

# U.S. INDEX 2018

## METHODOLOGY

DEVELOPMENT, STRUCTURE, SCOPE, CONTENTS,  
SCORING AND RESULTS PRESENTATION

November 2018



ACCESS TO  
**NUTRITION**  
INDEX™

**U.S. INDEX 2018**  
METHODOLOGY

# Table of contents

---

<b>Introduction .....</b>	<b>5</b>
<b>Conceptual framework: corporate benchmarking .....</b>	<b>7</b>
<b>ATNF's Index methodology design process .....</b>	<b>9</b>
Purpose and Theory of Change behind ATNF's Indexes .....	9
Stakeholder consultation and expert input .....	10
Original Global Index Corporate Profile methodology development .....	12
Spotlight Index development.....	14
Product Profile methodology development.....	15
BMS Marketing methodology development .....	16
<b>Key Index elements and scope.....</b>	<b>17</b>
Key Index elements.....	17
The Corporate Profile (CP) .....	17
The Product Profile (PP).....	17
The Breast-milk Substitutes (BMS) Marketing assessment.....	18
Topics beyond the scope of all Indexes .....	18
<b>Structure of the methodologies and approach to scoring and ranking .....</b>	<b>20</b>
Corporate Profile methodology .....	20
Product Profile methodology.....	23
The BMS Marketing methodology.....	26
<b>The U.S. Spotlight Index 2018.....</b>	<b>30</b>
Specific aim of the U.S. Index.....	30
Basis of, and approach to developing, the U.S. Index methodology .....	30
Company selection .....	31
<b>Key U.S. Index elements .....</b>	<b>33</b>
Corporate Profile methodology .....	33
Adaptation of the Corporate Profile methodology to the U.S. context .....	33
U.S. Index Corporate Profile Methodology structure .....	34
Approach to scoring and weighting .....	35
Limitations to the Corporate Profile methodology .....	36
Product Profile methodology.....	37
Adaptation of the Product Profile methodology to the U.S. context .....	37
Limitations to the Product Profile methodology .....	37
BMS Marketing assessment .....	39
Adaptation of the BMS Marketing methodology to the U.S. context.....	39
Approach to U.S. BMS Marketing assessment.....	39
Limitations to the U.S. BMS Marketing assessment.....	40
Further research limitations and considerations.....	40

<b>U.S. Index Research methods .....</b>	<b>42</b>
Corporate Profile .....	42
Product Profile .....	43
BMS Marketing .....	43
Quality assurance processes.....	44
<b>Future development of the U.S. Spotlight Index .....</b>	<b>45</b>
<b>Appendices .....</b>	<b>46</b>
Appendix I: U.S. Index Corporate Profile Methodology 2018 .....	46
Section 1 - Nutrition governance and management .....	46
Section 2 - Formulating and delivering appropriate, affordable, accessible products .....	50
Section 3 - Influencing consumer choice and behavior.....	58
Appendix II: Organizations consulted .....	74
Appendix III: ATNI U.S. Expert Group members .....	75

# Introduction

---

This document sets out the approach used to design and publish the first U.S. Spotlight Index, and specifically how the methodologies for the various elements of the Index were developed and their scope and content.

The U.S. Access to Nutrition Index was developed between 2016 and 2018, and published in November 2018, by the Access to Nutrition Foundation (ATNF). The Index is a tool that can be used by major U.S. food and beverage manufacturers to benchmark their nutrition practices and serve as an impartial source of information by a wide range of stakeholders. ATNF's purpose in publishing the Index is to encourage these companies to increase U.S. consumers' access to nutritious products and responsibly exercise their influence on consumers' choice and behavior.

The U.S. Spotlight Index is modeled on the Global Access to Nutrition Index, the concept and methodology for which was initially developed by the Global Alliance for Improved Nutrition (GAIN) over a four-year period from 2009 to 2012. The Index concept was developed through extensive consultation with stakeholders including companies, governments, international organizations, civil society organizations, academia, and investors. Three Global Indexes have been published to date: the first in March 2013, the second in January 2016 and the third Index in March 2018. These Indexes scored and ranked the performance of the world's largest global F&B manufacturers' nutrition policies, practices and disclosure, using the Corporate Profile. The Indexes also include an assessment of world's six largest baby food manufacturers' marketing policies and practices. The third Global Index also introduced a new element - the Product Profile – which assesses the nutritional quality of the companies' product portfolios.

Shortly before the publication of the first Index, ATNF was established as a not-for-profit organization, based in the Netherlands. ATNF is independent from the companies it rates, and the wider food and beverage industry. It is overseen by a Board of Directors. Further information about ATNF's governance and operating policies is available [here](#). At the time of the first U.S. Index publication, ATNF was funded by the Bill & Melinda Gates Foundation, the Dutch Ministry of Foreign Affairs (DGIS), the Robert Wood Johnson Foundation and the UK Government's Department for International Development (DFID). ATNF is also pleased to have the support of 55 institutional investment organizations that manage more than U.S. \$5 trillion. These investors have pledged their support by signing the [Investor Statement](#). They engage directly with companies in which they are shareholders to encourage them to improve their performance on nutrition because they believe doing so is critical to delivering long-term shareholder value.

The following sections describe the approach that ATNF uses to develop its Indexes, including the Theory of Change that guides the Foundation's work. It outlines the main topics addressed by each Index and provides an explanation of the different elements of the Indexes: The Corporate Profile, the Product Profile and the Breast-milk Substitutes (BMS) Marketing assessment. Further, the U.S. Index Methodology is set out, with detail about the company selection, the approach used to data collection, and the scoring and ranking applied in the U.S. Index. This document concludes with commentary about the Foundation's intentions in terms of publishing future U.S. Indexes. A full description of the indicators used in this Methodology is included in Appendix I.

# Conceptual framework: corporate benchmarking

---

Over the last two decades, independent benchmarks and ranking initiatives have proliferated and diversified, as have financial indexes that take into account corporate performance on a range of environmental, social, governance and ethical issues. Research done several years ago identified more than 100 at that time, and today there are even more.<sup>1</sup>

The Indexes that ATNF publishes are modelled on the types of benchmarks developed for or by the investment and finance community primarily. However, others have been developed by industry associations or similar groupings of companies, and by NGOs, to determine and compare companies' performance on one or a range of environmental, social or governance aspects of their businesses. These benchmarks are broadly similar: they typically assess one or more of the following: i) companies' policies or commitments on the selected issue or issues; ii) their approach to, and progress in, managing the selected issues, and; iii) the extent of their disclosure of their policies and practices. They can be used in various ways: i) by investors in their investment research and investment decision-making, or in their engagement with companies in which they invest; ii) by companies to compare their performance to their competitors, and develop better strategies and plans, and, ii) by organizations or individuals (e.g. in academia, the media, policymakers, certification agencies and auditors, or corporate advisors) interested in companies' contribution to addressing the issue that is the focus of the initiative.

One of the first steps taken by the Global Alliance for Improved Nutrition (GAIN), the organization that incubated the Indexes, in designing the Access to Nutrition Indexes was to undertake an in-depth analysis of 32 such benchmarks and indexes to learn from them and incorporate their best features. Several of those assessed, including the Access to Medicine Index, the Carbon Disclosure Project or the Forest Footprint Disclosure Project continue to be published today.<sup>2</sup>

The Access to Nutrition Indexes aim to embrace the key principles that emerged from that analysis outlined in Box 1 in order to provide robust, comprehensive, independent analysis of the world's largest food and beverage manufacturers' contribution to addressing the world's nutrition challenges.

---

<sup>1</sup> For more information, see: SustainAbility (2011). *Rate the Raters Phase Four: The Necessary Future of Ratings*. Available at: [http://sustainability.com/wp-content/uploads/2016/07/rtr\\_phase\\_4\\_report.pdf](http://sustainability.com/wp-content/uploads/2016/07/rtr_phase_4_report.pdf); and SustainAbility (2018). *Rate the Raters 2018: Ratings Revisited*. Available at: [http://s10458.pcdn.co/wp-content/uploads/2017/12/SA-RateTheRaters\\_Ratings-Revisited\\_March18.pdf](http://s10458.pcdn.co/wp-content/uploads/2017/12/SA-RateTheRaters_Ratings-Revisited_March18.pdf).

<sup>2</sup> More information on these can be found in:

- Access to Medicine Index [online] Available at: <https://accesstomedicineindex.org/>
- Carbon Disclosure Project (n.d.) Carbon Disclosure Project [online] Available at: <https://www.cdp.net/en>
- Forest Footprint Disclosure Project (n.d.) Forest Footprint Disclosure Project [online] Available at: <https://www.nepcon.org/newsroom/forest-footprint-disclosure-project>

## **Box 1: Key design principles that guide the Access to Nutrition Indexes**

### **Base the assessment methodologies on prevailing international standards, norms and established best practices where possible**

ATNF Indexes aim to reflect the existing consensus on best practice, not to define such practices. Prevailing international standards, norms and established best practices form the starting point of the methodology. The Index does not assess compliance with regulations or law but the degree to which companies voluntarily take their responsibility to improve their policies, practices and products.

### **Recognize current state of knowledge and continually evolve**

As knowledge and practices about diets, nutrition and health continually evolve, the methodology should be revised at regular intervals to reflect this, while striving to retain comparability over time.

### **Ensure relevance and applicability to a range of company types**

The ATNF methodologies are designed to evaluate the degree to which core business activities such as product formulation, marketing, distribution and product labeling embed nutrition considerations. This type of assessment is relevant to a variety of company ownership types (i.e. publicly listed and privately owned), as well as companies with different product portfolios (primarily food, primarily beverages, or a mix of both).

### **Identify, reward and spread good practice**

Access to Nutrition Indexes aim to generate 'healthy competition' among the ranked companies to encourage them to do better in each future Index iteration, thereby demonstrating their increasing contribution to addressing critical nutrition challenges. They are not intended to be 'name and shame' exercises. The Corporate Profile therefore awards credit for good practice beyond minimum standards, rather than penalizing companies for poor practice. The Product Profile aims to highlight which companies have the healthiest portfolios and the healthiest products within categories, to stimulate them to improve their products and increase their contribution to public health.

### **Encourage transparency as well as good practice**

The ATNF Indexes award credit to companies not only for their policies and practices, but also for the level and quality of their public reporting. High levels of transparency allow other stakeholders to better understand the extent to which companies are addressing nutrition and undernutrition matters, and to engage with them about their approach and effectiveness.

### **Utilize an inclusive approach, incorporating multi-stakeholder input**

Input from relevant stakeholder groups – including policymakers, experts, civil society organizations and industry – was sought throughout the original methodology development process and subsequent revisions. This applies to the Global Index methodology, which served as the basis for the Spotlight Index methodology, and the same approach was applied in the development of the latter's methodology.

# ATNF's Index methodology design process

---

This chapter describes how the methodology for all Indexes was originally developed to provide an understanding of their scope and unique attributes. This is important background because the methodologies for all Spotlight Indexes are derived from the Global Index methodology.

The first section outlines the purpose of the Indexes and Theory of Change behind them and then outlines the critical role that stakeholder consultation and expert input plays in all methodology design and development. The following section explains the steps that were followed to design the Global Index methodology initially and the three elements that make up the Indexes at present. The chapter ends with a description of the scope of the Indexes, i.e. the topics they include and exclude.

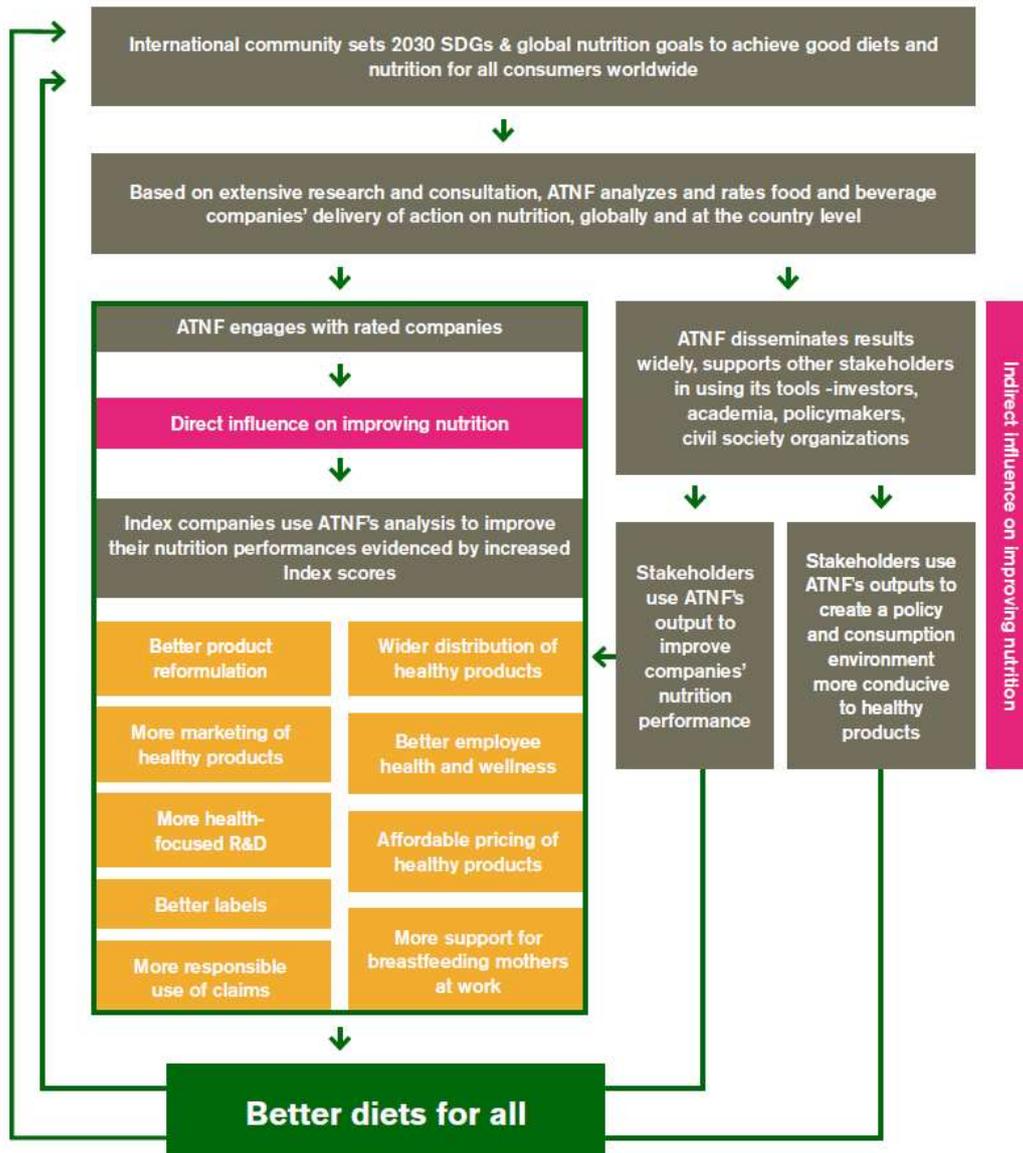
## Purpose and Theory of Change behind ATNF's Indexes

---

The purpose of the Foundation is to develop and deliver tools that: i) track the contribution of the food and beverage industry to addressing the twin global nutrition challenges of overweight and obesity, diet-related diseases, as well as undernutrition, and; ii) can be used by stakeholders to hold companies to account for delivering their commitments to tackle these challenges. ATNF uses the Global Indexes – its flagship tools – to encourage food and beverage companies to do as much as they can to improve the diets of adults and children around the world, as depicted in ATNF's Theory of Change below.

As can be seen in Figure 1, the point of departure for ATNF's Theory of Change is contributing to the global effort to reach the [Sustainable Development Goals](#) (SDGs); especially [Goal 2](#): 'End hunger, achieve food security and improved nutrition and promote sustainable agriculture'. This objective is behind the tools that ATNF develops and employs to help food and beverage manufacturers getting further involved in this process towards ending hunger and ensuring access by all people to safe, nutritious and sufficient food all year round (target 2.1); and ending all forms of malnutrition (target 2.2) by 2030. Likewise, [Goal 3](#) - 'Ensure healthy lives and promote well-being for all at all ages' - also guides ATNF's work, aiming to improve access to more nutritious foods and healthier lifestyles for all, with particular attention to the needs of newborns and children, as well as underserved populations.

**Figure 1 ATNF's Theory of Change**



Given their scale and reach, globally as well as in the United States, large food and beverage manufacturers have a substantial influence on the lives of consumers and employees, and as a result can play a meaningful part in improving their diets and health.

## Stakeholder consultation and expert input

As noted in the introduction, the Indexes were conceived by GAIN in 2009. In the three years leading up to the launch of the first Global Access to Nutrition Index in 2013, many stakeholder consultations were held, and extensive research was conducted. This was with the aim of building a 'best in class' Index, that would be used by many different stakeholders, and one which reflected the latest thinking about the appropriate private sector role in tackling global and national nutrition challenges.

Input from a wide range of stakeholders has informed every step of the Indexes' design, beginning with an early feasibility assessment, undertaken by McKinsey & Co., and including development of the methodology used for the first Index and the creation of the strategic plan for the future direction of the Index. ATNF has a wide range of stakeholders. These include: i) the F&B manufacturers included in the Indexes and their advisors; ii) other F&B companies, including other manufacturers as well as food retailers and others in the food processing value chain; iii) F&B industry associations or groupings; iv) investment banks, investment managers and investment sector associations; v) NGOs; vi) UN agencies; vii) academia; viii) governments and policymakers; viii) media; ix) consultants and experts; x) other commentators or opinion formers relating to the F&B sector, and health and nutrition.

Index development began in mid-2009 with a first phase of work to assess whether such a tool would be useful to encourage companies to increase consumers' access to more nutritious foods and beverages. In this phase, a wide variety of stakeholders in high- and lower-income countries were consulted. A total of six group consultations were held from September to November 2009 in North America, Europe, Asia, and Africa to ensure input from a diversity of viewpoints. These were supplemented by a series of individual conversations with representatives of key stakeholder groups. On the whole, the stakeholders consulted were receptive to the idea of an index, and they provided essential insights into challenges and opportunities in rating companies on their nutrition practices. These consultations also provided early indications of how different stakeholders might use an index.

Two multi-stakeholder groups were established in 2011 to provide advice on various aspects of Index development – the Expert Group and the Independent Advisory Panel. In order to protect the independence of the Index, no executives currently employed by food and beverage companies are eligible to serve on either group. Members of each serve in their personal capacities and in an advisory role only.

**Independent Advisory Panel:** The mandate of the Independent Advisory Panel is to provide strategic advice on the development of ATNF and all of its Indexes. It focuses on how to make the Indexes more useful and effective, the institutional arrangements necessary to sustain the Foundation's work over time, and how to engage with stakeholders around the objectives and findings of the Indexes. The list of members of the panel can be found [here](#).

**Expert Groups:** The mandate of ATNF Expert Groups is to advise on methodology development and to review Index reports, i.e. it is a technical advisory group. Expert Groups comprise experts in nutrition (including both undernutrition and obesity and diet-related chronic diseases) and in the role that the food and beverage industry plays in the nutrition sector. A BMS Marketing sub-group also advises on the approach to assessing BMS marketing, and on methodology development.

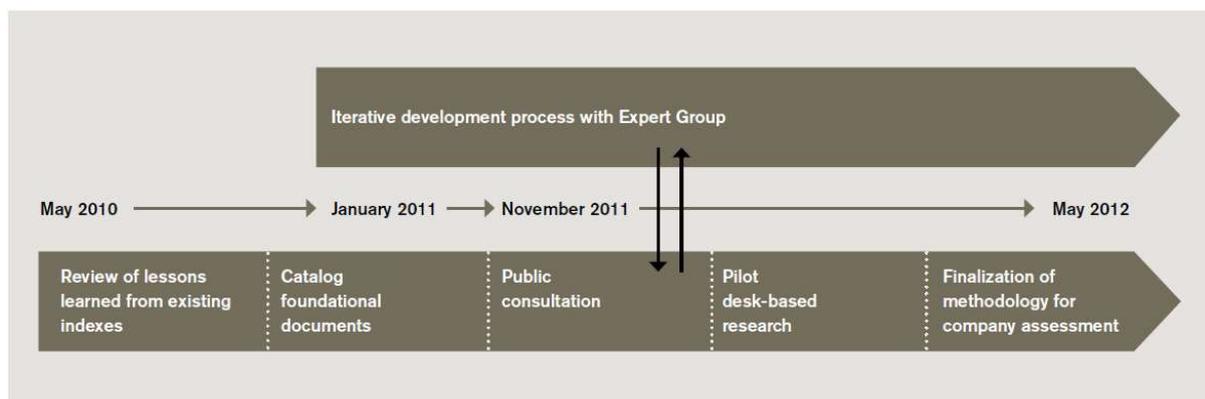
For each Spotlight Index, separate Expert Groups are set up comprised of members with specific insight and expertise with respect to that specific market. The members of the U.S. Index Expert Group are listed in Appendix III, and a list of those who advise on the Global Index is available [here](#).

In addition, after the publication of each Index, ATNF consults stakeholders to solicit their views on the results, the methodology and how the Index should evolve. This is important to ensure that the Indexes reflect current stakeholders' knowledge and expectations, and because ATNF relies on the active use by stakeholder of the results of the Index to amplify their impact. The input received from these consultations is collated and shared with the Expert Group, along with ATNF's analysis of any changes to relevant standards, guidelines and international or national strategies or frameworks, and informs changes that ATNF makes to each iteration of the Index methodologies.

## Original Global Index Corporate Profile methodology development

Thereafter, an iterative, consultative process was used to develop the ATNI company assessment methodology, called the Corporate Profile, as shown in Figure 2. The steps followed are expounded below:

**Figure 2 Overview of the original Global Index Corporate Profile methodology development process**



### 1. Review of lessons learned from existing indexes and benchmarks

Before beginning the development of the ATNI methodology, an in-depth review of 32 existing peer indexes, ratings, and ranking systems was conducted to learn lessons from them and identify their best elements. Among the elements reviewed were these initiatives' origins, rationale, structure, governance, communications strategies, approach to stakeholder engagement and consultation, and the structure and content of their methodologies. Key lessons learned were identified about how to design an effective Index and Index organization – not only on how to design the methodology.

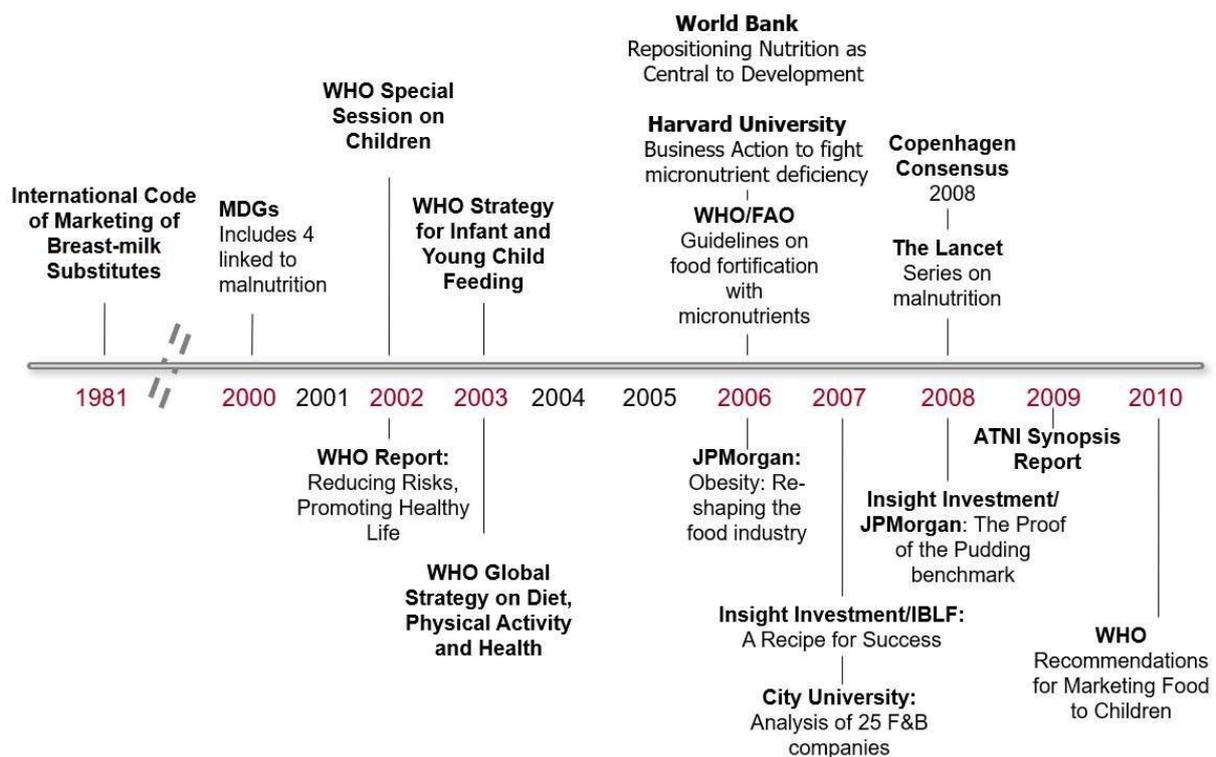
### 2. Catalog foundational documents

Extensive research was undertaken to identify all relevant international policies, norms and guidelines relating to diets and nutrition, developed by, for example, WHO, FAO, and other pre-eminent international organizations that provide guidance or recommendations on nutrition-related practices relevant to the food and beverage industry. These were identified to provide the basis for

the specification of indicators<sup>3</sup>. Selected key documents available at the time are shown in Figure 3. This catalog is updated regularly to reflect any new guidance or standards developed internationally by relevant UN bodies and international organizations. ATNF’s methodologies are updated for each Index based on these new developments.

In areas where no such international guidance existed, indicator specification was based on: reports published by governments, NGOs, investors and industry associations; academic studies; recommendations drawn from stakeholder consultations; examples of strong corporate practices, and; advice from the ATNI Expert Group.

**Figure 3 Foundations of the original Corporate Profile methodology**



### 3. Iterative Corporate Profile methodology development process with the Expert Group

Extensive and detailed discussion with the ATNI Expert Group began in January 2011. This international group of experts on diet, health and nutrition, and the food and beverage industry, met in full, or as sub-groups, over 20 times during a two-year period. The group provided advice on the scope and content of the Corporate Profile methodology and shared its expertise on a range of topics, including international policies and guidance on nutrition and their relevance to the various business functions of food and beverage companies. This intensive and iterative

<sup>3</sup> Indicators are the first-stage ‘unit’ of information that ATNF uses to measure companies’ performance in its Indexes. These are defined as questions with pre-defined answer options, and organized in criteria and categories, as described below. For more information on the process of weighting and scoring, please see the section entitled ‘Structure of the methodologies and approach to scoring and ranking’, on page 20.

development process yielded a draft methodology that was put to stakeholder consultation in November 2011.

#### **4. Stakeholder consultation**

During November 2011, an extensive survey was posted on the ATNI website to solicit stakeholder views on the proposed structure and content of the Corporate Profile methodology, with the goal of strengthening the final methodology. While open for comment from any interested individual, the project team reached out to a wide range of stakeholder groups, as outlined above. Experts from both high- and lower-income countries participated. Responses were analyzed in order to identify areas of consensus and elements that raised concern. The ATNI Expert Group was then convened to discuss the feedback received and to help guide the ensuing revision process, which took place from December 2011 through February 2012.

#### **5. Corporate Profile pilot using desk-based research**

Using this revised Corporate Profile methodology, pilot research was conducted using publicly available materials from a sample of companies to test the feasibility and relevance of the Corporate Profile methodology. The sample of companies was selected to test the methodology against variations in:

- Type of company (multinational, local subsidiary of multinational, regional)
- Form of company ownership (publicly listed, privately owned)
- Company product lines (food and/or beverage)
- Index (Core versus Spotlight)

This pilot research process led to additional revisions to the methodology. The final version of the Corporate Profile was first used for the ATNI Global Index published in 2013.

All subsequent Global and Country Spotlight Index Corporate Profile methodologies were developed similarly, following these steps:

- Review of lessons learned (from previous iteration of the Index or from related Indexes);
- Multi-stakeholder consultations (including companies);
- Adaptation of the methodology with input from the Expert Group;
- Finalization of the methodology, publication and dissemination to companies selected for inclusion in the Index.

## **Spotlight Index development**

---

In 2012, the Index development team at GAIN conducted research in South Africa, Mexico and India to determine whether Indexes modelled on the Global Indexes could be published for individual countries, if adjustments were made to the Global Index methodology to reflect the local legal, business and nutrition context.

Multi-stakeholder consultations were held in each of these three countries early in the development process so that country-specific perspectives could be incorporated into the design of each Spotlight Index and into the approach of ATNI overall. These consultations were particularly

helpful in understanding the local nutrition issues faced by the food and beverage industry and how companies interact with various stakeholders in those countries.

**South Africa:** In May 2011, the Index development team held two roundtable discussions with multi-stakeholder groups and one session with investment community representatives in Cape Town. It also held a roundtable discussion with investment community representatives in Johannesburg, as well as a series of individual conversations with various stakeholders.

**India:** In June 2011, the Index development team held two roundtable discussions in New Delhi. One of these sessions was attended largely by representatives from NGOs, international organizations, civil society groups and bilateral donors, while the second session consisted primarily of food and beverage industry representatives, investors, and industry consultants. One roundtable discussion was also held in Mumbai with Indian stakeholders primarily from food and beverage companies.

**Mexico:** In July 2011, the Index development team held three multi-stakeholder meetings in Mexico City. Two of these sessions were attended by food and beverage companies, civil society representatives and academia, while the third session involved investors.

ATNF concluded that Spotlight Indexes could be a valid and valuable tool to help those countries to address their specific nutrition challenges. Having adjusted the methodology for each of the countries, research was undertaken on the ten largest F&B manufacturers in each one, including of a mix of multinational and local companies. The results were not published, as they were intended only to be preparatory research exercises for later Spotlight Indexes.

The first Spotlight Index, for India was published in December 2016, once ATNF had secured funding. Further India Spotlight Indexes will be published every two years or so. The U.S. Index 2018 will therefore be the second Spotlight Index that ATNF will have released.

## Product Profile methodology development

---

In the Spotlight countries, in addition to assessing companies' business practices, ATNI worked with a team from the University of Oxford's Nuffield Department of Population Health, led by Professor Mike Rayner, to develop an approach to assessing the nutritional quality of each company's products. The methodology was developed with ATNI's Expert Group over several months during 2011, of which Professor Rayner is also a member.

The research was undertaken in 2012, in seven stages:

- 1) Selecting the nutrient profile models used to analyze the nutritional quality of products;
- 2) Specifying the population of foods and beverages to analyze;
- 3) Sampling from this population of foods and beverages;
- 4) Obtaining nutritional information for the sampled foods and beverages;
- 5) Selecting product categories and sub-categories for analysis;
- 6) Applying the nutrient profile models;
- 7) Selecting the outputs for the analysis.

The teams assessed the nutritional quality of around 50% of the products sold by the ten companies in the Index pilots in each country, using a sampling frame to define a dataset of products representative of the population. Products were assessed using two nutrient profiling models that met the selection criteria agreed by the Expert Group. The full methodology and the results from the Mexico study are available on request (as these documents are no longer available on ATNF's website).

ATNF concluded that Product Profiles would be a valuable element to include in each Index and identified several ways in which the methodology could be improved. These were incorporated into the methodology used for the 2016 India Spotlight Index, the final report for which is available [here](#), and the 2018 Global Index Product Profile, described later, which is available [here](#).

## BMS Marketing methodology development

---

The final element of the Access to Nutrition Indexes is an assessment of major baby food manufacturers' marketing policies, management systems, disclosure, and of their practices within specific markets, using an additional, comprehensive methodology. ATNF began developing the methodology for this element of the Indexes in 2014, again through extensive consultation with civil society organizations, experts in the field and baby food companies. The first BMS Marketing assessment using this methodology was included in the second Global Index published in 2016, and in the India Index published later that year. The third Global Index published in 2018 also included this element.

# Key Index elements and scope

---

Each Index comprises two main separate elements: The Corporate Profile and the Product Profile. A third element is the BMS Marketing assessment, which is a sub-element of the Corporate Profile, the results of which can either be incorporated in the Corporate Profile score of relevant companies (as is the case for Global Indexes) or can be reported separately (as was the case for the 2016 India Spotlight Index). This section describes the scope and purpose of these three elements of the Access to Nutrition Indexes; as well as those topics that are not included as they are beyond the scope of the Indexes.

## Key Index elements

---

### **The Corporate Profile (CP)**

Companies' policies, practices and disclosure related to promoting good nutrition for all, i.e. preventing and tackling obesity and diet-related chronic diseases, and undernutrition, are assessed using the Corporate Profile methodology. The Corporate Profile scores and ranking are one of three of the main outputs of the ATNF Indexes. They reflect the efforts that companies have made to: incorporate nutrition into their overall corporate strategy, and their governance and management systems; improve the nutritional quality of their product portfolios and develop new healthy products; improve their pricing and distribution of healthy products; support consumers to eat a healthy diet and live healthy lives; label their products effectively; market their products responsibly, and; engage with policymakers and their stakeholders.

The Corporate Profile was the first element of ranking developed by ATNF, to which most of the methodology described in this document refers. While many changes have been made to the detail since the 2013 Global Index, the basic structure has not been modified, as stakeholders and the ATNI Expert Group provided feedback when consulted that it was 'fit for purpose' and not in need of revision.

### **The Product Profile (PP)**

An objective assessment of the nutritional quality of companies' product portfolios is presented in the element of the Index called the Product Profile. The scores and ranking of the Product Profile provide the second main output of the Indexes. It principally assesses how healthy companies' products are. In other words, it analyses the nutritional quality of the products they sell, which is determined by the levels of fat, salt, sugar, fruit, vegetables and other components.

The Product Profile also provides an overview of the 'healthiness' of products within categories and the extent to which companies' products meet nutritional standards for their suitability to be

marketed to children. Moreover, it provides a baseline against which to measure any improvements companies make to the formulation of their products – which many have committed to make. Further, it offers insights into which companies offer the largest and smallest numbers and proportions of healthy products, and their levels of sales (at both the category and portfolio level). A full description of the methodology used for the Product Profile is available [here](#).

## **The Breast-milk Substitutes (BMS) Marketing assessment**

Finally, ATNF Indexes include as assessment of the marketing practices of major baby food companies, presented in the BMS Marketing sub-ranking. This element of the methodology assesses whether BMS manufacturers' marketing policies are in full compliance with the International Code of Marketing of Breast-milk Substitutes (The Code) and subsequent relevant World Health Assembly (WHA) resolutions, and whether they have management systems in place to ensure proper implementation of those policies across their businesses. It also assesses whether companies have clear objectives, policies and management systems to guide their lobbying activities related to BMS and whether they disclose their policies, information about their governance and management systems, auditors' reports, position statements and other relevant documentation. The methodology used for such assessments is available [here](#).

## **Topics beyond the scope of all Indexes**

---

The Access to Nutrition Indexes focus on food and beverage manufacturers' efforts to improve the diets, and thereby the health, of consumers. Certain topics are beyond the scope of the Indexes:

### **Products intended to address acute undernutrition or other special nutrition needs**

The Indexes focus on company practices related to foods and beverages formulated for, sold to, and consumed by the general population, which is the principal market for most major food and beverage manufacturers. The Indexes are not designed to take account of companies' activities targeting people with special nutritional or dietary needs such as athletes and people whose dietary requirements are supervised by healthcare professionals.

### **Products that are a part of a formal weight management program**

If companies rated by the Indexes sell products that are intended to be a part of (or are marketed/branded in association with) a formal weight-management program, their activities related to these products are not included in the assessment, as there is currently no international consensus on the appropriate nutritional standards for such products.

### **Issues not related to nutrition and health**

Other issues that are related to the social and environmental impact of food and beverage companies are outside the scope of ATNF Indexes, as already outlined to some extent. Some of these issues are addressed by other assessment or rating systems. They include:

- Food safety<sup>4</sup>
- Water management practices
- Environmental sustainability, including sourcing of ingredients
- Impact on climate change
- Fair treatment of workers and communities
- Crop breeding (e.g. hybridization and genetic modification)

---

<sup>4</sup> Spotlight Index methodologies are adapted to the local regulatory, business, nutrition and health context. Therefore, as an exception, food safety is assessed in the India Spotlight Index.

# Structure of the methodologies and approach to scoring and ranking

---

Each of the three elements has a different structure and methodology, and generates the final score using different scoring and weighting systems. This section explains those aspects of each one.

## Corporate Profile methodology

---

The overarching concept of the Corporate Profile methodology is that it inherently defines what 'ideal performance' is for the companies being assessed, drawn from all the foundational documents and expert knowledge of good practice. In other words, were they to have the policies, commitment, objectives, targets, management systems, practices and disclosure described by the wording for the top-level performance of each indicator, they would score 10 on each indicator, and therefore would score 100% for each criterion and subsequently on each category, and achieve an Index score of 10 out of 10.

The Corporate Profile methodology is organized into three sections, each of which reflect a distinct type of corporate activity: 1) Governance, 2) Delivering products; 3) Influencing consumer choice and behavior.

Each of these **sections** comprises various components:

- **Categories:** Seven broad topic areas or categories (A-G) relevant to companies' nutrition-related practices. These categories do not change for any Index.
- **Criteria:** More detailed criteria are defined within each of the categories and are adapted for each Index; there is no fixed number of criteria.
- **Indicators:** Indicators are the first-stage 'unit' of information that ATNF uses to measure companies' performance in its Indexes. A large number of indicators are used within each criterion to assess companies' performance, all specific to each Index. These are defined as questions with pre-defined answer options (the full list of indicators is provided in Appendix I). There are three types of indicators: those related to companies' commitments, practices and disclosure.

While the weightings of the three indicator types are the same for all Indexes, and while criteria within categories are always equally weighted, the weighting of the categories varies between the Global Indexes and the Spotlight Indexes, based on the local context and advice of each Index's Expert Group.

Figure 4 summarizes the Corporate Profile’s methodology structure.

**Figure 4 Topic areas of the Corporate Profile element**

7 Topic areas (categories)										
A. Governance	B. Products	C. Accessibility	D. Marketing	E. Lifestyles	F. Labeling	G. Engagement				
Example of criteria within categories	A1. Corporate nutrition strategy A2. Nutrition governance and management systems A3. Quality of reporting	B1. Product formulation B2. Nutrient Profiling System	C1. Product pricing C2. Product Distribution	D1. Marketing policy: all consumer D2. Auditing and compliance with policy: all consumers D3. Spending: Advertising focus: all consumers D4. Marketing policy: Children D5. Auditing and compliance with policy: Children D6. Spending: Advertising focus (children) and policy impact	E1. Supporting employee health & wellness E2. Supporting breastfeeding mothers at work E3. Supporting consumer-oriented healthy eating and active lifestyle programs	F1. Product labeling	G1. Lobbying and influencing governments and policymakers G2. Stakeholder engagement	Commitment (25%)	3 Indicator types	
							Performance (50%)			
							Disclosure (25%)			
Governance		Delivering products		Influencing consumer choice and behavior			3 Sections			

The Corporate Profile methodology for each Index follows the same approach to scoring and rating, with variations on the number of indicators and the criteria. To generate each company’s overall Corporate Profile score and ranking, the following process is used:

- **Indicator level:** Companies are assessed on the indicators within each criterion, using pre-defined answer options. The top performance level on any indicator is a score of ten points, with lower scores awarded for lower levels of performance. Most indicators are structured using a standard decreasing sliding scoring scale (the score at each level down is half the previous level), i.e. if there are 3 performance levels possible (e.g. the company has a policy in place, the company is currently developing a policy, the company does not have a policy), the score for the top level of performance is 10, the second level is 5, the third level is 2.5, and no information/no activity is 0. However, for others, as appropriate, there may be three or five answer options that carry an equal number of points, more than one of which can be selected and aggregated to generate the score for that indicator, or other structures to the indicators according to the nature of the practice being assessed. If certain indicators are applicable to the particular company being assessed, it will be adapted as necessary.

Market presence is also considered: Global Indexes include **undernutrition indicators** that are applied to those companies with more than 5% of their food and beverage sales in

non-OECD markets. This is done to ensure that the methodology reflects the realities of all companies' operations and is not a one size fits all approach. Consequently, as a general rule Spotlight Indexes include undernutrition indicators when the country at stake is not an OECD member, as companies' sales are only considered in that country's territory.

Two types of multipliers are applied to some indicators; for some, both are applied:

**Healthy multiplier.** Many indicators assess what companies are doing in relation to 'healthy foods'. However, there is no universally recognized definition of 'healthy foods'. Each company uses a different definition for this term. ATNF cannot verify whether products that meet a company's own healthy criteria are truly healthy (in the context of the Corporate Profile – though this is precisely the purpose of the Product Profile, described later). As a proxy, ATNF uses the score from B2, which assess the rigor of the nutrient profiling system which it uses to determine which products are healthy. A healthy multiplier is applied between 1 (having no effect on the underlying indicator score) and 2 (doubling the underlying indicator score), based on the B2 score, thereby giving a higher weight to companies with a robust definition of healthy products.<sup>5</sup>

**Geographic multiplier:** In the Global Indexes this is applied to appropriate indicators to reflect whether companies apply the same policies and practices across all markets of operation, only in selected regions or only in their home markets. It ranges from 1 (no multiplier applied) if the activities being measured by the indicator occur only in its home market to 2 if the activities being measured are applied globally.

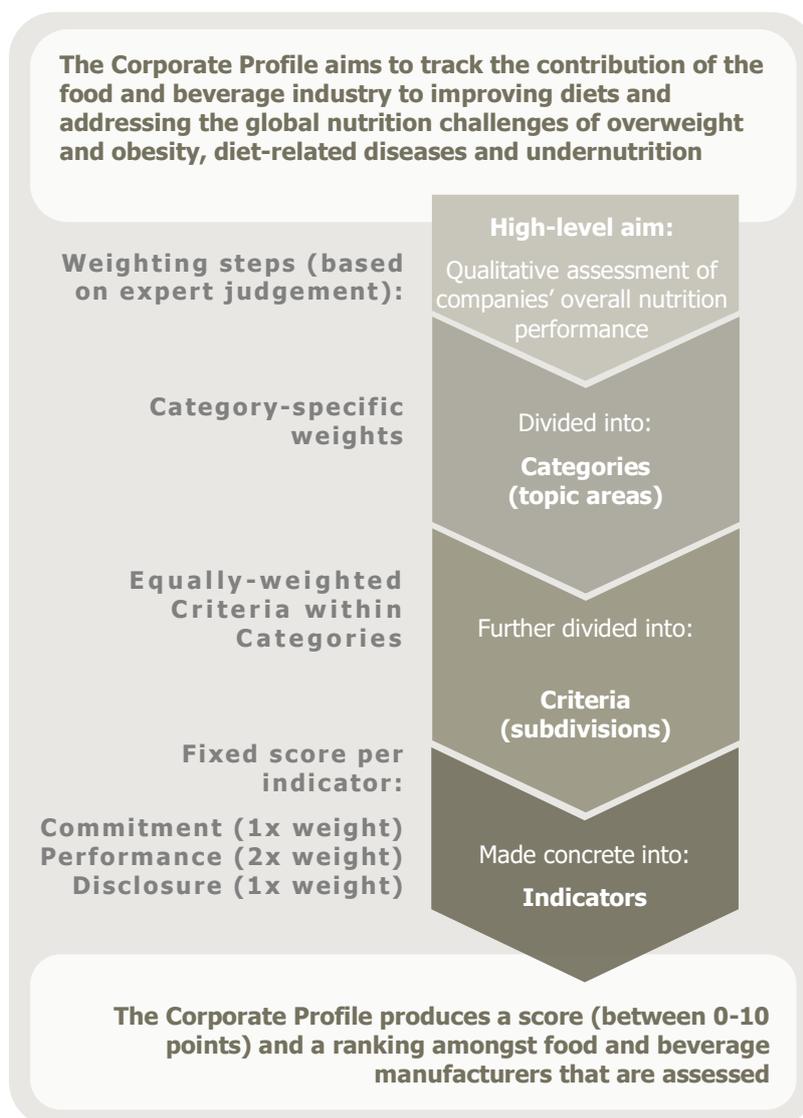
- **Criterion level:** Within each criterion, the score is calculated by totaling the 'raw' score for commitments, and multiplying those with a weight of 25%, doing the same for the performance indicators, though they are weighted 50%, and the same for the disclosure indicators, also weighted at 25%. Performance is given twice the weight of Commitment and Disclosure to reinforce the importance of turning commitments into practice. Adding up the weighted scores for each of these three indicator types generate each company's score for each Criterion.
- **Category level:** Each Criterion is weighted equally within each Category; therefore, a company's score for a Category is the average score of the Criteria within that Category.
- **Final score:** The final category weightings are then applied. The **result is the company's Corporate Profile score**, out of a maximum of 10.

The results are presented as a ranking in the report, showing companies' overall Corporate Profile score and their score for each Category. The results for each Category are set out in separate chapters, which include a series of examples of corporate best-practice drawn from the analysis, presented in boxes throughout the text, to encourage other companies to emulate them, and to illustrate them to other readers.

---

<sup>5</sup> ATNF plans to integrate the Product Profile and Corporate Profile in the future and to base the value of the healthy multiplier on the Product Profile score.

**Figure 5 Corporate Profile theoretical framework**



It is important to note that Category B Products, within the Section 'Delivering products', assesses companies' commitments and targets to improve the nutritional quality of their products and invest in improving the healthiness of their portfolios. This is not the same as the Product Profile assessment, which is an objective assessment of nutritional quality based on the Health Star Rating system, and presented as a separate ranking as explained below.

## Product Profile methodology

The Product Profile adds an objective assessment of the nutritional quality of companies' product portfolios, for each company's best-selling categories in the geographic area covered by the Index at stake. It therefore complements the more qualitative Corporate Profile assessment. To date, the Product Profile has been presented as a separate ranking and score. ATNF will consider integrating the scores in future Indexes.

To determine products' nutritional quality, ATNF uses two nutrient profiling systems (NPS)<sup>6</sup> that meet the qualitative criteria developed by ATNF's Expert Group,<sup>7</sup> from research of tens of such systems collated for WHO:

- The [Health Star Rating](#) (HSR) nutrient profiling system is used in Australia, but applicable in any market, to determine how healthy each product is. Products are rated between 0.5 stars (least healthy) to 5 stars (most healthy). Any product that scores 3.5 or above is considered healthy.
- The [WHO Regional Office for Europe Nutrient Profile Model](#) (WHO Euro), relevant to any market, to identify which products are suitable to be marketed to children.

The methodology used for the Product Profile was developed in partnership with the Food Policy Division of The George Institute for Global Health (TGI), based at the University of Sydney, the organization that ATNF commissions to under these studies. It draws on the experience of the pilot studies outlined earlier, undertaken by Professor Mike Rayner, of the University of Oxford. Professor Rayner is a member of the ATNI Expert Group and advises the TGI research team for each Product Profile.

A full description of the methodology used to assess nine markets undertaken for the 2018 Global Access to Nutrition Index, including the U.S., is available in [TGI's report](#) of that study. The same two NPS were used for all countries for consistency, i.e. to be able to compare results across countries. A summary of the approach is outlined in Figure 6, and the description below.

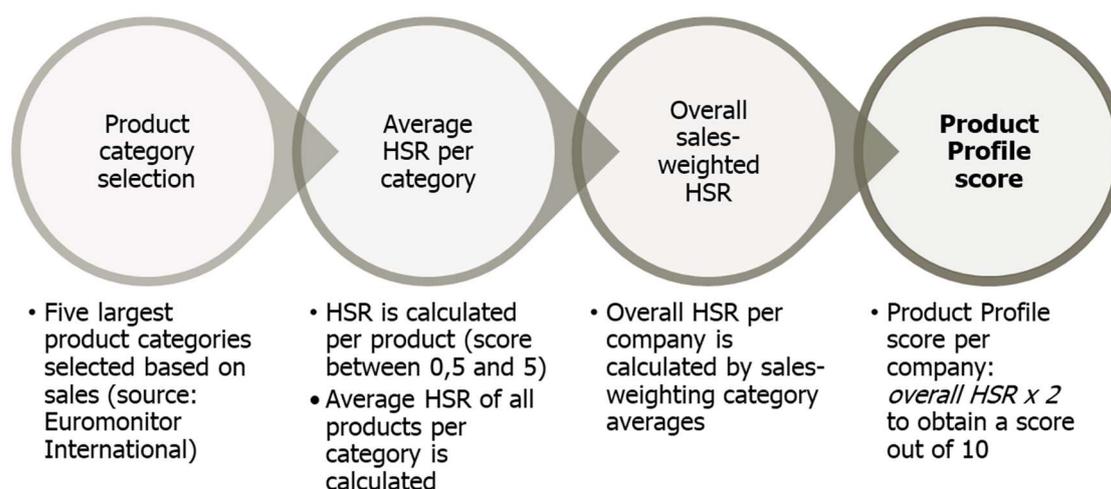
---

<sup>6</sup> Nutrient profiling is "The science of classifying or ranking foods according to their nutritional composition for reasons related to preventing disease and promoting health." The first systems were developed over 20 years ago for voluntary food labeling schemes. At around the same time, governments and regulatory agencies began to use them to set standards for the use of nutrition and health claims, and they have been used – or proposed for use – by governments to regulate the advertising of foods to children. Retailers, media outlets and others have also developed proprietary systems to help guide decision-making on product formulation, labeling, use of 'healthy' logos and marketing to children. More than 100 NPS's are known to be in use around the world today (World Health Organization (2010). Nutrient Profiling. Available at: <http://www.who.int/nutrition/topics/profiling/en/>).

<sup>7</sup> The criteria used to select these two systems are:

- Developed with appropriate stakeholder consultation
- Covered the majority of categories of processed food and beverage products
- Took into account both positive and negative nutrients
- Was not designed solely to address school foods, given requirement to assess foods in the general market
- Well-validated with results published in the peer-reviewed literature demonstrating that the models produce internally consistent classifications of 'healthy' and 'unhealthy' foods, consistent with general nutrition principles
- Enabled differentiation of nutritional quality within and between categories
- Algorithm in the public domain so as to be able to access and apply it
- Able to generate meaningful results across all countries

**Figure 6 Product Profile Theoretical Framework**



- **Food category selection:** For each of the companies assessed, ATNF first identifies all categories in which the companies sell products (based on retail sales data obtained from Euromonitor International). Products eligible for inclusion are defined as 'all packaged foods and non-alcoholic beverages manufactured by the included companies available for purchase.' Up to a maximum of five of the companies' best-selling categories in each of the nine markets were included. A food or beverage is considered as a unique item based upon the brand name and description irrespective of serving size and packaging (i.e. a specific brand of cola sold in 330mL cans is considered to be the same food item as the same specific brand of cola sold in 600mL bottles).
- **Nutrient content data:** Nutrient content information was extracted from photographs of product packaging and entered into TGI's FoodSwitch databases for each country or similar databases to which TGI had access via agreement with their developers. Products with data entered or updated from 2013 onwards were used to generate product lists for each company.
- **Research process:** The ten companies were provided with their product lists and nutrient content, from the database, and offered an opportunity to make corrections or additions.
- **Calculation of HSR:** The HSR is first calculated for each product. These scores are then aggregated by category, by adding up the HSRs for each product in the category and dividing the result by the number of products in the category to generate a mean HSR for that category. The company's non-sales weighted average HSR for the whole portfolio is calculated by adding up the HSRs of all of its products and dividing that figure by the total number of products. To generate each company's initial sales-weighted Product Profile score, the mean HSR for each of its categories is weighted by the corresponding sales figure provided by Euromonitor International and aggregated. The maximum initial score is five (because this is the maximum possible rating on the HSR for any individual product). A similar process is followed applying the WHO Euro model to determine the number and

percentage of products in the portfolio and by category that are suitable to be marketed to children.

- **The Product Profile score** is simply this figure doubled, to arrive at the final score. It is doubled so that it is scored out of ten to provide comparability with the Corporate Profile.

The results are presented as a ranking in the report, highlighting best performance among the assessed manufacturers. This is accompanied, *inter alia*, by information on how nutritional quality varies by product category and by company, and the extent to which companies' products are suitable to be marketed to children.

While the Corporate Profile is predominantly a qualitative measure of companies' policies, practices and disclosure related to improving diets and nutrition globally or in a specific context; the Product Profile offers a quantitative analysis of how healthy their product portfolios and categories are. As both the Corporate Profile and the Product Profile scores are presented out of a total of 10, stakeholders can put both sets of results side-by-side to see how the companies' compare on the different measures. The current Spotlight Indexes do not prioritize one ranking over another: the Corporate Profile and Product Profile present different information.<sup>8</sup> Setting the results of the Product Profile alongside the results of the Corporate Profile illustrates the extent to which companies are delivering on their promises (particularly for Category B which assesses companies' commitments and targets to improve the nutritional quality of their products and invest in improving the healthiness of their portfolios).

## The BMS Marketing methodology

---

A very limited assessment of BMS companies' marketing practices was incorporated into the first Global Index published in 2013. In response to stakeholders' feedback, ATNF began developing a more comprehensive BMS marketing methodology in 2014 through extensive consultation with organizations and individual experts in infant and young child nutrition, and BMS marketing. The BMS methodology was first applied for the BMS Marketing assessment included in the second Global Index, of 2016.

It is designed to evaluate whether BMS manufacturers market their products in line with the following key international guidelines and standards in this area:

- The International Code of Marketing of Breast-milk Substitutes (The Code).
- Subsequent World Health Assembly (WHA) resolutions that make significant additions or provide clarifications to the original Code, referred to throughout this document in appropriate sections.

---

<sup>8</sup> ATNF intends to integrate the Corporate Profile and Product Profile assessments into one integrated Index score in the future for Global and Spotlight Indexes. For the Global Index 2018, the Product Profile is presented alongside the Corporate Profile results but the overall Index ranking is based only on the integrated Corporate Profile and, for BMS manufacturers, BMS marketing scores. In the India Spotlight Index 2016 and U.S. Index 2018 the Corporate Profile and Product Profile rankings are presented separately, without presenting an overall integrated score and ranking.

- Codex Alimentarius Standards (Codex) for infant formula and formulas for special medical purposes intended for infants (Codex Standard 72-1981) and Codex standard for follow-up formula (Codex Standard 156-1987).
- Relevant local regulations in the countries in which ATNF conducts the in-country studies.

The Indexes assess whether companies market the following BMS products in line with the recommendations of The Code:

- CF identified as being suitable for infants up to six months of age.
- Any type of milk-based formula, including: infant formula (IF) (that can satisfy the normal nutritional requirements of infants up to six months of age); follow-on formula (FOF), also called follow-up formula (for infants from six months of age); and growing-up milk (GUM), also called toddler milk (for young children from 12 to 24 months of age).

The 2018 Global Index did not assess whether companies had adopted the recommendations of WHA 69.9 passed in 2016 which extends the Code's application to infant formulas marketing as suitable for young children up to 36 months of age and makes new recommendations on the marketing of complementary foods. ATNF intends to incorporate the recommendations of WHA 69.9 in future Indexes.

The assessment is undertaken using two separate tools:

**BMS 1 Corporate Profile assessment:** The BMS 1 Corporate Profile methodology is designed to measure the extent to which the BMS companies' marketing policies align to The Code; whether companies have comprehensive, effective procedures and management systems to implement their policies; as well as their level of transparency. The six largest BMS manufacturers are included in the Global Index assessments, based on revenues (obtained using Euromonitor data). The number of companies assessed in each Spotlight Index varies, according to how many major manufacturers there are in that market.

**BMS 2 In-country assessments:** In-country assessments are designed to measure companies' compliance with The Code and/or national regulations, whichever is stricter. These assessments cover all forms of marketing, as set out in The Code, by interviewing mothers and healthcare workers, visiting retail stores and online retailers, as well as monitoring traditional and digital media. For this assessment, countries are selected based in a rating system used by FTSE4Good, which is based on data relating to the child mortality rate, level of malnutrition, HIV rates, corruption levels, the Human Development Index score, status of implementation of The Code, and other factors. For the BMS 2, all companies – including local companies or any other multinationals – whose products or marketing are found in the territory in which the assessment is taking place are included in the study.

BMS 1 also assesses the commitments companies make with respect to feeding bottles and teats, as well as equipment and materials, as defined by The Code or local regulations. Further, because The Code encompasses products for special medical or dietary use, these products are also assessed in both BMS 1 and BMS 2.

The BMS assessment presented separately in the Indexes as a sub-ranking. However, the BMS marketing score is used to adjust the Corporate Profile score of those F&B manufacturers in the main Index that also sell BMS.

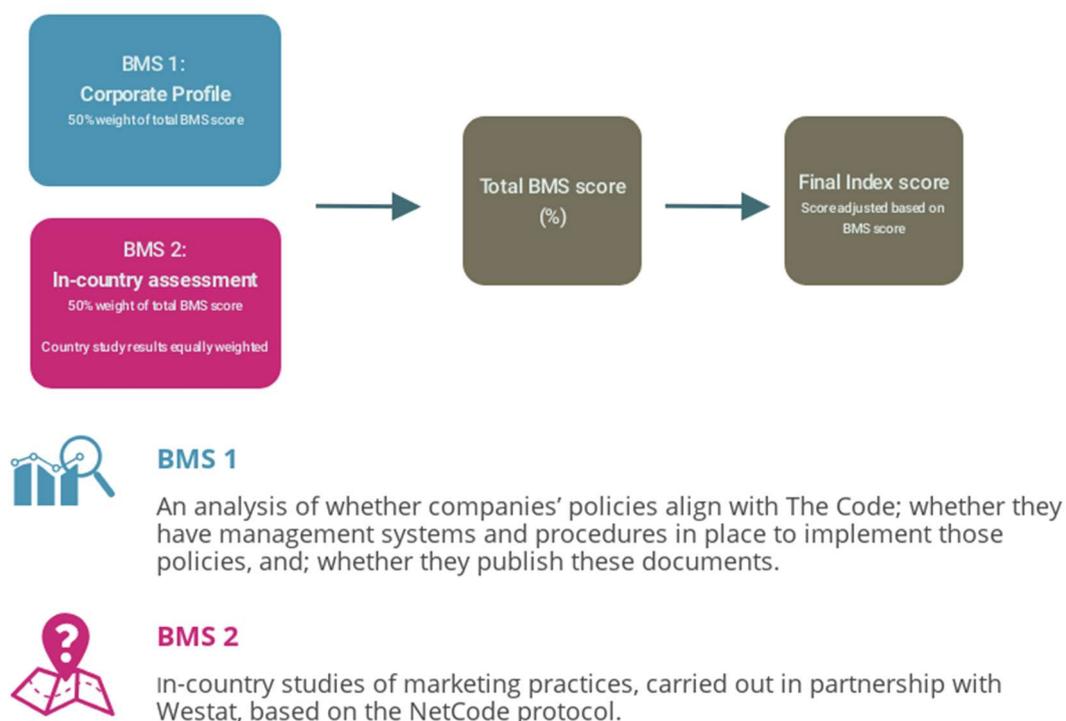
The final BMS marketing sub-ranking and scores are arrived at by averaging the Corporate Profile assessment score (BMS 1) and the in-country assessments of marketing practice (BMS 2). The total possible score for each of the separate elements is 100% and the total possible overall BMS score is 100%. The higher that score, the closer the company has come to achieving full compliance with the recommendations of The Code and local regulations, as assessed using the ATNF methodology.

The overall Corporate Profile scores of the F&B sector BMS companies are adjusted to reflect their BMS scores. If a company scores 100%, no adjustment is made because its marketing of BMS products complies fully with The Code, and, in the key markets studied, local regulations. If this is not the case, an adjustment is made, proportionate to the BMS score, up to a maximum of -1.5 out of 10.

Some of the companies included in the BMS Marketing assessment are not included in the main Index (because they are not classified as F&B manufacturers). In these cases, they are not included in the main Index Corporate Profile ranking and only receive a BMS Marketing score and ranking.

The approach to scoring is summarized in Figure 7.

**Figure 7 How the BMS marketing scoring works and links to the Corporate Profile score**



Additional background and material on ATNF's approach to assessing BMS marketing can be found on our website, including previous Index reports, scorecards for each BMS company and the most recent (2018) [BMS Marketing methodology](#).

# The U.S. Spotlight Index 2018

---

In 2016, ATNF started exploring the possibility of publishing a U.S. Access to Nutrition Spotlight Index. Having secured funding to do so, early in 2017 ATNF began consulting with U.S. stakeholders on how to adapt the Global Index methodology to the U.S. context.

This section first outlines the specific aim of the U.S. Index, summarizes how ATNF engaged with stakeholders on its development and the approach used to select companies for inclusion in the Index. It then explains how the 2018 Global Index methodology was adapted to the U.S. context. The structure and weightings of the Corporate Profile methodology, as well as its limitations are then outlined. Finally, the methodology and limitations of both the Product Profile methodology, and the approach to assessing BMS marketing in the U.S. Index are described.

## Specific aim of the U.S. Index

---

The aim of the U.S. Index is provide stakeholders concerned to improve diets and nutrition in the U.S. with a tool that: i) tracks the contribution of the food and beverage industry to addressing the twin global nutrition challenges of overweight and obesity, diet-related diseases, and food insecurity, and; ii) can be used to hold the rated companies to account for delivering their commitments to tackle these important national nutrition challenges.

## Basis of, and approach to developing, the U.S. Index methodology

---

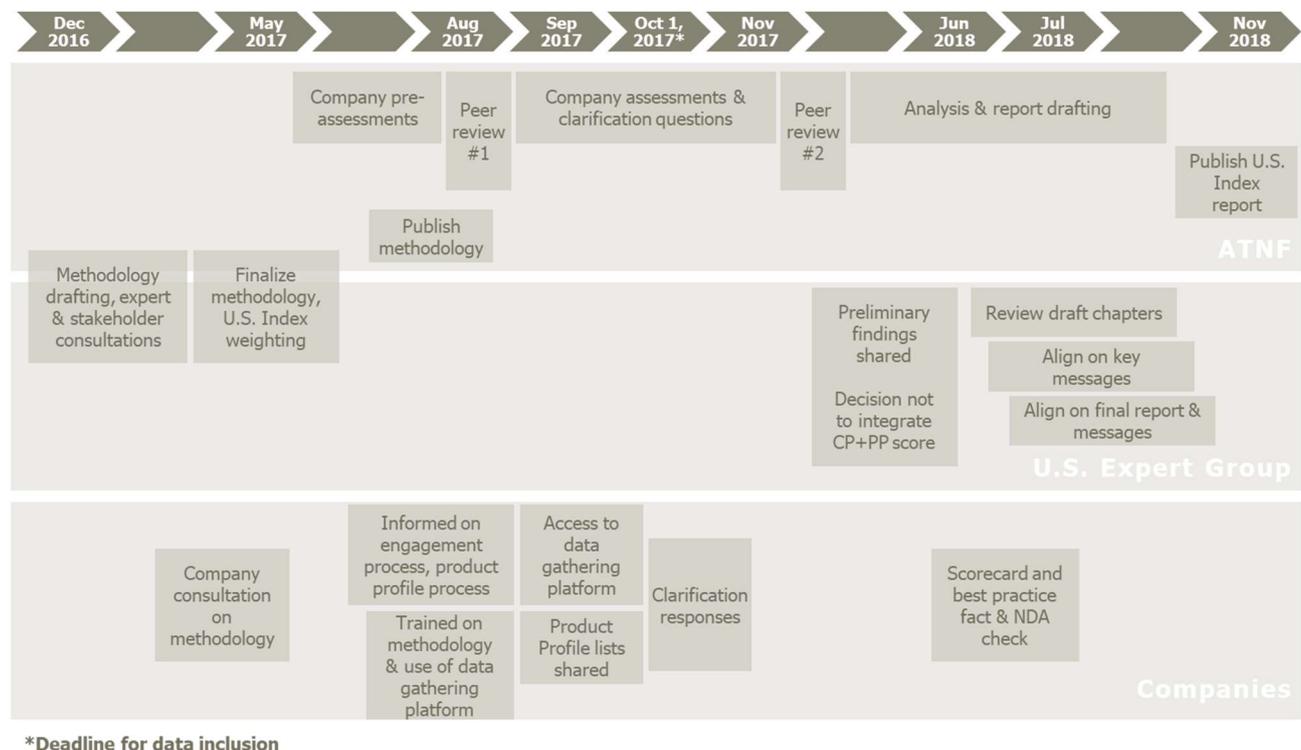
The 2018 U.S. Index is based on the 2018 Global Index. It incorporates the same three elements and takes the same broad approach to assessing companies, and to scoring and ranking them, but is adapted to the U.S. context.

ATNF determined how the Corporate Profile and BMS Marketing methodologies of the Global Index methodology should be adapted to take account of the specific legal, regulatory and business context in the United States, and the specific nutrition challenges the country faces, through desk-based research and stakeholder consultation during the course of 2017. Stakeholders consulted included Index companies, industry groups, civil society organizations and academics, and were involved through various meetings and one-to-one consultations (see the full list in Appendix II).

In addition, as described earlier, ATNF convened a U.S. Expert Group and consulted the BMS marketing sub-group to provide advice on all aspects of Index development and methodology adaptation (see Appendix III for the list of members of the U.S. Expert Group). Data for the Product Profile for the U.S. had already been collected and analyzed for the 2018 Global Index. No adaptations were therefore possible.

Figure 8 shows the full engagement process used to develop the U.S. Index. Having considered the input from these exercises, ATNF finalized the Corporate Profile methodology and the approach it would use to assess BMS marketing for the 2018 U.S. Index.

**Figure 8 Engagement process with stakeholders**



## Company selection

With the funding available, it was determined that the Index could include the ten largest food and non-alcoholic beverage manufacturers in the United States. All Access to Nutrition Indexes assess the largest manufacturers globally or in an individual market, based on their sales, as these companies have the greatest influence among processed food producers on consumers' diets.

The U.S. Index 2018 ranks the ten largest food and non-alcoholic beverage manufacturers: The Coca-Cola Company (Coca-Cola), ConAgra Brands (ConAgra), Dr Pepper Snapple Group (Dr Pepper Snapple), General Mills, Inc. (General Mills), Kellogg Company (Kellogg), The Kraft Heinz Company (Kraft Heinz), Mars, Inc. (Mars), Nestlé S.A. (Nestlé), PepsiCo, Inc. (PepsiCo) and Unilever. These companies were selected based on their Fiscal Year (FY) 2016 sales in the United States. Together they accounted for over 30% of the processed food and beverage market share in the United States in 2016 and generated a total of just over \$160 billion in revenues.<sup>9</sup> The United States is the largest single market for the ten companies assessed.

<sup>9</sup> Derived from Euromonitor International: Packaged Food, Hot Drinks and Soft Drinks, 2017.

Of the ten manufacturers assessed in this first U.S. Index, most sell a wide range of food and beverage products. Only two produce beverages solely or predominantly (Coca-Cola and Dr Pepper Snapple). All but two – Nestlé and Unilever – are headquartered in the United States. At the time of the research, nine of the ten were public companies; only Mars Inc was privately held. In early 2018, Dr Pepper Snapple was acquired by JAB, a Luxembourg-based investment vehicle.

The BMS Marketing assessment focuses only on the three largest baby food companies in the United States by sales: Abbott Laboratories, Inc. (Abbott), Nestlé and RB/Mead Johnson Nutrition (RB/MJN), which together account for 80% of sales of infant formula and baby foods and drinks in the United States.

# Key U.S. Index elements

---

This section outlines how the methodologies of the Corporate Profile, the Product Profile and the BMS Marketing assessment were adapted for the U.S. Spotlight Index 2018 to reflect the specific legal, regulatory and business context in the United States, and the specific nutrition challenges the country faces. For each element also, the limitations faced in the application of the methodologies are explained.

## Corporate Profile methodology

---

### **Adaptation of the Corporate Profile methodology to the U.S. context**

The Corporate Profile methodology has been adapted to take into account U.S. laws, regulations, standards and guidance where they exist. Specifically, this means that national guidelines and standards are applied in the U.S. Index methodology, supplemented by international guidelines, standards and frameworks for aspects that are not covered by relevant national guidance or where national guidance is less strict. The applied guidelines, standards and frameworks do not constitute legal requirements for companies but describe best practice or provide recommendations for companies to follow voluntarily.

Key differences compared to the Global Index Corporate Profile methodology are:

1. The U.S. Index Corporate Profile does not include a separate section on undernutrition, unlike the Global Index, which focuses on this aspect of malnutrition for companies with a certain proportion of sales in low-income countries, where it is relevant. Instead, indicators assessing companies' activities related to food insecurity in the United States are integrated across the categories.
2. Rather than assessing what companies do to address the particular needs of 'low-income populations' as in the Global Index, the U.S. Index focuses on their activities related to 'priority populations'. These populations are defined as "those whose access to healthy food is constrained by low income or geographic factors." This refers to those on low incomes, and people who live in communities in rural areas, a long way from grocery stores that sell a wide range of products, including fresh foods. It also refers to those who live in communities in urban areas who only have easy access to smaller stores with very limited ranges of foods and beverages, which are often those high in fat, salt and sugar, and that stock few fresh or healthy packaged foods. People from certain racial or ethnic minority groups may have a higher chance of being part of one of these communities, or of having a lower income, which may be an important consideration in striving for food and health equity for all. Those who have limited mobility may also have difficulty accessing healthy foods and beverages.

3. Access to Nutrition Indexes do not assess compliance with the law. Thus, Category F – Labeling, was adapted substantially by removing indicators that are already covered under extensive U.S. regulations in this area, including all indicators of the original Criteria F2 on nutrition and health claims. Because the U.S. Index Category F only contains some of the indicators used in the Global Index, the weight in the overall score has been reduced to 5% (as compared to 15% in the Global Index). The remaining 10% has been divided between Category B, C, D and E. This adaptation of category weights in the Corporate Profile score was based on consultation and agreement with the U.S. Expert Group.

4. In Category G, specific indicators were removed in relation to companies' engagement with policymakers, as disclosure on lobbying issues and expenditure is required by U.S. law.

5. In addition, several U.S.-specific nutrition topics have been incorporated in the Corporate Profile methodology. These include:

- What companies do to address food insecurity among priority populations whose access to healthy food is constrained by low income or geographic factors.
- Whether companies follow U.S. dietary guidelines in formulating or reformulating their products and whether they commit to addressing the 'copy-cat' issue in relation to the Smart Snacks in School program.<sup>10</sup>
- Whether companies commit to donating predominantly healthy products to food banks.
- Responsible marketing policies and performance that go beyond the commitments embodied by the main industry self-regulatory pledges.

## **U.S. Index Corporate Profile Methodology structure**

The structure of the U.S. Index Corporate Profile methodology is the same as that for all previous Indexes. It has the same three Sections and the same seven Categories (A-G) as other Indexes, and all 19 Criteria were determined to be applicable to the U.S. context. However, revisions were made to the indicators, as described above, to align with U.S. national guidelines, norms and accepted good practices. Table 1 shows the final U.S. Corporate Profile Sections, Categories and their revised weightings, and Criteria, as agreed with the Expert Group. A full description of the U.S. Index Corporate Profile methodology, including detail on the indicators, is included in the Appendix I of this document. This description was shared with the assessed companies and published on the ATNF website in August, 2017.

---

<sup>10</sup> The Smart Snacks in School regulation applies to foods sold a la carte, in the school store, vending machines, and any other venues where food is sold to students. Concern has been raised by nutrition experts that while products supplied to schools meet the Smart Snacks in School nutrition standard, equivalent products with the same look and feel, sold in retailers and other outlets, do not. Companies should pay particular attention to ensuring that foods and beverages commonly consumed by children are of high nutritional quality. To address the concerns about 'copy-cat' products, they should ensure that all products sold under the Smart Snacks program meet the same nutrition standards everywhere.

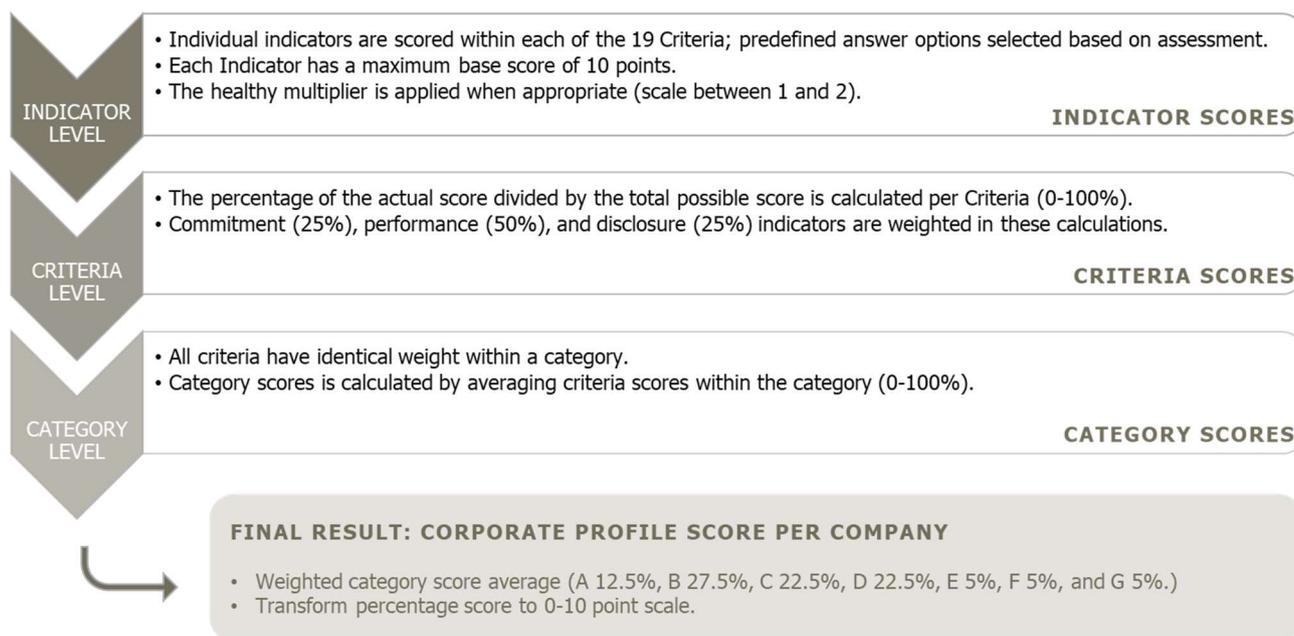
**Table 1 U.S. Index Corporate Profile Methodology Overview**

Category (weight in total score)	Description	Criteria
<b>Section 1: Nutrition governance and management</b>		
<b>A (12.5%)</b>	Corporate strategy, management and governance	<b>A1</b> Corporate nutrition strategy
		<b>A2</b> Nutrition governance and management systems
		<b>A3</b> Quality of reporting
<b>Section 2: Formulating and delivering appropriate, affordable, accessible products</b>		
<b>B (27.5%)</b>	Formulating appropriate products	<b>B1</b> Product formulation - Nutrition
		<b>B2</b> Nutrient profiling system
<b>C (22.5%)</b>	Delivering affordable, accessible products	<b>C1</b> Product pricing
		<b>C2</b> Product distribution*
<b>Section 3: Influencing consumer choice and behavior</b>		
<b>D (22.5%)</b>	Responsible marketing policies, compliance and spending	<b>D1</b> Marketing policy: all consumers
		<b>D2</b> Auditing and compliance with policy: all consumers
		<b>D3</b> Spending: Advertising focus: all consumers
		<b>D4</b> Marketing policy: Children
		<b>D5</b> Auditing and compliance with policy: Children
		<b>D6</b> Spending: Advertising focus (children) and policy impact
<b>E (5%)</b>	Supporting healthy diets and active lifestyles	<b>E1</b> Supporting employee health & wellness
		<b>E2</b> Supporting breastfeeding mothers at work
		<b>E3</b> Supporting consumer-oriented healthy eating and active lifestyle programs
<b>F (5%)</b>	Product labeling and use of health and nutrition claims	<b>F1</b> Product labeling
<b>G (5%)</b>	Influencing governments and policymakers, and stakeholder engagement	<b>G1</b> Lobbying and influencing governments and policymakers
		<b>G2</b> Stakeholder engagement

## Approach to scoring and weighting

As described in the previous chapter, a company’s Corporate Profile score is calculated by rolling up scores from the indicator level. Figure 9 presents the steps taken to calculate each company’s final Corporate Profile score.

**Figure 9 Corporate Profile scoring algorithm**



## Limitations to the Corporate Profile methodology

### **The definition of healthy products and (re) formulation targets:**

The Corporate Profile methodology depends on companies' own definitions of healthy products. There is no Codex or other universally recognized guideline that can be applied in the ATNI Corporate Profile methodology to check the validity of the companies' definitions of healthy products. Similarly, the ambition level and relevance to public health of nutrition criteria underlying companies' product (re)formulation targets cannot be assessed against a universal, external standard for product reformulation by product type or category. Instead, the comprehensiveness of the reformulation targets and the process of implementation is assessed. The rigor of how companies define 'healthy' products and (re)formulation targets is assessed through analysis of companies' internal NPS. Complementary to this assessment in the Corporate Profile, the Product Profile provides an objective assessment of the healthiness of products according to validated methods, based on the HSR and WHO Euro systems.

### **Company commitments and self-reported performance:**

The Corporate Profile relies to a large extent on companies' self-reported information and data. This is the case throughout the methodology, but it is particularly important in Category D, which addresses responsible marketing practices. Companies can only achieve a full score in Category D if they make public commitments, show evidence of performing in line with those commitments and if they have commissioned third-party audits of their marketing practices.

### **Company assessment:**

Due to the interactive nature of the ATNF Corporate Profile research process, as described in previous sections, it is not feasible to perform company assessments (coding) *in duplo*, i.e. by two independent analysts. Instead, an internal peer review system is applied to ensure that the

assessments for all indicators in the methodology are checked for accuracy and consistency across all companies.

## Product Profile methodology

---

### **Adaptation of the Product Profile methodology to the U.S. context**

The U.S. Product Profile utilizes and assesses in detail the U.S. data subset from the wider nine-country study undertaken for the 2018 Global Access to Nutrition Index, described earlier, which included nine countries. ATNF worked with the Food Policy Division of The George Institute for Public Health (TGI), based at the University of Sydney. Professor Mike Rayner, University of Oxford, advised the research team. A full description of the methodology used for the study is available in [TGI's report](#) on the nine-country Product Profile.

For the 2018 U.S. Index, the largest five product categories by sales of the ten companies are assessed, which cover the vast majority of their U.S. sales. This was to avoid assessing niche products with low levels of sales, which make a small contribution to U.S. diets. Nutrition data held in the TGI FoodSwitch USA database was used, supplemented with information submitted by some of the companies. As noted, TGI generated two sets of results for each company: one to determine the nutritional quality of companies' products, by applying the HSR both at the category and portfolio level, and another by applying the WHO Euro nutrient profiling model to determine what percentage of products assessed overall, and with each category, are suitable to be marketed to children. ATNF then weighted these results using the Euromonitor International sales figures.

Each company's U.S. Product Profile score was calculated by doubling the sales-weighted HSR score (a maximum of 5) simply to arrive at a score out of ten so that it could be compared more easily to the Corporate Profile score, which also has a maximum of ten. The [Product Profile methodology](#) explains in more detail how the sales-weighted HSR score is derived. Product Profile scores and ranking is presented separately, in parallel to the Corporate Profile scores and ranking.

### **Limitations to the Product Profile methodology**

The limitations of the Product Profile are set out more fully in the [TGI report for the 2018 Global Index](#). In summary:

#### **Nutrition data:**

Some companies did not provide a full list of the products included in this study nor complete nutrition content data. If real values were missing for some nutrients, proxy values were used. The most likely impact of using these proxy values is underestimation of the real differences between products (because proxy values were imputed at the sub-category level), and correspondingly, therefore, underestimation of the real differences between companies. It also resulted in some products having to be excluded from the analysis because data was not available for the nutrients essential to applying the nutrient profiling models.

**Scope of products covered:**

Ideally the analysis would have included all products sold by all ten companies rather than being restricted to only their top five selling categories. Nevertheless, the coverage of all companies' sales is quite high (between 77 and 100% of estimated company sales) thereby providing a reasonably robust indicator of the healthiness of their entire U.S. portfolios.

**More specific sales data:**

Product-level sales data should ideally be used to calculate the sales-weighted figures, rather than the product category-level sales data that was used currently. However, ATNF was unable to obtain a data set with that level of detail from Euromonitor International or another provider.

**Nutrient profiling models used:**

The U.S. was one of nine countries included in the Product Profile undertaken for the Global Index 2018 published in May 2018. Two models were chosen for that study, with the advice of the Expert Group, that were suitable to all of the nine markets. Both met ATNF's selection criteria (including but not limited to being based on extensive research and validation, applicable to a wide range of foods and beverages and being publicly available). They are the HSR system to assess products' nutritional quality and the WHO Euro model to assess products' suitability to be marketed to children. Both are subject to ongoing evaluation and refinement. Had a Product Profile been undertaken separately and solely for the U.S. market, different models may have been selected, such as the WHO Pan American Health Organization (PAHO) model for marketing to children. Discussion continues about how each applies to some food categories. The HSR model does not score some 'non-nutritive' products such as tea and instant coffee; as a result, these products have not been included in the analysis. This means that the results for companies such as Unilever and Nestlé, for example, are based on their sales excluding these products. Plain water, on the other hand, is given a maximum HSR of five to encourage its consumption. Baby foods are also excluded from the study as the two selected nutrient profiling models are not designed to assess these specialized products, as are minimally processed agricultural products.

**Serving size of products not considered:**

Neither of the nutrient profiling models used takes serving size into account. Some experts consider this to be a limitation, while others believe it is a strength. One important determinant of weight gain is the quantity of food people choose to consume in one sitting (portion size). The actual amount recommended – the serving size – is designed to limit portion size. The serving size indicated on a multi-pack or provided within a single pack can influence how much of a product is eaten. Some argue that nutrient profiling models should include consideration of serving size – and some of the companies' systems do so. However, the absence of agreed national and international standards has meant that, to date, it has not proved possible to consider serving size with the models used for this study. This may also account for the differences between the numbers of healthy foods identified by this study and by the companies themselves using their own models.

## BMS Marketing assessment

---

### **Adaptation of the BMS Marketing methodology to the U.S. context**

As noted, the Global Index BMS Marketing methodology is designed to measure BMS manufacturers' compliance with The International Code of Marketing of Breast-milk Substitutes (The Code) and subsequent relevant World Health Assembly (WHA) resolutions at a global level. It comprises two elements: BMS 1 Corporate Profile and BMS 2 In-country assessment. BMS 1 assesses the BMS marketing policies, management systems and disclosure of selected BMS manufacturers whereas BMS 2 analyses the marketing practices of BMS manufacturers in two countries for each Index.

There are several differences between how this assessment has been carried out for the U.S. Index and how it is done for ATNF's Global Indexes and other Spotlight Indexes.

1. The U.S. Index assessment is based on only one of the two elements of ATNF's BMS Marketing methodology – BMS 1 Corporate Profile.
2. ATNF did not have the resources to commission an extensive in-country study of the marketing practices of BMS manufacturers (the BMS 2 element of the methodology). The BMS marketing assessment is based solely on publicly available policy documents.
3. Three companies were assessed, as noted before: Abbott, Nestlé and RB/MJN. They were chosen because they are by the largest players in the baby food market: together they account for nearly 80% market share and the majority of BMS marketing in the United States.
4. Only Nestlé is a constituent of the U.S. Spotlight Index; the other two companies are not included in the Index because neither is classified as food and beverage manufacturer.
5. Because this is the first U.S. Index and due to the limited scope of the companies' commitments as they apply in this country, they are not scored or ranked on their BMS performance as they are in other Indexes. Therefore, Nestlé's Corporate Profile score has not been adjusted based on the BMS score, as is the case in other Access to Nutrition Indexes.

Companies received information on the engagement process and the U.S. Index methodology in August 2017. Between September and November 2017, all information for the Global and U.S. Corporate Profile analysis was gathered using an online data-gathering platform.

### **Approach to U.S. BMS Marketing assessment**

Per the process for applying the BMS 1 Corporate Profile [methodology](#), the publicly available BMS marketing policies of each of the three baby food companies are first reviewed to determine the extent to which they applied in the United States. None was found to apply, i.e. none outlined any commitment to go beyond legal requirements related to marketing breast-milk substitutes in the United States, no further analysis of their policies or management systems was necessary. Were the companies to extend their policies to apply in the United States in future, they would be assessed using the full BMS 1 methodology. The companies' statements about their support for

breastfeeding and stance *vis-a-vis* The Code were reviewed. The results are presented in narrative form only, not as a ranking.

## Limitations to the U.S. BMS Marketing assessment

### **BMS 2 not included:**

Other Access to Nutrition Indexes include an assessment of the actual BMS marketing practices of companies. For each Global Index, two such country studies are done; for a Spotlight Index, a study is done in one major city in the country. ATNF commissions Westat, an experienced U.S.-based research organization, to carry out these studies using a robust research protocol (NetCode<sup>11</sup>). They include interviews with mothers and healthcare workers, and collate data on BMS promotion within healthcare facilities, in retail stores and online, via advertising on a wide range of media channels, and of product labels and claims. In the absence of this study, ATNF has drawn on the work of other organizations that have done relevant research to present an overview of BMS marketing in the United States.

### **New WHA recommendations not assessed:**

The U.S. Spotlight Index did not assess whether companies had adopted the recommendations of WHA 69.9 passed in 2016 which extends the Code's application to infant formulas marketing as suitable for young children up to 36 months of age and makes new recommendations on the marketing of complementary foods.

## Further research limitations and considerations

---

In addition to the methodological limitations described above, some research considerations should be taken into account:

### **NDA:**

Some of the data shared by the companies was provided under NDA and therefore cannot be referenced explicitly in the report. However it is incorporated into companies' scores.

### **Limited or no disclosure:**

Some companies disclosed limited or no information at all, either publicly or to ATNF under NDA. (The three companies that did not engage in ATNF's research process are marked in figures that show rankings in this report and on company scorecards to indicate that the assessments are based solely on publicly disclosed data.) Scores for companies with limited or no disclosure,

---

<sup>11</sup> The Network for Global Monitoring and Support for Implementation of the International Code of Marketing of Breast-milk Substitutes and Subsequent relevant World Health Assembly Resolutions (NetCode) Protocol was developed in 2014 to help governments assess the level of adherence to the Code and/or national laws in different settings. The assessment targets several critical stakeholders – mothers, retailers, health workers, health facilities and media channels. This Protocol was developed and is supported by the WHO and a wide range of expert organizations including UNICEF, IBFAN, WABA, HKI, Save the Children Foundation and the WHO Collaborating Center at Metropal University. The overall goal of the Protocol is to stop all promotional activities related to the marketing of breast-milk substitutes, feeding bottles and teats. ATNF makes use of the NetCode Protocol to assess companies in their compliance with the Code or national regulations, whichever is stricter. For more information about the NetCode Protocol, see: <http://www.who.int/nutrition/publications/infantfeeding/netcode-toolkit-monitoring-systems/en/>

therefore, are lower than for those that disclose a lot of information. As such, they may not be representative of what the companies actually do. The U.S. Index aims to stimulate transparency and public disclosure of relevant information regarding nutrition and health. Based on observations of increased public disclosure across several iterations of the Access to Nutrition Global Index, increases in public disclosure by companies are anticipated for future U.S. Indexes.

**Different financial years and time periods assessed:**

Since companies often have different financial years and publishing timetables for their corporate reports, some relevant data was not published in time to be included in the research. Further, the research phase for the U.S. Spotlight Index was done in parallel with the Global Index 2018 and ended on October 1, 2017. Any information that was published or disclosed to ATNF after the deadline, was not included in the scored assessment.

**Time constraints:**

Completing the Corporate Profile assessment survey and providing feedback on the Product Profile product lists requires significant time from the companies. Companies dedicate different levels of resources to engaging with ATNF during the research process, and time constraints may have limited the amount of relevant information that companies were able to share, that was not already publicly available.

# U.S. Index Research methods

---

This section sets out how the research is done for each of the three Index elements. It explains how the research is undertaken, and how the accuracy and validity of the results is assured.

## Corporate Profile

---

The research process for the U.S. Corporate Profile development started in Summer 2017. During the entire process leading up to the publication of the U.S. Index 2018, ATNF interacted and sought contact with all the companies through company consultations during the development of the methodology, gathering data for the assessments, and in the final reporting phase before publication. This approach, with companies as one group of stakeholders among various other groups of key stakeholders, is part of the multi-stakeholder approach that ATNF applies for all Indexes it publishes.

In May 2017, ATNF initiated a stakeholder consultation process to define the U.S. Index methodology, in which food and beverage companies were informed of the plans and were offered the opportunity to provide input. After finalizing the methodology and selection of the food and beverage companies to be included in the U.S. Index, in August 2017, all companies were formally invited to engage in the research process on a voluntary and cost-free basis to ensure the independence of the Index. As part of this engagement, companies were offered the opportunity to enter into a Non-Disclosure Agreement (NDA) with ATNF, which enabled them to provide information and evidence to ATNF that was not publicly available.

Between June and November 2017, ATNF research analysts gathered public information from corporate websites and third-party sources that were referred to by companies. This information, source documents, and preliminary assessments were saved on an online data-gathering platform. ATNF then provided companies with access to this platform and offered them training on how to use it. Companies were then requested to comment on the initial assessment made by ATNF based on publicly available data, and to provide additional relevant information and supporting evidence via the platform, under the NDA. This information, provided it was supported sufficiently with evidence, was accepted by ATNF for the assessment of Commitment and Performance indicators, but not for Disclosure indicators, as the latter require public disclosure of information. After re-assessment of the data by ATNF, all companies were again asked to provide clarification and/or additional evidence in response to further ATNF queries through the online platform. New information and source documents were accepted if published before the research deadline of October 1, 2017.

It is worth noting that across the various sections and categories of the assessment, companies' global commitments were credited where they apply to, and are relevant in, the United States.

However, measures of performance, e.g. progress against targets and indicators related to public disclosure, were only credited if U.S.-specific data was reported or published.

Moreover, all relevant information gathered in the company interaction process and the analyst interpretation stage were recorded on the data-gathering platform. The same approach to data collection was used for the BMS Marketing assessment, although the results were not used for scoring and ranking the three companies involved, as mentioned earlier. For all assessments, individual email communication and follow-up with companies occurred as needed.

The completeness and correctness of the data collected for the Corporate Profile, BMS marketing assessment and Product Profile is a particularly important aspect of ATNF's quality assurance process. The companies are the relevant sources of this type of information and, therefore, the interactive process of collecting data and obtaining clarification from them is designed to ensure that the data used for the assessment is complete and correct. Of the ten companies assessed in the U.S. Index 2018, seven actively engaged with ATNF during the research process. The three companies that did not engage are marked in graphs showing rankings and on company scorecards.<sup>12</sup>

## Product Profile

---

For the 2016 India Index, 2018 Global Index (and inherently for the 2018 U.S. Index, as the United States was one of the countries included in the Global Index dataset), ATNF commissioned the Food Policy Division of The George Institute for Global Health (TGI), affiliated with the University of Sydney Medical School, to undertake the Product Profile research. This division was uniquely placed to do the research because of its flagship FoodSwitch program, a growing database of nutrition and labelling information describing over 500,000 packaged and restaurant foods, and its experience in using this database to analyze changes in the healthiness of the food supply of more than a billion people around the world. TGI followed its standard rigorous research and validation processes.

## BMS Marketing

---

For each of the three baby food manufacturers, an ATNF analyst reviewed their broad statements relating to breastfeeding and infant nutrition, per Section 1 of the BMS 1 methodology, and then whether their BMS marketing policies applied in the U.S. As none of the companies' policies apply in the United States, no further analysis of the companies using the BMS Marketing BMS 1 methodology was required. These conclusions were checked by a senior ATNF team member and reviewed by the BMS Expert Group.

---

<sup>12</sup> A separate Scorecard - summary document - is published for each company that sets out all of the analysis of that company. It combines graphs, data and narrative description of the Corporate Profile results, the Product Profile results and, for Nestlé only, the BMS Marketing findings. The front page of each company's scorecard, summarizing the company's strengths and areas for improvement, is included in the final U.S. Index report. The full Scorecard is made available at ATNF's website as well.

## Quality assurance processes

---

The validity of ATNF's analysis and related scoring depend on the accurate and consistent assessment of the material submitted or published by the companies about their commitments, performance and disclosure. ATNF has a robust quality assurance process to ensure that the appropriate answer option is selected for each indicator by the analysts and consistency across companies, in addition to measures to ensure that the information the assessments are based on is complete and correct (described previously in the section 'Data collection').

Analysts within ATNF's research team undertake the assessments. The complete assessment of one company, including all Indicators within all Criteria and Categories, are undertaken by a single analyst, to ensure optimal knowledge and understanding of the company's context and way of reporting. The internal consistency of company-reported information and data was verified by cross-checking information across related indicators.

At two timepoints in the research process, full consistency checks by means of internal peer-review were performed, covering all companies and all indicators to ensure fair and consistent scoring. A single research analyst reviewed the assessment of all indicators within one Category, across all companies to ensure that a consistent approach was applied. All seven categories were reviewed in this way and assessments were revised as needed. Final cross-checking was then done by the ATNF research manager and companies were asked to check their own scorecards and best practice examples for factual accuracy (described previously in the section 'Engagement process with companies').

# Future development of the U.S. Spotlight Index

---

ATNF will follow its standard process following publication of the U.S. Index. A range of stakeholder consultations will be held to gather feedback on the results of the Index and how the methodology for each of the elements could be improved. ATNF will develop proposals for how this could be done and discuss and iterate them with the U.S. Expert Group. Once final revisions are agreed, this methodology document will be updated, as will the data-gathering platform, ready for research for the second U.S. Index to begin. This cycle will continue following the publication of each Index.

ATNF believes that the U.S. Access to Nutrition Index could be a valuable new and unique tool for stakeholders to use to track the contribution major U.S. food and beverage manufacturers make to addressing the country's substantial and mounting health challenges linked to diet and nutrition. They provide objective comparable information and data to track the progress the rated manufacturers make over time in improving their policies, practices and disclosure, as well as their products.

Additional elements could be added in future, to, for example, measure companies' spending on marketing healthy and less healthy foods and beverages, or how well designed and effective their programs to improve public health are. Moreover, were more funding available, the Index could be expanded to rate more manufacturers, or parallel Indexes could be developed to assess food retailers, food service and quick service restaurants performance on improving access to nutrition in the United States.

# Appendices

---

The appendices include:

- Appendix I: U.S. Index Corporate Profile Methodology 2018
- Appendix II: Organizations Consulted
- Appendix III: ATNI U.S. Expert Group members

## Appendix I: U.S. Index Corporate Profile Methodology 2018

---



### **Healthy multiplier**

A healthy multiplier is applied to any scores for commitments or performance indicators relating to 'healthy' products. The multiplier is derived from the company's score on Category B2 (but is not the actual score) and ranges between 1 (no multiplier) and 2 (for companies that score 75% or more on B2).

## **Section 1 - Nutrition governance and management**

### **Category A Corporate strategy, management and governance**

A company can better sustain and scale up nutrition activities when a commitment to the issue starts at the top of the organization and is integrated into its core business strategy. Nutrition issues are then more likely to be prioritized as the company allocates resources, tracks performance and reports to its stakeholders.

This Category assesses the extent to which a company's corporate strategy includes a specific commitment and strategic focus on health and nutrition in the U.S. market in general and whether it makes a specific reference to priority populations who lack access to a wide variety of healthy foods in the U.S. The Category furthermore assess whether its approach is embedded within its governance and management systems, as evaluated using three Criteria:

**A1** Corporate nutrition strategy

**A2** Nutrition governance and management systems

**A3** Quality of reporting

This Category carries 12.5% of the weight of the overall score of the Corporate Profile methodology.

A1 Corporate nutrition strategy		
U.S.		
No.	Nutrition	
	Commitment	
1	Does the company have a clear commitment to, and strategic focus on, health and nutrition, articulated in its mission statement and/or strategic commitments in the U.S. markets?	<p>Mission statement mentions health and/or nutrition AND company states a strategic commitment to grow through a focus on health and nutrition</p> <p>Either the mission statement mentions health and/or nutrition, or a strategic commitment to grow through a focus on health and nutrition</p> <p>No clear focus on health and/or nutrition in mission statement or growth strategy</p>
2 ♥	Has the company stated a commitment to deliver more, healthy foods, and made a specific reference to priority populations <sup>13</sup> who lack access to a wide variety of healthy foods in the U.S.?	<p>Yes, with explicit reference to priority populations who lack access to a wide variety of healthy foods</p> <p>Yes, but with no explicit reference to priority populations</p> <p>Commitment under development</p> <p>No commitment or no such statement</p>
3	Company's role in nutrition	
3.1	Does the company recognize it has a role to play in tackling the U.S. challenges of increasing levels of obesity and diet-related chronic diseases?	<p>Yes</p> <p>No or no information</p>
3.2	Does the company recognize the key public health priorities, as set out in authoritative documents such as the WHO Global Action Plan 2013 – 2020, the U.S. Surgeon General's 2011 National Prevention Strategy or the Institute of Medicine's 2012 Report Accelerating Progress in Obesity Prevention?	<p>Yes</p> <p>No or no information</p>
	Performance	
4	How comprehensive is the company's assessment of risks related to nutrition?	<p>Numerous nutrition-related risks identified</p> <p>Few nutrition-related risks identified</p> <p>No nutrition-related risks identified</p>
5	Does the company state that nutrition was a factor in the company's decisions about acquisitions, disposals and forming joint ventures or other partnerships in the U.S. market in the last 3 years?	<p>Company states that nutrition issues are factored into its acquisitions, disposals, JV or partnership decisions and provides specific examples</p> <p>Company states that nutrition issues are factored into its acquisitions, disposals, JV or partnership decisions but does not provide specific examples</p> <p>No evidence that nutrition issues are factored into a company's acquisitions, disposals, JV or partnership decisions</p>
6 ♥	What percentage of the company's total U.S. value of sales in FY2016 did healthy products account for (according to company's definition of healthy)?	<p>More than 50%</p> <p>Between 25 and 49%</p> <p>Between 10 and 24%</p> <p>Less than 10%</p>
7	What % of U.S. revenues are derived from selling products to schools under the Smart Snacks to Schools program (Not scored, for information only)	
	Disclosure	
8	Does the company disclose: (Tick all that apply)	<p>A clear statement that its growth strategy is based on an increasing focus on health and nutrition (Indicator 1)</p> <p>Acquisitions, disposal, JV and partnerships commentary related to nutrition (Indicator 5)</p>

<sup>13</sup> Priority populations are those whose access to healthy food is constrained by low income or geographic factors.

A1 Corporate nutrition strategy		
U.S.		
		Quantitative information about % total sales accounted for in FY2016 by healthy products (Indicator 6)

A2 Nutrition governance and management systems		
U.S.		
No.	Nutrition	
	<b>Commitment</b>	
1	Does the company have a Board- approved commercial 'nutrition strategy' or 'nutrition policy' for the U.S. market?	Comprehensive Limited Under development None of these
2	Has the company set objectives for delivering its nutrition strategy or policy in the U.S.?	A comprehensive set of objectives A limited set of objectives The company is in the process of developing objectives The company doesn't have objectives/no information
3	Does the company or its foundation fund non-commercial public health and nutrition programs?	Yes, based on a clear strategy or plan Yes on an ad-hoc basis No or no information
	<b>Performance</b>	
4	Who has formal accountability for implementing the company's nutrition strategy and/or programs in the U.S.?	CEO or an Executive that reports directly to the Board A committee that reports to the Board, e.g. Sustainability or Corporate Responsibility Committee No information
5	Does the company seek specialist external experts' advice on preventing and addressing obesity and diet-related chronic disease?	Formal panel of experts with a broad range of expertise (i.e. nutrition and health, responsible marketing, labeling, promoting active lifestyles, food insecurity etc.) Formal panel of experts with narrow range of expertise (e.g. medical or nutrition only; no marketing/sports and activity/nutrition education etc. specialists) Informal/ad-hoc input sought No external input sought/no information
6	To whom does the company allocate the day-to-day responsibility for implementing its nutrition strategy/plan in the U.S.? What is his/her function and level in the company?	An Executive Manager (one level below the board) A Manager two or more levels below the board No responsibility or no Information
7	Is the company's nutrition plan/strategy delivery subject to standard internal audit and annual management review?	Yes, standard internal audit and annual management review Either standard internal audit or annual management review but not both To none of them or no information
8	Does the company link the remuneration of the CEO and/or senior managers with performance on nutrition targets/objectives?	CEO's compensation is specifically linked to performance on nutrition objectives in the U.S. CEO's compensation is linked to performance on U.S. CSR initiatives (nutrition clearly part of those initiatives) Only links senior managers' remuneration to performance on U.S. nutrition objectives No link or no information
	<b>Disclosure</b>	
9	Does the company disclose: (Tick all that apply)	Its nutrition strategy/policy for, or which covers the U.S. (Indicator 1)

A2 Nutrition governance and management systems		
U.S.		
		A comprehensive or limited set of objectives, related to R&D, NPD, reformulation, improving accessibility and affordability, labeling, use of claims etc. and/ or a limited set of objectives (Indicator 2)
		Accountability arrangements for delivering the company's nutrition strategy (Indicator 4)
		Names and affiliations of members of its advisory panel/names of advisors link to (Indicator 5)
		Managerial arrangements (Indicator 6)
		Compensation arrangements for CEO (Indicator 8)

A3 Quality of reporting		
U.S.		
No.	Nutrition	
	Performance	
1	Does the company publish formal, regular reports on its overall approach to tackling nutrition issues covering the U.S. market and how often?	Annually (i.e. the company has an annual reporting cycle) Less frequently than annually No reporting
2	Does the company's reporting on preventing and addressing obesity and diet-related chronic diseases in the U.S. include: (Tick all that apply)	A clear sense of the company's nutrition strategy and how it relates to overall business strategy Clear reporting against all objectives and targets A clear outlook on future plans and targets Explanation of the challenges faced, not only success/positive stories None / not relevant
3	The company's reporting on food insecurity in the U.S. includes its non-commercial public health and nutrition programs:	Comprehensive Limited None
4	In what kind of publication and how does the company report on its nutrition activities?	Throughout the Annual Report and Accounts or equivalent, highlighting how nutrition issues are adding value to the business Within its Annual Report and Accounts or equivalent, e.g. in the sustainability or corporate responsibility section In a separate report (e.g. website) on its nutrition activities but does not mention nutrition issues its Annual Report and Accounts or equivalent. No reporting
5	Is the company's nutrition reporting subject to verification or external review?	The report that contains the nutrition commentary is independently verified Report not formally verified but includes commentary from independent external reviewer(s) No or limited external review

## Section 2 - Formulating and delivering appropriate, affordable, accessible products

### Category B Formulating appropriate products

Companies in the U.S. can help consumers make healthier choices by improving the nutritional quality of foods made available to them. This Category addresses companies' efforts to do so through research and development (R&D), new product formulation and reformulation of existing products. It also assesses the quality of the nutrient profiling system that a company may use to guide its product formulation efforts.

This Category consists of two Criteria:

**B1** Product formulation - Nutrition

**B2** Nutrient profiling system

This Category carries 27.5% of the weight of the overall score Corporate Profile methodology.

B1 Product formulation – Nutrition <sup>14</sup>		Product Category 1-5
<b>U.S.</b>		
<b>No</b>	<b>Nutrition</b>	
	<b>Commitment</b>	
<b>1</b>	Has the company made any commitments to invest (or continue to invest) in R&D to improve the nutritional quality of its products for the U.S. markets?	Yes No or no information
<b>2</b>	What percentage of U.S. revenues did the company spend on R&D (e.g. average over last 3 years)? (For information only, i.e. not scored)	
<b>3</b>	Has the company set targets for the U.S. markets with respect to the amount it intends to increase its R&D effort/spending in coming years on nutrition (or the number of new, healthy products it intends to introduce)?	Yes No or no information
<b>4</b>	Does the company state that its approach to reformulating its existing products is aligned to the U.S. dietary guidelines?	U.S. dietary guidelines No commitment to reformulating products or no information
<b>5</b>	Does the company commit to formulate all products that it sells under the Smart Snacks in School program in the same way for sales outside schools?	The company formulates all products that it sells under the Smart Snacks in School program in the same way for sales outside schools The company has a commitment to bring up to the same nutrition standards the formulation of all products sold to schools under the Smart Snacks program No commitment to formulate all products that it sells under the Smart Snacks in School program in the same way for the sales outside schools or NA
	<b>Performance</b>	
		Consolidated data on the number of new products launched

<sup>14</sup> This Criterion asks questions about nutrients. If a nutrient is not relevant for a company, related questions will be made not applicable.

B1 Product formulation – Nutrition <sup>14</sup>		Product Category 1-5
<b>U.S.</b>		
<b>6</b> ♥	Can the company provide evidence of having introduced new healthy products in the U.S. in the last three years?	Some examples but no consolidated data for products launched No products
<b>7</b> ♥	<b>Company's products that meet 'composite healthy standard'</b>	
7.1	Percentage of company's products that met its 'composite healthy standard' by the end of FY 2016 in the U.S. market?	More than 50% Between 25-50% Between 10-25% Less than 10% 0% or no information
7.2	By what percentage has the number of products that meet the company's 'composite healthy standard' increased between FY 2012 and the end of FY 2016 in the U.S. market?	By more than 10% by number of products (or less than 10% but the number of products that met the healthy standard was already more than 50% in 2012) By more than 5% by number of products By more than 2% by number of products No info or no change
<b>8</b> ♥	Across how many brands does the company offer products that meet the company's overall healthy standard for adults in the U.S. market?	At least one product in all brands At least one product in at least half of its brands Fewer, or no information
<b>9</b> ♥	<b>Products that meet the healthy standard for children under 12</b>	
9.1	What percentage (by number of products) of your U.S. portfolio meet the standard to children under 12 in 2016 (according to own NPS or to the CFBAI nutrition criteria (if a member)):	More than 50% Between 25 - 49% Between 5 - 24.9% Between 1 - 5% 0% or no information
9.2	What percentage (by number of products) of your U.S. products in relevant categories meet the Smart Snacks nutrition standards?	More than 50% Between 25 - 49% Between 5 - 24.9% Between 1 - 5% 0% or no information
<b>10</b> ♥	Across how many brands does the company offer products that meet the company's overall healthy standard for children in the U.S. market?	At least one product in all brands At least one product in at least half of its brands Fewer, or no information
<b>11</b>	<b>Smaller sizes packaging of relevant product categories (For information only, i.e. not scored)</b>	
11.1	What percentage of confectionery products does the company offer smaller sizes in FY 2016?  100 KCAL per serving or less 150 KCAL per serving or less	
11.2	What percentage of savory snacks products does the company offer smaller sizes in FY 2016?  100 KCAL per serving or less 150 KCAL per serving or less	
11.3	What percentage of ice-cream products does the company offer smaller sizes in FY 2016?  100 KCAL per serving or less 150 KCAL per serving or less	

B1 Product formulation – Nutrition <sup>14</sup>		Product Category 1-5
<b>U.S.</b>		
11.4	What percentage of carbonated drinks products does the company offer smaller sizes in FY 2016?  100 KCAL per serving or less 150 KCAL per serving or less	
11.5	What percentage of juices products does the company offer smaller sizes in FY 2016?  100 KCAL per serving or less 150 KCAL per serving or less	
11.6	What percentage of sports & energy drinks products does the company offer smaller sizes in FY 2016?  100 KCAL per serving or less 150 KCAL per serving or less	
<b>Product Categories 1 - 5: Nutrition targets and performance</b>		
<b>Commitment</b>		
<b>12</b>	<b>Salt/sodium targets</b>	
12.1	Has the company already reformulated all products in the category and reached the salt/ sodium target/threshold?  If no,  Has the company set a target to reduce levels of salt/ sodium and, if so, for what percentage of relevant products in the category?	Yes No Not applicable More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No salt target
12.2	Baseline and target year	The company has specified a baseline year from which the reduction will be made/threshold will be reached The company has set a target year by when the reduction will be made /threshold will be reached
<b>13</b>	<b>Saturated fats targets</b>	
13.1	Has the company already reformulated all products in the category and reached the saturated fats target/threshold?  If no,  Has the company set a target to reduce levels of saturated fats and, if so, for what percentage of relevant products in the category?	Yes No Not applicable More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No saturated fats target
13.2	Baseline and target year	The company has specified a baseline year from which the reduction will be made/threshold will be reached The company has set a target year by when the reduction will be made/threshold will be reached
<b>Added sugars targets</b>		
<b>14</b>	Did the company set an added sugar target/ threshold or a calorie reduction target/ threshold	Added sugar Calorie Not applicable
<b><i>If added sugars:</i></b>		
14.1	Has the company set a target to reduce levels of added sugar and, if so, for what percentage of relevant products in the category?  If no,	Yes No More than 80%

B1 Product formulation – Nutrition <sup>14</sup>		Product Category 1-5
<b>U.S.</b>		
	Has the company set a target to reduce levels of added sugars and, if so, for what percentage of relevant products in the category?	Between 50% - 79% Between 25% - 49% Less than 25% No added sugar target
14.2	Baseline and target year	The company has specified a baseline year from which the reduction will be made/threshold will be reached The company has set a target year by when the reduction will be made/ threshold will be reached
	<b><i>If calories:</i></b>	
14.1	Has the company already reformulated all products in the category and reached the calorie target/threshold?	Yes No
	If no,	More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No calorie target
	Has the company set a target to reduce levels of calories and, if so, for what percentage of relevant products in the category?	
14.2	Baseline and target year:	The company has specified a baseline year from which the reduction will be made/threshold will be reached The company has set a target year by when the reduction will be made/threshold will be reached
<b>15</b>	<b>Fruits, Vegetables, Nuts, Legumes targets</b>	
15.1	Has the company already reformulated all products in the category and reached the fruits, vegetables, nuts, legumes target/threshold?	Yes No Not applicable
	If no,	More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No fruits, vegetables, nuts, legumes target
	Has the company set a target to increase the proportion of fruits, vegetables, nuts, legumes and, if so, for what percentage of relevant products in the category?	
15.2	Baseline and target year:	The company has specified a baseline year from which the increase will be made The company has set a target year by when the increase will be achieved
<b>16</b>	<b>Whole grains targets</b>	
16.1	Has the company already reformulated all products in the category and reached the whole grains target/threshold?	Yes No Not applicable
	If no,	More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No whole grains target
	Has the company set a target to increase the proportion of whole grains and, if so, for what percentage of relevant products in the category?	
16.2	Baseline and target year:	The company has specified a baseline year from which the increase will be made The company has set a target year by when the increase will be achieved
	<b>Performance</b>	
<b>17</b>	What percentage of all relevant products (by number) met the company's sodium/salt target by FY 2016?	More than 80% Between 50 - 79% Between 25 - 49%

B1 Product formulation – Nutrition <sup>14</sup>		Product Category 1-5
<b>U.S.</b>		Between 2 - 24%
		Less than 1% or no information
		Not applicable
<b>18*</b>	What percentage of all relevant products (by number) met the company's sugar target by FY 2016?	More than 80%
		Between 50 - 79%
		Between 25 - 49%
		Between 2 - 24%
		Less than 1% or no information
		Not applicable
<b>18*</b>	What percentage of all relevant products (by number) met the company's calorie target by FY 2016?	More than 80%
		Between 50 - 79%
		Between 25 - 49%
		Less than 1% or no information
		Not applicable
<b>19</b>	What percentage of all relevant products (by number) met the company's saturated fat target by FY 2016?	More than 80%
		Between 50 - 79%
		Between 25 - 49%
		Between 2 - 24%
		Less than 1% or no information
		Not applicable
<b>20</b>	What percentage of all relevant products (by number) met the company's fruits, vegetables, nuts, legumes target by the end of FY 2016?	More than 20%
		Between 10 - 19%
		Between 2 - 9%
		Less than 2% or no information
		Not applicable
<b>21</b>	What percentage of all relevant products (by number) met the company's whole grains target by the end of FY 2016?	More than 20%
		Between 10 - 19%
		Between 2 - 9%
		Less than 2% or no information
		Not applicable
<b>Disclosure</b>		
<b>22</b>	Does the company disclose:	Spending on R&D (Indicator 2)
		Targets for R&D spending on nutrition-related projects (Indicator 3)
		Commitment to formulate similarly all products that it sells under the Smart Snacks in School program in the same way for the sales outside schools. (Indicator 5)
<b>23</b>	Does the company disclose: (Indicators 12-16 for all product categories 1-5)	All targets/thresholds relating to this product category
		Some targets/thresholds relating to this product category
		No or no information
		Not applicable
<b>24</b>	Does the company disclose: (Indicator 6)	The number of new healthy products launched
<b>25</b>	Does the company disclose: (Indicator 7.1)	The percentage of products that meet its composite healthy standards?

\* Indicator 18 appears twice, as it refers to the selection of the relevant target in Indicator 14; depending on the selection of an added sugar or a calorie reduction target, only the corresponding version of indicator 18 is assessed.

\* Indicator 18 appears twice, as it refers to the selection of the relevant target in Indicator 14; depending on the selection of an added sugar or a calorie reduction target, only the corresponding version of indicator 18 is assessed.

B1 Product formulation – Nutrition <sup>14</sup>		Product Category 1-5
<b>U.S.</b>		
<b>26</b>	Does the company disclose: (Indicators 17-21 for all product categories 1-5)	Percentage of all relevant products that met all the company's nutrient targets Percentage of some relevant products that met all the company's nutrient targets No or no information Not applicable
<b>27</b>	Does the company disclose: (Indicator 9.1)	The percentage of its products that can be marketed to children?

B2 Nutrient profiling system		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	
	<b>Performance</b>	
<b>1</b>	Does the company have an NPS? (For information only, i.e. not scored)	Yes No or no information
	<b>If yes,</b>	
1.1	Is this NPS used to guide new product development/reformulation? (For information only, i.e. not scored)	Yes No or no information
1.2	Is the NPS used to determine which products can be marketed to children? (For information only, i.e. not scored)	Yes No or no information
1.3	Is the same system used for both purposes? (For information only, i.e. not scored)	Yes No
<b>2</b>	In respect of the NPS that the company uses to guide new product development or reformulation, is that system:	A formal internal NP system (that calculates overall scores of ratings of the nutritional quality of its products) to guide its reformulation program. A pre-cursor to a full NP system, e.g. a tool to assess levels of salt, fat, sugar etc. and rate them high, med, low or above or below a threshold, but which does not calculate overall nutritional quality No system
<b>3</b>	How did the company develop its NP System?	Adopted or adapted an existing NP system developed through an independent multi-stakeholder process Developed its own NP system with independent external input Developed its own NP system without independent external input/unclear whether independent external input was used No or no information
<b>4</b>	Which products and categories are covered by the NP system?	All products and product categories Some products and product categories None or no information
<b>5</b>	What types of food components does the NP system assess?	Both positive and negative food components Negative food components only No information
	<b>Disclosure</b>	
<b>6</b>	How/where does the company publish its NP system to allow consumers and other stakeholders to assess and understand it?	In peer-reviewed journal In full by the company itself Limited information or on request only Not published

## Category C Delivering affordable, accessible products

Producing healthier options is a necessary but insufficient condition to improve consumer access to nutritious foods and beverages. Consumers also need to have access to these products. Companies should offer them at competitive prices and distribute them widely to offer consumers a 'level playing field' between healthy and less healthy options.

This Category assesses companies' efforts to make their healthy products more affordable and accessible to U.S. consumers through their approaches to pricing and distribution. It consists of two Criteria:

**C1** Product pricing

**C2** Product distribution

This Category carries 22.5% of the weight of the overall score Corporate Profile methodology.

C1 Product pricing		
U.S.		
No.	Nutrition	
	Commitment	
1 ♡	Does the company make a commitment to address the affordability of its healthy products in the U.S. market?	Clear commitment made for whole business, with particular reference to priority populations
		Clear commitment made for whole business without particular reference to priority populations
		Broad commitment with particular reference to priority populations
		No commitments/no information
2 ♡	Has the company codified its affordability commitment with respect to healthy products within a formal policy?	Policy that applies to all product categories
		Policy that applies only to some product categories
		Policy under development
		No or no information
3 ♡	Which targets has the company set for the U.S. market? (Tick all that apply)	Number of consumers to reach with affordably priced healthy products by set date
		Number of units or sales value target for affordably priced healthy products by set date
		Achieve a particular price point for healthy products
		Narrow the price differential on healthy vs. less healthy products
		Targets set with particular reference to priority populations
		No commitments/no information
Performance		
4	How senior is the person to whom the company allocates the responsibility for implementing the affordability policy?	Named executive
		Named manager
		No responsibility allocated
5 ♡	Can the company demonstrate that it has done analysis on appropriate pricing of healthy products for priority populations in the U.S.?	Yes
		No
		Strong evidence

C1 Product pricing		
U.S.		
No.		
6 ♥	Can the company provide evidence that it reached its targets or that it is working towards its targets?	Weak evidence
		None / No information
<b>Disclosure</b>		
7	Does the company disclose:	Commitment to address the affordability of its healthy products in the U.S. market (Indicator 1)
		Policy on affordability with respect to healthy products (Indicator 2)
		Named person with responsibility (Indicator 4)
		Commentary on availability of affordable options for priority populations (Indicator 6)

C2 Product distribution		
U.S.		
No.	Nutrition	
<b>Commitment</b>		
1 ♥	Does the company make a clear and specific commitment to address the accessibility of healthy products in the U.S.?	Clear commitment made for whole business, with particular reference to priority populations
		Clear commitment made for whole business without particular reference to priority populations
		Broad commitment with particular reference to priority populations
		No commitments/no information
2 ♥	Has the company codified its commitment within a policy on commercial distribution of its healthy products?	Policy that applies to all product categories
		Policy that applies only to some product categories
		Policy under development
		No policy / no information
3 ♥	Does the company commit to ensuring that at least some of the products it donates to non-commercial public health and nutrition programs/organizations (e.g. Feeding America individual food banks) are healthy?	Yes
		No / no information
4 ♥	Has the company set targets in the following area: (Tick all that apply)	Number of new consumers of healthy products to reach through improved distribution
		Number of priority populations to reach with healthy products through improved distribution in urban deserts
		Number of units or sales value targets for healthy products related to extended distribution
		Number of new retail partners to achieve extended accessibility goals
		Number of priority consumers to reach with healthy products through improved distribution in rural deserts
		Investment planned in improving accessibility of healthy products
<b>Performance</b>		
5	How senior is the person to whom the company allocates responsibility for implementing the affordability policy?	Named executive
		Named manager
		No responsibility allocated
6 ♥	Can the company demonstrate that it has done analysis of the accessibility of healthy products to priority populations in the U.S.?	Urban poor
		Rural poor
		Priority ethnic populations

C2 Product distribution		
<b>U.S.</b>		
		Vulnerable age groups
		None or no information
<b>7</b>	Can the company demonstrate that it is making progress to achieving the targets that it sets out in indicator 4?	Strong evidence
		Weak evidence
		No evidence
<b>8</b> 	Can the company provide evidence of donating healthy products to non-commercial public health and nutrition programs/organizations e.g. Feeding America individual food banks?	100%
		More than 80%
		More than 60%
		No evidence
<b>Disclosure</b>		
<b>9</b>	Does the company disclose:	Commitment to address the accessibility of healthy products (Indicator 1)
		Commitment to donate only healthy products to food-access/food insecurity programs/organizations e.g. Feeding America individual food banks (Indicator 3)
		Accessibility targets (Indicator 4)
		Named person with responsibility (Indicator 5)
		Commentary on availability of healthy options for priority populations (Indicator 8)

## Section 3 - Influencing consumer choice and behavior

### Category D Responsible marketing policies, compliance and spending

This Category captures the extent to which companies support U.S. consumers, including priority consumer groups and children, in making healthy choices by adopting responsible marketing practices and by prioritizing the marketing of their healthier products.

The Category consists of two parallel groups of three Criteria:

- D1** Marketing policy: All consumers
- D2** Auditing and compliance with policy: All consumers
- D3** Spending: Advertising focus: All consumers
- D4** Marketing policy: Children
- D5** Auditing and compliance with policy: Children
- D6** Spending: Advertising focus (children) and policy impact

This Category carries 22.5% of the weight of the overall score Corporate Profile methodology.

D1 Marketing policy: All consumers		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	
<b>1a</b>	Does the company have its own policy on responsible marketing in the U.S. (that goes beyond the ICC Framework)? (For information only, i.e. not scored)	Yes
		No or no information
<b>1b</b>		Yes

D1 Marketing policy: All consumers		
<b>U.S.</b>		
	Does the company commit to the ICC Framework? (For information only, i.e. not scored)	No or no information
	<b>Commitment</b>	
<b>2</b>	The company has a responsible marketing policy that applies to all consumers in the U.S. that applies explicitly to the following media: (Tick all that apply)	<p>TV &amp; radio</p> <p>Own websites</p> <p>Third-party websites</p> <p>DVDs/CDs/GAMES</p> <p>Social media (FB or Twitter feeds of the company or brands)</p> <p>All print media (newspapers, magazines, books, and printed advertising in public places)</p> <p>Mobile and sms marketing</p> <p>Cinema</p> <p>Outdoor marketing</p> <p>In-store marketing/point of sales marketing</p> <p>Sponsorship</p> <p>Product placement i.e. in movies or TV shows</p>
<b>3</b>	The company's policy includes the following commitments related to the representation of products: (Tick all that apply)	<p>Commits that copy, sound and visual presentations in marketing communications for food and beverage products should accurately represent the material characteristics of the product featured, such as taste, size, content nutrition or health benefits, and should not mislead consumers concerning any of those characteristics. (Article 5 of ICC)</p> <p>All nutritional and health-benefit information and claims for food and beverage products should have a sound scientific basis. And where claims or terminology used in marketing communications might reasonably be interpreted by a consumer as health or nutrition claims, they should be supportable with appropriate scientific evidence. (Article 3 of ICC)</p> <p>Commits to presenting products in the appropriate portion size and context (and not condone or encourage excess consumption) (Article 1 of ICC)</p> <p>Commits not to represent food products not intended to be substitutes for meals as such. (Article 5 of ICC)</p> <p>Commits not to undermine the concept of healthy balanced diets, or the importance of a healthy active lifestyle. (Article 17 of ICC)</p> <p>Commits not to use any models with a BMI of under 18.5 (Industry best practice)</p> <p>Commits not to use consumer taste or preference tests in a way that might imply statistical validity if there is none. Testimonials are based on well-accepted and recognized opinion from experts. (Article 6 of ICC)</p> <p>Commits to presenting products in the context of a balanced diet (Industry best practice)</p> <p>All of the above</p>
	Does the company make an explicit commitment to developing and delivering marketing strategies for	Yes

D1 Marketing policy: All consumers		
U.S.		
4 ♥	healthy products tailored to reaching priority populations in the U.S.?	No or no information
5 ♥	Can the company provide evidence of taking steps to understand and reach priority populations through targeted marketing of healthy products? (Tick all that apply)	<p>Has done research to generate consumer and marketing insights relating to marketing of healthy products to priority populations</p> <p>Can demonstrate use of multiple communication channels from mass to social media to reach specific priority populations with marketing of healthy products</p> <p>Has worked with creative agencies to ensure communication of healthy products is compelling and attractive to specific priority populations</p> <p>Has worked with behavioral specialists to inform design of communications of healthy products to drive desired behavior change</p>
<b>Disclosure</b>		
6	Does the company publish its policy (or pledge to support the ICC Code), which is publicly available? (Indicator 3)	<p>Yes, in full</p> <p>Yes, in summary, not including details of scope of application</p> <p>No</p>
7	Does the company disclose: (Indicator 4)	The commitment on developing and delivering healthy food marketing strategies intended for priority consumers

D2 Auditing and compliance with policy: All consumers		
U.S.		
No.	Nutrition	
Performance		
1	Does the company audit its compliance in the U.S. with its policy?	<p>Yes</p> <p>No/no information</p>
2	How is compliance assessed?	<p>The company appoints an independent external auditor to assess compliance with its policy or takes part in an auditing process of an external body it is a member of undertaken by independent company</p> <p>By an industry association</p> <p>The company conducts its own audits</p> <p>No audit/no information</p>
<b>Disclosure</b>		
3	Does the company disclose: (Indicator 1)	Information about its audit

D3 Spending: Advertising focus: All consumers		
U.S.		
No.	Nutrition	
Commitment		
1	Does the company have a commitment to increase its marketing spending on healthy products in the U.S.? (For information only, i.e. not scored)	<p>Yes</p> <p>No</p>
<b>Performance</b>		
2		<p>0-15%</p> <p>16%-25%</p>

D3 Spending: Advertising focus: All consumers		
U.S.		
	What percentage of the total marketing budget is allocated to marketing healthy products: (for information only, i.e. not scored)	26%-40% 41%-50% Above 50%
3	Can the company provide for the five largest categories the % marketing budget allocated for marketing healthy options as percentage of the total category marketing budget? (For information only, i.e. not scored)	
<b>Disclosure</b>		
4	Does the company disclose? (Indicator 1) (For information only, i.e. not scored)	Commitment

D4 Marketing Policy: Children		
U.S.		
No.	Nutrition	
Commitment		
<i>Form of commitment/policy</i>		
1	Does the company support the CARU guidelines? (For information only, i.e. not scored)	Yes No or no information
2	Approach to policy on marketing to children (For information only, i.e. not scored)	The company is a member of CFBAI and has its own policy that goes beyond CFBAI commitments The company is a member of CFBAI and follows only those commitments The company is not a member of the CFBAI
<b>For CFBAI members only:</b>		
	Does the company apply its own NPS to identify healthy products covered by its policy?	Yes No or no information
	Does the company use the CFBAI nutrition criteria to identify healthy products covered by its policy?	Yes No or no information
<b>Media to which commitments apply</b>		
3 ♥	Do the company's responsible marketing commitments related to children apply explicitly to the following media covered by CFBAI: (Tick all that apply)	TV Radio Print Third-party websites Company-owned websites primarily directed to children under 12 Video and computer games rated 'Early Childhood' DVDS of movies rated G and other DVDs whose content is primarily directed to children under 12 Mobile media primarily directed at children under 12 including cell phones, smart phones, tablets other personal digital devices or word of mouth/viral forms of marketing Interactive games that incorporate foods or beverages Product placement i.e. in movies or TV shows
4 ♥	Do the company's responsible marketing commitments related to children apply explicitly to the following additional media not covered by CFBAI: (Tick all that apply)	Social media (FB, YouTube, Twitter feeds of the company or brands, blogs and podcasts) In films rated G, PG and PG-13 Outdoor marketing In-store marketing/point-of-sales marketing Sponsorship of events (e.g. sporting, cultural etc.)
<b>Types of messages and marketing techniques used</b>		

D4 Marketing Policy: Children		
U.S.		
5 ♥	Does the company commit to: (Tick all that apply)	Support the role of parents or others responsible for guiding diet and lifestyle choices or not to undermine the role of parents or other responsible for guiding diet and lifestyle choices
		Ensuring that marketing materials contain an educative message in relation to healthy diets and lifestyles
		Not showing children engaging in other activities while eating (e.g. watching television, using screens, walking, playing)
		No to mislead children about the emotional, social or health benefits of consuming the product
6 ♥	Does the company commit to using responsible marketing techniques? (Tick all that apply)	Commits not to create a sense of urgency
		Commits not to use inappropriate price minimization
7 ♥	Does the company commit to representing foods fairly? (Tick all that apply)	Objective claims are backed up with adequate substantiation, as would be understood by a child
		The nutritional content of products and the benefits of consumption are fairly and accurately represented
8 ♥	Does the company commit to clearly differentiating marketing and branding? (Tick all that apply)	To clearly display the company or brand name when advertising on virtual media
		To clearly differentiate, by labeling, advertising and content on virtual media
		Not to brand merchandise aimed at children except related to healthy products
		Only to place products in programs, games, etc. that meet the company's healthy food standard
9 ♥	Does the company commit to use celebrities responsibly or not at all? (Tick all that apply)	Commits not to sponsor materials or people or activities popular with children except in conjunction with healthy products
		Pledges not to use celebrities and other people with strong appeal to children in marketing of products other than those that meet the company's healthy standard
		Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product
10 ♥	With respect to fantasy and animated characters: (Tick all that apply)	Pledges not to use third-party fantasy and animation characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in additional media to those included in CFBAI pledge
		Pledges not to use third-party fantasy and animation characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, for CFBAI covered media only

**D4 Marketing Policy: Children**

<b>U.S.</b>		
		<p>Pledges not to use its own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, <b>IN ALL FORMS OF MARKETING</b></p> <p>Pledges not to use its own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging</p>
<b>11</b> ♡	With respect to promotional toys, games, vouchers and competitions: (Tick all that apply)	<p>Promotional games, toys, vouchers, competitions etc. are used only in relation to healthy foods</p> <p>No commitment</p>
<b><i>Audience thresholds by age group</i></b>		
<b>12</b> ♡	<b>Advertising to children aged 2-6</b>	
12.1	What percentage audience threshold for children aged 2-6 does the company use to restrict its advertising on measured media?	<p>&lt;25%</p> <p>26 - 35%</p> <p>&gt;36%</p> <p>&gt;50%</p> <p>No audience threshold</p>
12.2	What kind of products does the company advertise to children aged 2-6?	<p>No products</p> <p>Healthy products only</p> <p>All products</p>
<b>13</b> ♡	<b>Advertising to children aged 7-12</b>	
13.1	What percentage audience threshold for children aged 7-12 does the company use to restrict its advertising on measured media?	<p>&lt;25%</p> <p>26 - 35%</p> <p>&gt;36%</p> <p>&gt;50%</p> <p>No audience threshold</p>
13.2	What kind of products does the company advertise to children aged 7-12?	<p>No products</p> <p>Healthy products only</p> <p>All products</p>
<b>14</b>	<b>Advertising to children aged 13 and over: (For information only, i.e. not scored)</b>	
14.1	What percentage audience threshold for children aged 13 and over does the company use to restrict its advertising on measured media?	<p>&lt;25%</p> <p>26 - 35%</p> <p>&gt;35%</p> <p>&gt;50%</p> <p>No audience threshold</p>
14.2	What kind of products does the company advertise for children aged 13 and over?	<p>No products</p> <p>Healthy products only</p> <p>All products</p>
<b>15</b> ♡	Does the company utilize tools to ensure that its online marketing deters certain age groups? (Tick all that apply)	<p>Ensuring design of websites/pages is appropriate to over 12s predominantly, i.e. not designed to attract younger children</p> <p>Age screening prior to logging on/registering (e.g. enter DOB or require parent to consent)</p> <p>Review of traffic data to determine demographic visiting sites</p> <p>Ensuring adverts are designed deliberately not to appeal to children younger than 12</p>

**D4 Marketing Policy: Children**

<b>U.S.</b>		
		Nature of third-party websites chosen to advertise on (i.e. ages targeted)
<b>16</b> ♥	To which online media does the company apply the tools listed above?	Its own corporate and brand websites, third party websites and mobile media Only two of the three Only one of the three or not clear No separate consideration of how to address 'child audience' for these media
<b><i>Marketing in and around schools</i></b>		
<b>17</b> ♥	To what extent does the company commit to a responsible marketing approach near and in Pre-K through Elementary schools (and/or any schools with children up to age 11)? (Tick all that apply)	No marketing or advertising in such schools Only marketing/advertising 'healthy' products in primary schools in agreement with schools/parents Commitment extends to places near primary schools Commitment applies explicitly to new media marketing/advertising techniques Commitment includes only offering 'educational materials' when in agreement with schools/parents The company does not commit to this or no information
<b>18</b> ♥	Which types of marketing are covered by the company's commitment relating to Pre-K through Elementary schools?	Signs, scoreboards or posters Educational materials (e.g. text or work books, curricular, websites for educational purposes, other) Vending machines, food or beverage cups or containers, food display racks, coolers School equipment, e.g. pencils, notebooks, textbook covers, other stationery supplies School uniform or sports uniform Advertisements in school publications, on school radio stations, in-school TV, computer screen savers, school-sponsored or use internet sites, announcements on the PA system Fundraisers or sponsored programs linked to companies, to encourage purchases etc. (e.g. McTeacher's night, Campbell's Labels for Education, General Mills box tops for Education etc.) Corporate incentive programs that reward or provide children with free or discounted foods or beverages School buses Market research activities (taste tests, coupons, free samples) No marketing or advertising in such schools
<b>19</b> ♥	To what extent does the company commit to a responsible marketing approach near and in middle and high schools (for children between the ages of 12 and 18)? (Tick all that apply)	No marketing or advertising in middle or high schools Only marketing/advertising 'healthy' products in such schools in agreement with schools/parents Commitment extends to places near such schools Commitment applies explicitly to new media marketing/advertising techniques

D4 Marketing Policy: Children		
U.S.		
		<p>Commitment includes only offering 'educational materials' when in agreement with schools/parents</p> <p>The company does not commit to this or no information</p>
20 ♥	Which types of marketing are covered by the company's commitment relating to middle and high schools?	<p>Signs, scoreboards or posters</p> <p>Educational materials (e.g. text or work books, curricular, websites for educational purposes, other)</p> <p>Vending machines, food or beverage cups or containers, food display racks, coolers</p> <p>School equipment, e.g. pencils, notebooks, textbook covers, other stationery supplies</p> <p>School uniform or sports uniform</p> <p>Advertisements in school publications, on school radio stations, in-school TV, computer screen savers, school-sponsored or used internet sites, announcements on the PA system</p> <p>Fundraisers or sponsored programs linked to companies, to encourage purchases etc. (e.g. McTeacher's night, Campbell's Labels for Education, General Mills box tops for Education etc.)</p> <p>Corporate incentive programs that reward or provide children with free or discounted foods or beverages</p> <p>School buses</p> <p>Market research activities (taste tests, coupons, free samples)</p> <p>No marketing or advertising in such schools</p>
21 ♥	To what extent does the company commit to a responsible marketing approach in other places where children gather (after-school clubs, Boys and Girls Clubs, YMCAs, other childcare and other educational establishments, family and child clinics, pediatric services or other health facilities, amusement parks or zoos, sporting or cultural events held at those premises)	<p>No marketing or advertising in and near these settings</p> <p>No marketing or advertising in these settings</p> <p>Only marketing/advertising healthy products near these settings in consultation with their management and users (but not in them)</p> <p>Only marketing/advertising healthy products in and near these settings in consultation with their management and users</p> <p>No commitment to one of the above options or no information</p>
22 ♥	Which types of marketing are covered by the company's commitment relating to other places where children gather?	<p>Signs, brochures or posters inside or outside the buildings or facilities</p> <p>Vending machines, food or beverage cups or containers, food display racks, coolers</p> <p>Toys or equipment</p> <p>Clothing</p> <p>Fundraisers or sponsored programs linked to companies, to encourage purchases</p> <p>Corporate incentive programs that reward or provide children with free or discounted foods or beverages</p> <p>Market research activities (taste tests, coupons, free samples)</p> <p>No marketing or advertising in such schools</p>
<b>Disclosure</b>		

D4 Marketing Policy: Children		
U.S.		
23	Does the company disclose: (Indicator 4, regarding responsible marketing commitments related to children)	Yes, policy or Pledge that is published in full
		Yes, policy or Pledge published in summary only
		Does not publish a policy on or covering marketing to children in the U.S.

D5 Auditing and compliance with policy: Children		
U.S.		
No.	Nutrition	
Performance		
1	Does the company audit its compliance with its policy on marketing to children?	Yes No or no information
2	Is the audit conducted by:	Compliance is assessed by an industry association or pledge organization The company conducts an internal audit No audit/no information
3	How often is the audit undertaken?	Annually Less frequently than annually No information
4	Which media are covered by the audit:	Audits extend beyond CFBAI covered media Audits cover CFBAI covered media only Audits cover fewer media than CFBAI No audit
5	<b>What is the company's individual compliance level for TV and digital marketing? (%)</b>	
5.1	Individual compliance level for measured media	Over 90% Less than 90% or no reporting
5.2	Individual compliance level for measured digital media	Over 90% Less than 90% or no reporting
6	Does the company have a clear commitment to corrective action?	Clear commitment to corrective action, if needed No commitment to corrective action
7	Has the company had any complaints against it upheld by CARU in the last 3 years?	No Yes
Disclosure		
8.1	Does the company disclose: (Indicator 5.1)	Its individual compliance level for TV Disclosure of only aggregate industry compliance level
8.2	Does the company disclose: (Indicator 5.2)	Its individual compliance level for digital media based on an audit of multiple markets Disclosure of only aggregate industry compliance level

D6 Spending: Advertising Focus (children) and Policy Impact		
U.S.		
No.	Nutrition	
Commitment		
1	Does the company have a commitment to increase its marketing of healthy products to children? (For information only, i.e. not scored)	Yes No or no information
Performance		
2	What percentage of the total marketing spend on marketing to children for each media channel is dedicated to healthy products aimed at children in FY2015/16: (For information only, i.e. not scored)	
2.1	Traditional media	

D6 Spending: Advertising Focus (children) and Policy Impact		
<b>U.S.</b>		
2.2	Digital media	
	<b>Disclosure</b>	
<b>3</b>	Does the company disclose: (For information only, i.e. not scored)	Commitment (Indicator 1)
		Data on increased spending on marketing healthy products directed to children (Indicator 2)

## Category E Supporting healthy diets and active lifestyles

Companies can support healthy diets and active lifestyles for their own staff in the U.S. by providing employee health and wellness programs. In addition to other benefits, these programs can help facilitate a company culture that contributes to a greater focus on improving the company's nutrition practices. Supporting breastfeeding mothers through supportive working practices and by providing appropriate facilities is another way that companies can support those mothers to give their infants in the U.S. a healthy start to life. Companies can also help consumers to adopt healthy diets and active lifestyles through supporting public health and nutrition programs in the U.S.

This Category assesses the extent to which companies support such efforts through three Criteria:

**E1** Supporting employee health and wellness

**E2** Supporting breastfeeding mothers at work

**E3** Supporting consumer-oriented healthy eating and active lifestyle programs

This Category carries 5% of the weight of the overall score Corporate Profile methodology.

E1 Supporting employee health & wellness		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	
	<b>Commitment</b>	
<b>1</b>	Does the company make a commitment to support staff health and wellness in the U.S. through a program focused on nutrition, diet and activity?	Yes
		Yes but not all aspects of nutrition, diet and activity are mentioned specifically
		No or no information
<b>2</b>	Does the company set a target for employee participation in its health and wellness programs in the U.S.?	More than 70% of employees to participate in one year
		Between 30% - 69% to participate in one year
		Broad objectives
		No targets
<b>3</b>	Which expected outcomes does the company articulate in relation to the nutrition, diet and activity element of its health and wellness program?	Clear articulation of expected health and business outcomes
		Clear articulation of expected health outcomes only
		No reference to expected outcomes or focus on business outcomes only
<b>4</b>	<b>New facilities</b>	
4.1	Has the company built any new offices in the last three years? (For information only, i.e. not scored)	Yes
		No or no information
4.2		Yes

## E1 Supporting employee health & wellness

U.S.		
	If so, has it incorporated architectural or design features to encourage activity in the workplace?	No or not applicable
<b>Performance</b>		
<b>5</b>	Which of the following elements is part of the company's program in the U.S.?	
	<b>A. Healthy Diet:</b> (Tick all that apply)	Seminars on nutrition, diets etc. Online materials and support for staff on nutrition and diet Healthy options/diet plans in cafes, restaurants on work sites Dietary information on menus Subsidized fruit/healthy snacks No subsidies on chocolates, high sugar/fat/salt products Cooking master classes focused on healthy options Links to local fresh food markets or similar Personalized nutrition No program
	<b>B. Healthy Body:</b> (Tick all that apply)	Gyms on work sites Personalized exercise plans Subsidies for gym memberships off site Lunchtime/worktime walking or exercise clubs On-site sports teams Active participation in sports challenges Encouragement to use stairs not lifts etc. Encouragement/facilities to walk/bike to work Online resources re. healthy living/exercise No program
	<b>C. Healthy behavior:</b> (Tick all that apply)	Senior staff model good behavior, publicize their efforts Health focused welcome pack for new starters Healthy living/nutrition campaigns regularly throughout work sites Awards for staff making good progress Other: counseling sessions, work life balance sessions etc. No program
<b>6</b>	To whom across the whole company and all operations in the U.S. is the company's program available?	The program is available to all employees and to family members The program is available to all employees but not family members The program is available to some employees and family members The program is available to some employees but not family members No or no information
<b>7</b>	How much % of U.S. staff participated in the healthy diet, body, behavior parts of the wellness programs in the U.S. in 2016?	Above 50% Between 25 and 49% Between 1 - 24% No information/less than 1%
<b>8</b>	How does the company evaluate the health impact of the nutrition, diet and activity elements of its health and wellness programs?	Independent evaluations undertaken for at least one site. Company does own evaluations for at least one site. No or no information
<b>9</b>		Both quantitative and qualitative results

<b>E1 Supporting employee health &amp; wellness</b>		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	<b>Commitment</b>
	Can the company demonstrate the health improvements delivered by the nutrition, diet and activity elements of its health and wellness program?	Only qualitative results No or no information
<b>Disclosure</b>		
<b>10</b>	Does the company disclose:	Commitment to support staff health and wellness through a program focused on nutrition, diet and activity (Indicator 1) Targets for employee participation in its health and wellness programs (Indicator 2)
<b>11</b>	Does the company disclose: (Indicator 3)	Expected health outcomes Expected business outcomes
<b>12</b>	Does the company disclose: (Indicator 9)	Quantitative information on the outcomes of the nutrition, diet and activity elements of its health and wellness program Narrative and/or qualitative information about the results of the program
<b>13</b>	Does the company disclose: (Indicator 8)	Full evaluation Summary evaluation

<b>E2 Supporting breastfeeding mothers at work</b>		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	<b>Commitment</b>
	<b>Commitment</b>	
<b>1</b>	Does the company commit to providing breastfeeding mothers with appropriate working conditions and facilities at work in the U.S.?	Yes, set out in a policy Make a commitment, but no formal policy No or no information
<b>2</b>	Does the company's maternity policy allow women to take paid maternity leave?	6 months or more Between 3 and 6 months Up to 3 months or less
<b>Performance</b>		
<b>3</b>	<b>Does the company provide facilities that support breastfeeding mothers?</b>	
	Provide private, hygienic, safe rooms with facilities for expressing and storing breast-milk, such as refrigeration, or other facilities beyond legal requirements?	Yes No or no information
	Offer flexible working arrangements to support breastfeeding mothers?	Yes No or no information
<b>Disclosure</b>		
<b>4</b>	Does the company disclose: (Indicator 1)	Its policy on supporting breastfeeding mothers
<b>5</b>	Does the company publish a commentary about how it supports breastfeeding mothers within the workplace? (Indicator 3)	Yes No or no information

<b>E3 Supporting consumer-oriented healthy eating and active lifestyle programs</b>		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	<b>Commitment</b>
	<b>Commitment</b>	
<b>1</b>	<b>Does the company have:</b>	
1.1	For healthy eating/nutrition education programs for its consumers and/or local communities:	Commitment to align programs to national dietary guidelines Clear policy that excludes brand-level sponsorship (as opposed to corporate branding) No commitment or only to offer own programs

<b>E3 Supporting consumer-oriented healthy eating and active lifestyle programs</b>		
<b>U.S.</b>		
1.2	For active lifestyle programs for its consumers and/or local communities?	Clear policy that excludes brand-level sponsorship (as opposed to corporate branding) No or no information
1.3	For food insecurity/food access programs	Clear policy that excludes brand-level sponsorship (as opposed to corporate branding) No or no information
2	What types of public health and nutrition programs does the company commit to supporting?	That are underpinned by a sound evidence base That have been designed with expert advice That draw on stakeholder inputs
3	Has the company set out the health outcomes it seeks to achieve through the public health and nutrition programs it supports: (i.e. those that support nutrition education, physical activity and/or food insecurity) are designed to achieve?	Specific health outcomes participants in the program should benefit from are clearly articulated for all programs Specific health outcomes participants in the program should benefit from are clearly articulated for some programs Broad public health benefits are set out for each program, or goals for participation or reach, but health outcomes expected for participants are not set out. No such health benefits are set out
<b>Performance</b>		
4	Does the company fund programs that educate priority populations about: (Tick all that apply)	Benefits of a healthy balanced diet Importance of fresh fruit and vegetables Importance of being active Importance of regular meals and/or limited snacking Importance of drinking water Benefits of exclusive breastfeeding Benefits of safe, timely and adequate complementary feeding for infants and young children
5	Does the company evaluate all or some of the programs' impacts independently?	In all cases, embedded in design of programs In some cases No or no information
<b>Disclosure</b>		
6	Does the company disclose: (Indicator 1)	Document that outlines the company's public health and nutrition programs that it commits to support Document that sets out its policy on brand-level sponsorship
7	Does the company disclose: (Indicator 2)	A description of the evidence base for the design of its public health and nutrition programs A description of the expert advice it has solicited A description of the stakeholders it has consulted to design the programs
8	Does the company disclose: (Indicator 3)	Specific health outcomes are clearly articulated for all programs Specific health outcomes are clearly articulated for some programs Broad public health benefits are set out or no information
9	Does the company disclose: (Indicator 4)	The health outcomes achieved by each of its public health and nutrition programs The health outcomes achieved by some of its public health and nutrition programs Information about the reach of/participation in its programs No information about the programs it supports or offers

E3 Supporting consumer-oriented healthy eating and active lifestyle programs		
U.S.		
10	Does the company disclose: (Indicator 5)	All of the independent evaluations carried out for the programs it supports
		Some of the independent evaluations carried out for the programs it supports

## Category F Product labeling and use of health and nutrition claims

One important means of promoting healthy diets, and addressing obesity and undernutrition, is to provide consumers with accurate, comprehensive and readily understandable information about the nutritional composition of what they eat. This can promote better nutrition by helping consumers choose appropriate products to manage their weight and help to prevent or address diet-related chronic diseases.

Given the strong regulation of nutrition labeling and use of claims in the U.S., this Category is limited to whether companies commit to front-of-pack labeling in U.S. This assessment has one Criteria:

### F1 Product labeling

This Category carries 5% of the weight of the overall score Corporate Profile methodology.

F1 Product labeling		
U.S.		
No.	Nutrition	
	Commitment	
	<i>Commitments for Back-Of-Pack labeling</i>	
1	Does the company commit to provide Back-of-Pack nutrition information on total or added/free sugars? (For information only, i.e. not scored)	Yes
		No
	<i>Commitments for Front-Of-Pack labeling</i>	
2	How does the company provide information on the front of pack?	In an interpretative format, providing indicators of how healthy the product is, rather than just numeric information
		Numeric information only, but showing % of recommended daily intake (or similar measure)
		Numeric information on levels of key nutrients, but not showing % recommended daily intake (or similar measure)
		No FOP labeling used
	Performance	
3	What percentage of the company's products carry a front-of-pack labeling?	More than 80%
		Between 50 - 79%
		Between 6 - 49%
		Less than 5%
	Disclosure	
4	For what percentage of products does the company provide the nutrition panel online?	For 90% or more of products
		For between 50 - 90% of products
		For between 10 - 49% of products

F1 Product labeling	
U.S.	
	No nutrition information published or for less than 10% of products

## Category G Influencing governments and policymakers, and stakeholder engagement

Companies can have an impact on consumers' access to nutrition by influencing the U.S. government and policymakers through lobbying activities, political contributions and positions on nutrition policies. In addition, constructive engagement by companies with a wide range of other stakeholders in the U.S. (including civil society and academics) can help to inform companies' approaches to nutrition.

This Category focuses on companies' engagement with stakeholders on corporate nutrition practices and nutrition-related issues. Companies are assessed under two Criteria:

**G1** Lobbying and influencing governments and policymakers

**G2** Stakeholder engagement

This Category carries 5% of the weight of the overall score Corporate Profile methodology.

G1 Lobbying and influencing governments and policymakers	
U.S.	
No.	Nutrition
	<b>Commitment</b>
<b>1</b>	Does the company commit to:
	No lobbying at all
	Only to engage with governments, political parties, policymakers and policymaking bodies in support of measures to prevent and address obesity and diet-related chronic diseases*
	No or no information
	*If second answer option,
	Does the commitment apply to lobbying conducted by third parties paid by the company:
	Lobbying conducted by third parties paid by the company
	Lobbying conducted by the company only
	<b>Disclosure</b>
<b>2</b>	Does the company disclose: (Indicator 1)
	Its policy on lobbying and donations or Code of Business Ethics etc.
<b>3</b>	Does the company publish: (Tick all that apply)
	Its membership of industry associations, lobbyists (individuals or groups), think tanks, interest groups or other organizations that lobby on its behalf
	Its financial support for these organizations
	Any potential governance conflicts of interest (or state that none exist)
	Board seats at industry associations and on advisory bodies related to nutrition issues
<b>4</b>	<b>Publication of its activities</b>
4.1	Does the company publish a commentary or make other disclosures about its lobbying activities in support
	Yes
	No

<b>G1 Lobbying and influencing governments and policymakers</b>		
<b>U.S.</b>		
	of government measures to combat obesity and diet-related chronic diseases?	
4.2	Does the company disclose its policy position used in lobbying/governmental engagement, on the following, in its home market: (Tick all that apply)	<input type="checkbox"/> School nutrition <input type="checkbox"/> Front-Of-Pack labeling <input type="checkbox"/> Fiscal instruments related to nutrition (e.g. soda/sugar tax) <input type="checkbox"/> Food marketing to children <input type="checkbox"/> Government Funded Nutrition Programs

<b>G2 Stakeholder engagement</b>		
<b>U.S.</b>		
<b>No.</b>	<b>Nutrition</b>	
	<b>Commitment</b>	
<b>1</b>	Does the company commit to engage with stakeholders in developing nutrition policies/programs in the U.S.?	<input type="checkbox"/> Yes <input type="checkbox"/> No or no information
	<b>Performance</b>	
<b>2</b>	What form of engagement does the company have with stakeholders?	<input type="checkbox"/> Comprehensive, well-structured and focused on business strategy and performance <input type="checkbox"/> Limited; typically one-way communication rather than engagement, and more ad-hoc <input type="checkbox"/> No information
<b>3</b>	Can the company provide evidence of engagement with stakeholders on addressing non-commercial public health and nutrition in the U.S.?	<input type="checkbox"/> Extensive engagement with stakeholders <input type="checkbox"/> Limited engagement with stakeholders <input type="checkbox"/> No or no information
<b>4</b>	Can the company provide evidence of engagement with stakeholders on addressing non-commercial public health and nutrition in the U.S.?	<input type="checkbox"/> Extensive engagement with stakeholders <input type="checkbox"/> Limited engagement with stakeholders <input type="checkbox"/> No or no information
	<b>Disclosure</b>	
<b>5</b>	Does the company disclose:	<input type="checkbox"/> Its commitment to engage with stakeholders in developing nutrition policies/programs (Indicator 1) <input type="checkbox"/> Specific examples of how input has been used to adapt policies/programs, i.e. to change business practices (Indicator 4) <input type="checkbox"/> Broad statement about the benefits of stakeholder dialog (Indicator 4)

## Appendix II: Organizations consulted

---

Alive & Thrive

Berkeley Media Studies Group, University of California at Berkeley

CDC

Center for Digital Democracy

CFBAI

CSPI

Duke Global Health Institute, Duke University

Food Nutrition Policy Consultants LLC

Healthy Eating Research

Helen Keller International

Institute for Health Research and Policy, University of Illinois at Chicago

Public Citizen

Rudd Center

UNC Gillings School of Public Health

University of Washington School of Public Health

U.S. Breastfeeding Committee

WHO

1000 Days

---

## Appendix III: ATNI U.S. Expert Group members

---

The mandate of the U.S. Expert Group is to provide input into the development of the U.S. Corporate Profile methodology and other aspects of the Index. This group consists of members with expertise in various aspects of nutrition (including health dimensions of obesity and diet-related chronic diseases, marketing, labeling, use of claims, nutrient profiling, regulatory issues, etc.)

The members of the U.S. Expert Group serve in their personal capacities and in an advisory role. As such, the scope and content of ATNI do not necessarily reflect their views or the views of their institutions. Members are listed below.

### **Shiriki Kumanyika**

Chair ATNI Expert Group;

*Professor Emerita of Epidemiology, Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania;*

*Research Professor in Community Health & Prevention, Drexel University Dornsife School of Public Health*

### **Lindsay H. Allen**

*Director, USDA ARS Western Human Nutrition Research Center;*

*Research Professor, Department of Nutrition, UC Davis*

### **Terry T-K Huang**

*Professor, School of Public Health, City University of New York*

### **Mike Rayner**

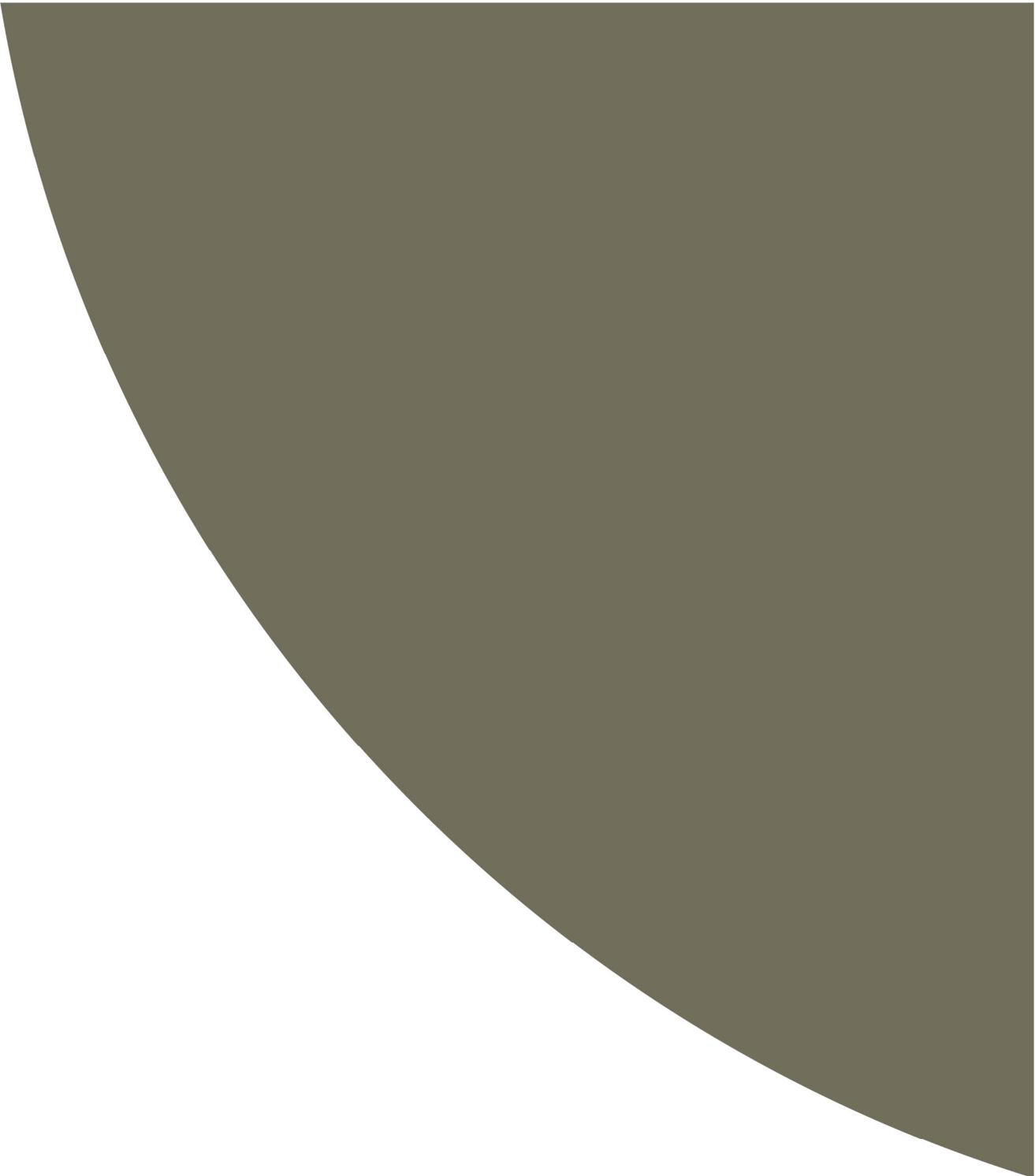
*Director, British Heart Foundation Health Promotion Research Group, University of Oxford*

### **Linda Meyers**

*Former Director (retired), Food and Nutrition Board, National Academies of Sciences, Engineering, and Medicine, Washington, DC*

### **Mary Story**

*Director and Professor, Healthy Eating Research, Duke University*



**Access to Nutrition Foundation**

Arthur van Schendelstraat 650

3511 MJ Utrecht

The Netherlands

+31 (0)30 410 09 16

[info@accesstonutrition.org](mailto:info@accesstonutrition.org)

[www.accesstonutrition.org](http://www.accesstonutrition.org)