 is very poor. Figure 8 shows that the assessment from year to year is very similar. All obligations are scored with an average of between 3.7 and 4.5, and the ranking of what scores highest and lowest is almost the same from year to year. Reporting to the coordination group on activities and overall goal achievement is the point the agreement partners find most satisfactory. No one has given a score below 3 here.

Figure 8 The participants' assessment of how the health authorities are meeting their obligations in 2017, 2018 and 2019. 1 = very poor, 6 = very good



When the agreement partners are asked to highlight the most important task to the health authorities, it is "Working with systematic measures that promote public health in general and increase the proportion of the population who have a diet that is in line with the national dietary guidelines" - which is emphasized as the most important for over half of the respondents (39 of 68).

As a general comment, it is pointed out by one participant that several countries can have a part to learn from this cooperation across sectors.

4 The letter of intent as a tool

4.1 Why the letter of intent?

In the in-depth study we saw the approach to the agreement as a tool. We asked about the following: Why and how did you join the agreement? What do you get out of the agreement? What is the advantage of a letter of intent compared to other forms of regulation?

The respondents were concerned that the letter of intent was not the first time the industry had cooperated with the authorities. At the same time, they pointed out that previous collaborations had been about individual areas, such as vegetables, seafood, salt and the like. All the contractual partners emphasized that the letter of intent has brought together previous individual initiatives and makes cooperation for better public health more transparent. The agreement partners emphasize the positive in that they are moving in the same direction.

All the parties we spoke to also emphasized the value of a common meeting place between the food industry and the authorities. The fact that they can meet regularly and discuss makes them experience the collaboration as easier.

Several emphasized that by signing an agreement, one committed more, and being a party to the agreement made both the effort and the commitment stronger. At the same time, several stated that public health and social responsibility were important to them even **before** the agreement was entered into, and the agreement thereby supported a goal they already shared with the authorities.

Although the agreement partners are very positive about the letter of intent, there are of course areas they see can be improved.

4.2 Carrot or stick?

Is the letter of intent a suitable tool for achieving the goal of a healthier population, and what are the possible alternative ways of promoting this goal? The question is whether the industry will voluntarily work for the goals of the agreement, or whether it is believed that coercion in the form of taxes works better?

The agreement partners are unequivocally concerned that the agreement is a better way of working because it promotes cooperation, both between the agreement partners and between the food industry and the authorities. In addition, taxes could lead to increased cross-border trade, which is already perceived today as a threat to the industry according to both the organizations and some of the manufacturers/traders. The discussion about tax management became particularly topical when the special taxes on chocolate and confectionery and non-alcoholic beverages were increased in the state budget for 2018. At the same time as the industry has entered into an agreement to work for reduced sugar intake, there will be a sharp tax increase that the agreement partners were unprepared for, both the companies and the organizations. The agreement requires predictability on the part of the authorities so that such sudden changes do not challenge the willingness to co-operate on the goals, and the affected agreement partners were clear that the tax increase had made cooperation more difficult. This then also led to the sub-goal of reduced sugar being put on hold and the Brewers' Association suspending the agreement and not participating in agreement-initiated activities. Both the authorities and the Brewers 'Association are clear that the Brewers' Association has not terminated the agreement, but "put it on hold".

Whether the tax increase actually led to a reduced sugar intake is difficult to say, since the tax has been imposed on both water with and without sugar. The industry knows its own turnover figures, but there is a lack of consumer surveys or surveys on the scope and content of cross-border trade. Figures from the industry show that the turnover of water without sugar has increased, but this is obviously not a clear result of the tax increase since these products are also covered by the tax.

In addition to interviewing a selection of agreement partners, we also interviewed the Consumer Council as a participant outside the agreement. They pointed out that taxes will control consumption, and thereby be more effective in achieving the goals than the slower cooperation under the Letter of Intent. The Consumer Council is concerned that:

- Bilateral agreements between the authorities and the industry have clear limitations and can be at the expense of the authorities' ability and willingness to introduce cost-effective and necessary regulatory measures that the industry does not want to be introduced.
- The Consumer Council is for cooperation and free will, but it can only be one of several approaches to achieve the necessary effect.
- Regulations are about making the healthy choices easier or at least as cheap as the unhealthy choices.

In the interviews, the agreement partners are concerned with consumers' free choice to also buy goods that are not healthy. Therefore, a number of tools are used to influence consumers through branding, product placement and product development without forcing consumers financially, as a tax increase will do. To avoid taxes being used as a tool, the industry has taken a number of measures, but they emphasize that this presupposes that the authorities also work through the agreement and do not use other tools they are unprepared for.

The agreement partners are clear that they strongly support the agreement, and none of the interviewed agreement partners envisages better alternatives.

4.3 Letter of intent as a way to work

Letter of intent is an interesting way to work that Fafo has researched extensively, including through the Letter of Intent on a more inclusive working life (the IA agreement). This was first entered into in 2001 and extended and revised a number of times since. Both content and goal formulations have been changed, and it has been evaluated both in terms of a way to work and effects (Industry group's evaluation 2018[3]; Ose et al. 2009, 2013[4]). The current agreement for the period 2019-2022 defines the

[3] The goals of a more inclusive working life - status and development trends Report 2018 Reporting from the industry group for the IA agreement, 29 June 2018. https://www.regjeringen.no/globalassets/departementene/asd/dokumenter/2018/ia-rapport_2018_web.pdf

[4] Ose, S.O., Dystad, K., Slettebak, R., Lippestad, J., Mandal, R., Brattlid, I. and Jensberg, H. (2010–2013). Evaluation of the IA agreement. Sintef, 2013. Ose, S.O., Bjerkan, A.M., Pettersen, I., Hem, G.K., Johnsen, A., Lippestad, J., Paulsen, B., Mo, T.O., Saksvik, P.Ø. (2009). Evaluation of the IA agreement (2001–2009). Sintef.

goal as follows: "The overall goal of the IA collaboration is to create a working life with room for everyone by preventing sick leave and drop-outs and in this way increasing employment. The new agreement covers the entire Norwegian working life. The workplace is the main arena for IA work. Good co-operation between the parties is a prerequisite for the success of the IA work." [5]

The letter of intent for a healthier diet has a somewhat different structure and other partners to the agreement, but the thinking behind the agreement is the same: voluntary cooperation on goals in which one has common interests and where the alternative is a government-introduced legislative change such as changes in the sick pay scheme. Letter of intent as a form of regulation is based on some assumptions:

- that the relevant parties sign,
- that the measures are relevant in relation to the goals
- and that the gains for all parties are strong enough to commit.

The letter of intent for a more inclusive working life has demonstrated how difficult it is to reach the small and disorganized businesses, where the parties cannot be a supporter in the work. The letter of intent for a healthier diet is similarly dependent on reaching different parts of the food industry, both on the producer and retailer side. The grocery trade in Norway is dominated by three large chains: NorgesGruppen, Coop Norge and Rema 1000. This can make the retailer link easier to engage, and it is therefore particularly interesting to look at how this affects the letter of intent's implementation and impact. Also on the producer side, there are several major participants in the agreement, such as Orkla, Tine and Nortura, while the letter of intent also covers a number of medium-sized and small companies.

It turned out that the two letters of intent were largely anchored in different places in the companies and organizations we visited. Our respondents are all big, except for a small company, but this company had not entered into an IA agreement and therefore had no experience with this agreement. Where the IA agreement was most often a matter for the HR/personnel departments or negotiation departments, the letter of intent for a healthier diet was more often referred to the quality department or industry departments. There was therefore little contact between those who worked with the two agreements and little transfer of knowledge within the organization.

The letter of intent for a healthier diet has both fewer benefits for those who enter into an agreement and fewer possible sanctions against parties who break the agreement. The IA agreement, on the other hand, has broad party-based ownership, i.e. all the major employers and employees organizations and authorities have signed it, and it has party-political roots that have enabled it to survive several government constellations. All parties are aware of the IA agreement and a proposal for major interventions in the area covered by the agreement would have been reacted to (as a proposal that one should perhaps look at the sick pay scheme received). The letter of intent for a healthier diet does not seem to have the same broad ownership, nor the same political roots beyond the Ministry of Health (Ministry of Health and Care Services). In addition, there is little the industry can do if the authorities choose to break the agreement, while the parties in working life have a number of resources that can be used. At the same time, the agreement partners express that they do not perceive the agreement as politically controversial, and no one expects that the agreement

[5] https://www.regjeringen.no/no/tema/arbeidsliv/arbeidsmiljo-og-sikkerhet/inkluderende_arbeidsliv/id947/

will terminate in the event of a change of government. This is different from countries that have also had similar agreements, such as Australia and the UK, where the agreement did not survive a change of government.

The IA agreement also has the freedom to market activities and experienced results, both separately and through *Idebanken.org (Norwegian web-page on Inclusive Working Life)*, and there is little quality assurance on whether the published activities are maintained over time and whether they have the desired effects. The letter of intent for a healthier diet has strong restrictions on what the agreement partners can provide information on or how they can label the goods. On the one hand, the Competition Act is limiting for co-operation on measures, and on the other hand, the EU's claims regulations are limiting for labelling e.g. salt reductions in a product of less than 30 percent. As several of the agreement partners pointed out, such a large reduction in one go will give most products a different taste and consistency, and it is smaller and gradual reductions that will lead to the goal of reduced salt intake in the population. The agreement partners do therefore not receive the "traction" that public awareness of the measures they implement can provide.

5 Main findings

Predictability from the authorities is very important for the various agreement partners in the industries. They want clear political commitments so that the authorities do not implement more measures or tax changes during the agreement period, unless this has been discussed with the agreement partners in advance. This must be clearly stated in a new/extended agreement.

The agreement partners are also calling for performance measurements that show changes in the consumer's diet. They are calling for the announced consumer survey and they want a survey of cross-border trade to determine how large the trade leakage across borders is and how it affects consumers' diet in the target areas.[6] The consumer survey is expected, but it is perceived as problematic that it only comes in the last part of the agreement period. The question is which instruments the ministry has used to influence Statistics Norway, which is the responsible provider of the survey.

Several of the meetings and activities in the Letter of Intent take place in Oslo and require physical attendance in order to participate. There was a desire for meetings and activities to be streamed/posted online so that they can be available to companies that do not have the capacity to travel to the meetings.

Several pointed out that a healthier diet in the population concerns most ministries, and not just the Ministry of Health and Care Services. The Ministry of Education and Research and the Ministry of Agriculture were highlighted in particular. The Ministry of Education and Research is responsible for growing up and schooling, and thereby establishing children's eating habits. Healthier diets start in kindergarten and it is important that topics are not just left to the Ministry of Health and the Norwegian Directorate of Health. The Ministry of Agriculture can influence the quality of raw materials that are part of food production and is therefore important to involve in the work. Several other ministries are also working on areas that affect the diet of the population, and the agreement partners want a broad political anchoring of the agreement with the authorities.

The agreement partners also expressed a desire for the authorities to "speak up" about the agreement more than currently. Although the authorities have implemented a number of measures to make the agreement and its goals visible, such as #MerAv (MoreOf), there is a lack of visibility of the agreement partners' efforts. The proposed award/prize for good work in the letter of intent may be such a measure as the industry calls for.

[6] The interviews were conducted before COVID-19 and the closure of the borders between Norway and Sweden. Prerequisites for conducting such surveys have changed at the time this report is written (September 2020).

Appendix 1 Questionnaire

Fafo

The letter of intent for a healthier diet

Reporting is voluntary.

The form is assessed according to competition regulations by the Norwegian Directorate of Health.

Business background			
B1	Business name	....	
B2	Location of head office	....	
B3	Is your business nationwide or local?	1. Nationwide 2. Local	☐ ☐
B4	Total turnover last year (use numbers)	☐☐☐☐☐☐☐☐☐☐☐ 1. Prefer not to answer 2. Don't know	
B5	Number of employees (use numbers)	☐☐☐☐☐☐☐☐☐☐☐ 1. Prefer not to answer 2. Don't know	
B6	Type of business *Select all that are relevant*	a. Manufacturer b. Wholesaler c. Agent d. Industry organization/health authority	☐ ☐ ☐ ☐
B7	Link to the agreement *Select all that are relevant*	a. Priority area 1: Reduction of salt b. Priority area 2: Reduction of added sugar c. Priority area 3: Reduction of saturated fat d. Priority area 4: Increased intake of fruits, berries, vegetables e. Priority area 4: Increased intake of whole grain foods f. Priority area 4: Increased intake of fish and seafood	☐ ☐ ☐ ☐ ☐ ☐

Priority area 1: Reduction of salt

[Only to be answered by those who have checked B7a on page 1]

SA1	Have you set your own goals for salt reduction?	1: Yes 2: No→SA4
SA2	Do you monitor the development of the salt reduction targets yourself?	1: Yes 2: No→SA4
SA3	How often is it measured?	1: Monthly or more often 2: Quarterly 3: Biannually 4: Annually 5: Other…………………………………………
SA4	**Has your company implemented any of the following measures in relation to *Priority area 1: Reduction of salt* within the agreement in 2019?**	
a	Development and launch of new product(s)	1: Yes 2: No 3: Not applicable
b	Optimizing existing product(s)	1: Yes 2: No 3: Not applicable
c	Changed packaging or portion size (intended to influence healthier choices)	1: Yes 2: No 3: Not applicable
d	Change of packaging design, retail pack (intended to influence healthier choices)	1: Yes 2: No 3: Not applicable
e	Marketing initiatives	1: Yes 2: No 3: Not applicable
f	Changed product placement in retail outlets (intentionally influencing healthier choices)	1: Yes 2: No 3: Not applicable
g	Other measures implemented *If yes, please describe*	1: Yes 2: No ………………………………………………
SA5	What was the most effective measure you took in 2019?	………………………………………………………
SA6	Why was this measure effective?	………………………………………………………
SA7	Has anyone from your company attended meetings/seminars/workshops within Priority area 1: Reduction of salt during 2019?	1: Yes 2: No 3: Not applicable

Priority area 2: Reduction of added sugar

[Only to be answered by those who have ticked B7b on page 1]

SU1	Have you set your own goals for reducing added sugar?		1: Yes 2: No→SU4
SU2	Do you monitor progress in relation to the goals of reducing added sugar?		1: Yes 2: No→SU4
SU3	How often are they measured?		1: Monthly or more often 2: Quarterly 3: Biannually 4: Annually 5: Other
SU4	**Has your company taken any of the following measures in connection with *Priority area 2* within the agreement in 2019?**		
	a	Development and launch of new product(s)	1: Yes 2: No 3: Not applicable
	b	Optimizing existing product(s)	1: Yes 2: No 3: Not applicable
	c	Changed packaging or portion size (intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
	d	Change of packaging design, retail pack (intended to influence healthier choices)	1: Yes 2: No 3: Not applicable
	e	Marketing initiatives	1: Yes 2: No 3: Not applicable
	f	Changed product placement in retail outlets (intentionally influencing healthier choices)	1: Yes 2: No 3: Not applicable
	g	Other measures implemented within "Priority area 2: Reduction of added sugar" last year? *If yes, please describe*	1: Yes 2: No ………………………………………
SU5	What was the most effective measure you implemented in 2019?		………………………………………………
SU6	Why was this measure effective?		………………………………………………
SU7	Has anyone from your company participated in meetings/seminars/workshops for Priority area 2: Reduction of added sugar during 2019?		1: Yes 2: No 3: Not applicable

Priority area 3: Reduction of saturated fat

[Only to be answered by those who have ticked B7c on page 1]

FE1	Have you set your own goals for reducing saturated fat?	1: Yes 2: No→FE4
FE2	Do you monitor the development in relation to the goals for reducing saturated fat yourself?	1: Yes 2: No→FE4
FE3	How often is it measured?	1: Monthly or more often 2: Quarterly 3: Biannually 4: Annually 5: Other
FE4	**Has your company taken any of the following measures in relation to *Priority area 3* within the agreement in 2019?**	
a	Development and launch of new product(s)	1: Yes 2: No 3: Not applicable
b	Optimizing existing product(s)	1: Yes 2: No 3: Not applicable
c	Changed packaging or portion size (intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
d	Change of packaging design, retail pack (intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
e	Marketing initiatives	1: Yes 2: No 3: Not applicable
f	Changed product placement in retail outlets (intentionally influencing healthier choices)	1: Yes 2: No 3: Not applicable
g	Other measures implemented within "Priority area 3: Reduction of saturated fat" last year? *If yes, please describe*	1: Yes 2: No ……………………………………………
FE5	What was the most effective measure you implemented in 2019?	…………………………………………………………
FE6	Why was this measure effective?	…………………………………………………………
FE7	Has anyone from your company participated in meetings/seminars/workshops within Priority area 3: Reduction of saturated fat during 2019?	1: Yes 2: No 3: Not applicable

Priority area 4: Increased intake of fruits, berries, vegetables

[Only to be answered by those who have ticked B7d on page 1]

FG1	Have you set your own goals for increasing the intake of fruit, berries and vegetables?	1: Yes 2: No→FG4
FG2	Do you monitor the development in relation to the goals of increased intake of fruits, berries and vegetables?	1: Yes 2: No→FG4
FG3	How often is it measured?	1: Monthly or more often 2: Quarterly 3: Biannually 4: Annually 5: Other
FG4	**Has your company taken any of the following measures in relation to *Priority area 4: Increased intake of fruits, berries, vegetables* within the agreement in 2019?**	
a	Development and launch of new product(s)	1: Yes 2: No 3: Not applicable
b	Optimizing existing product(s)	1: Yes 2: No 3: Not applicable
c	Changed packaging or portion size(intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
d	Change of packaging design, retail pack (intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
e	Marketing initiatives	1: Yes 2: No 3: Not applicable
f	Changed product placement in retail outlets (intentionally influencing healthier choices)	1: Yes 2: No 3: Not applicable
g	Other measures implemented within "Priority area 4: Increased intake of fruits, berries, vegetables" last year? *If yes, please describe*	1: Yes 2: No …………………………………………
FG5	What was the most effective measure implemented in 2019?	…………………………………………
FG6	Why was this measure effective?	…………………………………………
FG7	Has anyone from your company participated in meetings/seminars/workshops within Priority area 4: Increased intake of fruits, berries, vegetables during 2019?	1: Yes 2: No 3: Not applicable

Priority area 4: Increased intake of whole grain foods

[Only to be answered by those who have ticked B7e on page 1]

KO1	Have you set your own goals for increasing the intake of whole grain foods?	1: Yes 2: No→KO4
KO2	Do you monitor developments in relation to the goal of increasing the intake of whole grain foods?	1: Yes 2: No→KO4
KO3	How often is it measured?	1: Monthly or more often 2: Quarterly 3: Biannually 4: Annually 5: Other
KO4	**Has your company taken any of the following measures in relation to *Priority area 4: Increased intake of whole grain foods* within the agreement in 2019?**	
a	Development and launch of new product(s)	1: Yes 2: No 3: Not applicable
b	Optimizing existing product(s)	1: Yes 2: No 3: Not applicable
c	Changed packaging or portion size(intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
d	Change of packaging design, retail packk (intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
e	Marketing initiatives	1: Yes 2: No 3: Not applicable
f	Changed product placement in retail outlets (intentionally influencing healthier choices)	1: Yes 2: No 3: Not applicable
g	Other measures implemented within "Priority area 4: Increased intake of whole grain foods" last year? *If yes, please describe*	1: Yes 2: No …………………………………………
KO5	What was the most effective measure implemented in 2019?	…………………………………………
KO6	Why was this measure effective?	…………………………………………
KO7	Has anyone from your company participated in meetings/seminars/workshops within Priority area 4: Increased intake of whole grain foods during 2019?	1: Yes 2: No 3: Not applicable

Priority area 4: Increased intake of fish and seafood

[Only to be answered by those who have ticked B7e on page 1]

FI1	Have you set your own goals for increasing the intake of fish and seafood?	1: Yes 2: No→FI4
FI2	Do you monitor your own development in relation to the goal of increasing the intake of fish and seafood?	1: Yes 2: No→FI4
FI3	How often is it measured?	1: Monthly or more often 2: Quarterly 3: Biannually 4: Annually 5: Other
FI4	**Has your company taken any of the following measures in relation to *Priority area 4: Increased intake of fish and seafood* within the agreement in 2019?**	
a	Development and launch of new product(s)	1: Yes 2: No 3: Not applicable
b	Optimizing existing product(s)	1: Yes 2: No 3: Not applicable
c	Changed packaging or portion size(intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
d	Change of packaging design, retail pack (intentionally affecting healthier choices)	1: Yes 2: No 3: Not applicable
e	Marketing initiatives	1: Yes 2: No 3: Not applicable
f	Changed product placement in retail outlets (intentionally influencing healthier choices)	1: Yes 2: No 3: Not applicable
g	Other measures implemented within "Priority area 4: Increased intake of fish and seafood" last year? *If yes, please describe*	1: Yes 2: No ………………………………………………
FI5	What was the most effective measure implemented in 2019?	………………………………………………
FI6	Why was this measure effective?	………………………………………………
FI7	Has anyone from your company participated in meetings/seminars/workshops within Priority area 4: Increased intake of fish and seafood during 2019?	1: Yes 2: No 3: Not applicable

The keyhole symbol

NO1	Total number of products with the keyhole symbol in 2019	Don't know; Not applicable
NO1b	How many products in the entire range are the company's own brands? (use numbers)	Don't know; Not applicable
NO2	Number of new products with the keyhole symbol in 2019	Don't know; Not applicable
NO2b	How many of the new products in 2019 were the company's own brands? (use numbers)	Don't know; Not applicable

The participants' assessment of the agreement

AV1	How satisfied is your company with the agreement? *1 = Not satisfied at all* *6= Very satisfied*	1 2 3 4 5 6
AV2	Do you feel you are gaining something from the agreement? *1= Haven't gained anything from the agreement* *6= Have gained a lot from the agreement*	1 2 3 4 5 6
AV3	What do you think you have gained the most from?	…………………………….
AV4	How difficult is it for your company to achieve the goals of the agreement? *1= Very difficult* *6= Very easy*	1 2 3 4 5 6
AV5	What is particularly challenging	…………………………….
AV6	What kind of measures give the best result?	…………………………….
AV7	What is your main motivation for joining the agreement?	…………………………….

The participants' assessment of the health authorities		
AV9	What measures significant to your business do you feel that *the health authorities* have taken in relation to the agreement during 2019?	…………………………… None; Not applicable
AV10	What measures significant to the entire agreement do you feel that *the health authorities* have taken during 2019?	…………………………… None; Not applicable
AV11	How well do you think *the health authorities* fulfil their obligations within the following fields? *1= Very badly* *6= Very well* *9= Don't know*	
	a. Monitoring the population's diet	1 2 3 4 5 6 9
	b. Obtaining data to evaluate the performance of this agreement and working towards its implementation	1 2 3 4 5 6 9
	c. Fielding regular representative dietary surveys	1 2 3 4 5 6 9
	d. Working with systematic measures that promote public health in general and increase the proportion of the population who have a diet that is in line with the national dietary advice. Having a special focus on children and young people	1 2 3 4 5 6 9
	e. Reporting to the coordination group on measures and overall goal achievement	1 2 3 4 5 6 9
	f. Influencing consumers through communication and taking other systematic measures to make healthy choices easier	1 2 3 4 5 6 9
	g. Participating in dialogue and interaction with other relevant authorities and the Research Council related to the objectives of the letter of intent.	1 2 3 4 5 6 9
AV12	From your business perspective, what is the most important commitment for the ***health authorities*** (of those mentioned above) *Tick only one*	a b c d e f g
To conclude:		
AV31	Do you have any further comments on the implementation of the Letter of Intent in 2019?	…………………………… None

Appendix 2 Interview guide for the in-depth study

- Where does the initiative for the agreement come from? How did it come to be?
- Why and how did you join the agreement? What do you get out of the agreement?
- What is the advantage of a letter of intent compared to other forms of regulation?
- You are also part of the Letter of Intent for a more inclusive working life. What are the similarities and differences in working methods between these two agreements of intent and how to work in them?
- Have you discussed other ways to work that you regard as more suitable? What is the alternative to the agreement?
- Who is potentially in a position to overturn the agreement? How many participants can withdraw before the agreement is dissolved? Can more areas than sugar be left in the lurch? If so, which ones and why?
- The agreement expires in 2021. What does it take for you to be interested in a new period? Does anything have to change, or can it just be continued as it is?

Appendix 3 List of all agreement partners by priority area

The overview below lists all participants who have been sent the self-report for the years 2017, 2018 and 2019. It is also indicated which part of the agreement each individual participant has signed:
Salt – Priority area 1: Reduction of salt content in foods and the reduction of salt intake in the population through the Salt partnership.
Sugar – Priority area 2: Reduction of added sugar in foods and reduction in the population's intake of added sugar
Fat –Priority area 3: Reduction of saturated fat in foods and reduction of the population's intake of saturated fat
#MerAv (MoreOf) – Priority area 4: Increase the population's intake of fruit and berries, vegetables, whole grain products and seafood by 20 percent by 2021

Participant	Participant group	2017	2018	2019	Salt	Sugar	Fat	#MerAv (MoreOf)
A. Nilsson & Co AS	*Manufacturer*	√	√	√				√
AS Pals	*Manufacturer*	√	√	√	√	√	√	
Bakehuset AS	*Manufacturer*	√	√	√	√			√
Baker Brun AS	*Manufacturer*	√	√	√	√	√		√
Bama	*Manufacturer*	√	√	√				√
Barilla Norge AS	*Manufacturer*	√	√	√				√
Baxt AS[1]	*Manufacturer*	√	√	√		√		
Berentsen Brygghus AS[1]	*Manufacturer*	√	√	√		√		
Best Stasjon AS	*Eatery*		√	√	√	√	√	√
BKLF AS	*Organisation*	√	√	√	√	√	√	√
Brynhild Gruppen	*Manufacturer*	√	√	√	√	√		
Brødrene Karlsen AS	*Manufacturer*		√	√				√
Brødrene Raastad	*Manufacturer*	√	√	√				√
Cater Mysen AS	*Manufacturer*	√	√	√				√
Cernova/Mesterbakeren AS/ Nærbakst[2]	*Manufacturer*	√	√	√	√	√	√	√
Circle K Norge AS	*Eatery*		√	√	√	√	√	√
Coca Cola[1]	*Manufacturer*	√	√	√		√		
Coop	*Retail*	√	√	√	√	√	√	√
COOR Service Management AS	*Eatery*			√	√	√	√	√
Den Stolte Hane AS	*Manufacturer*	√	√	√	√			

Participant	**Participant group**	**2017**	**2018**	**2019**	**Salt**	**Sugar**	**Fat**	**#MerAv (MoreOf)**
Det Glutenfrie Verksted v/Nordic Refreshment Company AS	*Manufacturer*		√	√		√		√
Diplom-Is AS	*Manufacturer*	√	√	√		√	√	
Domstein Sjømat AS	*Manufacturer*	√	√	√	√			√
Duga AS	*Manufacturer*	√	√	√	√			√
Engrosfrukt AS	*Manufacturer*		√	√				√
Eugen Johansen AS	*Manufacturer*	√	√	√				√
Fatland Jæren AS	*Manufacturer*	√	√	√	√		√	
Findus Norge AS	*Manufacturer*	√	√	√	√		√	√
Finsbråten as	*Manufacturer*	√	√	√	√		√	
Finstad Gård Engros AS	*Manufacturer*	√	√	√				√
Fjordland AS	*Manufacturer*	√	√	√	√	√	√	√
Gartnerhallen AS	*Manufacturer*	√	√	√				√
Germann Vervik eftf AS	*Manufacturer*	√	√	√				√
Grans Bryggeri AS	*Manufacturer*	√	√	√		√		
Grilstad	*Manufacturer*	√	√	√	√		√	
H. A. Brun AS	*Manufacturer*	√	√	√	√	√	√	√
Hansa Borg Bryggerier AS[1]	*Manufacturer*	√	√	√		√		
Ministry of Health and Care Services[3]		√	√	√				
Hennig Olsen Is	*Manufacturer*	√	√	√		√	√	
Hoff SA	*Manufacturer*	√	√	√	√		√	√
Holmens AS	*Manufacturer*	√	√	√	√		√	√
Huseby Gård	*Manufacturer*	√	√	√				√
Ingebrigtsen kjøtt AS[4]	*Manufacturer*	√	√		x[6]		x	
Insula AS	*Manufacturer*	√	√	√	√			√
Interfrukt AS	*Manufacturer*	√	√	√				√
ISS Facility Services AS	*Eatery*		√	√	√	√	√	√
JÆDER Ådne Espeland AS	*Manufacturer*	√	√	√	√		√	√
Kavli Norge AS: O. Kavli AS & Q-meieriene[2]	*Manufacturer*	√	√	√	√	√	√	√
King Oscar AS/Thai Union	*Manufacturer*	√	√	√		√		√
Kolonial.no	*Retail*	√	√	√	√	√	√	√
Lantmännen Unibake	*Manufacturer*	√	√	√	√	√		√
Leiv Vidar AS	*Manufacturer*	√	√	√	√		√	
LERUM AS[1]	*Manufacturer*	√	√	√		√		
Lerøy Seafood	*Manufacturer*	√	√	√	√			√
Lunde Gård engros AS	*Manufacturer*	√	√	√				√
MAARUD AS	*Manufacturer*	√	√	√	√		√	

Participant	**Participant group**	**2017**	**2018**	**2019**	**Salt**	**Sugar**	**Fat**	**#MerAv (MoreOf)**
Macks Ølbryggeri AS[1]	*Manufacturer*	√	√	√		√		
Matbørsen AS	*Manufacturer*	√	√	√	√		√	√
Meum Frukt & Grønt AS	*Manufacturer*	√	√	√				√
Mills	*Manufacturer*	√	√	√	√		√	
Mondelez Norge AS	*Manufacturer*	√	√	√	√		√	
Nestlé	*Manufacturer*	√	√	√	√	√	√	√
NHO Mat og Drikke (FoodDrinkNorway)	*Organisation*	√	√	√	√	√	√	√
NHO Reiseliv (The Norwegian Hospitality Association)	*Organisation*		√	√	√	√	√	√
NHO Service og Handel (Norwegian Federation of Service Industries and Retail Trade)	*Organisation*	√	√	√	√	√	√	√
Norfesh AS	*Manufacturer*	√	√	√				√
Norges frukt- og grønnsaksgrossisters Forbund (Norwegian Fruit and Vegetable Wholesalers' Association)	*Organisation*	√	√	√	√	√	√	√
NorgesGruppen	*Retail*	√	√	√	√	√	√	√
NorgesGruppen Servicehandel AS	*Organisation*		√	√	√	√	√	√
Norgesmøllene AS	*Manufacturer*	√	√	√	√	√	√	√
Norrek Dypfrys AS	*Manufacturer*	√	√	√			√	√
Nortura	*Manufacturer*	√	√	√	√		√	
Odd Langdalen frukt og engros AS	*Manufacturer*	√	√	√				√
Orkla	*Manufacturer*	√	√	√	√	√	√	√
Pelagia AS	*Manufacturer*	√	√	√				√
Red Bull[1]	*Manufacturer*	√	√	√		√		
Rema	*Retail*	√	√	√	√	√	√	√
Ringnes AS[1]	*Manufacturer*	√	√	√		√		
Rolf Olsen Engros AS	*Manufacturer*	√	√	√				√
Salatmestern AS	*Manufacturer*	√	√	√	√			
Salmon Brands AS	*Manufacturer*	√	√	√				√
Scandic Hotels AS	*Eatery*		√	√	√		√	√
Servicegrossistene AS	*Eatery*		√	√				√
Sjømat Norge	*Organisation*	√	√	√	√			√
ST1 Norge AS	*Eatery*		√	√	√	√	√	√
Svanøy Røykeri AS	*Manufacturer*	√	√	√				√
Synnøve Finden AS/Scandza	*Manufacturer*	√	√	√	√	√	√	√
T.L. Måkestad AS	*Manufacturer*	√	√	√				√
Tine	*Manufacturer*	√	√	√	√	√	√	
Toma Facility Services AS	*Eatery*			√	√	√	√	√

Participant	Participant group	2017	2018	2019	Salt	Sugar	Fat	#MerAv (MoreOf)
Toma Mat AS	*Manufacturer*	√	√	√	√		√	
Tor Sevaldsen Produksjon AS[4]	*Manufacturer*	√			x	x	x	x
Umoe Restaurants AS	*Eatery*		√	√	√	√	√	√
United Bakeries	*Manufacturer*	√	√	√	√		√	√
Virke (the Enterprise Federation of Norway)	*Organisation*	√	√	√	√	√	√	√
Virke KBS	*Organisation*		√	√	√	√	√	√
YX Norge AS	*Eatery*		√	√	√	√	√	√
Økern Engros AS	*Manufacturer*	√	√	√				√
Total		**80** *(85[5])*	**93** *(97[5])*	**94**	**58**[6]	**45**[6]	**49**[6]	**71**[6]

[1]Participants who have only signed Priority area 2: Reduction of added sugar - these are not included in any analyses in this report
*[2]Participants who have chosen to respond jointly: **Cerenova** also responds for Mesterbakeren, Norgesmøllene and Nærbakst AS; **Kavli** respond for O. Kavli og Q-meieriene*
[3]The Ministry of Health and Care Services has signed all priority areas, but for them it is not relevant to respond to the self-report as their role differs from that of the other agreement partners, and this is not captured by the questionnaire. They are therefore excluded from the total.
[4]No longer in the agreement - went bankrupt in October 2019
[5]The totals deviate somewhat from previous years' reporting, primarily because three participants have chosen to respond as one. In 2017 and 2018, they were counted as three participants, in 2019 they are considered as one participant. In addition, the Ministry of Health and Care Services has been excluded from the total
[6]The figures for each individual priority area apply for 2019
[7]x indicates which priority areas the participant had signed when they took part but is not part of the 2019 reporting.

Appendix 4 Uncertainty related to reporting

Response rate

The response rates from the three years of self-reporting are compared in Table 3, both for each individual priority area and in total. The table shows the response rate between 2017 and 2018 was very similar both in total and for the individual priority areas, except for priority area 4 where there were slightly fewer who responded in 2018. On the other hand, the response rate increased for everyone in priority areas and in total, except for Priority area 3, in 2019 compared with 2017. Furthermore, the table shows that there was no difference between the priority areas in the proportion who responded to the self-report in 2017. For 2019, on the other hand, fewer people from Priority area 3 responded than from Priority areas 1 and 4.

Table 3 Differences in response rate

	Participants who have signed the agreement			**Response rate**			**t-value *significance p<0.05**					
									2017		**2019**	
	2017	*2018*	*2019*	*2017*	*2018*	*2019*	*2017 vs. 2018*	*2017 vs. 2019*	*Salt*	*Fat*	*Salt*	*Fat*
Priority area 1: Salt	46	60	56	63 %	62 %	80 %	0.15	2.70**	-	-	-	-
Priority area 3: Fat	40	50	48	55 %	56 %	60 %	0.13	0.63	1.00	-	3.24**	-
Priority area 4: #MerAv (MoreOf)	58	72	69	57 %	46 %	77 %	2.12*	3.98**	0.90	0.27	0.69	2.94**
Total (without sugar	71	84	85	61 %	58 %	79 %	0.81	5.15**				

Measures within the priority area

Table 4 shows the proportion of participants from each individual priority area who have implemented various measures. The table shows that there is a relatively small difference in the type of measures the agreement partners have implemented between 2017 and 2018, and also between 2017 and 2019 within each individual priority area. For the self-report of 2019, we have compared the three most used measures within each priority area with the other measures. The results show that within each priority area, there is a significant difference in the type of measures used by the agreement partners.

Table 4 Differences in measures

				t-value		*significance p<0.05		
						2019		
Priority area 1: Salt *Univers = 58*	*2017 n=29*	*2018 n=37*	*2019 n=45*	*2017 vs. 2018*	*2017 vs. 2019*	*Optimi-zation*	*Develop-ment*	*Marketing*
Optimization of existing products	82 %	76 %	78 %	0.91	0.69	-	-	-
Development of new products	71 %	65 %	67 %	0.79	0.88	2.49*	-	-
Marketing measures	43 %	46 %	31 %	0.37	1.65	10.73*	7.73*	-
Changed packaging or portion size	32 %	22 %	24 %	1.36	1.47	12.86*	9.59*	1.58
Change of packaging design	36 %	27 %	22 %	1.17	2.02	13.54*	10.17*	2.05*
Other measures	11 %	10 %	18 %	0.20	1.42	15.05*	11.43*	3.06*
Changed catering offer	-	16 %	16 %	-	-	15.88*	12.12*	3.60*
Changed product placement	14 %	8 %	11 %	1.13	0.59	18.29*	14.05*	5.08*
Priority area 3: Saturated fat *Univers = 49*	*2017 n=21*	*2018 n=28*	*2019 n=29*	*2017 vs. 2018*	*2017 vs. 2019*	*Optimi-zation*	*Develop-ment*	*Marketing*
Optimization of existing products	71 %	64 %	48 %	0.73	2.41*	-	-	-
Development of new products	67 %	39 %	48 %	2.85**	1.95	0.00	-	-
Marketing measures	43 %	29 %	38 %	1.41	0.50	1.21	1.21	-
Changed packaging or portion size	29 %	18 %	24 %	1.24	0.56	3.08*	3.08*	1.83
Other measures	19 %	14 %	21 %	0.64	0.25	3.53*	3.53*	2.26*
Changed catering offer	-	7 %	21 %	-	-	3.53*	3.53*	2.26*
Change of packaging design	33 %	18 %	7 %	1.65	3.12**	6.16*	6.16*	4.7*
Changed product placement	14 %	14 %	7 %	0.00	1.08	6.16*	6.16*	4.7*
Priority area 4: Fruit/vegetables/berries *Univers = 71*	*2017 n=19*	*2018 n=22*	*2019 n=32*	*2017 vs. 2018*	*2017 vs. 2019*	*Develop-ment*	*Marketing*	*Optimi-zation*
Development of new products	79 %	73 %	69 %	0.53	1.00	-	-	-
Marketing measures	63 %	46 %	56 %	1.31	0.61	1.46	-	-
Optimization of existing products	58 %	46 %	47 %	0.92	0.94	2.47*	0.98	-
Other measures	21 %	18 %	31 %	0.29	1.00	4.43*	2.81*	1.79
Changed packaging or portion size	37 %	46 %	31 %	0.69	0.53	4.43*	2.81*	1.79
Change of packaging design	32 %	41 %	22 %	0.71	0.94	5.78*	4.01*	2.94*
Changed product placement	16 %	27 %	19 %	1.03	0.34	6.29*	4.46*	3.37*
Changed catering offer	-	14 %	13 %	-	-	7.47*	5.47*	4.31*

Priority area 4: Whole grain *Univers = 71*	*2017* *n=16*	*2018* *n=20*	*2019* *n=26*	*2017 vs. 2018*	*2017 vs. 2019*	*Develop-ment*	*Marketing*	*Optimi-zation*
Development of new products	81 %	75 %	69 %	0.50	1.07	-	-	-
Marketing measures	69 %	55 %	54 %	1.01	1.17	1.41	-	-
Optimization of existing products	56 %	55 %	50 %	0.07	0.45	1.79	0.36	-
Change of packaging design	56 %	40 %	46 %	1.12	0.75	2.17*	0.73	0.36
Changed catering offer	-	25 %	23 %	-	-	4.71*	3.04*	2.65*
Changed packaging or portion size	38 %	20 %	15 %	1.37	1.91	5.92*	4.07*	3.65*
Changed product placement	25 %	20 %	15 %	0.41	0.91	5.92*	4.07*	3.65*
Other measures	13 %	5 %	12 %	0.94	0.11	6.46*	4.52*	4.08*
Priority area 4: Fish/seafood *Univers = 71*	*2017* *n=14*	*2018* *n=15*	*2019* *n=21*	*2017 vs. 2018*	*2017 vs. 2019*	*Develop-ment*	*Marketing*	*Optimi-zation*
Development of new products	71 %	60 %	57 %	0.70	0.99	-	-	-
Marketing measures	79 %	67 %	57 %	0.83	1.65	0.00	-	-
Optimization of existing products	64 %	67 %	48 %	0.19	1.09	0.70	0.70	-
Other measures	29 %	7 %	33 %	1.78	0.29	1.92	1.92	1.19
Change of packaging design	57 %	40 %	33 %	1.04	1.00	1.92	1.92	1.19
Changed packaging or portion size	57 %	33 %	33 %	1.50	1.64	1.92	1.92	1.19
Changed product placement	21 %	33 %	14 %	0.83	0.60	3.88*	3.88*	3.05*
Changed catering offer	-	7 %	10 %	-	-	4.43*	4.43*	3.56*

The agreement

Table 5 shows how the participant assesses the agreement - whether they are satisfied with the agreement, whether they get something in return for it and whether it is difficult to achieve the agreement's goals. All assessments were made on a scale from 1 to 6 where 1 was the worst/most difficult and 6 was the best/easiest. The table below shows that there are no significant differences in the assessment between the years, except that in 2019 there is a significant decrease in what the contractual partners feel they get in return for the agreement. It is consistent from year to year that the agreement partners are relatively satisfied with the agreement, but that the score for how difficult it is to achieve the agreement's goals is significantly lower. In 2019, what the company feels they get back was also significantly lower than how satisfied the agreement partners were.

Table 5 Differences in assessment of the agreement

	Average (std)			**t-value *significance p<0.05**					
						2017		*2019*	
	2017 n=44	*2018 n=48*	*2019 n=66*	*2017 vs. 2018*	*2017 vs. 2019*	*Satisfied*	*Getting something*	*Satisfied*	*Getting something*
How satisfied is your company with the agreement?	4.34 (1.098)	4.33 (0.753)	4.15 (0.996)	-0.51	-0.94	-	-	-	-
Do you feel you are gaining something from the agreement?	3.91 (1.096)	3.94 (0.932)	3.44 (1.286)	0.14	-1.99*	-1.84	-	-3.55*	-
How difficult is it for your company to achieve the goals of the agreement?	3.32 (1.116)	3.23 (1.134)	3.15 (1.153)	-0.38	-0.77	-4.32*	-2.50*	-5.33*	-1.36

Partnership for a healthier diet
Mid-term report 2019

In December 2016, the food industry and the Norwegian Ministry of Health and Care Services signed the Letter of intent for facilitating a healthier diet. The goal is to achieve a more comprehensive and overall collaboration between the health authorities and the food industry in order to make it easier for the consumer to make healthier choices. Fafo is commissioned by the Directorate of Health to evaluate the agreement. The evaluation includes an annual self-report from the parties who have signed the agreement. This memorandum is the mid-term report from the project and includes the third annual report from the project.

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