

ACCESS TO NUTRITION INDEX

SUMMARY 2016



ACCESS TO
NUTRITION
INDEX™

Acknowledgements

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ATNI was produced by the ATNI development team which consists of Inge Kauer, Marije Boomsma and Simona Kramer along with external consultant Rachel Crossley. The team also drafted this report on the Global Index.

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RESEARCH SUPPORT

 **SUSTAINALYTICS**

 **Westat**[®]

Sustainalytics scored and ranked company performance for the Access to Nutrition Index. They also contributed to the development of the methodology, report and company scorecards for the Index, and engaged with food and beverage companies during the data collection and analysis process. The Sustainalytics team consisted of Andrea van Dijk, Corina Goruian, Laurence Loubières, Simon MacMahon, Larysa Metanchuk, Marion Oliver, David Parsons and Joshua Zakkai.

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Preface

I am pleased to introduce the second edition of the Access to Nutrition Index (ATNI). The ATNI is an independent benchmarking tool that measures companies' contributions to good nutrition against international norms and standards. The methodology for this second Global Index has been refined with support from governments, NGOs, academia, investors and companies.

One in three people in the world today is under-nourished or overweight. Obesity and diet-related chronic diseases including heart disease, stroke, diabetes and certain cancers are global pandemics, affecting countries of all income levels. At the same time, undernutrition continues to affect billions of people globally – increasingly in the form of hidden hunger when people may have enough food but lack access to sufficient micronutrients. Given their global reach, food and beverage companies have a powerful role to play alongside governments, international organizations and civil society in helping to tackle this crisis and its grave human and economic consequences. This is a social responsibility but it's also in the companies' interests as consumers worldwide are increasingly demanding healthier foods.

The increased engagement of companies in our research process is a positive trend highlighting that they are both paying increased attention to nutrition and considering the ATNI as a valuable tool to benchmark and improve their performance. Other stakeholders are also using the Index as a measure of companies' performance. For example, private sector data from the ATNI is used in the Global Nutrition Report that is published on an annual basis. Also, global investors have supported the Index publicly through signing our investor statement and have been using the first Index to engage with companies they invest in.

This report summarizes findings from the 2016 ATNI Global Index, which rates 22 of the world's largest food and beverage manufacturers on their nutrition-related commitments, performance and disclosure globally. More information on the 2016 ATNI is available at www.accesstonutrition.org. Companies have been assessed on nutrition governance, formulation of products, accessibility, marketing, lifestyles, labeling and engagement. The Global Index also includes a separate pilot study and ranking of the world's leading companies that manufacture breast-milk substitutes (BMS). In developing countries, breastmilk is often a life-saver for vulnerable infants. Marketing of breast-milk substitutes is, therefore, a highly sensitive and controversial issue on the nutrition agenda. With our pilot study we intend to contribute to a transparent and multi-stakeholder dialogue on monitoring and improving companies' compliance with the International Code of Marketing of Breast-milk Substitutes.

I would like to thank the Bill & Melinda Gates Foundation, the Wellcome Trust and the Children's Investment Fund Foundation for supporting our work. I would also like to thank the members of the Access to Nutrition Foundation (ATNF) Board, the Independent Advisory Panel and Expert Group, our research partners Sustainalytics and Westat and the ATNF project team for their enormous efforts and support in producing this second Global Index.

The conversation on the role of the food and beverage industry in improving nutrition has progressed since our launch in 2013. This second Index shows that the world's top 22 food and beverage companies have taken some steps towards improving consumers' diets. Many of the companies are still lagging behind, however, and greater efforts are required by all companies. There is much more to do to tackle the mounting global nutrition crisis. It is my hope that the ATNI will continue to serve as a call to action for all involved.

Inge Kauer





Summary



Overview

The Access to Nutrition Index (ATNI) was launched in 2013, and gained a positive response from stakeholders, including food and beverage manufacturers, NGOs and investors. The ATNI has begun to influence nutrition policies and practices within companies.

Since the launch of the first Index, recognition of the human and economic consequences of poor nutrition has increased. Globally one in three people are now either undernourished, overweight or obese. Over the last 35 years obesity has more than doubled and has now reached epidemic proportions. Over the next 10 years, malnutrition is set to continue to increase.

Obesity and diet-related chronic diseases, including heart disease, stroke, diabetes and certain cancers are global pandemics and affect countries of all income levels. At the same time, undernutrition continues to affect billions of people globally – increasingly in the form of hidden hunger where people have sufficient food but lack access to adequate micronutrients. Due to the pervasive and increasing role of their products in many people's diets, global food and beverage manufacturers have the potential to make a substantial contribution to turning back the global scourge of malnutrition through their business practices and through non-commercial activities. This is a social responsibility but it's also in the companies' financial and business interests as consumers worldwide are increasingly demanding healthier foods and more ethical practices from companies.

ATNI is a global initiative that evaluates the largest food and beverage manufacturers' policies, practices and disclosure related to all types of poor nutrition. It provides companies with a tool to benchmark performance on nutrition against others in their sector, and provides stakeholders with impartial, objective, consistent, in-depth information on companies' contributions to improving nutrition. The aim of ATNI is to encourage companies to both increase access to healthy products and also to responsibly exercise their influence on consumers' choice and behaviour.



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Methodology and approach

Based on global sales in 2013, 22 of the largest global food and beverage companies were assessed and ranked for the 2016 Global Index. This includes 19 of the 25 companies assessed in the 2013 Global Index, and three new companies.

Similar to the 2013 Global Index, the ATNI methodology assessed companies against international guidelines, norms and accepted good practices, except when such guidance was not available. In those instances, assessment was based on guidance from a panel of nutrition experts.

The methodology has been significantly expanded and strengthened since 2013 based on extensive stakeholder consultations held during 2014.

Company assessments were conducted by the global responsible investment research firm Sustainalytics, and used publicly available documents, supplemented by additional information provided by each company via an online data platform developed by IT provider 73BIT.

Each company is rated on a scale of 0-10 based on their nutrition-related commitments, practices and disclosure against the same seven Categories and assigned weightings used in the 2013 Index.

The Categories and assigned weights are:

- **A Governance** (12.5%) - Corporate strategy, governance and management.
- **B Products** (25%) - Formulation of appropriate products.
- **C Accessibility** (20%) - Delivering affordable, available products.
- **D Marketing** (20%) - Responsible marketing policies, compliance and spending.
- **E Lifestyles** (2.5%) - Support for healthy diets and active lifestyles.
- **F Labeling** (15%) - Informative labeling and appropriate use of health and nutrition claims.
- **G Engagement** (5%) - Engagement with governments, policymakers and other stakeholders.

A quarter of all scored questions were new questions and many indicators also required more detailed, specific information or quantitative data. This means that exact one to one comparisons of results between 2013 and 2016 are not possible, although general orders of magnitude may still be compared.

To reflect the critical life-long health implications and urgency of addressing undernutrition, it was assigned a fixed weight of 25% in the Category scores. In 2013, this element was not fixed but accounted for approximately 20% of the total weight.

Due to the importance of breastfeeding for the health of infants and young children, and in later life, one new criteria in Category E (Lifestyles) was introduced to measure companies' support for breastfeeding mothers at work.

A score of zero indicates that no evidence was found for any nutrition-related commitments, practices or disclosure; a score of 10 signifies that the company is achieving best practice against the current state of knowledge and consensus reflected by the ATNI assessment methodology.

The rankings of companies that did not submit documentation, information or data to Sustainalytics during the research process were based solely on published information.

Rankings

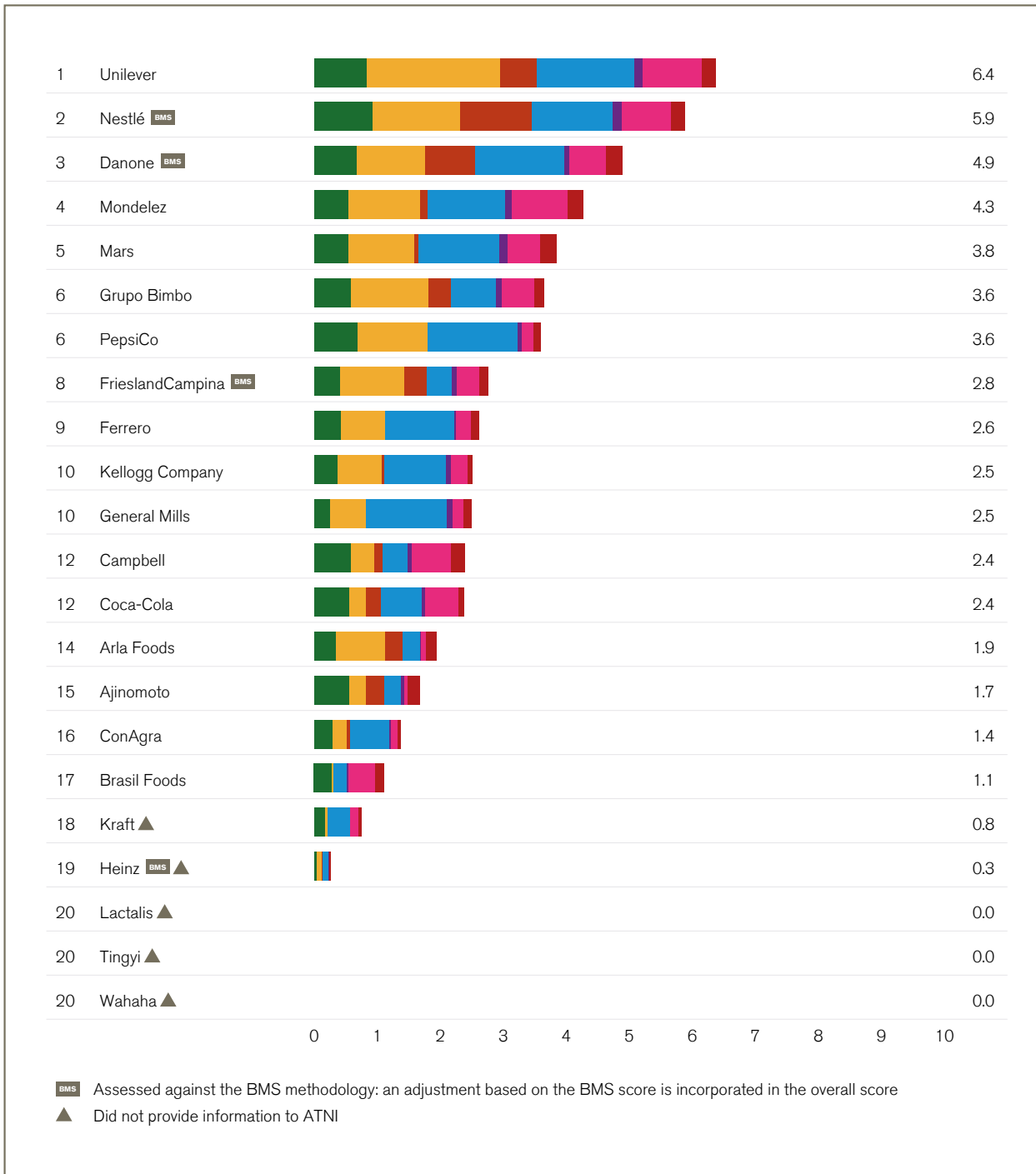
The ATNI **Overall ranking** shows companies' performance across all Categories of the methodology in the context of both obesity, diet-related chronic diseases and undernutrition. Companies with very low scores make little if any information about their nutrition practices publicly available and had minimal or no engagement in the research process. The largest manufacturers of breast-milk substitutes (BMS) were also assessed using a separate additional BMS methodology. For these manufacturers an adjustment has been incorporated based on their score on the BMS sub-ranking. In all cases, their overall score fell. Companies assessed using the BMS methodology are indicated using the following symbol: **BMS**.

The **sub-ranking Nutrition General** reflects companies' efforts to deliver healthy food choices and responsibly influence consumer behavior.

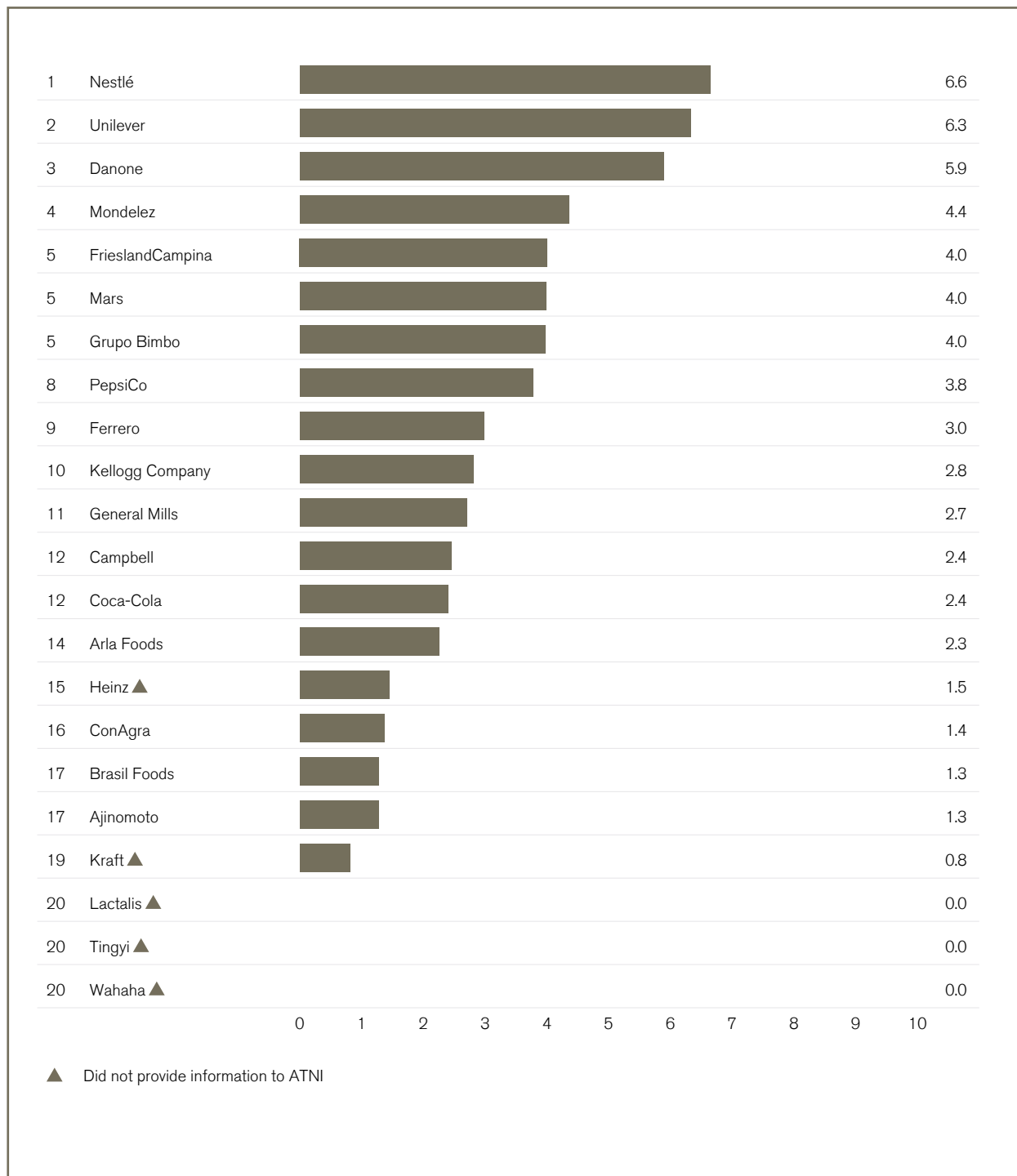
The **sub-ranking Undernutrition** reflects companies' efforts specifically aimed at undernutrition, including the fortification of products with micronutrients otherwise deficient in the diet.

The **sub-ranking Marketing of breast-milk substitutes** assesses the extent to which companies market all their BMS products in line with the recommendations of The International Code of Marketing of Breast-milk Substitutes.

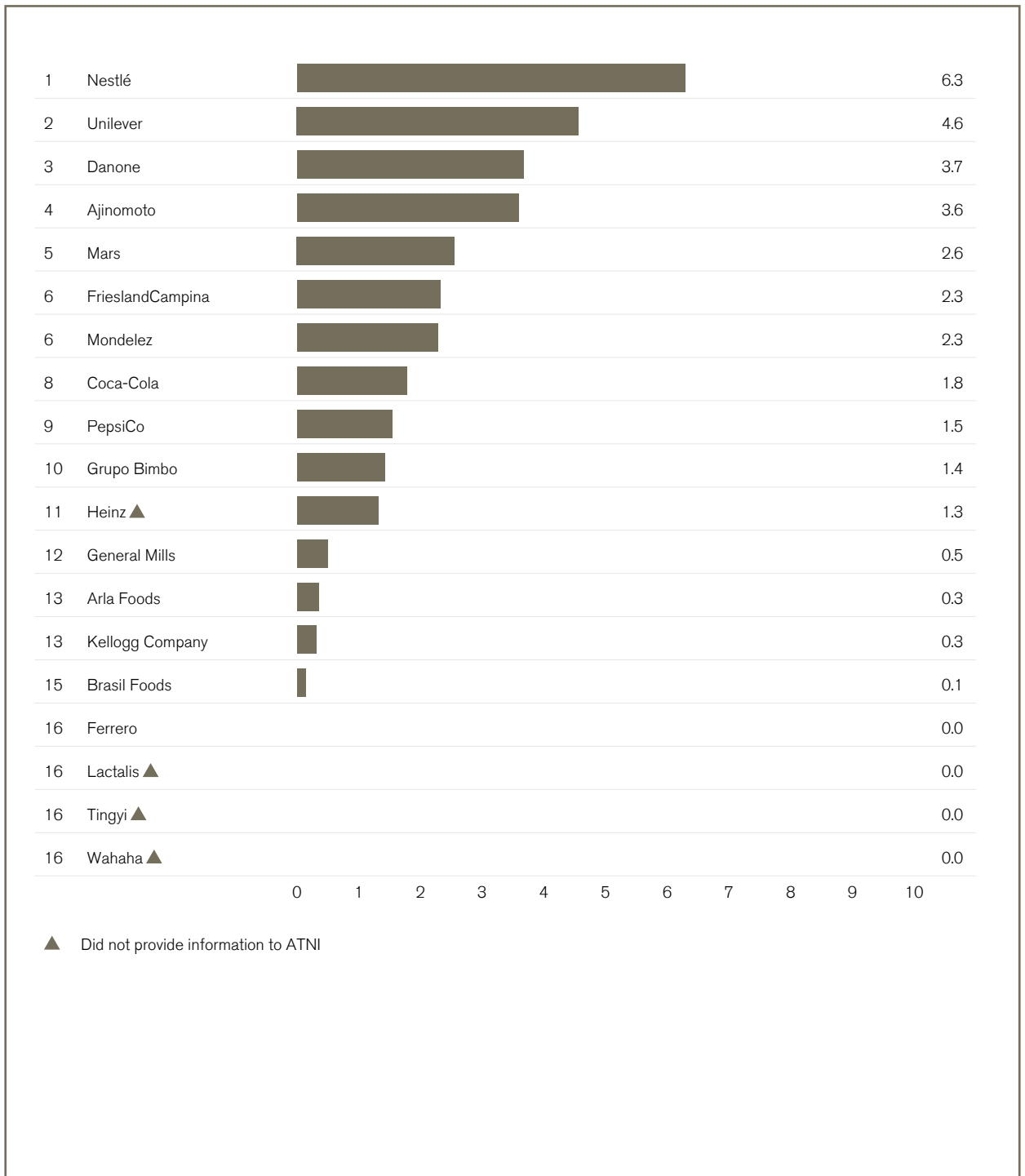
1 Overall Ranking



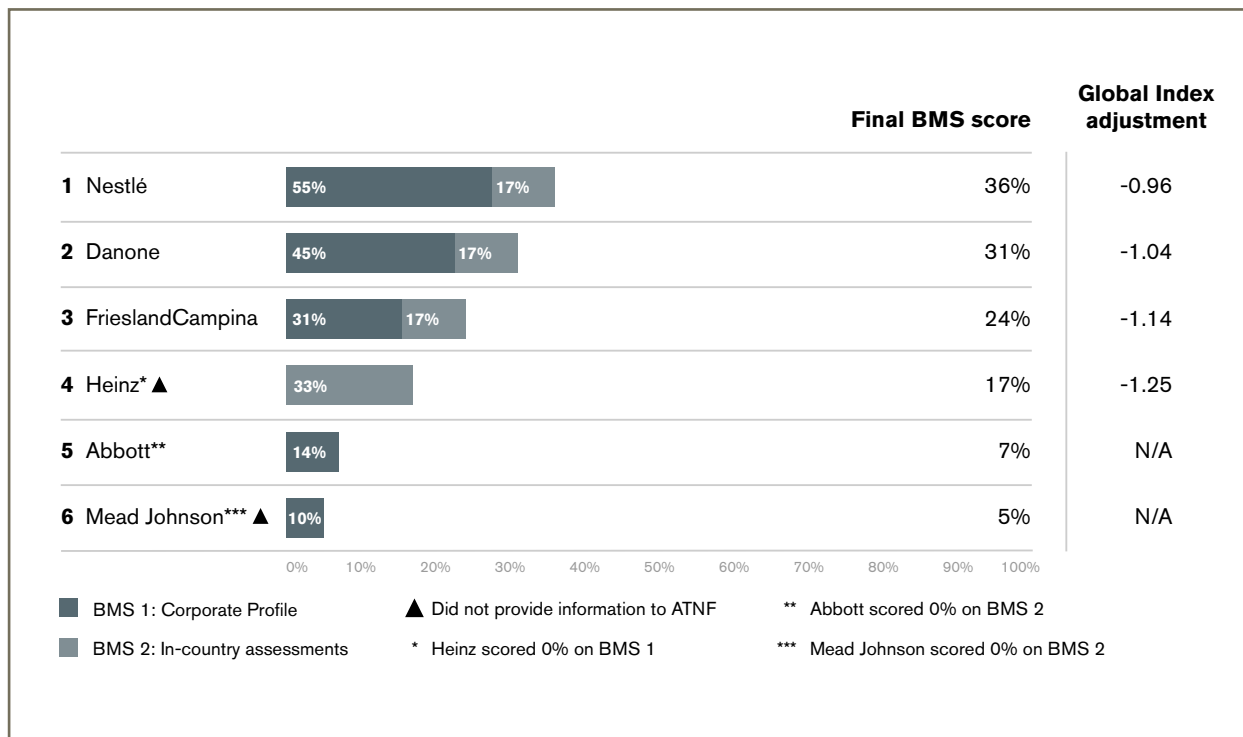
2 Nutrition General



3 Undernutrition



4 Marketing of breast-milk substitutes



Six manufacturers of breast-milk substitutes (BMS) were assessed using a separate additional BMS methodology. To be included in the BMS analysis, sales of baby food had to account for more than 5% of a company's total sales in FY2014. Four food and beverage (F&B) sector companies were included on this basis, along with the two largest pharmaceutical sector manufacturers of infant formula and baby foods. Alignment of company policies with the 1981 International Code of Marketing of Breast-milk Substitutes (The Code) was assessed, as was the quality of management systems being used to implement those policies and their disclosure of policies and practices. In addition, companies' marketing practices in the capital cities of Indonesia and Vietnam were assessed by Westat, an independent professional research organization, using the Interagency Group on Breastfeeding Monitoring (IGBM) Protocol. The results are set out in the sub-ranking above and a separate chapter of the Global Index report.

Key findings

Food and beverage companies have a powerful role to play in helping tackle the mounting global nutrition crisis

One in three people in the world today are undernourished or overweight. Obesity and diet-related chronic diseases, are global pandemics, affecting countries of all income levels. At the same time, undernutrition continues to affect millions of people globally. Given their global reach, food and beverage companies have a powerful role to play alongside governments, international organizations and civil society in helping to tackle this crisis and its grave human and economic consequences. As well as being a social responsibility, this is directly in the companies' commercial and financial interests as consumers worldwide are increasingly demanding healthier foods from companies.

The ATNI has gained widespread recognition as an effective public accountability tool

ATNI has gained widespread recognition as an independent benchmarking tool that works with industry, nutrition experts and civil society to measure companies' contributions to improved nutrition against best practices standards and internationally agreed norms. Since the first Index, companies have increased their engagement with the research process. This shows a positive trend highlighting how the Index can enable the food and beverage industry to improve their policies and practices to help consumers around the globe eat better food. Other stakeholders use the Index as a tool to call on companies for action. Private sector data from the ATNI is used, for instance, in the Global Nutrition Report that is published on an annual basis, while investors in F&B companies are increasingly taking into consideration the ATNI rankings and company scorecards.

There have been some improvements but the industry as a whole is still moving too slowly

On balance, the outcomes of the second Access to Nutrition Index show some progress, but companies have a long way to go if they are to play their full part in tackling the global nutrition crisis. When considered together, the world's 22 largest food and beverage manufacturers have improved their contribution to improving consumers' diets. Some companies have given health and nutrition issues increased weight in their corporate strategies; some have made commitments to improve the nutritional quality of some of their products; some have introduced more healthy options and some have adopted and established reasonably comprehensive back-of-pack labels.

Other areas show fewer signs of progress. Overall commitments to market responsibly to children showed no measurable improvement and although most companies have subscribed to global or regional self-regulatory pledges, these remain weak in several areas. Overall, no company scored more than 6.4 out of 10.

Three companies continue to lead the rankings

The top three companies in the 2016 Index are Unilever, Nestlé and Danone. These three also led the Index in 2013.

Although all companies still have a long way to go, Unilever, Nestlé and Danone have clearly embedded a commitment to addressing global nutrition challenges into their core business models; commitments are translated into practice and reported on publicly. This is commendable. It should be regarded as an example of best practice and as a guide to improvement for other companies. Unilever leads with regards to providing healthier products to consumers worldwide. The company has a strong Nutrient Profiling System (NPS) against which the global product portfolio is checked for levels of key nutrients. Nestlé stands out with a clear corporate nutrition strategy that is approved at the highest levels of the company and includes a comprehensive set of objectives that cover the reformulation of products to make them healthier, access to healthy foods and responsible marketing. Danone remains relatively strong in including nutrition in its business strategies as well as its processes. It leads for including affordability considerations in its product Research & Development (R&D) programs, and for stakeholder engagement. However, Danone dropped in the overall rankings mostly because the company's nutrition targets for the next few years had not yet been published at the time of the research for this report.

Eight companies have improved their ranking, six have fallen, while five have remained the same and three were new additions to the 2016 Global Index.

Mars and FrieslandCampina have risen the most on the 2016 Global Index (Mars rose from 16th to 5th and FrieslandCampina rose from 19th to 8th).

Both significantly improved disclosure regarding nutrition policies. Mars has invested in assessing the nutritional quality of its product portfolio and adopted several new nutrition related policies, while FrieslandCampina has adopted new responsible marketing policies and also reports on the healthiness of its product portfolio (using a strong NPS). Mondelez is a new entrant to this Global Index following its split with Kraft, and has performed relatively well.

Companies have shown improvement in several areas

Areas where companies have shown improvement since the 2013 Global Index are:

Nutrition

- Improved strategic focus on nutrition.
- Improved nutritional quality of some products.
- Introduction of more healthy products.
- Back-of-pack labeling.
- Provision of nutrition-focused elements in staff health and wellness programs.

Undernutrition

- Assigning top-level managerial responsibility and oversight to undernutrition.
- Explicitly committing to tackling micronutrient deficiencies in developing countries through targeted fortification of products (though not all companies focus on priority countries or populations).
- Reporting on engagement with governments in developing countries on undernutrition.

Companies with universally applicable policies lead the way

There is a clear difference in performance in the Index between companies that commit to apply their policies globally and across all products, and those companies whose commitments have a more limited scope.

Many companies do not apply consistent standards across all markets of operation. This indicates that many view improvement as only being necessary where regulations are in place or pressure exerted from civil society. Many companies, particularly those headquartered in the U.S. (including General Mills, Kraft, Heinz, Kellogg Company and ConAgra), seem systematically to apply lower or no standards and less responsible practices in unregulated markets or those with low levels of regulation. This is a cause for concern. Companies should help to tackle global nutrition challenges not because they are forced to by regulators (or the threat of regulatory action) but because they can make a substantial contribution to public health. The top performing companies on the Index demonstrate that making standards universally applicable does not hinder commercial success.

Much more work to do

Most companies still do not systematically or structurally implement and report on their stated nutrition commitments. Across the industry significant improvements can be made in:

- The development of formal nutrition strategies with clear objectives and the integration of these strategies in both business practices and reporting on results (Category A).

- The improvement of the nutritional quality of their products (Category B).
- Making healthy products accessible and affordable in developing countries (Category C).
- The adoption of global responsible marketing policies for all consumers and strengthening policies on marketing to children across all marketing channels (Category D).
- Making more robust programs for employees to pursue active lifestyles and eat healthy diets, and increase the independence of investments in projects focused on consumers (Category E).
- Making lobbying and stakeholder engagement on nutrition more transparent (Category G).

Across the board, far too little is being done to tackle undernutrition in the developing world

Undernutrition remains largely neglected by companies, few companies have made specific commitments with little translation into practice. Mars and Ajinomoto show leading practice in some areas, however despite the business challenges in reaching out to undernourished consumers, more needs to be done to ensure companies assume some responsibility for the massive challenges that many undernourished people face in accessing affordable healthy products. Although many companies have business expansion goals in emerging economies (19 out of the 22 companies generate more than 5% of their revenues from non-OECD countries), none have integrated undernutrition at a strategic level. Only four companies have initiatives to reformulate products for undernourished populations. This is particularly important for higher-risk developing markets among priority populations such as women of childbearing age and children under-two.

Marketing practices of major BMS manufacturers fall short of international standards

None of the policies of the four F&B companies and their two pharmaceutical sector competitors fully align with the International Code of Marketing of Breast-milk Substitutes (The Code) or the many subsequent World Health Assembly (WHA) resolutions adopted that reinforce the central calls made in The Code, despite it having been in place for over 30 years. Nestlé ranked first in the BMS sub-ranking and Mead Johnson ranked last. The pilot research studies carried out by Westat in Indonesia and Vietnam revealed widespread failings of marketing practices in these two major growing BMS markets.

Key recommendations

Based on their performance on the Index and identified areas of weakness, the following key recommendations are made to companies:

- **Companies general:**
 - **Embed a commitment to nutrition within the core business strategy:** Only Unilever, Nestlé and Danone have clearly embedded a commitment to addressing global nutrition challenges into their core business models. The seven companies that do not appear to have developed any form of nutrition strategy should initiate the process. The 12 companies that are taking some action, but in an ad-hoc manner, should develop a more formal and comprehensive strategy with clear objectives directed by senior executives who are accountable for delivery.
 - **Put nutrition commitments into practice:** Companies should accelerate the pace to implement commitments across the entire business.
 - **Enhance disclosure on nutrition activities:** Companies' contributions to tackling global nutrition issues face increasing scrutiny. Companies' should enhance accountability through increased disclosure regarding efforts to improve consumers' access to healthy diets and encouraging active lifestyles worldwide.
- **Nutrition general:**
 - **Set clear product reformulation targets:** One of the most important ways companies can contribute to the improvement of consumers' diets is by dedicating more of their R&D budgets to improving the nutritional quality of their products. Companies should also adopt and publish global reformulation targets for ALL products in line with the World Health Organization's (WHO) recommendations. These should include targets to reduce ingredients such as salt, fat, trans fat and sugar and to increase levels of fruit, vegetables, wholegrain and fiber – as relevant to their portfolios.
 - **Adopt comprehensive global policies on responsible marketing:** This applies to all consumers and to children in particular. Policies on responsible marketing to children need to apply to all media, to specify the age groups that will not be targeted, the kinds of marketing techniques that will not be used and the products that will not be marketed to children. The definition of which products can be marketed to children should be underpinned by a robust NPS, such as the one recommended by WHO or national governments. Adherence should be monitored annually by third parties, and the results published.
 - **Devote greater resources to develop and implement programs to support employee health and commission regular, independent evaluations of program effectiveness:** Specifically to improve employee health through better nutrition and active lifestyles, and disclose more about this activity.
- **Except where prohibited by national legal regimes, better labeling for consumers everywhere:** This should include complete back-of-pack labeling as well as interpretative front-of-pack labeling. Health claims should be responsibly labeled across all markets, particularly unregulated markets or those with limited regulation.
- **Adopt and disclose clear policies for lobbying:** Companies should adopt clear policies to guide any lobbying activity related to nutrition and undernutrition issues and increase disclosure of the lobbying they do, and their funding of or membership in lobbying organizations.
- **Undernutrition:**
 - **Put greater and more strategic focus on preventing and addressing undernutrition:** All companies should seek to establish corporate strategies backed with specific funding to effectively address undernutrition.
 - **Target activities to tackle undernutrition on priority countries and populations:** More explicit emphasis should be placed on targeting priority countries, women of childbearing age and children under-two, the populations in greatest need of fortified foods and other support to overcome undernutrition.
 - **Undertake more strategic and market research:** Other than the three leading companies that have done extensive research in several markets, most other companies have not taken steps to adequately assess the business opportunities available to them and how they might contribute to tackling undernutrition through their non-commercial activities, including investments in pre-competitive, public good research.
 - **Cooperation with low-income country governments and other stakeholders in undernutrition should be improved:** All companies should significantly invest in engaging with governments and other stakeholders in low-income countries trying to address undernutrition and where possible offer greater support to that process. More public-private co-investment should be a priority to explore. Identify pathways to the dual benefit combination of a solid business case and a compelling public good case through technologies, innovations, strategic joint ventures, social policies and international agency support. This should be done in a coordinated and strategic manner through global initiatives such as the Scaling Up Nutrition (SUN) Business Network.
- **Marketing breast-milk substitutes:**
 - **All companies need to review their global BMS marketing policies to bring them fully into line with The Code and relevant WHA resolutions.** Policies should be applied consistently and globally – not just in higher-risk countries, which at present tends to be the case. Policies should apply to all types of BMS, defined by the WHO as any formula intended for infants up to 24 months (including infant formula, follow-on formulas and growing-up milks) and complementary foods up to six months.



- **Except where prohibited in national laws, all companies need to overhaul their management systems** to ensure that marketing policies are applied consistently across all markets. They should also commit to upholding policies fully aligned with The Code particularly in markets where local regulations are weak.
- **Failures in all companies' management systems were evident in both Vietnam and Indonesia** as shown by research carried out by Westat. This revealed several instances of non-compliance with all articles of The Code assessed and/or local regulations in those markets.
- **Increased disclosure of policies, management systems and the results of independent audits for compliance.** Greater transparency of investigations about complaints regarding poor marketing practices and resulting corrective actions is also essential to demonstrate that companies take calls to be more accountable seriously.
- **Guidance by the WHO on how The Code should be interpreted and applied with respect to marketing all complementary foods will allow companies to perform better.** The WHO could also make a valuable contribution by clarifying the definitions of several key terms used in The Code, which are not interpreted in the same way in different countries by companies and other stakeholders.
- The Access to Nutrition Foundation (ATNF) recommends the WHO and others concerned with the responsible marketing of BMS around the world **develop a robust, credible, ongoing system for monitoring all BMS companies' compliance with The Code, including multi-national and national manufacturers.** ATNF could draw on this in the future to feed into its assessment of these companies.



Outlook

After the launch of this Index, ATNF will consult with companies on their results on the Global Index to discuss their performance and what they can learn from leading practices. Additionally ATNF will share and debate the results with a broad group of stakeholders at meetings and by collaborating in nutrition-related international conferences, workshops and debates.

As with the first Index in 2013, ATNF will continue to raise and encourage further work on a range of topics by companies, investors, governments, policymakers, nutrition experts and researchers. These include, for example, achieving greater consensus on the need for, and proper design of, Nutrition Profiling Systems for product reformulation and guiding marketing to children; gaining agreement on and widespread use of effective front-of-pack labeling formats and building knowledge on how companies can improve the affordability and accessibility of healthy products. Also substantially improving companies' understanding of the countries and populations in greatest need of support to tackle undernutrition and how that can be done effectively through public-private partnerships.

With respect to promoting responsible BMS marketing in line with The Code, significant progress could be made if the WHO were to clarify further its definition of products covered by The Code and set out clearer definitions of some terms used in The Code that are not interpreted consistently by all stakeholders. In addition, ATNF encourages the International Association of Infant Food Manufacturers (IFM) to strengthen the Rules of Responsible Conduct to bring them more fully into line with The Code. Progress could also be made by UNICEF and other stakeholders to update the Interagency Group on Breastfeeding Monitoring (IGBM) Protocol in ways outlined in this report. Finally, ATNF will seek to continue to encourage greater discussion among all BMS stakeholders on how the BMS industry – companies large and small in all markets – might pursue marketing practices fully in line with The Code and subsequent WHA resolutions.

The Global ATNI Index will be published every other year. The next edition is scheduled for launch in March 2018. Prior to this, the Index methodology will be updated in line with the emerging nutrition guidelines, standards, policies and corporate practices and evolving expectations of stakeholders.

The second ATNI Global Index demonstrates the positive impact of taking steps to make healthy food more accessible and affordable to consumers on a company's performance in the ranking. Actively disclosing nutrition data is an important contribution to this as well. For the third Index in 2018, the ambition is that all companies engage with ATNI because by then they are convinced that investing in nutrition makes business sense and fulfills the social responsibility they have towards consumers worldwide.



Key findings and recommendations

Categories and Marketing of breast-milk substitutes (BMS)

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A Governance

Key findings

- There is one clear leader in this Category, Nestlé, which scored 8.7. Mars, FrieslandCampina, Ajinomoto and Brasil Foods were the most improved companies in the ranking.
- Nestlé, Unilever, Danone and PepsiCo each demonstrate evidence of embedding a commitment to addressing global nutrition challenges within their business models. Most peer companies, however, still do not appear to appreciate the scale of these challenges nor the imperative of taking a leading role in addressing them.
- The majority of companies demonstrate some orientation towards nutrition through commitments that imply a process for greater integration of nutrition factors into core business considerations. In total, 18 companies have made at least one commitment that indicates improved integration of nutrition into overall corporate strategy, nutrition governance and management systems.
- Many companies have still not embedded nutrition issues into core business strategies and day-to-day practices across global operations. Efforts to transform high-level commitments into concrete practices such as linking executive compensation to nutrition objectives, or monitoring the sales of healthy products, remain poor across the board. With companies increasingly expanding into emerging markets, the continued lack of integration of issues of undernutrition at a top-line strategic level is a concern.
- Category A is the second highest scoring Category in the 2016 Global Index (after Category D), with an average score of 3.6. In the 2013 Index Category A was the highest scoring Category.
- The top four ranked companies in this category – Nestlé, Unilever, Danone and PepsiCo – all scored above 5 and exhibit an advanced approach to how nutrition issues can be considered and addressed. The companies ranked from fifth to ninth, demonstrate an awareness of the importance of nutrition issues in their business strategy and have started incorporating this awareness into their businesses. The next eight companies, ranked twelfth to nineteenth, show some recognition that nutrition issues should be considered, but have taken insufficient steps to integrate this recognition into operations.
- Three companies score zero. They did not disclose efforts to integrate nutrition issues into their business strategy. This could ultimately cause competitive disadvantage for these companies, as consumer eating trends indicate an increasing preference towards healthier options.
- With respect to undernutrition, the majority of companies assessed recognize that they have a key role to play in addressing this challenge. However corporate strategies to address issues of undernutrition are far less developed than for nutrition issues. There is a clear gap between recognition and action.
- Many companies express high-level commitments to address undernutrition. But only seven have allocated oversight and responsibility to senior executives. Similarly, only Ajinomoto, Danone, Nestlé and Unilever have formally set out plans. The vast majority fail to demonstrate any action or progress or monitor performance. The companies that are active, Grupo Bimbo, Kellogg Company, FrieslandCampina, Mars, Mondelez, and PepsiCo, appear to take a more ad-hoc approach, with initiatives in (a few) of the developing countries they operate in.
- In general, companies perform most strongly in section A3, Quality of Reporting. Scores for A1 on strategy and A2 on management are generally lower. This outcome reflects a tendency by some companies to build communication strategies around ad-hoc or marginal efforts to address nutrition and undernutrition. Instead they should seek to develop integrated nutrition strategies with supporting management and governance frameworks to drive growth through an enhanced focus on healthy and fortified products.

Corporate strategy, governance and management (12.5% of overall score)

Key recommendations

- **Adopt or enhance a formal global nutrition strategy:** The six companies that do not appear to have developed any type of nutrition strategy should initiate the process. The twelve companies that are taking ad-hoc action, should develop more formal and comprehensive strategies, which incorporate objectives to address areas such as product reformulation, accessibility, responsible marketing, supporting healthy lifestyles, labeling, the use of health and nutrition claims, and engagement with governments and stakeholders. Food companies have a critical role to play in global efforts to address issues of undernutrition and the nutrition-related aspects of chronic disease. However without strong global nutrition strategies they will continue to lack focus, coordination and accountability, therefore slowing efforts to address undernutrition or nutrition-related aspects of chronic disease.
- **Implement clearer management arrangements, incentives and reward structures:** The ten companies that have not assigned accountability for the implementation of a nutrition strategy and/or programs should do so. Ideally responsibility should be allocated directly to the CEO or another executive who reports directly to the Board of Directors. The 16 companies that have not assigned responsibility for their day-to-day nutrition activities should do so. Only five companies demonstrate that the incentives of either senior managers or the CEO are linked to the achievement of set nutrition objectives. Clear management arrangements and strengthened incentive structures can lead to management-level action to ensure delivery of nutrition objectives. They are tools that all companies that are serious about improving societal nutritional outcomes should utilize.
- **Enhanced disclosure:** A significant amount of the information on companies' nutrition strategy, governance and management was derived through confidential corporate disclosure. This includes proprietary commercial materials which is fully appreciated by ATNI. Nevertheless, companies are encouraged to improve public reporting on how nutrition is integrated into core business processes.
- **Put greater and more strategic focus on preventing and addressing undernutrition:** Almost half of companies scored on undernutrition are doing too little to address the issue. Especially when compared to efforts to tackle obesity and related diseases. They should emulate the leading companies by establishing formal strategies to address undernutrition delivered through a double value proposition – the business proposition and the public good proposition.
- **Undertake much more strategic and market research related to undernutrition:** Good strategies for any area of business are based on extensive research and consideration. Fewer than half of the companies assessed appear to have done research in this area. Such research is critical to the identification of any commercial opportunities or other ways in which issues of undernutrition can be addressed. The absence of market research appears to underlie the current ad-hoc and sometimes ill-informed approaches pursued by many companies.
- **Target activities to tackle undernutrition on priority countries and populations:** All companies should increase the focus of their undernutrition activities to ensure the greatest impact possible is generated. Explicit emphasis should be placed on priority countries and particularly on women of childbearing age, children under-two, the populations in greatest need of fortified foods and the provision of other support to address undernutrition. Furthermore, companies should focus on delivering more tailored solutions to micronutrient deficiencies among these groups.

B Products

Key findings

- Unilever achieves the highest score of 8.4. This is particularly commendable as changes in the methodology and stricter analysis made it much harder for companies to score well.
- While Unilever remains the leader, the gap with the next two companies has widened compared to 2013. Nestlé is also commended for continuing to show commitment and leadership in this area, scoring 6.4.
- Three of the 22 companies analyzed did not disclose any relevant information and scored zero, compared to four out of 25 companies in 2013.
- The third ranked company, FrieslandCampina, has climbed the ranks significantly due to more engagement and disclosure, having only ranked eighteenth in the 2013 Global Index. Other companies that have significantly improved their rankings are Mars (up to eighth) and Ferrero (up to tenth). Some companies' positions have slipped since 2013 (Kellogg Company and ConAgra) indicating reduced disclosure.
- This Category is among the three Categories in which companies score the highest, suggesting that companies overall pay more attention to product composition when addressing global diet-related diseases than they did in 2013. Nonetheless, the average score is still very low, at only 2.8 points.
- While most companies have made some commitments to improving the nutritional quality of all or some of their products and are introducing new healthier products, in general, their efforts remain inadequate to properly address global nutrition challenges. Nineteen of the 22 companies are making some changes to product formulation, but the scale and scope of these varies substantially, with scores on 'B1: Product formulation' ranging from 0.0 to 7.7.
- Thirteen of 22 companies (59%) report having an NPS and so score on 'B2: Nutrient profiling', compared to 48% of companies that scored in this area in 2013. These companies generally perform better in section B1 than those who do not show evidence of an NPS, as well as across the Index, as the score on B2 determines the level of healthy multiplier scoring applied throughout.
- Only Danone and Unilever were able to provide data on the percentage of their products in different regions that meet the standard that enables them to be advertised to children (i.e. that they are healthy).
- Ajinomoto, Danone, FrieslandCampina, Mondelez, Nestlé, Coca-Cola and Unilever have explicitly committed to tackle undernutrition and micronutrient deficiencies in developing countries through targeted fortification of their products.
- Four companies differentiate themselves in terms of product reformulation for undernourished populations: Ajinomoto, Nestlé, Unilever and Danone. They have all committed to tackle undernutrition through initiatives that aim to increase the number/volume of fortified foods available to undernourished populations, targeting priority countries and disclosing information about their initiatives in this area.



Formulation of appropriate products (25% of overall score)

Key recommendations

- Adopt an NPS:** The pace at which companies are adopting a robust NPS is still slow, even though there has been a small increase in the proportion of companies providing evidence of using one. An NPS is an essential element of any serious nutrition strategy, as it provides the basis for identifying which products need their nutritional quality improved. It also provides a consistent centralized means of monitoring progress and the proportion of healthier products in portfolios. The companies exhibiting robust systems clearly differentiate themselves from others by demonstrating a strong commitment to improving their portfolios, thereby also potentially increasing their market shares in healthy products segments. The companies that have not yet adopted an NPS should do so in order to drive healthy product innovation and reformulation in line with WHO recommendations for healthy diets. A good NPS should be aligned with internationally recognized standards, reviewed and verified by expert stakeholders, cover all products, and assess both negative and positive nutrients. They should either use a scoring system that scores products on a sliding scale or a threshold system that sets maximum and minimum nutrient levels by sub-category.
- Set clear nutrition R&D targets:** While many companies reported having R&D activities to enhance the nutritional quality of their products, very few could demonstrate concrete targets in terms of R&D budgets allocated to achieving this goal. Companies are encouraged to establish targets with respect to the amounts they plan to invest in product innovation, including developing fortified products to address the specific dietary needs of the undernourished.
- Establish product reformulation targets:** While 16 companies have commitments for reducing/eliminating 'negative' nutrients and increasing/adding 'positive' nutrients, Ajinomoto, Lactalis, Heinz, Wahaha, Kraft, and Tingyi failed to disclose one single target. Companies are encouraged to transform their products in a more systematic manner by setting concrete targets and deadlines.
- Conduct regular performance assessments on meeting product reformulation targets:** Companies should establish systems to capture their progress towards increasing their offering of healthier products, both for the general market and for children. This data should be gathered across global operations and should measure volume of products reformulated, as well as their sales values. Further, this data should be published in order to demonstrate that progress is, in fact, being made.
- Focus on high-priority countries and target groups for delivering fortified products:** While companies show evidence of delivering fortified products to undernourished populations, these efforts often seem sporadic and unfocused. In order to make a meaningful contribution to addressing undernutrition, companies should systematically concentrate on countries and populations that experts have identified as being in greatest need. Companies scoring relatively poorly in this Category (i.e. below 5.0) need to put much more emphasis on addressing undernutrition by developing more extensive and formal commercial strategies, rather than relying on limited philanthropic efforts, which alone are unlikely to deliver solutions at scale.



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C Accessibility

Key findings

- One company stands out as a clear leader in this Category - Nestlé, scoring 6.7 out of 10.
- Unilever (4.8) and Danone (3.0) also score relatively well.
- Overall, only 36% (eight) of companies perform above the average score for this Category. Several companies perform relatively well but many perform very poorly or do not score at all (ten companies).
- As in 2013, performance in this area is among the lowest on the Index. The average score for the Category is 1.2 out of 10. This suggests that most companies place very little emphasis on making healthy and fortified products affordable and accessible to those who need them most.
- The accessibility and affordability of healthy and fortified foods is still an emerging issue for the industry. Apart from a few leading companies, affordability and accessibility issues do not appear to be integrated by companies as full components of an overall nutrition strategy.
- Average scores are slightly higher for assessing companies' efforts to make healthy products more affordable (C1) (1.4 out of 10), than for assessing companies' efforts to make healthy products more accessible (C2) (0.9 out of 10).
- Companies were generally able to demonstrate better affordability commitments than in 2013, which often took the form of more detailed company-wide mission statements or publicly available goals. However, apart from the leading companies, these commitments did not translate into improved disclosure or practices.
- Most company's efforts were weak and did not appear to be guided by a unifying strategy, i.e. they followed an individual project-based approach rather than taking an overall strategic approach. Currently companies do not hire external input for developing new approaches to making products more affordable.
- Four companies, Arla, FrieslandCampina, Nestlé and Danone, have developed commercial accessibility commitments and implemented programs that are relatively advanced. Eleven companies are still in the early stages of addressing access to healthy products, with eight of those companies considered to be in the very early stages. Early efforts have been project focused rather than strategic and generally confined to philanthropy via corporate foundations rather than delivered through core business operations. Integration of accessibility considerations into business practices was the most challenging component in this Category for companies. Nestlé has put in place formal commitments, policies, objectives and targets, and its performance in this area distinguishes it as a leader.
- Current non-commercial leading practice to make fortified products accessible in developing countries is to use local collaboration and micro-distribution channels, including hiring individuals as vendors for their local community. One company – Danone, is expanding its micro-distribution program to other developing countries, indicating that innovative distribution models to reach consumers in difficult contexts can work and be replicated in a meaningful manner. Another example is Unilever's Shakti micro-distribution programme in India and Africa. Unilever employs rural women to distribute and sell affordable products in their local communities, improving product accessibility in remote villages or other areas where conventional grocery stores are not available.
- Little is invested in product R&D to improve the long, slow and unrefrigerated supply chains common in low-income regions.
- Similarly to efforts for making products more affordable, companies do not tend to seek external input from academia, governments, NGOs or other stakeholders to assist in the development of programs to make products more accessible.

Delivery of affordable, available products (20% of overall score)

Key recommendations

- **Adopt formal policies and set targets:** Companies must bridge the gap between broad mission statements and actionable goals. They need to adopt formal policies and commitments for both key issues, affordability and accessibility and set targets to structure their efforts.
- **Put a stronger and more formal focus on core business-driven solutions to accessibility and affordability:** Overall, companies need to move from addressing these critical topics only through philanthropic foundations and CSR programs and integrate efforts into core business. The scale of the problem of obesity and undernutrition requires large-scale, sustainable, long-term solutions. These are best delivered through commercial solutions and structured partnerships with leading expert organizations. Although many companies operate nutrition-oriented philanthropic projects, these alone are not likely to have the economic sustainability to offer long-term solutions. To enable long-term program impact and sustainability, financial viability must be achieved within the constraints of product affordability in low-income countries.
- **Provide more funding to – or partner with – programs proven to address undernutrition effectively in order to seek innovative solutions for complex supply chain issues:** Organizations that specialize in addressing accessibility issues possess deep knowledge and experience that can add value to corporate efforts to address the accessibility of fortified foods. Companies should seek to better support these organizations, either through direct funding or through collaboration. In order to reach economic sustainability, companies should seek to establish public-private-partnerships that enable knowledge and infrastructure to be shared and solutions to be delivered. Through collaboration, expert agencies can provide the local knowledge needed to best leverage a company's large and sophisticated supply chain systems in service of improved nutrition accessibility.



D Marketing

Key findings

- Danone is the leading company in this Category, with a score of 8.5 out of 10. Unilever, Nestlé and PepsiCo demonstrate reasonably good commitments, auditing and disclosure practices and score about 7.0. However, as ATNI does not measure a company's actual marketing activity for any particular market, it is not able to determine the extent to which companies adhere to their commitments in any specific market.
- Five other companies scored reasonably well overall (i.e. above 4) reflecting their relatively consistent application of industry association pledges, which harmonises performance to some degree.
- Three companies (Wahaha, Tingyi and Lactalis) do not disclose any commitments for responsible marketing either to all consumers or to children and score zero. The performance and commitments for the remaining ten companies were weak.
- FrieslandCampina, Grupo Bimbo, Nestlé and General Mills all improved their ranking by three positions relative to the 2013 Global Index, while Kraft dropped 12 positions and Coca-Cola dropped six positions.

Commitments to responsible marketing

- Similar to 2013, most companies have either one overarching policy or two separate policies for responsible marketing to all consumers and marketing to children, and/or have committed to adhere to the pledges of industry associations. Many adhere to industry associations' responsible marketing pledges at the international, regional or national level, such as those of the International Chamber of Commerce (ICC), International Food and Beverage Alliance (IFBA), Children's Food and Beverage Advertising Initiative (CFBAI) or the EU Pledge, and/or mirror these standards in their own policies. Some companies make additional commitments, which is commendable.
- The pledges restricting marketing to children are not uniform in strength or scope, and none meet the best practice standards set out in the ATNI methodology. The key weaknesses include:
 - Not all pledges are applicable across all media and forms of promotion.
 - Some pledges lack a commitment to corrective action.
 - Not all pledges restrict or ban advertising in or near secondary schools or places where children gather.
- Companies' policies to restrict marketing to children tend to be stronger than those directed to all consumers,

demonstrating an awareness of the need to address alarming levels of overweight and obese children and increasing levels of diet-related chronic diseases among children.

- Sixteen companies commit either to not advertise any products to children under-12 (where they make up 35% or more of the audience), or to restrict their marketing to children under-12 to healthy products only. However, no companies commit to responsible marketing practices for children over-12. This is a concern, as children over 12 are exposed to a great deal of marketing for less healthy products and can be significantly influenced by it.

Performance

- As noted in the findings for Category B, only two companies were able to provide data on the percentage of their products that are healthy enough to be marketed to children in different regions. Only five companies use an NPS to determine whether products meet a healthy threshold that allows them to be marketed to children. This indicates that few companies are able to demonstrate how their responsible marketing policies are applied in practice and makes it difficult to determine which companies have made the greatest strides in improving the healthiness of products that children eat.

- Companies perform most poorly on indicator 'D2' regarding auditing compliance with their policies geared towards all consumers, and disclosure of compliance. This indicates that companies' approach to auditing compliance of marketing commitments to children are significantly more robust than audits for compliance with marketing commitments for all consumers. In the case of general marketing policies, the vast majority of audits are conducted in-house. Audits for compliance with policies on marketing to children tend to be third party assessments by an independent auditor appointed by the pledge organization.

Disclosure

- Progress has been made in disclosure particularly, with more companies now publishing their policies. However, scores decreased in other key areas, such as the type of media covered by marketing commitments for all consumers and commitments to corrective action when incidents of non-compliance for marketing to children are found.
- ATNF intended to evaluate companies' spending on marketing healthy products to adults and children, however too few companies were able to provide this information to complete this analysis.

Responsible marketing policies, compliance and spending (20% of overall score).

Key recommendations

Marketing to all consumers

- **Adopt a comprehensive global policy:** Those companies that have not yet adopted a comprehensive global policy on responsible marketing should do so, and publish it. At a minimum, the policy should follow the key pledges contained in the ICC General Code and Framework for Responsible Food and Beverage Marketing Communications.
- **Engage independent auditors to assess compliance with marketing commitments for all consumers:** Companies generally take part in or audit the compliance for their commitments on responsible marketing to children with greater rigor than they do for the more general marketing commitments that cover all consumers. Companies should also commission independent audits of their compliance with these policies and make compliance rates public.

Marketing to children

- **Adopt a comprehensive global policy:** Those companies that have not yet adopted a global policy on responsible marketing to children should do so, and publish it. At a minimum, the policy should be applicable to children under-12, apply when children make up more than 25% of a general audience, should be global in scope, set out how various marketing techniques will be used, and prohibit marketing in or near primary or secondary schools or other places where children gather.
- **Strengthen existing policies:** Companies with a policy that does not meet best practice should seek to strengthen the policy. For example, they should ensure that the policy is globally applicable and includes all forms of marketing – especially for channels for which exceptions are often made, such as point-of-sale, on packaging and new media.
- **Underpin marketing practice with an appropriate NPS:** Companies should use a robust NPS which meets the criteria set out in criteria 'B2' to define which products can be marketed to children across all markets. Currently only five companies use such a system.

- **Adopt emerging best practice relating to online marketing:** Companies should clearly set out the tools they use to ensure that online marketing is appropriately targeted and designed to deter children under-12 (or the age threshold of their policy) from viewing marketing designed for older children or adults.
- **Take part in regular annual independent audits:** All companies should take part in robust annual audits of compliance, either through an industry body-commissioned independent audit or one commissioned separately. Such audits should cover a wide range of markets, both developed and developing.
- **Publish individual audit results:** To demonstrate their commitment to fully implement the policy and their willingness to be held accountable, companies should make their individual compliance rates to traditional and new media publically available.
- **Report on taking corrective action:** Companies should commit to, and report on, how they have taken corrective actions when non-compliance is identified.

E Lifestyles

Key findings

- The best performer in this Category is Nestlé with a score of 7.1 out of 10, while the average score is low, at only 2.5.
- Mars rose from 17th to second place thanks to adoption of strong recent policies. Other companies that made substantial progress in Category E are FrieslandCampina, General Mills and Kellogg Company.
- Only three companies score above five; these are the only ones to demonstrate a global approach to the promotion of healthier lifestyles among employees and consumers. The remainder implement only limited activities or only support core markets.
- While some companies seem to have implemented interesting initiatives, the industry as a whole needs to devote much greater resources to developing and implementing appropriate programs to support their employees, and to support consumers through independently designed and implemented programs in pursuing active lifestyles and healthy diets.
- Category E is among the lowest-scoring category in the 2016 Global Index. This is primarily because the methodology was strengthened and changed slightly, but also because a new criteria was introduced (E2) assessing companies' support for breastfeeding mothers in the workplace.
- The leading companies changed positions, except for Unilever, which keeps its position in the top three in both editions of the Index. This is mostly due to the new criteria (E2), where the current leading companies (Nestlé, Mars and Unilever) scored well above the average, while PepsiCo and Coca-Cola (the leaders in 2013) scored 0 and 0.4, respectively, indicating limited support for breastfeeding mothers in the workplace.
- Three companies (compared to six in 2013) did not disclose any relevant information and scored zero.

Employee-oriented programs

- Companies generally had higher scores on the assessment of their employee-oriented programs than on supporting independent, third-party programs targeting consumers.
- Similar to the findings in 2013, most companies provide staff health and wellness programs with some nutrition and activity-related elements. However, only ten companies offer these programs globally, while the others appear to limit their scope to home or major markets. Few companies set employee participation targets or identify expected health and business outcomes, and only four companies independently evaluate the health impact of the nutrition, diet and activity elements of their programs.

Support for breastfeeding mothers

- Disclosure related to the newly introduced criteria (E2) is limited; most of the companies provided the information only under a non-disclosure agreement. Only six identified companies have a formalized commitment to providing breastfeeding mothers with appropriate working conditions and facilities at work.

Consumer-oriented healthy diets and active lifestyle programs

- The methodology on this topic was strengthened significantly and companies scored well only if they demonstrated support for independently designed and implemented programs, as well as non-branded consumer-oriented programs.
- Fewer than half of the companies have a commitment formalized in a policy to guide their funding, or support independently designed and implemented programs oriented toward active lifestyles, as well as nutrition education and healthy diets.
- Overall, companies' approaches to supporting undernourished consumers in developing countries is poor, and only six companies scored in this area. This suggests very limited corporate support for programs that consider the nutritional needs of the most vulnerable people.

Support for healthy diets and active lifestyles (2.5% of overall score)

Key recommendations

- **Demonstrate a strong commitment to support healthier lifestyles among employees:** The nine companies that have not yet done so should put in place a robust health and wellness program that incorporates nutrition, physical activity and healthy behaviors, and make it available to all employees and their family members worldwide. Companies should design these programs to deliver clear intended health and business outcomes such as mitigating sedentary lifestyles and unhealthy diets, while achieving improved efficiency and productivity.
- **Commission independent evaluations of staff health and wellness programs:** To increase their credibility and ensure that resources are being deployed wisely, companies should commission independent evaluations of these programs and make changes according to their recommendations, following the lead of Danone, FrieslandCampina, Mars and PepsiCo.
- **Report more on programs to support healthier diets and lifestyles:** Most companies could improve their disclosure regarding these programs and the evaluations commissioned.
- **Adopt best practice policies to support breastfeeding mothers and disclose more information about them:** Many agencies and governments are placing more emphasis on promoting breastfeeding in order to boost the practice where levels are low or to counter falling rates around the world (which is likely to undermine a population's health over the long term). To demonstrate their support for breastfeeding mothers in the workplace, all companies should adopt best-practice global maternity leave policies (if it is not already a statutory requirement), in order to facilitate exclusive breastfeeding in the child's first six months, which supports healthy growth and development. These policies should also enshrine a commitment to provide appropriate facilities and flexible working arrangements in all workplaces when mothers return to work. Companies should also disclose more about these efforts.
- **Demonstrate a commitment to supporting independently designed and implemented consumer-oriented programs:** Delivering effective programs at scale requires multi-stakeholder collaboration around comprehensive, integrated programs designed and implemented by independent organizations with relevant expertise. Companies should seek to support these kinds of programs exclusively, rather than design programs that have commercial goals (such as raising brand profile and marketing products). Companies should be more transparent about their role in any consumer-oriented programs they support and should make a commitment to not use brand-level sponsorship for these programs in order to clearly differentiate their marketing efforts from those to genuinely improve consumers' diets and levels of activity.
- **Commission independent evaluations of consumer-oriented programs and publicly disclose the results:** Companies should follow the lead of Mondelez and embed independent evaluations into the design of all programs they support. Moreover, companies should publish the results of all evaluations undertaken, including both the successes and challenges they have faced. Sharing lessons learned should lead to better approaches being adopted across the industry, more effective use of corporate resources, and the abandonment of ineffective approaches.
- **Boost efforts to tackle undernutrition:** The companies assessed in this Index could play a more significant role than they currently do in alleviating poor nutrition and hunger in many parts of the world. They should dedicate much more attention and resources to developing or supporting programs to educate undernourished consumers about the value of consuming fortified food, micronutrient supplementation, appropriate complementary feeding and a diverse diet.
- **Support undernutrition programs:** Companies should sign up to undernutrition programs such as the Zero Hunger Challenge, Scaling Up Nutrition and the World Food Program to fight undernutrition.

F Labeling

Key findings

- Unilever is the leader with a score of 6.2.
- Unilever, Nestlé and Mondelez all score above 5.0, demonstrating good progress towards best practice. None of these companies were placed in the top three positions in the 2013 Index. However, many companies performed poorly. Nine companies scored below 2.0 and three companies (Wahaha, Tingyi and Lactalis) did not disclose any relevant information and scored zero in this category.
- Companies that have most improved their ranking since the 2013 Index are FrieslandCampina (up 12 places), Campbell (up eight places) and Grupo Bimbo (up six places). Ajinomoto, Kraft and ConAgra all fell substantially.
- Overall, this Category remains a low scoring one, with an average score of only 2.4, showing that this is an area all companies need to pay more attention to. This is particularly the case with front-of-pack labeling and the adoption of responsible claims policies. However, 45% of companies scored above the average score in 2016, compared to 40% in 2013. This demonstrates moderate improvement across the group. Eight companies have released new policies or strengthened their practices since the last Index was published.
- Companies generally scored better in 'Labeling' (F1) than in 'Health and nutrition claims' (F2), as more have disclosed labeling commitments and practices. However, very few address health and nutrition claims in countries where their use is not regulated.
- Similar to the findings of the 2013 Global Index, most companies commit to labeling the nutritional content of their products, both back-of-pack and front-of-pack. However, only four companies commit to including all key nutrients as recommended by Codex. Two of these companies apply this commitment globally and voluntarily, rather than only committing to follow regulatory requirements in their home market, such as following U.S. Food and Drug Administration (FDA) labeling regulation.
- Ten of the companies assessed (45%) committed to comply with the International Food & Beverage Alliance's (IFBA) 'Principles for a global approach to fact-based nutrition information', showing their support to the industry's collective effort to address poor dietary intakes among consumers. However, to achieve highest score, companies need to go beyond IFBA's requirements.
- Companies with international operations fail to provide evidence of having rolled out their policies globally: Twenty out of 22 do not disclose the percentage of markets in which they have implemented labeling commitments in full. This is a concern, given that complete, objective, fact- and science-based nutrition information should be provided to all consumers in all markets. Companies are expected to go beyond the somewhat more lenient legal requirements in emerging countries to ensure that vulnerable consumers are not exposed to misleading nutritional statements.
- Few companies made commitments concerning proper labeling of fortified products in emerging markets. Only five companies scored on F1 and three on F2 illustrating that overall the industry has not adopted recommended and important practices that would help undernourished consumers in developing countries choose appropriately fortified products.



Informative labeling and appropriate use of health and nutrition claims (15% of overall score).

Key recommendations

- Adopt and publish a formal policy that commits both to full back-of-pack labeling and interpretative front-of-pack labeling:** To help consumers make informed and healthy choices, companies should adopt policies that commit to providing, on the back-of-packs: i) full, fact-based nutrition information for all key nutrients (recommended by Codex); ii) present the information as a percentage of guideline daily amounts or daily values; iii) provide the information for both single and multiple portions. On the front-of-pack, companies should commit to providing interpretative labeling using colored graphics or symbols. These are more effective than presenting numbers in a monochrome format and help consumers to correctly assess the nutritional content of a product.
- Go beyond joint industry pledges that fall short of best practice:** Although some companies pledge to support industry initiatives (e.g. IFBA's 'Principles for a global approach to fact-based nutrition labeling' and 'Facts Up Front'), they should go further and align their own policies with international best practice.
- Apply the policy globally:** Consumers everywhere should have the same comprehensive information made available to them about the nutritional content of foods. Companies that operate globally should apply their commitments across all markets and all products (where national regulation allows), instead of simply committing to follow national requirements (which can fall short of international standards).
- Adopt and publish a global policy on the use of health and nutrition claims:** While in developed countries the use of health and nutrition claims is regulated, this is not the case in many developing countries. Therefore, in countries where no national regulatory system exists (or is weak), companies should commit to only placing health or nutrition claims on a product if it meets the standards set out by Codex to ensure that consumers in these countries are not misled about potential health benefits.
- Report more on the use of health and nutrition claims:** Companies should exhibit greater accountability by disclosing more information about their use of such claims across their global portfolios and track and report on the number of products that carry these claims.
- Publish nutrition content information for all products online:** In this digital age, many consumers look up information online. Companies should work to ensure that they provide full nutritional information on their corporate or brands' websites, in an easily accessible way.
- Label foods high in micronutrients:** For fortified foods developed for those with micronutrient deficiencies in emerging markets companies should commit to providing information about the micronutrients within those products. This will help consumers to make more informed choices that address their specific health and nutritional needs.



G Engagement

Key findings

- Danone is the leader in this Category, scoring 6.3 and leading other companies by a significant margin. This marks a departure from the 2013 Global Index, in which three companies were tied with the highest score. Nestlé did best on 'G2: Stakeholder engagement'.
- Of the 19 companies that have commitments and/or programs in place, all except two took relevant steps with regards to engaging both government and stakeholders. FrieslandCampina, Mars and Campbell improved most in the rankings.
- 77% of companies had either commitments or activities for both engagement with governments and stakeholders. Three companies have no commitments or activities, and only two companies have commitments and activities exclusively related to engagement with governments or stakeholders.
- Similar to the findings in 2013, companies demonstrated stronger performance on engagement with nutrition stakeholders compared to lobbying and engagement with government. However, scores for both were very low, on average: 1.8 on 'stakeholder engagement' (G2) versus 1.0 on 'lobbying and influencing governments and policymakers' (G1). Many more companies disclosed information about their nutrition stakeholder engagement than about government engagement.
- Companies slightly improved their performance on lobbying and engagement since 2013. Programs that existed in 2013 continued to expand and mature, with more robust accompanying disclosures. Generally however, companies did not demonstrate evidence of adopting policies in areas that focus on key nutrition issues.
- Specific policy positions were rarely disclosed. Although high-level lobbying or business ethics policies were in place at most companies, very little information on lobbying positions was published.
- Companies do not appear to be generally involved or cooperating with policy formation in this area with governments of developing countries. Danone, Ajinomoto, and Unilever were the only three companies of the 22 assessed that were able to provide examples of engagement with developing world governments on undernutrition issues.
- Too often, reporting provides only a general discussion of lobbying and engagement with no clear sense of the extent to which companies are using engagement with governments and other stakeholders to inform their nutrition and undernutrition strategies. Most companies still seem to view engagement activities as principally public relations (PR) exercises, i.e. a way in which to promote their activities, rather than a means to strengthen their nutrition-related business and philanthropic strategies. Only a few companies have adopted the comprehensive AA1000 engagement standard.



Engagement with governments, policymakers and other stakeholders (5% of overall score).

Key recommendations

- **Adopt and disclose clear policies on lobbying:** Companies need to adopt clear policies to guide their lobbying activity related to nutrition and undernutrition issues. These need to support regulatory and policy initiatives that encourage good nutrition and not undermine efforts to improve diets and health. While many companies disclose a position on lobbying in general, very few address nutrition and undernutrition issues therein. A clear policy strengthens organizational accountability around lobbying activities.
- **Improve disclosure, particularly with regards to lobbying activities:** This gap was identified in the 2013 Index and remains apparent. Companies could be more transparent about their support for, involvement in, and financial contributions to industry associations and lobbying organizations. While some companies are legally required to provide a baseline of information on lobbying in countries such as the U.S, all companies should provide this information globally to allow stakeholders to examine the role they are playing.
- **Make lobbying positions on key nutrition issues public:** All companies should enhance disclosure on how their lobbying activities relate to tackling obesity and diet-related chronic diseases. This includes ambitions related to responsible marketing and labeling, so that all stakeholders can understand the positions they are taking in their dialogue with regulatory authorities.
- **Enhance policy cooperation with governments of developing countries:** All companies need to significantly boost their engagement and offer greater support to governments in developing countries that are trying to address undernutrition. When undertaking either commercial or philanthropic undernutrition-focused projects, companies should work to support the goals of local governments.
- **Implement the AA1000 standard in stakeholder engagements:** A clear gap remains in translating stakeholder engagement activities into organizational change, a shortcoming also identified in 2013. Few companies follow the AA1000 standard, which provides a structure for conducting thorough and effective stakeholder consultation. This is particularly relevant for low-scoring companies with underdeveloped consultation programs, as the AA1000 standard clearly sets out the scope and framework of a best practice program, along with practical implementation guidelines.
- **Formally integrate stakeholder engagement into business development:** By including a stakeholder insight and issue gathering phase when developing new strategies and initiatives, companies can assemble valuable information on potential risks and opportunities and understand how others are tackling similar challenges.
- **Demonstrate how stakeholder dialogue has influenced business decisions:** This should be the primary purpose of engagement. A critical next step for many companies is not only to ensure that their engagement is designed in such a way as to generate valuable insights to influence strategy and practice, but to report clearly on how they have done so.



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Marketing of breast-milk

Key findings

Overall

- The BMS marketing policies and practices of the six companies assessed, which in FY2014 accounted for global baby food sales of \$33.7 bn, fall well short of the recommendations set out in The Code (as measured by the ATNI methodology) as being necessary to protect and encourage breastfeeding and contribute to the optimal health of babies and infants worldwide.
- While in relative terms, Nestlé has the highest overall score on the BMS assessment, in absolute terms its aggregate score was low at 36%. Abbott and Mead Johnson rank lowest, with scores of 7% and 5% respectively, on aggregate. Danone ranked second, with an aggregate score of 31% and FrieslandCampina ranked third, with an aggregate score of 24%. Heinz ranked fourth with an aggregate score of 17%. These outcomes, based on the Corporate Profile analysis of their BMS marketing policies, management systems and disclosure, and on two pilot studies in Vietnam and Indonesia illustrate – if these two studies are indicative of a wider pattern – that all six companies have a great deal more to do in other countries to improve their BMS marketing policies and practices.
- There is a large degree of variation in the companies' Corporate Profile assessment scores, which range from Nestlé at 55% to Heinz at 0%. This is also the case in the two pilot studies conducted in Vietnam and Indonesia, where scores ranged from 33% for Heinz to 0% for Abbott and Mead Johnson. This illustrates the substantial differences in companies' policies and how effectively – or otherwise – they control marketing in these markets. With the exception of Heinz, the results appear to show that the companies with the stronger policies and management systems control their marketing in Vietnam and Indonesia slightly more effectively than those with weaker policies and management systems.
- Four of the six companies pledge not to market complementary foods as suitable for infants less than six months of age in higher-risk countries; Danone extends that commitment to all countries. However, all except Nestlé caveat their statements by indicating that they will do so if local regulations allow.
- No companies apply their policies in all markets as recommended by The Code; rather, they apply them differentially in higher-risk and lower-risk countries, to some products but not others.
- All five companies other than Nestlé state that in all countries they will follow local regulations even if they are weaker than their own policies (which are all weaker than The Code). This finding gives rise to particular concern, given the number of countries in which local regulations do not align to The Code, as documented by the research of WHO, Helen Keller International (HKI), International Baby Food Action Network (IBFAN), Alive & Thrive and others.
- Nestlé appears to have robust, globally applied management systems to implement its BMS marketing policy (though with some gaps). However, the other companies' management tools, such as formal procedures, detailed instructions to staff, guidelines and training are weak or lacking in relation to some Articles of The Code. Some companies' procedures do not appear to be consistent in all markets.
- Danone and Nestlé make some policy commitments related to BMS lobbying and state some objectives. The other four companies do not.
- Companies' disclosure varies a great deal. While Nestlé discloses a great deal, and scores very well in this area, the transparency of the other companies ranges greatly, with Abbott and Mead Johnson publishing very little of their management systems documentation, and Heinz nothing. Mead Johnson, Danone, FrieslandCampina and Abbott adhere to self-regulatory industry code of the International Association of Infant Food Manufacturers (IFM) called the Rules of Responsible Conduct, which are publicly available.

BMS 1: Corporate Profile

- While the language of Nestlé's policy aligns most closely with The Code, none of the companies' policies align fully with The Code and cover all BMS products (per the WHO's clarification of the definition of BMS products covered by the scope of The Code published in July 2013), including infant formula for infants from birth to six months of age, follow-on formula for infants from six months of age, growing-up milks for infants from 12 to 24 months of age and complementary foods indicated as suitable for introduction before six months of age.

substitutes (BMS)

BMS 2: In-country assessments

- A cause for significant concern identified by Westat (the research organization sub-contracted by ATNF to carry out pilot studies of BMS companies' marketing in Vietnam and Indonesia) is that companies' management systems are clearly not fully effective. In total 1,096 incidences of non-compliance with the methodology were found for the six ATNI ranked companies in both Vietnam and Indonesia and 1,630 incidences overall, across all 112 companies included in the studies. This finding is in line with several other organizations' research conclusions. For the six companies in the ATNI sub-ranking, more than seven times more incidences of non-compliance were found in Indonesia than Vietnam. In Vietnam, 31% of these related to growing-up milks and in Indonesia, 85% also related to those products.
- The companies found to have the highest total number of incidences of non-compliance in Vietnam were Abbott (27) and in Indonesia Danone (354) and Nestlé (353). Once these figures were normalised to take into account the number of products each company sells in each city, Mead Johnson had the highest level of non-compliance in Vietnam (2.9) while FrieslandCampina had the highest level in Indonesia (16.8).
- Aggregating the results from both countries, most incidences of non-compliance related to point-of-sale promotions (533), advertising (443) and labels (89) among the six companies being assessed in the ATNI BMS sub-ranking. The least incidences related to informational and education materials in healthcare facilities or retailers (31).

- The Westat studies also revealed 264 incidences of non-compliance among the non-ATNI rated companies assessed in Vietnam and 270 in Indonesia. These companies included other large international and local players. In Vietnam, the other 90 companies accounted for 69% of total number of incidences of non-compliance. In Indonesia, the 16 non-ATNI ranked companies accounted for 22% of the total.

Wider findings

- The lack of clear definitions of a few key terms in The Code, and relating to its application, made it difficult to make decisions about whether some apparent incidences of non-compliance were in fact such; for example, there is no explanation available as to which type of images 'idealise' the use of BMS products. Due to this lack of clarity, the companies' scores do not include any incidences of pictures of baby animals or infant-like cartoon characters, but only images of human infants.
- The industry's self-regulatory code, the 'Rules of Responsible Conduct (RRC)', developed in 2013 for members by IFM fall significantly short of the recommendations of The Code, subsequent WHA resolutions and the WHO's recent clarification of products covered by The Code. A full analysis of the RRC, identifying its weaknesses, is available at www.accesstonutrition.org



BMS

Key recommendations

- All companies assessed need to improve their marketing practices so as to protect and encourage exclusive breastfeeding for the first six months and continued breastfeeding up to two years of age and beyond by marketing their products responsibly, in line with the recommendations of the WHO and UNICEF. This includes the six companies being evaluated by ATNI as well as the other 106 companies assessed in Vietnam and Indonesia.

The six multinationals rated here should:

- Revise their policies where required in order to ensure full alignment with The Code, using the definition of BMS products clarified by WHO in its statement of 17 July 2013. This would include filling gaps in alignment with The Code and relevant WHA resolutions, and committing to applying their policy to all markets and to all types of BMS products.
- Adopt the industry best practice of going beyond compliance with local regulation and following their own policies (strengthened to align fully with The Code) where local regulations are weaker than The Code, while meeting all local legal requirements.
- Plug gaps in, and strengthen their management systems where they are weak, and make greater efforts to ensure they are applied consistently in all markets. Were these systems to be working effectively, they would ensure, for example, that informational and educational materials and samples are not distributed to health care facilities and retailers, that company representatives do not make contact with women, that all BMS product advertising ceases (including on new media, not just traditional media), that no point-of-sale promotions are found and that all labels comply with recommendations of The Code and local requirements.
- Publish their non-proprietary BMS marketing policies in full and publish much more about their management procedures to enable stakeholders to scrutinise them.

Wider recommendations:

- National governments should ensure that they fully implement The Code through local regulations to create a 'level playing field' between all companies selling products in their markets. Strong monitoring and enforcement is also essential to effectively control companies' BMS marketing activities.
- The WHO and other international organizations should continue to encourage and support countries to fully implement The Code and WHA resolutions within national regulations, and to support their monitoring and enforcement activities. This would help to build a more comprehensive picture of manufacturers' marketing activities on which many stakeholders could draw.
- The WHO could also make a valuable contribution to this type of research by publishing additional guidance on its expectations relating to marketing of complementary foods. Another key need is greater clarification of key terms used in The Code that are currently interpreted differently by stakeholders, such as what types of image 'idealise' BMS.
- IFM should revise its Rules of Responsible Conduct to extend their geographic scope to all markets, to all products for infants up to 24 months of age, and remove the clause that companies will follow local regulations in any countries where they are weaker than the Rules.
- The Interagency Group on Breastfeeding Monitoring (IGBM) Protocol, first developed in 2007, which was used by Westat to conduct the studies, should be updated to address the gaps in its scope, including, for example, extending evaluation of companies' advertising to online media and specifying how retailers should be selected to evaluate point-of-sale promotions. It should also include new methodologies to assess other articles of The Code not currently included and extend the scope of products assessed to include all formula products intended for infants up to 24 months old.

About the foundation



About the Access to Nutrition Index

The Access to Nutrition Index is published by the Access to Nutrition Foundation (ATNF), an independent non-profit organisation based in the Netherlands dedicated to objectively assessing and improving the contribution the private sector makes to addressing global nutrition challenges. The primary objective of ATNF is to publish, on a regular basis, a set of Indexes that assess and rates major food and beverage manufacturers' nutrition policies, practices and disclosure. The Index methodology is developed with input from a wide range of global stakeholders including the World Health Organisation, academia, civil society organisations, industry and investors. Since the launch in 2013, more than 40 investment firms have become signatories to the ATNI Investor Statement, with over \$3 trillion assets under management. The Index is funded by the Bill & Melinda Gates Foundation, the Wellcome Trust and the Children's Investment Fund Foundation.

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Note

Sustainalytics Research is responsible for the scoring and ranking of company performance for the Access to Nutrition Index. Sustainalytics Research contributed to the report and company scorecards for the Index, and engaged with food and beverage companies as part of the data collection and analysis process.

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Development

73BIT, a British IT developer, set up the online data platform used to collect and process company data. It also developed automatic scoring sheets and reports that fed into the scorecards.

Ontwerpwerk

multidisciplinary design

Design & development

Ontwerpwerk, a Dutch design agency in The Hague, designed and developed the report and website.



Language editor

Copywriting report and scorecards

