

ACCESS TO NUTRITION INDEX

INDIA SPOTLIGHT SUMMARY 2016



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Acknowledgements

FUNDERS

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This India Spotlight Index was produced by the ATNF team which consists of Inge Kauer, Marije Boomsma and Simona Kramer along with Senior Advisor Rachel Crossley. The team also drafted this report.

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RESEARCH SUPPORT

 **SUSTAINALYTICS**

Sustainalytics, a leading global ESG research and rating provider, that scored and ranked company performance for the Global Access to Nutrition Index in 2016, has also produced the company scores and rankings for the India Spotlight Index. Sustainalytics has 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. Sustainalytics' project team consisted of Andrea van Dijk, Larysa Metanchuk, Marion Oliver, and Trisha Taneja.

 **The George Institute**
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The George Institute, health and medical research institute, conducted the Product Profile assessment in India for the Access to Nutrition Foundation. The George Institute team consisted of Dr Elizabeth Dunford, Alexandra Jones, Dr Bruce Neal, Thout Sudhir Raj and Fraser Taylor with advice of Professor Mike Rayner at Oxford University.

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Westat, a health and social science research organization, conducted the in-country assessment in India of companies that market breast-milk substitutes. The Westat team included Steve Durako, Brenda Brewer, Vibha Vij, Annie Lo, and Katherine Stone. In-country data collection was performed by Westat's subcontractor, CMS in Mumbai, led by Paramita Dasgupta.

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December 2016

Preface

I am very pleased to introduce the first edition of the India Spotlight Index. This is a groundbreaking publication. It provides the first fully independent national assessment of the contribution by India's largest food and beverage (F&B) manufacturers to better health outcomes through good nutrition.

The double burden of malnutrition poses daunting challenges for India: it has both a large undernourished population with the highest number of stunted children in the world – 48 million under the age of 5 are wasted – and a growing pandemic of overweight and obese people suffering from chronic diet-related diseases such as diabetes. Today, the prevalence of overweight and obese children and adolescents between 5 and 19 stands at a staggering 22%. Given the growth in consumption of packaged foods in India and increasing demand in urban areas for healthy food, the nation's F&B manufacturers have the potential to play a pivotal role in tackling the double burden of malnutrition.

Of the 10 largest F&B manufacturers in the country, seven engaged fully in the research for the Index, suggesting widespread awareness of this potential. These seven companies shared confidential data with the Access to Nutrition Foundation (ATNF) in addition to the information they publish.

The 2016 Index reflects extensive consultations conducted between 2013 and 2016. It furnishes a comprehensive and objective assessment of India's major F&B manufacturers' nutrition and undernutrition-related policies and practices in nutrition governance, product formulation, accessibility, marketing, lifestyles, labeling and stakeholder engagement. The Index identifies and highlights a number of best practices that all companies can learn from. It also presents an in-depth analysis of the nutritional quality of the products these companies sell based on the Health Star Rating system. Moreover, the critical importance of advancing and protecting breastfeeding in India is addressed by assessing compliance with India's IMS Act and the International Code of Marketing of Breast-milk Substitutes.

A principal conclusion of our extensive research is that F&B manufacturers in India are falling far short of what they need to do if they are to fulfil their potential in helping to fight the mounting double burden of malnutrition in India. There are also, however, some positive signs: ATNF has identified many good nutrition practices that could be adopted across the industry and several valuable initiatives run by NGOs.

The Government of India, too, has taken important steps towards better nutrition – by, for instance, strengthened food labeling regulations, technical standards for fortification and by having adopted and successfully enforced strong regulations with respect to breast-milk substitute marketing.

To what extent will India's F&B industry rise to the challenge of confronting the double burden of malnutrition? The potential for the industry to be a central actor in meeting the challenge is self-evident. I hope when we publish the second India Spotlight Index in 2018 we will be able to show that the industry has made great strides to address this most critical issue.

I would like to thank the Bill & Melinda Gates Foundation, the Children's Investment Fund Foundation and the Wellcome Trust for supporting ATNF's work. I would also like to thank the members of the Access to Nutrition Foundation Board, the Independent Advisory Panel and the Expert Group, and many Indian experts, our research partners Sustainalytics, Westat and The George Institute, and the ATNF team for their enormous efforts and support in producing the first India Spotlight Index.

Inge Kauer
Executive Director Access to Nutrition Foundation





Executive summary



Overview

In India, the double burden of malnutrition poses a serious challenge – the need to tackle both persistent levels of undernutrition at the same time as rising levels of overweight and obesity. Severe undernutrition has been a national problem for generations and remains so today. According to the latest available data from the National Survey undertaken by the Ministry of Women and Child Development in 2013-14, the prevalence of stunting in children below five years is 39%. This equates to around 48 million children – or two in every five children under the age of five – making India home to the largest number of stunted children in the world. Moreover, among the same population, more than 70% suffer from iron deficiency, 65% are deficient in vitamin A and 45% are zinc deficient.

The gravity of this situation has been greatly compounded in recent years by an alarmingly rapid rise in levels of overweight and obesity in the population. India now ranks third, after the US and China, in terms of the absolute number of obese people. Around 20% of children and adolescents are overweight. These trends, which are predicted to increase substantially, are already causing serious pandemic diseases in the form of diabetes, heart disease, stroke and certain cancers.

Food and beverage (F&B) manufacturers in India have the potential – and the responsibility - to be part of the solution. The serious health consequences of poor nutrition lend urgency to the need for India's F&B manufacturers to proactively adopt impactful initiatives to improve the nutritional quality of their products, as well as other aspects of their businesses, augmented by other non-commercial practices (e.g. how they direct the mandatory Corporate Social Responsibility tax funds). It is in the companies' financial and business interests to do so. Clear incentives are emerging: Indian urban consumers are increasingly demanding healthier foods and the Government is becoming increasingly active by, for example, introducing tighter nutrition labeling regulations and standards for fortification.

The Access To Nutrition Index (ATNI) evaluates the largest food and beverage manufacturers' policies, practices and disclosure related to nutrition, both in individual countries and globally. They provide companies with a tool to benchmark their performance on nutrition against others in their sector and they provide stakeholders with consistent, in-depth information on companies' contributions to improving nutrition. The aim of the Index is to encourage companies to increase access to healthy products and to responsibly exercise their influence on consumers' choice and behavior.

The first Global Index was launched in 2013 and the second in 2016. It gained a positive response from stakeholders, including food and beverage manufacturers, NGOs and investors. Following the publication of the first Global Index, the Access to Nutrition Foundation (ATNF), the organization that designs and publishes the Indexes, conducted research to explore the feasibility of launching Spotlight Indexes to assess companies in markets with a high double burden of malnutrition – India, Mexico and South Africa. The purpose of such Spotlight Indexes is to gather and publish empirical evidence on the performance of companies on nutrition and to strengthen the basis for national dialogue and action to address the double burden.

In this regard, the India Spotlight Index 2016 is groundbreaking. It is the first such Spotlight Index to be published. It assesses the policies, practices and disclosure of the largest multinational and Indian food and beverage manufacturers in India, as well as the nutritional quality of their product portfolios. Moreover, a critical element of the Index is an assessment of the compliance of manufacturers of infant formula and complementary foods (known as breast-milk substitutes or BMS) with local marketing regulations and the International Code of Marketing of Breast-milk Substitutes.



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Methodology and approach

Based on total sales in India in 2014, the ten largest Indian food and beverage manufacturers were selected for assessment for the first India Spotlight Index. They are Gujarat Cooperative Milk Marketing Federation (Amul), Britannia Industries, Coca-Cola India, Mondelez India, Mother Dairy Fruit & Vegetable Pvt. Ltd. (Mother Dairy), Nestlé India, Parle Products Pvt. Ltd. (Parle Products), PepsiCo India, Ruchi Soya Industries Limited (Ruchi Soya) and Hindustan Unilever. In addition to the ten companies that were scored and ranked, four more companies (Adani Wilmar Ltd. (Adani), Cargill India Pvt. Ltd. (Cargill), ITC Limited (ITC) and Karnataka Co-operative Milk Producers' Federation Ltd. (Nandini)) which make and fortify dairy products, oil and/or wheat were approached to be interviewed about their focus on undernutrition, specifically food fortification.

The India Spotlight Index methodology comprises three components:

- **Corporate Profile** – assessing companies' nutrition and undernutrition-related commitments and policies, practices and disclosure in seven Categories:
 - **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.
- **Breast-milk substitutes marketing assessment** – a study that assesses the marketing practices of baby food companies in India.
- **Product Profile** – assessing the nutritional quality of the products of all companies included in the India Spotlight Index.

As in the Global Index, the **Corporate Profile** methodology assessed companies in India against international and national guidelines, norms and accepted good practices, except when such guidance was not available. In those instances, the assessment was based on guidance from a panel of nutrition experts. Suggestions from extensive stakeholder consultations held in India between 2013 and 2016 strengthened the methodology and helped adapt it to the Indian context. For the eventual Corporate Profile score, each company is rated in each category on a scale of zero to ten. In addition to individual Category scores, a company also receives a 'nutrition general' score (which reflects action it takes to address nutrition for all consumers) and an undernutrition score (which reflects action it takes in respect of

undernourished consumers). A score of zero indicates that no evidence was found for any positive nutrition-related commitments, practices or disclosure; a score of ten signifies that the company is achieving best practice according to the current state of knowledge and consensus reflected by the ATNI Corporate Profile methodology.

Company assessments for the Corporate Profile were conducted by the global responsible investment research firm Sustainalytics. The assessments were based on publicly available documents, supplemented by information provided by each company via an online data platform developed by IT provider 73BIT. Companies that did not submit documentation, information or data to Sustainalytics during the research process were ranked solely on information published online.

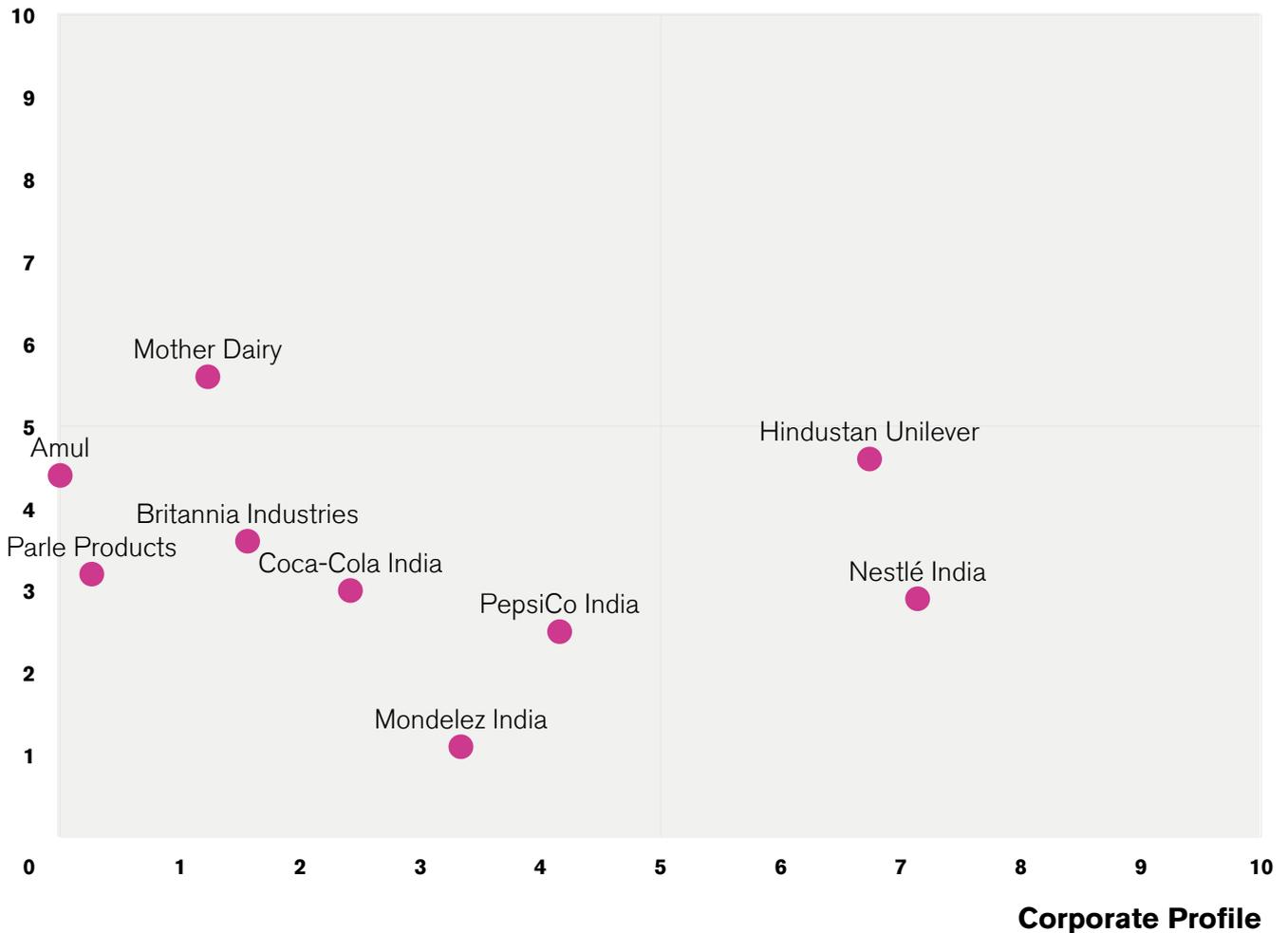
The **BMS marketing assessment** was undertaken in Mumbai during the summer of 2016. This assessment follows the approach taken in the 2016 Global Access to Nutrition Index to assess infant foods companies' marketing practices within India. It assesses these companies' compliance with the International Code of Marketing of Breast-milk Substitutes (The Code), subsequent World Health Assembly (WHA) resolutions and the India regulation that controls the marketing of infant formula and complementary foods i.e. The India Infant Milk Substitutes, Feeding Bottles and Infant Foods (Regulation of Production, Supply and Distribution) Act, 1992 as amended in 2003 (IMS Act). The study was undertaken using the Interagency Group on Breastfeeding Monitoring (IGBM) Protocol. The research was carried out by specialist research organization Westat, based in Rockville, Maryland (U.S.), working closely with The Centre For Media Studies (CMS) Research House, based in New Delhi, which undertook the in-country data collection. All companies (8) whose BMS products were found for sale in Mumbai were included in the study.

The **Product Profile** primarily assesses the nutritional quality of products sold by the Index companies, using the Health Star Rating (HSR) nutrient profiling system. This system analyzes the level of several positive nutrients (e.g. fruits and vegetables and fiber) and several negative nutrients (e.g. salt and fats) in products, and generates a rating for each product from 0.5 stars (the lowest rating, indicating a product has low nutritional quality) to five stars (the highest rating, indicating that a product has a high nutritional quality). Weighting the HSR for each product category by the sales of that category, and re-basing that score on a scale of one to 10, generates the overall Product Profile score. A score of 10 indicates that all of a company's sales derive from the healthiest possible products; a score of one indicates that a company's revenues are generated from selling only the least healthy products. ATNF commissioned The George Institute for Global Health, based in Sydney, Australia, with offices and extensive experience of working in India, to undertake this research.

Overall Score and Ranking

In the India Spotlight Index, all companies are given two separate scores and ranks: one for the Corporate Profile and one for the Product Profile.

Product Profile



The overall ranking matrix presents companies' performance on the two key elements of the India Spotlight Index: the Corporate Profile and the Product Profile.

- The Corporate Profile score summarizes companies' performance across all seven Categories of the Corporate Profile methodology in terms of their response to obesity, diet-related chronic diseases as well as undernutrition. Companies with a low rank and score make little if any information about their nutrition policies and practices publicly available and had minimal or no engagement in the research process. Companies with a higher rank and score typically publish more information, engaged in the research process and have stronger nutrition commitments and practices. The scores of the companies that produce and market breast-milk substitutes in India have been adjusted based on their scores on the BMS assessment.
- The Product Profile shows how nutritious the products are that each company sells in India, i.e. the nutritional quality of their product portfolio weighted by retail sales. Companies that score relatively low derive the majority of their sales from less nutritious products. Companies with a higher rank and score generate a higher proportion of their sales from more nutritious products.

Key findings

The majority of the companies actively engaged in the first India Spotlight Index, demonstrating that they see value in doing so

The first India Spotlight Index assessed the ten largest food and beverage manufacturers in India by sales. Seven of the ten companies actively engaged in the research process, i.e. provided unpublished information to augment ATNF's research based on public sources. In addition to five multinational companies (MNCs), two Indian-based companies engaged in the Index research process: Britannia Industries and Mother Dairy. The other Indian-based companies did not submit data but two showed interest in the initiative by attending various meetings and two of the four approached to be interviewed about their fortification practices did so. This level of active participation in the first India Spotlight Index is welcomed and provides a good starting point for future engagement with the Indian food and beverage industry.

Taken as a whole, the largest food and beverage manufacturers in India are falling far short of what they need to do to help fight the enduring and mounting double burden of malnutrition in India

Only around 12% of the beverages sold by the Index companies and 16% of the foods were estimated to be of high nutritional quality in the Product Profile analysis. This worrying picture shows that many manufacturers have much work to do to improve the nutritional quality of many of their products and/or to invest in new product development to broaden their product offering. Despite the small role packaged products currently play in many Indian people's diets, F&B manufacturers in India have an unprecedented opportunity, as consumption of these products starts to grow in line with increasing incomes to become a major part of the solution to India's double burden of malnutrition. This will not happen, however, in the absence of major and urgent changes to companies' core business models and their product portfolios.

Mother Dairy leads on the Product Profile and Nestlé India leads on the Corporate Profile

On the Corporate Profile, the highest-ranking companies are Nestlé India and Hindustan Unilever, scoring 7.1 and 6.7 out of 10 respectively. All of the MNCs score higher on the Corporate Profile than the participating Indian-based companies. The parent companies of the former tend to publish a range of commitments, policies and reports, many of which apply in India; the latter tend to have more limited policies and disclosure of nutrition-related activities. Two companies score particularly poorly – Amul and Parle Products – they did not participate in the research process, published little or no information and received no points in several categories. Their scores and ranking may therefore only be partly representative of any efforts they are making to tackle India's nutrition challenges.

Nestlé India scores better on the Corporate Profile of the India Index than its parent did on a global basis. The Corporate Profile scores on the India Spotlight Index of Hindustan Unilever and Coca-Cola India are broadly similar to their parent companies' scores on the 2016 Global Index. PepsiCo India also performs better than its parent company did, but Mondelez India performs more poorly; the latter can be explained by the company's more limited product portfolio in India and low levels of disclosure about its activities in India.

On the Product Profile, Mother Dairy ranked first, Hindustan Unilever second, Amul third and Britannia Industries fourth. The lowest ranking companies are PepsiCo India in eighth place and Mondelez India in ninth place. This is because a large proportion of PepsiCo's revenues are generated by snacks and sugar-sweetened beverages and because Mondelez sells mainly confectionary.

All companies score relatively well on nutrition commitments. Indian-based companies can improve by adopting and disclosing their nutrition strategies and policies

Eight of the ten companies assessed (Britannia Industries, Mondelez India, Mother Dairy, Nestlé India, PepsiCo India, Parle Products, Coca-Cola India and Hindustan Unilever) make strategic commitments to grow their businesses by focusing on health and nutrition. In addition, the policies of six of these eight companies recognize that they have a role to play in tackling increasing levels of obesity and diet-related chronic diseases in India.

The subsidiaries of global corporations adhere to the global health and nutrition policies and strategies of their parent companies. These include responsible marketing policies covering all consumers and children, employee health and wellness programs, maternity policies including facilities to support breastfeeding mothers and a commitment to labeling products according to Codex guidelines. The wide-ranging commitments in their strategies and policies result in high scores across most areas of the Index. Conversely, the Indian-based companies typically do not have formal strategies and have more poorly codified management procedures related to nutrition and poor disclosure. Disclosure of actions they are taking to improve their nutrition footprint tends to be incomplete.

All companies can do more to ensure that their healthy products are more affordable and accessible in India

All companies can do more to ensure that their healthy products are more affordable and accessible in India. As with the Global Index, Category C (Affordability and Accessibility) is one of the lowest scoring categories, with an average score of only 1.9 out of 9. Most companies do not seem to have considered the importance of ensuring that healthy products are affordable and accessible, particularly to low-income consumers, and do not appear to have developed any commitments or policies in this regard.

All companies can invest more in engagement to promote healthy balanced diets across India

Category G (Stakeholder Engagement) is also a low scoring category, with an average score of 1.3 out of 10. Most companies do not disclose information about their membership or funding of industry organizations that lobby policymakers nor about their engagement with other stakeholders concerned about nutrition issues. The companies assessed for the Index demonstrate varying levels of stakeholder engagement. The overall picture, however, indicates that they need to be much more proactive in advancing dialogues with their key stakeholders on how they might improve their nutrition strategies and practices if goals to address India's double burden of malnutrition are to be met.

Nine of the companies have established a commitment to combatting undernutrition by fortifying their products – but they must significantly scale up these activities if they are to truly deliver on their commitments.

Establishing a clear and transparent commitment to fortification is an essential first step and companies are to be lauded for this. But in reality, companies have a long way to go before they deliver on their commitments. Operationalizing the commitment in the context of a focused strategy is hard work and companies need to devote more resources to it. Only five of the companies assessed disclose a commitment to addressing undernutrition by fortifying appropriate products (and/or using fortified ingredients) and only two, Britannia Industries and Nestlé India, of these five companies disclose having undertaken comprehensive market research to inform their product fortification strategy.

Nestlé India leads the rank when it comes to addressing micronutrient deficiencies through product fortification, followed by Britannia Industries. Only Nestlé India and Britannia Industries have a structured approach to product fortification with relevant commitments and programs. They also engage in other non-commercial initiatives designed to disseminate fortified products to those who need them.

Despite some examples of leading practice, in particular, the oil fortification activities of Cargill, most companies still need to develop full-scale commercial product fortification programs. Similarly, in terms of philanthropic activity in this area, companies generally demonstrate an ad-hoc approach to supporting programs that deliver fortified products or educate undernourished consumers. There is a significant opportunity for the industry to work together and in partnership with other key actors to develop a large-scale joined-up approach to tackling undernutrition in India.

Mother Dairy, Hindustan Unilever and Amul sell the largest proportion of healthy products among the companies assessed

The comprehensive Product Profile study – the first of its kind to be published in India – demonstrates that, relative to the other companies included in the Index, Mother Dairy, Hindustan Unilever and Amul deliver the highest level of sales of products of high nutritional quality. Mother Dairy has a broad portfolio comprising nine categories of products, whose Health Star Ratings range from the maximum possible of five stars for its frozen fruit and vegetables to its butter, margarine and other dairy categories, which score an average of two stars or more. The company scores 5.6 on the Product Profile ranking. The average number of stars for Hindustan Unilever products within each category ranged from 0.5 out of 5 stars (the lowest score possible) for its

liquid concentrates to 3.8 out of 5 stars for its soups. Its Product Profile score is 4.6. Amul's sales-weighted portfolio has a rating of 2.2 out of 5 on average with an overall Product Profile score of 4.4.

PepsiCo India and Mondelez India rank lowest on the Product Profile study in eighth and ninth place respectively, indicating that their product portfolios are least healthy according to the Product Profile, which assessed the nutritional quality of companies' sales.

Large-scale effective fortification requires clear and enforceable government standards, accompanied by commitment and investment by the companies to build the market for fortified products

Fortification is recognized as the most effective strategy to address micronutrient deficiencies. However, in India, only 2% to 5% of foods are believed to be fortified with the micronutrients lacking in many Indian's diets. The foods that are fortified are mostly staples, such as dairy and wheat, fortified with vitamins A, D, C and iron among other micronutrients. Most companies assessed produce no or very few fortified packaged products, and often those which they do fortify are not healthy products. Cargill is the exception which has shown leadership by fortifying its oils voluntarily. Moreover, other than one or two examples of companies using salt fortified with iodine to make their products, most do not commit to exclusively using fortified ingredients such as wheat or milk.

However, the technical fortification standards for several commodities launched by Food Safety and Standards Authority of India (FSSAI) in October 2016 could provide the much-needed central leadership to scale up fortification and create a "level playing field" for companies. This major step taken by the government affords the perfect opportunity to the F&B industry to declare its support, and for companies to set bold, specific targets to build the market for fortified foods and to deliver fortified products to millions of consumers across India.

Companies' marketing of breast-milk substitutes in Mumbai was found broadly to comply with the requirements of the IMS Act and The Code, with some concerning exceptions

In consultations before the assessment of the marketing of breast-milk substitutes (BMS) was undertaken, in the summer of 2016, local experts noted that the Indian IMS Act is fully aligned with, and in some areas, more demanding

than The Code. Moreover, they said it was unlikely to find many incidences of non-compliance. That was, in fact, the case. Public advertising of BMS products monitored appeared to be virtually non-existent, at least in Mumbai. Further, no point-of-sale promotions of BMS products were found in any of the 'bricks and mortar' retail establishments visited. Few printed informational or educational materials were found in clinics or shops, and company representatives appear to have little direct contact with women or healthcare workers. The labels of all but one product made for the Indian market complied with labeling regulations. The only products not to have compliant labels were seven parallel imports, i.e. products intended to be consumed in other countries. This is a credit to the strength of the IMS Act, or its diligent application by healthcare workers and vigilant monitoring by local stakeholders such as the Breastfeeding Promotion Network of India (BPNI).

Some indications were found of marketing and promotion of BMS products in ways that circumvent the IMS Act and The Code, and which are difficult to monitor and enforce

The study noted that some online retailers offer promotions and price discounts. However, such stores may not directly procure the products they sell from the manufacturers and may decide on promotions and discounts themselves, rather than such promotions being initiated by the manufacturers. Also, various marketing websites were found to invite mothers to "sign-up" to access information and engage in exchanges with other members. While there were no reports of non-compliance with the IMS Act by such marketing sites, they are potential routes through which companies can establish brand recognition and profile.

Key recommendations

Companies

Most Index companies make strategic commitments to grow their businesses by focussing on health and nutrition, and there are examples of several good corporate nutrition practices. However, the aggregate picture of the current nutrition performance of India's largest food & beverage (F&B) companies underscore that they have a long way to go if they are to achieve their goals and make a significant contribution to tackling the double burden. The translation of words into actions will require ambitious, clear strategies that include specific, measurable and time-bound commitments in all areas of their businesses, including:

- Although the majority of the companies recognize their role in addressing India's serious nutrition challenges, Indian-based companies particularly have yet to develop and disclose clear nutrition strategies to show that they intend to play a major role. **All companies must integrate a nutrition strategy into their core business, and set and deliver on a range of commitments if they are to have substantial, measurable effects on nutrition outcomes.**
 - **All companies that have not yet done so, particularly the multinational companies that score lowest on the Product Profile, should adopt and implement a comprehensive strategy to develop healthier products.** This should be underpinned by a Nutrient Profiling System (NPS) that accurately defines healthy products which is then used to assess their product portfolios and monitor progress in improving them. They are specifically encouraged to commit to reducing levels of salt, saturated fats, trans fats and added sugars across their product portfolios, as relevant, by setting specific targets and deadlines for achieving those targets.
 - **All companies are encouraged to adopt formal policies and/or commitments to ensure the affordability and accessibility of healthy products (to help to reduce levels of overweight and obesity across India) and of fortified products (to help consumers who are deficient in key micronutrients).**
 - **Companies who have not yet done so should adopt a strong responsible marketing policy for all consumers, as well as a separate, more detailed policy on responsible marketing for children.** To align with their peers in the Indian market, and international standards, companies are encouraged to sign the recently relaunched Food & Beverage Alliance of India (FBAI) marketing pledge at a minimum.
- All companies should also prohibit marketing activities in and near primary and secondary schools and monitor their compliance with both marketing policies.
- **Indian-based companies particularly are encouraged to develop commitments to support healthy eating and lifestyle programs for their staff and programs for consumers designed and implemented by independent expert organizations.** All companies should set targets for staff participation and for the health outcomes the programs intend to achieve and track their progress in achieving them. Moreover, companies are encouraged to demonstrate the impact of their staff health and wellness and their consumer health programs by commissioning and publishing independent evaluations of them. Similarly, companies are encouraged to go beyond legal compliance with respect to supporting breastfeeding mothers at work and offer six months or more maternity leave.
 - **Although most companies largely comply with Indian labeling regulations, Indian-based companies particularly should adopt formal commitments to disclose more nutrition information on product labels, in line with Codex standards.** Similarly, they should make stronger commitments to follow Codex guidance on the use of health and nutrition claims given that Indian regulations are weaker in this area. Companies that have not yet done so should take steps to provide full product nutrition content information online for all of their products.
 - **All companies should also improve their disclosure with respect to their involvement in organizations that engage with political parties, policymakers and policymaking bodies on nutrition issues.** They should also publish policy positions on key issues, such as marketing to children, product labeling etc. All those companies that do not yet do so, should engage with stakeholders on their nutrition and undernutrition strategies and practices to solicit their feedback and be transparent about these activities.
 - **Considering the large number of undernourished people in India, companies that have not yet done so should commit to source fortified staples for use in their products where possible and adopt a systemic approach to tackling undernutrition by producing fortified products tailored to the needs of priority populations, such as young children and women of childbearing age.**

- **Companies are encouraged to use their CSR tax contributions to support organizations that deliver proven interventions to address undernutrition.**

Government and other stakeholders

The Government of India has a critical role to play in encouraging companies to scale up their efforts to solve the country's severe malnutrition challenge and providing a level playing field in which they can operate. This requires a strong, transparent and enforceable framework of evidence-based policies and standards on various aspects of nutrition and health, in line with international norms and standards set by the WHO, Codex and others. The government has already invested in trying to improve nutrition in India, however, other specific areas in which it could invest further include:

- **Enabling and encouraging food and beverage companies to introduce fortified packaged products to address the specific widespread micronutrient deficiencies.**
- **Providing leadership, for instance, by making use of more fortified staple ingredients compulsory in government programs, such as the Mid Day Meal Scheme in schools.**
- **Developing an enforceable code on marketing unhealthy products to children (and all consumers).**
- **Extending existing nutrition content labeling regulations in line with Codex standards.**

In addition also other stakeholders, such as civil society organizations, research institutes are encouraged to engage more with F&B manufacturers, as well as with policymakers and standard-setting organizations, to support the implementation of these recommendations through multi-stakeholder engagement.

While the IMS Act is strong and comprehensive, and incidences of non-compliance appear to be relatively few, the government and concerned stakeholders should consider how the activities of online retailers and marketing sites might be brought into line with – or deterred from contravening – the requirements and how parallel imports can be prevented.

Future outlook

The company and stakeholder discussions, and the research process behind the publication of the first India Spotlight Index have convinced ATNF that the Index has the potential to be a valuable tool to monitor the F&B industry's contribution to addressing India's nutrition challenges and to encourage it to invest more in doing so.

Moreover, the Index will have greater impact if more companies engage with ATNF in the development of future Indexes, and if it is expanded to cover more food and beverage manufacturers or even retailers, fast food companies and others in the value chain.

To maximize the value of the Index and amplify its impact, it is essential to create a deeper, more widespread awareness among the industry about India's nutrition challenges and to articulate the need for this rapidly growing sector to become an active, leading player in addressing those challenges. Similarly, the impact of the Index depends in part on other stakeholders taking up its findings and recommendations and working to implement them.

The Product Profile has shown how valuable such studies are in establishing a fact-base for companies and other stakeholders to work with to increase the number and range of healthy packaged foods and beverages available to Indian consumers. While it has some weaknesses and limitations, these do not undermine its value. The most valuable way that Indian stakeholders could strengthen future ATNI Product Profile studies, and similar work of others, is to adapt an existing well-verified NPS to the Indian context. Companies in India could then also use this system to underpin reformulation activities, new product development and to restrict marketing to children.

With respect to the marketing of breast-milk substitutes, ATNF hopes that when it conducts a follow-up study for the second India ATNI, no incidences of non-compliance will be found because companies will have addressed those identified in this study. Moreover, ATNF hopes that the Government will be able to take action to prevent parallel imports and address any non-compliant activities of online retailers and marketing sites.



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Board, Independent Advisory Panel and ATNI Expert Group

Two multi-stakeholder groups – the Expert Group and the Independent Advisory Panel – have provided advice on many aspects of ATNI's development since January 2011. This includes the India Spotlight Index pilot research and the first India Spotlight Index. Since part of the intended impact of ATNI includes active engagement by various stakeholder groups with F&B manufacturers, the Index needed to be a useful tool for a range of interested parties. This led to the selection of Expert Group and International Advisory Panel members with a wide range of expertise including India country experience. In order to ensure the independence of the Index development process, no current executives from F&B companies were members of either group.

Members of each of these groups have served in their personal capacities and in an advisory role. The views in this report do not necessarily reflect the views of these members or of their institutions. The ATNI development team is responsible for the final scope and content of the Index.

Board

Board	
Keith Bezanson	<i>Chair of the Board of ATNF and Chair Independent Advisory Panel, Access to Nutrition Foundation Former President, International Development Research Centre; Former Director, Institute of Development Studies</i>
Lauren Compere	<i>Managing Director, Boston Common Asset Management</i>
Inge Kauer	<i>Executive Director Access to Nutrition Foundation.</i>
Paula Luff	<i>CEO Viso Strategies Corporation Board Philanthropy New York; Senior Associate with the Project on Prosperity and Development at the Center for Strategic and International Studies</i>
Kathy Spahn	<i>President and Chief Executive Officer, Helen Keller International Board member of InterAction, International Agency for the Prevention of Blindness (IAPB), and the Bernadotte Foundation for Children's Eyecare</i>
Susanne Stormer	<i>Vice President, Chief Sustainability Officer, Novo Nordisk, Denmark Adjunct professor, Corporate Sustainability, Copenhagen Business School Member International Integrated Reporting Council.</i>
Marc Van Ameringen	<i>Former Executive Director Global Alliance for Improved Nutrition (GAIN)</i>
Paulus Verschuren	<i>Founder WorldFed NL; Former Special Envoy Food and Nutrition Security Ministry of Foreign Affairs, The Netherlands; Former Senior Director Unilever Global Health Partnerships; Former Executive Director International Life Sciences Institute – ILSI Europe</i>

Independent Advisory Panel

The mandate of the Independent Advisory Panel is to provide strategic, advice on the development of the ATNF. It focusses on how to make ATNI more useful and effective, what institutional arrangements should be made to sustain ATNI over time, and how to engage with a variety of stakeholder groups regarding the objectives and findings of the ATNI.

Independent Advisory Panel	
Keith Bezanson	<i>Chair of the Board of ATNF and Chair Independent Advisory Panel, Access to Nutrition Foundation; Former President, International Development Research Centre; Former Director, Institute of Development Studies.</i>
Ashish Deo	<i>Head of Commercial Solutions, Children's Investment Fund Foundation (CIFF).</i>
Shiriki Kumanyika	<i>Chair ATNI Expert Group, Access to Nutrition Foundation; Professor Emerita of Epidemiology, Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania.</i>
Nicola Perrin	<i>Head of Policy, Wellcome Trust.</i>
Juan Rivera	<i>Founding Director, Center for Research in Nutrition and Health, National Institute of Public Health, Mexico.</i>
Marie Ruel	<i>Division Director, Poverty, Health and Nutrition, IFPRI.</i>
Senoe Torgerson	<i>Senior Program Officer, Bill & Melinda Gates Foundation.</i>
Victoria Quinn	<i>Senior Vice President of Programs, Helen Keller International.</i>
Observer: Francesco Branca	<i>Director, Department of Nutrition for Health and Development, World Health Organization.</i>

ATNI Expert Group

The function of the ATNI Expert Group is to provide input into the development of the company assessment methodology and to review the analysis and Index report. This group consists of members with expertise in various aspects of nutrition (including both undernutrition and obesity and diet-related chronic diseases) and the role of the F&B industry when it comes to nutrition.

ATNI Expert Group	
Lindsay H. Allen	<i>Director</i> USDA ARS Western Human Nutrition Research Center <i>Research Professor</i> Department of Nutrition, UC Davis.
Terry T-K Huang	<i>Professor</i> School of Public Health, City University of New York.
Shiriki Kumanyika	<i>Chair</i> ATNI Expert Group <i>Professor Emerita of Epidemiology</i> Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania.
Linda Meyers	<i>Senior Science Advisor</i> for the American Society for Nutrition (ASN).
CS Pandav	<i>Professor and Head</i> Centre for Community Medicine, All India Institute of Medical Sciences (AIIMS).
Mike Rayner	<i>Director</i> British Heart Foundation Health Promotion Research Group, University of Oxford.
Boyd Swinburn	<i>Professor</i> Population Nutrition and Global Health at the University of Auckland and Alfred Deakin <i>Professor and Director of the World Health Organization (WHO) Collaborating Centre for Obesity Prevention at Deakin University in Melbourne.</i>
Kapil Yadav	<i>Assistant Professor</i> All India Institute of Medical Sciences (AIIMS).

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Note

Sustainalytics has produced the scoring and ranking of company performance for the Corporate Profile of the India Spotlight Index. Sustainalytics 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.

Westat is responsible for the collection of data related to company compliance with the International Code of Marketing of Breast-milk Substitutes and any additional country-specific regulations related to marketing of these products in Mumbai. Westat is responsible for the analysis of the data related to compliance with the BMS marketing standards and for the preparation of its final study report, the results of which have been incorporated by ATNF into the 2016 India Spotlight Index report and the scoring of company performance for the same Index.

The George Institute (TGI) is responsible for the nutrition and labeling data collection for the Product Profile assessment in India. TGI is also responsible for the analysis of the nutrition and labeling data related to the Product Profile and the TGI Product Profile final report, the results of which have been incorporated by ATNF into the 2016 India Access to Nutrition report and the scoring of company performance for the same Index.

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Development

73bit Limited (www.73bit.com)

Probench a tool developed by 73bit, set up the online data platform used to collect and process company data. Probench was also used to develop automatic scoring sheets and reports that fed into the scorecards.

ontwerpwerk

Design & development

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

Language editor

Koan Communications: copywriting report and scorecards.

