

Nutrition responses from food and beverage companies to the Covid-19 pandemic

The Access to Nutrition Initiative (ATNI) is committed to support the food industry's contribution to addressing the world's nutrition challenges, leveraging the power of the private sector to provide accessible and affordable healthy food to all. ATNI has developed this Framework to identify action (and inaction) by food and beverage manufacturers in response to the Covid-19 crisis worldwide.

ATNI Covid-19 Framework

Please note that this is a living document – we welcome comments and suggestions from stakeholders and may adapt it in the future to reflect the impacts of the Covid-19 pandemic.

Areas [Adapted ATNI Index Categories]	Indicators	Rationale for inclusion
A. Governance and leadership		
Nutrition-sensitive strategy	<ol style="list-style-type: none"> Does the company have a nutrition-sensitive strategy^a in response to Covid-19 and is this implemented? Has the company made any adjustments to their existing nutrition strategy based on Covid-19? Does the company commit/pledge to align to evidence-based external guidelines/recommendations on Covid-19 as these are (or become) available? Does the company address specific countries or populations vulnerable to Covid- 	<p>While preventing and mitigating Covid-19 short-term effects (including those specific to nutrition), a company can deliver long-term impact if its activities are integrated into its core business and management system as well as philanthropic strategy. Having a nutrition-sensitive strategy can help a company contribute to improved food security and nutrition in a sustainable way during the crisis and beyond.</p> <p>If a response to Covid-19 is to be informed and implemented strategically and carefully, drawing upon internationally recognized guidance is required.</p> <p>The Framework will monitor whether the company explicitly commits to support populations vulnerable to Covid-19 at high risk of adverse</p>

^a 'Nutrition-sensitive' interventions are defined as efforts that, within the context of sector-specific objectives, also aim to improve the underlying determinants of nutrition (adequate food access, healthy environments, adequate health services, and care practices), or aim at least to avoid harm to the underlying or immediate causes, especially among the most nutritionally vulnerable populations and individuals: World Bank, *Improving Nutrition through Multisectoral Approaches* (Washington, DC: International Bank for Reconstruction and Development, International Development Association of The World Bank, 2013). This Framework will cover Covid-19-related measures as they directly and indirectly impact on nutrition. Measures that indirectly impact on nutrition include 'nutrition-sensitive' interventions that aim to improve the underlying determinants of nutrition. A broader range of company actions will be considered that address underlying determinants of nutrition but do not directly address the production or marketing of (un)healthy products; these include mitigating supply-chain disruptions, donating or distributing personal protective equipment (PPE) and key issues around social inequity (such as commitments to a living wage for employees or to work with government on social protection for vulnerable populations).



	<p>19^b at high risk of adverse nutrition/health impacts?</p> <p>5. Does the company include in its strategy financial, in-kind or other support to help maintain operational stability of SMEs in its value chain in response to Covid-19?</p>	<p>nutrition/health impacts, covering low- and medium- and higher- income settings.</p> <p>Leadership and collaboration are required to support small and medium-sized enterprises (SMEs) that are particularly affected by the crisis.</p>
Management systems	<p>6. Has oversight of the company's Covid-19 nutrition-sensitive response been assigned formally?</p>	<p>Nutrition-related challenges are more likely to be prioritized as the company allocates resources, tracks performance and assigns responsibility.</p>
Reporting	<p>7. Does the company report publicly on its nutrition-sensitive Covid-19 response, including progress updates?</p>	<p>Informing stakeholders of companies' activities improves accountability</p>

B. Safe and healthier products

Safe and healthier products	<p>8. Has the company changed its product portfolio, nutrition criteria/nutrient-profiling system or made other changes to prioritize production of healthier products in response to Covid-19?</p> <p>9. Does the company reaffirm its fortification commitments or disclose other evidence-based approaches to addressing vulnerable Covid-19 populations at high risk of adverse nutrition impacts with healthy and appropriate products?</p>	<p>Movement restrictions, stockpiling, loss of incomes, supply chain disruptions, etc., led to supply and demand side shocks. Companies can prioritize investment and innovation in healthy and appropriate foods and beverages to ensure their products address the ongoing nutrition crisis.</p> <p>As a result of Covid-19, in some markets citizens have lost access to healthier products while others are turning to immunity-boosting products. In response, companies might decide to launch new products and/or postpone new developments.</p> <p>It is important that companies are transparent in their reporting and clarify whether any changes to the product portfolio (including micronutrient fortification) improve healthiness according to evidence-based nutrient-profiling systems.</p> <p>Although there are no current indications that food safety and/or food safety management systems are under particular pressure due to Covid-19, this aspect is considered under indicator 8 and changes in approach will be tracked.</p>
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C. Affordability and accessibility

Affordability / accessibility of healthy products	<p>10. Has the company taken action to secure or improve the accessibility / affordability of healthy products in response to Covid-19 and value chain challenges?</p>	<p>The economic shocks of the pandemic, price-gouging, etc., will lead to more people, especially in low- and- middle income settings, unable to afford nutrient-rich foods. Food manufacturers</p>
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^b The term 'populations vulnerable to Covid-19' looks at vulnerability to Covid-19 on top of ATNI's priority populations of those at high risk of malnutrition. In the case of Covid-19, this can be direct (e.g. populations at high risk of poor disease outcomes) or indirect (such as lower socioeconomic groups who are less able to weather financial shocks). These populations are found across high-, middle- and low-income countries.



	<p>11. Does the company commit to only donate healthy products to populations vulnerable to Covid-19 at high risk of adverse nutrition/health impacts?</p> <p>12. Does the company collaborate with NGOs/governments when donating products to ensure donations are needs-based?</p>	<p>can ensure their healthier products are accessible and affordable, especially to vulnerable populations. For example, companies can partner with retailers to address this need by offering healthier options at competitive prices and work with governments to contribute to social protection efforts.</p> <p>Food and beverage manufacturers must prioritize the accessibility of healthier products. As packaged foods and ready-to-eat meals can contain high levels of sugar, fat and salt, it is important that companies ensure that food to be donated (in addition to meeting hygienic and safety requirements) provides adequate nutrition and is available on a needs basis. In addition, any branding of donations should be minimised and appropriate.</p> <p>Food and beverage manufacturers can contribute by donating products of high underlying nutritional quality, including those that are fortified according to international standards, as relevant. National nutritional guidelines should be used as guidance.</p> <p>The Framework will capture differences (if any) in commitments and actions in high-income and in low-and-middle income settings. The Framework will also monitor good practice and poor practice with regards to donations.</p> <p>Clarify whether the company is working with government (e.g. to support social protection programmes) or on parallel initiatives.</p>
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D. Responsible marketing

<p>General marketing</p>	<p>13. Has the company committed to safeguard its responsible marketing practices during the crisis and/or implemented new initiatives responsibly?</p>	<p>Commitments should be published on company websites. The Framework will capture good and poor practices – e.g. to market 'comfort foods' more actively now in relation to the pandemic.</p>
<p>Marketing to children</p>	<p>14. Has the company committed / confirmed ongoing commitments not to market unhealthy products to children during the crisis (including through digital channels)?</p>	<p>Commitments should be published on company websites. During lockdown and social restrictions, children may be spending more time online or watching television; therefore, it is imperative that food companies are taking steps beyond those it normally takes to ensure that its businesses uphold its marketing to children commitments across all markets.</p>



E. Protecting employees and promoting healthy lifestyles

<p>Employee health and wellbeing</p>	<p>15. Has the company committed to adopt international/national guidance in relationship to Covid-19 and the workplace?</p> <p>16. Has the company taken action to support health, safety and/or nutrition of its employees, including during lockdowns and as part of reopening strategies, in relation to Covid-19?</p> <p>17. Has the company made a commitment and/or changed its remuneration policy with the goal of safeguarding jobs/income and livelihoods of its employees?</p> <p>18. Has the company committed to support breastfeeding and provide special employee arrangements during the crisis?</p>	<p>Companies have a responsibility to mitigate Covid-19 risks in the workplace and protect employees. The majority of food industry workers do not have the opportunity to work from home. Food manufacturers should reinforce personal and manufacturing hygiene measures and principles to mitigate risk of being contaminated with the virus.</p> <p>Personal protective equipment needs to be used appropriately and the food industry is strongly advised to introduce physical distancing and stringent hygiene and sanitation measures and promote frequent and effective handwashing and sanitation at each stage of processing, manufacturing and marketing. In addition, companies must ensure that employees have access to accurate information about Covid-19.</p> <p>Beyond these measures, companies can and must safeguard jobs/incomes, paid leave and access to good nutrition for its employees.</p> <p>Mothers who do not have indications of Covid-19 should continue breastfeeding, while applying all the necessary actions to protect against the infection; women with suspected or confirmed Covid-19 can also continue to breastfeed, taking appropriate precautions.</p>
<p>Value-chain health and wellbeing</p>	<p>19. Has the company taken action to support health, safety and/or nutrition of its value-chain partners?</p>	<p>Companies have an opportunity to renew commitments to support employee health and wellbeing extending to partners throughout the supply (and wider value) chain.</p> <p>This could include provision of PPE, nutrition-related information/education, food provision etc.</p>
<p>Consumer / community (educational) programs</p>	<p>20. Does the company support unbranded educational/ awareness programs related to nutrition, healthy diets and lifestyles in response to the crisis?</p>	<p>People should be enabled to eat a variety of foods, plenty of fruits and vegetables, whole grains, etc. In addition, it is imperative that regular physical activity is maintained wherever possible. Food companies can help spread education and awareness campaigns related to the importance of healthy and balanced diets/lifestyles during and after the crisis.</p> <p>Companies can prioritize 'double-duty' programs – i.e. those that simultaneously reduce the risk of nutritional deficiencies while preventing overweight/obesity and related diseases.</p> <p>Clarify whether programs are designed and/or implemented independently.</p>



F. Nutrition labelling and claims

Nutrition labelling and claims

21. Has the company committed to safeguard its nutrition labelling and nutrition and health claims practices during the crisis and/or implemented new initiatives responsibly?

Companies must safeguard labelling standards and should not use the crisis as an opportunity to deviate from existing labelling commitments. As evidence-based guidelines are published on nutrition and Covid-19, these must be followed.

While health claims are however regulated in some markets so may not be relevant to assess, this is not the case globally. Companies should ensure that they do not make unfounded health or nutrition claims in relation to Covid-19, e.g. in relation to immune-boosting effects. Any use of claims should be strictly evidence-based and in all cases compliant with applicable regulation and Codex Alimentarius guidance.

G. Engagement

Lobbying and influencing policymakers

22. Has the company publicly responded to government / authority requests for support in the Covid-19 response?

23. Is the company trying to influence policymakers to take decisions in response to Covid-19?

This framework aims to capture actions from companies to lobby/influence policymakers in relation to the Covid-19 situation. Examples could have positive or negative health implications and may include providing product donations / paid for products in government programs, taking action to keep supply chains open, taking action in specific settings, lower labelling or other nutrition-related standards, etc.

Companies might engage with governments in support of fighting Covid-19, such as contributing to food-based safety nets or supply of additional fortified products.

Stakeholder engagement and partnerships

24. Does the company provide examples of consulting or collaborating with international organizations, NGOs, academic experts etc. to inform its Covid-19 nutrition-sensitive interventions and/or strategy?

25. Is the company publicly supporting or leading industry wide initiatives to address Covid-19 related nutrition challenges?

Companies can consult and engage with relevant expert organizations to ensure that strategies and activities are informed and balance potential risks.

The Framework will capture the actions of companies through relevant industry associations.



Infant and young child nutrition (selected companies only)

<p>26. Has the company taken action to support local expert organisations or programmes that support breastfeeding in response to the Covid-19 crisis?</p> <p>27. Does the company state a commitment to uphold its own policy on BMS marketing and/or The International Code of Marketing of Breast-milk Substitutes and all subsequent, relevant World Health Assembly resolutions, during the Covid-19 crisis?</p> <p>28. Does the company report examples of taking any steps beyond those it normally takes to ensure that its businesses uphold its BMS Marketing policy in all markets during the Covid-19 crisis, including in relation to product donations?</p> <p>29. Has the company taken any action in response to Covid-19 to increase its offering of healthy complementary foods?</p>	<p>During the crisis, companies must continue to promote and support exclusive breastfeeding in the first six months of life, and continued breastfeeding to age two years and beyond, as well as the introduction of appropriate complementary foods from six months of age, and no earlier. WHO recommends that mothers with suspected or confirmed COVID-19 should be encouraged to initiate or continue to breastfeed. The benefits of breastfeeding substantially outweigh the potential risks for transmission.</p> <p>While all BMS manufacturers should commit to implementing the Code in full, few that currently have a BMS marketing policy apply it globally and to all types of products. Typically, their policies apply only in higher-risk markets and to certain types of products. At a minimum, companies must ensure that they continue to uphold all provisions of their policies. They should not, for example, increase their advertising or marketing of their BMS products; rather they should redouble their efforts to ensure that it is all compliant with the Code.</p> <p>Donations of BMS by manufacturers has been shown to lead to increased use of substitutes and a reduction in breastfeeding. Therefore, donations of BMS, complementary foods and feeding equipment, including bottles and teats, should be made only in line with the Code and relevant WHA resolutions, and with WHO and UNICEF guidance on feeding in emergencies^d. Any donations made under these conditions should not carry branding relating to a proprietary product covered by the scope of The Code.</p> <p>Companies should continue to respect The Code and not increase their efforts to contact mothers directly. Some mothers might have questions</p>
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^c World Health Organization. Clinical management of COVID-19: Interim guidance (27 May 2020). Geneva, Switzerland: World Health Organization; 2020 <https://www.who.int/publications/i/item/clinical-management-of-covid-19>

^d WHA Resolutions have clarified that in instances where children require BMS in the healthcare system then BMS should be purchased not donated. WHA Resolution 47.5 stated that governments must take measures 'to ensure that there are no donations of free or subsidized supplies of breast-milk substitutes and other products covered by the International Code of Marketing of Breast-milk Substitutes in any part of the health care system'; WHA Resolution 63.23 emphasized 'the need to minimize the risks of artificial feeding, by ensuring that any required breast-milk substitutes are purchased, distributed and used according to strict criteria': see UNICEF et al., *Infant and Young Child Feeding in the Context of COVID-19* (Brief No. 2 (v1), 30 March 2020) <https://www.unicef.org/media/68281/file/IYCF-Programming-COVID19-Brief.pdf>, UNICEF, *Response to Covid-19: Guidance Note on Financial Contributions or Contributions In-kind from Food and Beverage Companies* (Version 2, 29 April 2020) <https://www.nutritioncluster.net/sites/nutritioncluster.com/files/2020-05/COVID-Guidance%20on%20financial%20contributions%20and%20contributions%20in%20kind%20by%20FB.pdf>, and IFE Core Group, *Infant and Young Child Feeding in Emergencies: Operational Guidance for Emergency Relief Staff and Programme Managers* (Version 3.0, October 2017) https://www.enonline.net/attachments/3127/OpG_English_04Mar2019_WEB.pdf



about breastfeeding during the pandemic and worry about contracting or spreading the virus through their milk to infants. Nevertheless, companies should make sure not provide such advice directly to mothers and leave it to professionals in the health care system to provide practical feeding support and infant and young child feeding counselling to parents.