

Food equity: The intersection of health and racial justice

FINAL

Dear CEO/Company Representative: **[Note: the list of companies receiving this letter and signatories appears at the end]**

The undersigned asset managers and owners, representing more than **x** assets under management, led by members of the Interfaith Center on Corporate Responsibility, many of whom have been engaging **[company]** on nutrition related concerns for **[engagement duration]**, recognize that we all are continuing to adapt to a pandemic that has accentuated weaknesses in our systems, structures, and policies. Additionally, the public health crisis has demonstrated how racial inequities created and perpetuated by these systems, structures and policies have exacerbated the adverse economic and health impacts on Black, Latinx and Indigenous communities in the U.S. In short, it has highlighted the role that structural racism has played in fueling these disparities.

Data from the CDC indicates that Black and Latinx residents in the U.S. are three times as likely to become infected and twice as likely to die from COVID-19 as their white neighbors.¹² Preliminary research has also indicated that obesity and other chronic health conditions, which disproportionately impact communities of color, can contribute to severe COVID-19 symptoms.³ In the U.S., 43% of Black and Latinx workers are employed in service or production jobs that can't be done remotely. Latinx people are twice as likely to live in crowded residences compared to whites, and the percent of workers with paid sick leave decreases based on their earnings.⁴⁵ As investors, we feel that companies in the **[insert sector food and beverage, restaurant, retail]** sector can help address these inequities through the development and marketing of healthy products, ensuring affordability and accessibility of nutritious foods, and advocating for public policies that promote public health. By taking concrete steps to address issues of food equity and the associated racial disparities, food and beverage companies can help to build the health and resiliency of communities, as well as their own workforce. As companies work to 'build back better' from this pandemic, we are calling on **[company]** to examine how its business model, operations and value chain may directly or indirectly contribute to these inequities, and how you are working to create a more equitable and resilient system that benefits workers, the company, shareholders, and communities at large.

As investors, we see the role of public companies in addressing ESG and systemic inequality as increasingly more important. Yet, this role must extend beyond public statements of solidarity.

¹ <https://covidtracking.com/race>

² <https://www.nytimes.com/interactive/2020/07/05/us/coronavirus-latinos-african-americans-cdc-data.html>

³ <https://www.nytimes.com/2020/04/16/health/coronavirus-obesity-higher-risk.html?action=click&module=Top%20Stories&pgtype=Homepage>

⁴ <https://www.nytimes.com/interactive/2020/07/05/us/coronavirus-latinos-african-americans-cdc-data.html>

⁵ <https://www.pewresearch.org/fact-tank/2020/03/12/as-coronavirus-spreads-which-u-s-workers-have-paid-sick-leave-and-which-dont/>

A recent report by KKS Advisors, analyzing a sample of companies from the S&P 500 suggests that “commitments to purpose are less informative about a company’s future performance on social and human capital issues” than other indicators such as being an early responder to issues during a crisis and having an established record of proactively managing issues that may become material.⁶ Action needs to be coupled with commitments to ensure that **[company]** is proactively mitigating risks to the company, workers, communities and shareholders. To that end, we ask you to respond to the following:

- **Product development:** Fostering healthy eating among all racial and ethnic groups
 - How far upstream does the company integrate cultural and racial equity (i.e., social and economic factors; income, food prices, individual preferences and beliefs, cultural traditions, and geographical and environmental considerations⁷) into product development? For example, how do you assess the impact of community consumption of this product? What metrics do you use to measure progress?
 - Is the right to health considered from the onset of product formulation? Who within the company is responsible for overseeing this?
- **Marketing and Distribution:** Curtailing manipulative and unfair marketing and promotion practices^{8 9}
 - What is the proportion of advertising spent on unhealthy vs. healthy products by racial group per platform (e.g. traditional vs. digital channels) and age groups, defining ‘healthy’ through the use of an independent nutrition profiling model? What safeguards are in place to ensure you are not promoting your “unhealthy products” disproportionately to different communities?
 - Does **[company]** have goals or metrics for marketing healthy products?
 - Does **[company]** conduct an impact assessment of digital data practices with regard to the marketing of unhealthy products and assess the disparate health and economic outcomes on Black, Latinx and Indigenous communities as well as on children under the age of 14?

⁶ https://337827c9-ebc5-4704-b7bd-0ba2e859ee47.filesusr.com/ugd/f64551_cad4d1c1808343258f2b57fb8fff90d9.pdf

⁷ <https://www.who.int/publications/m/item/healthy-diet-factsheet394>

⁸ <https://ncdalliance.org/resources/signalling-virtue-promoting-harm>

⁹ <http://www.bmsg.org/resources/publications/the-4-ps-of-marketing-selling-junk-food-to-communities-of-color/>

- In the digital era, how does **[company]** ensure fair and transparent data use and consumer privacy? Are privacy policies publicly available and written in clear, easy to understand language?
- **Influence/engagement on public policy:** Eliminating undue influence that promulgates racial inequities that lead to adverse health outcomes and run counter to public health priorities
 - How does **[company]** assess whether your public policy engagement practices exacerbate adverse health impacts on Blacks, Latinx and Indigenous communities in the U.S. and in low- and middle-income markets outside the U.S.? Who within the company oversees this?
 - As we shift from a compliance to a shared societal expectation, how is the company re-examining its tax strategy and disclosure to align with responsible tax practices using guidance such as [GRI 207: 2019 Tax Guidance](#) and the [B Team Responsible Tax Principles](#) especially in the U.S.?

As investors, we encourage **[company]** to take this opportunity to re-envision a responsible business model that supports the development of resilient and inclusive economies and is accountable to all stakeholders. “Structural racism exists because discriminatory practices in one sector reinforce parallel practices in other sectors, creating interconnected systems that embed inequities in laws and policies¹⁰.” The task in front of you is to identify how **[company]** contributes to the perpetuation of these practices, and then enact measures to make sustained changes to your practices.

We appreciate your ongoing discussion with us on these important issues and look forward to your written response by **[date]**. Please direct any questions and correspondence to **X at X**.

Sincerely,

Name of lead investor

¹⁰ <https://www.nejm.org/doi/full/10.1056/NEJMp2023616>

Companies Receiving Food Equity Letter
Food and Beverage Cos
Campbell's
Coca-Cola
Conagra
General Mills
Kellogg
Keurig Dr. Pepper
Kraft Heinz
Mondelez
Nestle
PepsiCo
Unilever
Restaurant Chains
Dine Brands
McDonald's
RBI
Wendy's
Yum! Brands
Retailers
Amazon
Costco
Dollar Tree
Kroger
Target

Investor Signatories to Letter

1. American Baptist Home Mission Society
2. Region VI Coalition for Responsible Investment
3. Sisters of St. Dominic of Caldwell
4. Dominican Sisters of Peace
5. Sisters of St. Francis of Philadelphia

6. Sisters of Charity of Saint Elizabeth
7. Northwest Coalition for Responsible Investment
8. UUA
9. Reynders, McVeigh Capital Management, LLC
10. Dana Investment Advisors
11. Trinity Health
12. Maryknoll Sisters
13. Dominican Sisters ~ Grand Rapids
14. Change Finance, PBC
15. Harrington Investments
16. Sisters of Charity of Nazareth
17. Natural Investments
18. Transformative Wealth Management, LLC
19. Sustainable Wealth Advisors
20. Friends Fiduciary Corporation
21. Trillium Asset Management
22. Sisters of Saint Joseph of Chestnut Hill Philadelphia, PA
23. Miller/Howard Investments, Inc.
24. Ursuline Convent, Toledo, OH
25. Sisters of St. Francis-Dubuque
26. BMO Global Asset Management
27. Adrian Dominican Sisters
28. Daughters of Charity, Province of St. Louise
29. Congregation of St. Joseph
30. Mercy Investment Services
31. Seventh Generation Interfaith, Inc.
32. Zevin Asset Management
33. CommonSpirit Health
34. JLens Investor Network
35. Bon Secours Mercy Health
36. Domini Impact Investments LLC
37. Socially Responsible Investment Coalition
38. Boston Common Asset Management