



ACCESS TO
NUTRITION
INITIATIVE

Global Index 2021

Executive Summary

1 July 2021



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ATNI is pleased to present the fourth iteration of the Global Access to Nutrition Index, following on from editions published in 2013, 2016, and 2018.



“As the 25 largest food and beverage manufacturers, each must take responsibility to deliver healthy product offerings to consumers across the globe and not leave nutrition behind. That’s no small task – but it’s one that requires action urgently if we are to deliver on the Sustainable Development Goals to end world hunger and ensure good health and well-being. We’ve seen the fragility in supply chains in the last three years, but we’ve also seen some companies using this as an opportunity to innovate. With an increasing demand from consumers for healthy products, there is an opportunity for manufacturers to take on this new-found responsibility, to use the new post-COVID-19 reality to enable healthier diets for all.”

Inge Kauer
Executive Director Access
to Nutrition Foundation

This Index, like its predecessors, assesses how the world’s largest global food and beverage (F&B) manufacturers contribute to addressing malnutrition in all its forms: overweight and obesity, undernutrition, and micronutrient deficiency. Together, the Global Indexes are an important tool to advance ATNI’s vision of a world in which no one goes to bed hungry, and everyone eats a healthy, affordable diet that has all the nutrients and food groups needed to grow and develop fully in good health. As a result, death and illness from diets low in essential vitamins and minerals would be confined to history.

Twenty-five leading F&B manufacturers are included in the 2021 Global Index. All have been assessed on their commitments, practices, and disclosure – with regards to governance and management; the production and distribution of healthy, affordable, accessible products; and how they influence consumer choices and behavior.

There are several changes compared to the previous Global Index. In 2018, undernutrition was presented in a separate section; now, policies and actions targeting priority populations at high risk of malnutrition are woven throughout. Also added into the Index this year (as criteria B1) is a section assessing and scoring the healthiness of companies’ product portfolios, their performance within product categories among peers, and changes over time. You can find the full methodology, and details on the changes, [here](#).

Furthermore, previous Global Indexes incorporated a sub-ranking that assessed the marketing policies and practices of the world’s largest makers of breast-milk substitutes (BMS). For the 2021 edition, ATNI has published this assessment as a stand-alone Index and extended it to include an evaluation of the marketing of complementary foods (CF). The BMS/CF Marketing Index 2021 has been expanded from the six largest to the nine largest companies in this sector, by global revenues. Six of these companies are constituents of the Global Index 2021, and their final Global Index score depends in part on their BMS/CF Marketing Index 2021 score.

The Global Index is used by an increasing number of interested parties (policymakers, investors, international and non-governmental organizations (NGOs), and others) to hold the private sector accountable in delivering on commitments to tackle growing nutrition challenges worldwide. These challenges have never been more evident, as the COVID-19 pandemic has widened inequities, increased poverty, and impacted on malnutrition in all its forms. Despite the progress made over the last two years, as shown by this Index, companies still need to do much better by putting in place even stronger commitments to improving food systems and fighting malnutrition. With 2021 being the Nutrition for Growth Year of Action, now is the time for F&B manufacturers to step up, scale up, and make a difference to healthier diets for everyone, everywhere.

ATNI invites you to share the Global Index 2021 across your networks – and please do not hesitate to get in touch if you have any questions.

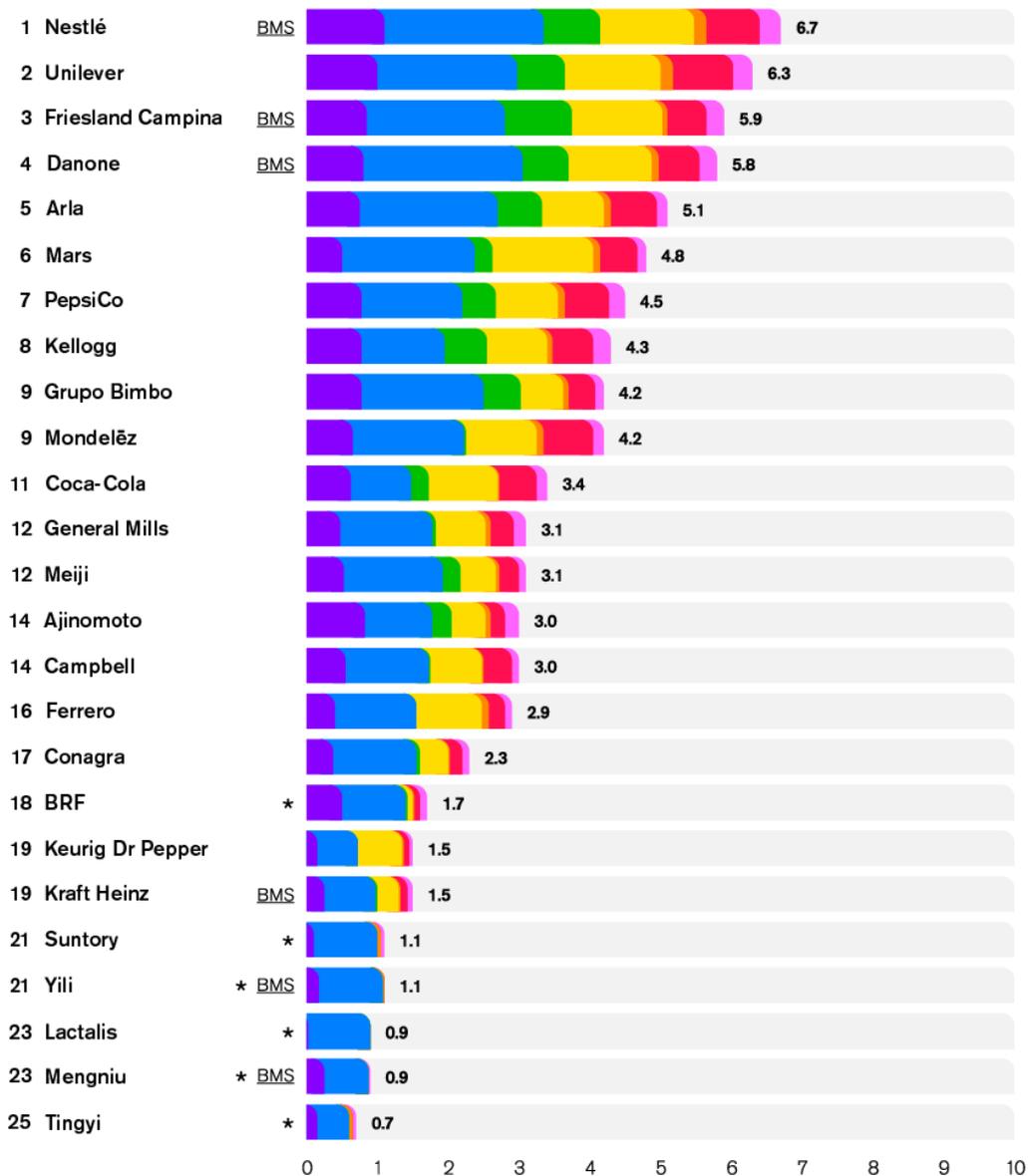
The full Index can be accessed [here](#). The press release for this publication is available [here](#).



Overall ranking 2021

Overall, the 2021 results show that companies need to enhance their efforts to encourage healthier diets for all. The average score remained the same as 2018 at 3.3 out of 10. When only taking into consideration the 22 companies that were assessed in both 2018 and 2021, the average score is 3.6. All 10 leading companies, except for Arla, scored lower than in the 2018 iteration, while most companies in the middle and lower rankings scored slightly higher.

Similar to 2018, Nestlé leads the 2021 rankings with a score of 6.7 out of 10. The company achieves a top-three rank in all categories of the Index and rates first in 'Governance' and 'Engagement'. Unilever comes second with 6.3, and FrieslandCampina third with 5.9. Arla showed a big improvement from 3.3 in 2018 to 5.1 in 2021, securing a rank of fifth in the Index, in part due to a new labeling policy, responsible marketing policies, and an improvement in healthiness of its product portfolio. Meanwhile, Meiji rose five places in the Index, partially due to its incorporation of a nutrition strategy in its CSR vision and new policies aimed at marketing to children and labeling.



A Governance (12,5%)
 B Products (35%)
 C Accessibility (15%)
 D Marketing (20%)
 E Lifestyles (2,5%)
 F Labeling (10%)
 G Engagement (5%)

BMS Assessed against the BMS methodology: An adjustment based on the BMS score is incorporated in the overall score

* Did not provide information to ATNI



Methodology

The ATNI Corporate Profile methodology used for the Global Index 2021 assesses companies' nutrition-related commitments and policies, practices, and disclosure across seven categories. A product profiling exercise, assessing the healthiness of companies' product portfolios using the Health Star Rating model, is also part of the Corporate Profile. Similar to 2018, scores of companies that have been assessed for the 2021 BMS/CF Marketing Index are adjusted based on their BMS/CF scores.

Note that there have been some changes to the methodology and presentation since the 2018 Global Index:

- Assessment of the nutritional quality of the products of Index companies using the government endorsed HSR nutrient profiling model, known as the Product Profile, is now incorporated within Category B (Products) and part of the overall Index scoring algorithm, rather than separately considered. The other two components of the Product Profile include assessment of the companies' performance within product categories and assessment of the change in product portfolio healthiness compared with the 2018 Product Profile.
- In the 2018 Global Index, undernutrition was a separate section for all companies that had significant market shares in low- and middle-income countries (accounting for 25% of overall score). In 2021, this has been replaced by indicators assessing all companies on their actions to target priority populations at risk of any form of malnutrition throughout the methodology.
- The weighting of the Categories has been adjusted. Category B (Products) now carries 35% of the overall weight of the Corporate Profile, compared to 25% in 2018. The Product Profile (Criterion B1), incorporated within category B, accounts for 20% of the overall Index weight, while Product (re-)formulation efforts (Criterion B2) and defining healthy products (nutrient profiling, Criterion B3) account for a further 7.5% each. Categories C and F carry 5% less weight to incorporate this change. Therefore, this Index places more emphasis on the nutritional quality of their portfolios, companies' performance on nutritional quality of products within categories among peers, and changes in product portfolio nutrition quality over time.
- ATNI has been stricter in requiring evidence for the continuation of commitments made before 2018, and when applying standards and requirements from leading international organizations such as the World Health Organization (WHO) Global Action Plan and the United Nations (UN) Sustainable Development Goals. Donations by companies are acknowledged but receive substantially less credit than commercial activities to address malnutrition. At the same time, companies were assessed on new indicators, such as actions targeting priority populations at high risk of malnutrition.
- The number of companies in the Global Index has also increased from 22 (2018) to 25 (2021). The Global Index 2021 company selection identified 25 of the largest F&B manufacturers, consisting of the top 20 companies by total global financial year revenues, and also included companies that were included in earlier Global Indexes.

Please note that the findings of this Index regarding companies' performance are based to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information, such as differences in disclosure requirements among countries or capacity constraints within companies due to, among other factors, the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

The full methodology can be accessed [here](#).



The global context

Malnutrition in all its forms remains a leading cause of death worldwide: In 2017, 11 million deaths and 255 million disability-adjusted life years were attributable to what we eat. The interlinkages between COVID-19 and nutrition are well-documented and striking, disproportionately affecting poorer and marginalized populations:

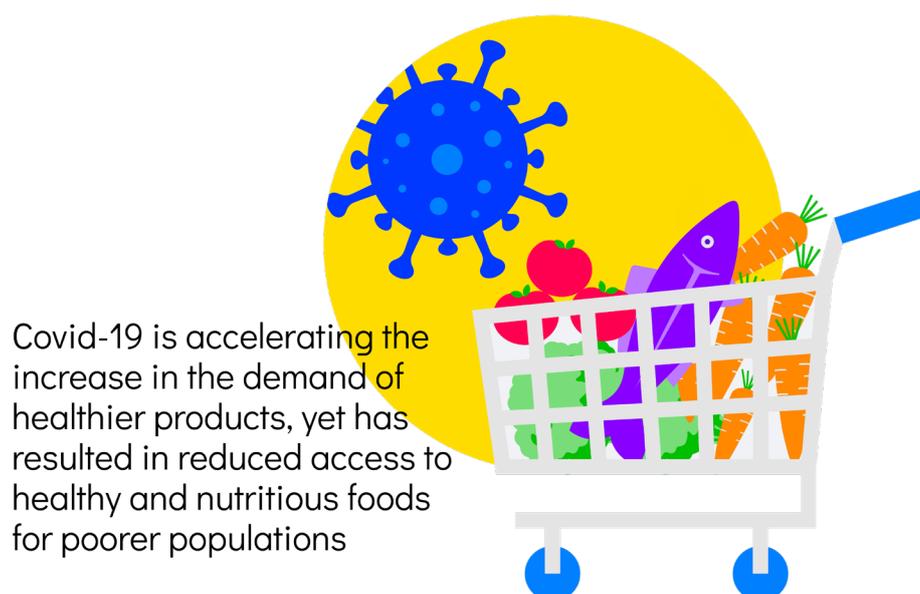
- **Overweight and obesity** affects one in three people globally, and people with obesity are more likely to experience severe outcomes from COVID-19. Indirect impacts of lockdown, such as school closures, may contribute to further increases in prevalence among children.
- In 2019, 690 million people were considered **undernourished**, and the economic effects of COVID-19 are pushing more people into extreme poverty: An estimated 9.3 million more children are likely to suffer from wasting by 2022.
- **Micronutrient deficiencies** affect over two billion people globally, and lockdown and supply-chain issues have negatively impacted food fortification and nutrition services for children.

Initial concerns about the safety of **breastfeeding** during COVID-19 were quickly allayed by WHO in 2020 – but the spread of misinformation continues to undermine breastfeeding. As ATNI has highlighted in its dedicated reports on the response of the F&B sector to COVID-19, violations of the International Code of Marketing of Breast-milk Substitutes have been reported around the world.

COVID-19 also laid bare some of the fragilities in supply chains, but the sector has innovated in ways that enable greater resilience. Growth in retail value and significant rises in e-commerce, combined with **increasing demand** from consumers for healthy food products, has given manufacturers both an opportunity and responsibility to use the new post-COVID-19 reality to enable healthier diets.

In this international Nutrition for Growth Year of Action (2021), ATNI hopes that the UN Food Systems Summit (September) and the Nutrition for Growth Summit (December), hosted by the Government of Japan, will inspire and guide all actors in the food system – including F&B manufacturers – to commit to and enact bold and transformative change.

For the full Context Section, please click [here](#).



Key findings

Similar to the 2018 Index, the company leading the ranking in the 2021 Global Index is Nestlé, with an overall score of 6.7 out of 10. Unilever is in second place (6.3), followed by FrieslandCampina (5.9).

This Index expanded the scope of the Product Profile assessment, with nutrition information available for more products (38,176 products assessed in 2021 compared to 20,865 in 2018) across 25 different markets relevant for the companies (in 2018, only nine markets were included). This significantly improves the quality of the assessment and its representativeness of companies' sales in the global market.

Nine companies improved the healthiness of their product portfolios and increased the mean HSR in the markets selected. At overall portfolio level, 11,797 products, or 31% of 38,176 distinct products, meet the independent healthy threshold (an HSR of 3.5 stars or more). For all products assessed for all companies, the mean HSR is 2.4 stars. In 2018, the mean HSR for 20,865 products assessed was also 2.4 stars. Five companies were found to have 50% or more of products assessed meet the healthy threshold.

The 2021 methodology gives more weight to the Products category, applies stricter evidence requirements, and has an increased focus on companies' commercial efforts to address malnutrition. With these changes, the average score across all the companies remains the same in this Index as in 2018: 3.3 out of 10. When only taking into consideration the 22 companies that were assessed in both 2018 and 2021, the average score is 3.6. This indicates that, overall, these companies are doing slightly better than in 2018. However, the 10 leading companies of the 2021 ranking, except for Arla, score slightly lower than in the 2018 iteration, while most companies in the middle and lower rankings score slightly higher. ATNI calls on all companies, especially the leading companies, to step up their efforts to improve healthy diets. All companies should seize this opportunity to make healthy products affordable to consumers globally and thus maintain competitiveness given consumers' changing needs and preferences.

Highlights of improvement in nutrition policies and practices include:

- Thirteen companies have improved their score in nutrition governance, reflecting strengthened nutrition policies and management systems.
- Nine companies showed improved healthiness of their products at portfolio level.
- Fourteen companies apply some form of company-specific nutrient profiling model (NPM) to monitor the healthiness of their products., while 19 companies make commitments on the (re)formulation of products at nutrient level.
- Nine companies commit to follow international guidance by Codex and WHO/the Food and Agriculture Organization (FAO) to ensure food fortification delivers clear health benefits. In 2018, only four companies assessed did so.
- In 2018, no companies applied interpretive nutrition labeling front-of-pack (FOP), which provides consumers with a qualification of the (relative) nutrition quality of the product. However, by 2021, six companies had introduced it to some or all products globally.
- This index shows 12 companies disclose lobbying positions on important nutrition topics, whereas, in 2018, only two companies did so (notably FOP labeling and health claims regulation). Plus, more companies have made commitments and/or provided examples of supporting governments in their efforts to prevent and address malnutrition.
- Three of the six companies assessed in the BMS/CF Marketing Index 2021, also included in the Global Index, have increased their scores since 2018. Danone and Nestlé retained first and second place on that Index respectively, and Kraft Heinz came third, because it shared its BMS marketing policy for the first time and performed relatively well in ATNI's in-country assessment, carried out in Mexico.



The companies that improved the most in the overall ranking are Arla (rising six places) and Meiji (rising five places):

Arla's greatest improvement has been in labeling and marketing: Since 2018, it has adopted a new labeling policy, with commitments to display nutritional information on both FOP and back-of-pack (BOP), and the company has also introduced a government-endorsed interpretive labeling on some of its products. Arla's responsible marketing policy improved through tailored marketing of healthy products for groups experiencing, or at high risk of, malnutrition in low- and middle-income countries. Meiji's score changed from 0.8 to 3.1, mostly due to the Meiji Group Sustainability 2026 Vision – a new strategy that includes a focus on nutrition (including addressing undernutrition and micronutrient deficiencies among women and older people in Japan) – and the introduction of several new basic policies relating to responsible marketing, labeling, and employee health.

ATNI welcomes this overall (albeit slight) improvement on three years ago. Despite these efforts, however, considering the overall average score of 3.3, there are still many aspects of company performance that urgently require investment and improvement. **2021 is both the era of COVID-19 and the Nutrition for Growth Year of Action: There has never been a greater need and opportunity for food and drink manufacturers to step up the positive changes needed to ensure healthier diets for all.**



Nutrition topic (Category) findings

Category A: Governance

Nestlé and FrieslandCampina rank first and second in **Nutrition Governance**, which addresses nutrition strategies, management systems, and reporting. Thirteen of the 22 companies that were assessed in 2018 have since strengthened their nutrition policies and management systems. Kraft Heinz has shown the greatest improvement, increasing its score by 2.8 points after adopting global nutrition guidelines in 2020, and Grupo Bimbo moved up furthest (by seven places) in this Category.

Although Governance remains the highest-scoring category on the Index, there has been only a small increase in average score (4.5 to 4.6).

Selected Best Practices

- Among the companies assessed, Nestlé demonstrates the most comprehensive nutrition strategies, management systems, and reporting.
- FrieslandCampina has updated its 'Nutrition Policy', published a 'Better Products Program' with nutrition criteria, and the company's 'Broadening Access to Nutrition' policy aims to make foods and beneficial nutrients available to more people, especially those with lower incomes.

Category B: Products

Danone leads in **Formulating Appropriate Products**: The company ranks first in the Product Profile and has updated its NPM, which is used to guide reformulation and innovation initiatives. Arla, Kraft Heinz, Mars, and Grupo Bimbo have made significant progress in their scores and rankings because of their adoption of new company specific NPMs and/or new commitments on (re)formulation.

This Index expanded the scope of the Product Profile assessment, with nutrition information available for more products (38,176 products assessed in 2021, compared to 20,865 in 2018) across 25 different markets relevant for the companies (in 2018, only nine markets were included). This significantly improves the quality of the assessment and its representativeness of companies' sales in the global market.

Nine companies show an increased mean HSR of products in the markets selected. This is one of three scored components of the Product Profile. Nestlé showed the highest improvement (0.8 Health Stars change), followed by Ferrero (0.5 Health Stars change). Both companies received a maximum score for this component.

However, the mean HSR score, a second scored element of the Product Profile, for all companies and all products was 2.4, the same as in 2018. Only five companies had half or more of their distinct products included in this research meet the healthy threshold (achieving an HSR of 3.5 stars or more out of 5). Four of these companies are estimated to derive 50 percent or more of their retail sales from these healthy products, showing most other companies are falling short in providing nutritious options globally. Of the 38,176 products assessed across all companies, 11,797 (31%) meet the healthy threshold – the same percentage as in 2018.

Danone achieved the highest mean healthiness score (6.9 out of 10). An indication of the nutritional quality of the company's products in best-selling categories across major markets, it was the only company to achieve the healthy threshold of 3.5 HSR at portfolio-level when results were sales-weighted.



Danone and Mars received the highest score on the relative healthiness of their products within product categories, a third scored component of the Product Profile assessment. Mars is assessed across eight product categories in which it competes with one or more peers. The company ranks first in 'Confectionary' and 'Ready meals', and second in 'Rice, Pasta, and Noodles'. Danone achieves a top rank in the categories 'Bottled Water' and 'Dairy'.

Compared to 2018, more companies define targets for at least one of the following nutrients – sodium, trans fat, saturated fat, and sugar/calories – but only Unilever defines a target on foods delivering 'positive nutrition' for all products globally.

Fourteen companies have adopted some form of NPM, compared to 13 in 2018. While ATNI learned of more companies planning to use independent NPMs or already using government-endorsed systems to validate their own/company-specific models, only three companies provided evidence that their definition of healthy products corresponds with the HSR healthy threshold.

Nine companies, four more than in 2018, indicate that their approach to the fortification of products, to help address undernutrition, is based on international guidance shared by FAO (Codex) and/or WHO (Guidelines on Food Fortification with Micronutrients). Just six commit to only fortify products of high underlying nutritional quality, or which meet certain nutrition criteria.

More than half of the companies have not made significant progress in this Category since the 2018 Index – particularly when it comes to the nutritional quality of products in their portfolios, adopting/improving NPMs, disclosing the number of products that meet healthy criteria, and developing healthy, appropriate products to address undernutrition and micronutrient deficiencies.

Selected Best Practices

- Ajinomoto and Kellogg adopted a full NPM. Grupo Bimbo has published new nutritional guidelines and an NPM which are validated by a government-endorsed system.
- Kellogg upgraded its model, which is now considered a full internal NPM (that calculates overall scores of ratings of the nutritional quality of its products). In addition, the company stands out in reporting by using an independent, government-endorsed NPM (Nutri-Score) as a tool to (re)formulate its products.
- As part of its newly released 'Future Foods' strategy, Unilever has made a commitment to double the number of products sold that deliver 'positive nutrition' by 2025. The company defines this as foods which "contain significant, impactful amounts of crucial ingredients and macronutrients, like vegetables or proteins, and/or micronutrients, like vitamins and minerals." The company is in the process of updating its NPM.
- Arla, FrieslandCampina, and Danone showed evidence that their definition of healthy products corresponds with the HSR ≥ 3.5 definition of healthy.
- Both FrieslandCampina and Nestlé have published commentaries on their investments to develop products specifically for priority populations experiencing, or at risk of, all forms of malnutrition (including overweight/obesity and diet-related noncommunicable diseases (NCD's)).

Category C: Accessibility

When it comes to **Accessibility and Affordability** of healthy products, FrieslandCampina and Nestlé have the most comprehensive approaches to pricing and distribution, including for products designed to address micronutrient deficiencies. Overall, companies perform better on accessibility (i.e., geographical access and distribution of healthy products) than on affordability (i.e., healthy product pricing). However, the average score for this category remains the lowest of the Index at 1.9, a decrease from 2018 when it was 2.5. This is partly because of a more demanding methodology in terms of requiring recent evidence and public disclosure on commitments. ATNI has also applied a heavier focus to the way companies improve their accessibility of healthy products commercially.



ATNI does take note of the actions companies take non-commercially, but these efforts (such as donations and other philanthropic programs) hold less weight in the end score.

Most low-scoring companies made broad, stand-alone commitments that were not part of a formal policy. At times, these companies demonstrated ad hoc actions in some (but not all) markets and/or for some of their products.

There was also little evidence of a strategic, global approach to the pricing and distribution of healthy products that address micronutrient deficiencies to populations experiencing, or at high risk of, malnutrition. Despite a clear need for action to improve the affordability and accessibility of healthy products, particularly as COVID-19 has further threatened access to nutritious foods and increased micronutrient deficiencies, companies' practices show limited progress in this area.

Selected Best Practices

- In ensuring Accessibility and Affordability of products, FrieslandCampina was the only company with objective, measurable targets, linked to its 'Broadening Access to Nutrition' policy for improving the pricing and distribution of its healthy products. One of its objectives is to increase the share of affordable nutrition products in its lower-income markets (Nigeria, Pakistan, Ivory Coast, Indonesia, Vietnam, and the Philippines) to at least 15% of sold volume in 2025. Additionally, the company aims to increase the percentage of affordable nutrition products that complies with its own nutrition criteria, 'Affordable Nutritional Standards', in these markets to at least 50% in 2025.

Category D: Marketing

FrieslandCampina again ranks first on **Responsible Marketing** (a score of 7.9 compared to an average of 3.5), consistently scoring high in general marketing policies, policies for children specifically, and auditing and compliance. In addition, it is one of the few companies to explicitly commit to developing and delivering marketing strategies to reach low-income groups at risk of undernutrition and micronutrient deficiencies with healthy and/or fortified products. Mars and Nestlé came second and third, respectively. The largest improvement (moving up five places) was made by Arla, which saw major improvements in its auditing of, and compliance with, marketing policies; including joining the EU pledge on advertising to children and initiating internal auditing of policies for all audiences to complement the auditing required by the EU pledge.

In general, companies score highest on the criterion assessing the quality of marketing policies for children. Most companies (20) have a specific marketing policy for this age group. However, many aspects of these policies could be improved in areas such as age ranges, and to cover all settings where children gather, along with digital spaces.

The lowest score is found in general aspects of responsible marketing, with a clear need for action to address in-store/point of sales and sponsorship marketing. Another issue, which has become even more evident and urgent as COVID-19 widens health inequalities globally, is for companies to commit to developing and delivering marketing strategies for healthy products that prioritize vulnerable populations.

An unscored element of the Index's research assesses whether products are suitable to be marketed to children, according to WHO criteria. In total, only 3493 out of 38,852 assessed products were deemed suitable to be marketed to children based on the criteria of relevant WHO regional NPMs. This equates to nine percent of distinct products assessed, which together also represent nine percent of the sales value of packaged foods of all companies combined. In 2018, ATNI found that 14% of 22,137 products assessed met the criteria of the WHO Regional Office for Europe Nutrient Profile Model.



Selected Best Practices

- FrieslandCampina was the only company to make explicit commitments on marketing strategies that reach priority populations and provide evidence of steps taken to reach these populations with products which address their specific nutrition needs through tailored marketing, on a global scale.
- Mars, Nestlé, and Unilever demonstrate leadership in their general marketing policies for all audiences. All three have publicly available responsible marketing policies that are fully aligned with the principles of the International Chamber of Commerce (ICC) general marketing code and make commitments beyond the ICC Code. They each apply their policy to all media channels covered by the ATNI methodology and implement it globally.
- Arla remains the only company specifically to use a definition of 'child' as being those aged under 18 (as defined in the UN Convention on the Rights of the Child), and to set out which aspects of its responsible marketing policy applies to under-18s and which to under-12s.

Category E: Lifestyles

Global food and beverage manufacturers have a significant impact on the **Lifestyles** of their employees and consumers. Overall, most companies (20) have a commitment to the health and wellness of their employees and implement programs designed to improve physical health and/or nutrition – with Unilever leading the field.

However, despite the need for action to support employee health and wellbeing – a factor that has been particularly evident during the COVID-19 pandemic – companies' efforts in this category achieved an average score of just 2.7. Only eight companies state their intention to address health and wellbeing in their wider value chain, which has been shown to be vitally important for supply-chain resilience during crises such as COVID-19. Most companies still do not provide support consistently across all their markets for breastfeeding mothers in the workplace. And, while most companies have programs on nutrition education that are healthy diet and active lifestyle orientated, these would be better designed, and more effective and appropriate, were they clearly evidence-based, aligned with relevant national or international guidelines, and (co-)implemented by independent third parties with relevant expertise.

Selected Best Practices

- Unilever's 'Lamplighter Program' combines health risk appraisals with physical activity opportunities, good nutrition, and mental resilience to improve employee health and wellbeing.
- Nestlé's new Global Parental Support Policy foster a gender-neutral approach to childcare, promoting paid leave, non-discrimination, and flexible working, and requiring breastfeeding rooms in all company locations with at least 50 employees.

Category F: Labeling

Unilever leads in the Category of **Product Labeling and Health and Nutrition Claims**, improving its score and rising three places in the ranking thanks to its front-of-pack (FOP) and back-of-pack (BOP) labeling commitments, transparency, and adherence to international guidelines. An important step forward in this Category is that, in 2018, none of the companies had introduced interpretive labeling (e.g., using color-coding, a traffic light system, or a star or similar rating system instead of only quantitative information) – but, by 2021, six companies had done so for some or all their products. Since 2018, there has also been an increase in the products and markets to which companies apply their BOP labeling commitments. However, the number of companies disclosing their overall BOP and FOP labeling commitments has not improved.



Overall, the average score of this Category (3.6) has remained low. Less than a third of all companies assessed in this 2021 Global Index adhere to (inter)national guidelines regarding the use of labeling claims. There is additional room for improvement regarding transparency, with some companies scoring very poorly overall on the disclosure element of product labeling.

Selected Best Practices

- Nestlé has a public commitment to use interpretive labeling on its products, globally. It is the only company that commits to not use nutrition and health claims in countries where local or national regulations are less strict than the Codex Alimentarius Guidelines, and it also uses an NPM to inform the use of claims. Meanwhile, Danone has extensive public commitments regarding the use of both FOP and BOP labeling on its products.
- Danone is also the only company that commits to display nutrition information online which specifically takes into account differences in product composition (which often varies between markets) for over 90% of its products globally; in turn providing consumers with accurate, country-specific nutritional information about its products.

Category G: Engagement

When it comes to **Engaging with Governments and Policymakers**, it is encouraging that 10 more companies than in 2018 are now disclosing lobbying positions on relevant nutrition topics, notably FOP labeling and health claims regulation. Meanwhile, almost all companies were found to have anti-corruption measures and whistleblowing mechanisms in place, and 15 companies either assign Board oversight of their lobbying positions or carry out internal audits of their lobbying activities. More companies are also making commitments and/or providing examples of supporting government efforts to prevent and address malnutrition, including obesity.

However, with an average score of just 2.9 across all the companies, there is still considerable room for improvement – particularly on disclosure of trade association membership, paid lobbyist activity, and governance conflicts of interest. Just two companies publicly commit to lobbying in support of measures to improve health and nutrition. A key concern is that only three companies were found to publish a commentary on lobbying measures to prevent and address all forms of malnutrition, and most companies focus primarily on supporting governments in their home market. There is significant scope for companies to invest in more comprehensive and structured engagement with domestic and international nutrition stakeholders, in order to inform, develop, and improve their nutrition strategies, policies, and programs.

Selected Best Practices

- Danone and PepsiCo are the only companies with a public commitment to engage with governments and policymakers with the intention to only support measures that prevent and address malnutrition. PepsiCo was found to be the most transparent in disclosing its lobbying positions across several topics, including responsible marketing and advertising legislation.
- Kellogg states that it actively engages in ongoing conversations with multilateral organizations, governments, and NGOs, to identify risks and opportunities and inform its strategies, new programs, and food innovations. It has also engaged with governments to address hunger and malnutrition among children from low-income households.

Marketing of breast-milk substitutes (BMS) and complementary foods (CF)

Manufacturers of BMS and CF have a significant impact on infant and young child (IYC) nutrition globally; influencing optimal breastfeeding and complementary feeding practices which not only have direct impacts on IYC health but, ultimately, affect the health of future generations.



The International Code of Marketing of Breast-milk Substitutes and all subsequent relevant World Health Assembly (WHA) resolutions, including WHA 69.9 (collectively referred to as 'The Code'), urges and guides BMS and CF manufacturers to market their products responsibly to protect and promote exclusive breastfeeding in the first six months, and continued breastfeeding up to two years of age and beyond. ATNI expanded the coverage of the BMS Index in 2021 to include the nine largest companies in the global baby food segment: Abbott, Danone, Feihe, FrieslandCampina, Kraft Heinz, Mengniu, Nestlé, Reckitt, and Yili.

Danone – the company with the second highest sales in the baby food segment in 2019 at \$8.5 billion – once again leads the BMS/CF Marketing Index 2021, with a score of 68%. This result is a substantial improvement from its 2018 score of 46%. Nestlé – the market leader with sales of just over \$15 billion in this segment in 2019 – comes second, with a score of 57%, also a substantial improvement on its 2018 score of 45%. These two companies' performances increased principally due to the relatively high levels of compliance ATNI found with The Code, and local regulations that go beyond this in the Philippines and Mexico; compared to lower levels of compliance found in similar studies that ATNI carried out in Nigeria and Thailand for the 2018 assessment (BMS/CF 2). However, their scores fell on the BMS/CF 1 element of the Index, which assesses the alignment of their policies, management systems, and disclosure with the International Code on the Marketing of Breast-milk Substitutes and all subsequent, relevant WHA resolutions up to and including WHA 69.9 in 2016. This is because neither company has revised its marketing policy since the 2018 Index, and the fact they were assessed for the first time on their compliance with WHO guidance related to WHA 69.9 on ending inappropriate marketing of foods for infants and young children.

Kraft Heinz increased its ranking to third in the BMS/CF Marketing Index 2021, with a score of 38%, up from zero percent in 2018. This improvement was driven by having shared with ATNI for the first time a BMS marketing policy, as well as achieving a better result in the Mexico study compared to the study carried out in Nigeria in 2017. This company is substantially different to the others assessed in the BMS/CF Marketing Index, as it is the smallest (with global sales in 2019 of \$512 million) and because it generated most of those sales from CF, whereas the majority of the other companies generated most of their sales from formulas.

While some of the companies' policies align to the 1981 Code recommendations and associated WHA resolutions to some extent, most make significant exclusions in relation to certain products and markets. None apply in full, globally. Moreover, none of the six companies whose policies could be assessed for this Index have yet extended them to incorporate the 2016 WHO guidance.

The companies assessed in both the Global Index and the BMS/CF Index are Danone, FrieslandCampina, Kraft Heinz, Mengniu, Nestlé, and Yili, and their scores in the Global Index are adjusted based on their scores in the BMS/CF Index. The methodology for the BMS/CF Marketing Index 2021 is available [here](#), and the Index report is available [here](#).



Recommendations

Category A: Governance

Companies that scored highly on governance tended to score better across other Categories, too – suggesting that nutrition activities are likely to be better sustained where commitment starts at the top, and are integrated into core business strategy and publicly and comprehensively reported on.

Therefore, ATNI recommends that global F&B manufacturers continue to integrate nutrition considerations into core business functions, including linking executive pay to performance on nutrition objectives. These commitments could then be translated into specific action, and research conducted into how best to use commercial opportunities to address specific needs of priority populations.

Category B: Products

Companies can and must do much more to develop and deliver a comprehensive strategy to improve the overall nutritional quality of their portfolios and within product categories. Product innovation, reformulation, diverging from unhealthy product lines, and/or acquiring healthier brand lines will improve company scores on all three components of the Product Profile assessment (portfolio healthiness, within category healthiness, and change in healthiness over time).

ATNI recommends that global F&B manufacturers disclose nutrient information (including micronutrients) for all products, to enable more robust independent assessments of the nutritional quality of products (such as ATNI's Product Profile). Companies must improve transparency on the proportion of sales from healthy products and ensure their targets on portfolio level healthiness (e.g., through divestment/ acquisition) and product (re)formulation are aligned with national and international standards.

ATNI also recommends that companies commit to only fortify products that are healthy and inherently of high quality in addressing undernutrition, and that strategies and R&D investments are strengthened to develop products addressing micronutrient deficiencies.

Category C: Accessibility

ATNI recommends that global F&B manufacturers adopt a clear policy on affordability and accessibility of healthy products, including strong, unifying public commitments and SMART (specific, measurable, achievable, realistic, and timely) targets to guide their actions.

Most companies need to strengthen their current commitments by specifically addressing the needs of low-income consumers and/or those that lack physical access to nutritious food, across all markets. ATNI recommends regular in-country analysis to identify and target consumers who are affected by socioeconomic inequities and COVID-19-related disparities. Action to ensure the accessibility of healthy food to these groups should be accompanied by an explanation of how the healthiness of products is based on objective nutrition criteria that align with international standards.

Category D: Marketing

ATNI recommends that global food and beverage manufacturers invest in improving marketing policies that accelerate efforts to drive sales of healthy options. Commitments should align with the ICC marketing framework, widen the media channels to which policies apply, and explicitly address in-store/point-of-sale and sponsorship marketing in policies.



Developing and delivering marketing strategies appropriate to priority populations is also key to overcoming the inequities that have been exacerbated by COVID-19. ATNI recommends all companies adopt and apply WHO regional standards on marketing to children, increase the age covered by restrictions to under-18, and lower the audience threshold used to restrict advertising on all media to 25% or less. Marketing restrictions in primary schools could be extended to include secondary schools, other places where children gather, and areas surrounding these places.

ATNI also recommends that companies commission independent, annual marketing audits of their responsible marketing policies.

Category E: Lifestyles

COVID-19 has shown that safeguarding the health and resilience of those working in the food supply chain is key to food security in times of crisis. Hence, ATNI recommends that companies urgently improve and extend their health and wellness programs, including both nutrition and physical-activity elements and setting meaningful and quantifiable outcomes. These programs should be accessible to all employees and their families globally, and with an additional commitment to improving the health and wellness of groups across the wider food value chain that are not direct employees.

ATNI recommends companies that have not yet done so develop robust and publicly-available parental policies that apply equally in market operations worldwide, including support for breastfeeding at work and providing parental support/paid maternity leave (ideally for at least six months).

Additionally, ATNI recommends that consumer education and healthy eating and active lifestyle initiatives are evidence-based, aligned with relevant national or international guidelines, and (co-) initiated and developed by independent organizations with relevant expertise. Companies could take renewed steps to support programs that address the specific needs of those at high risk of micronutrient deficiencies, particularly in the wake of the COVID-19 crisis.

Category F: Labeling

To compensate for differences in local regulations around the world, ATNI recommends that global food and beverage manufacturers commit to providing comprehensive nutrition information on all product labels, in all countries. This includes strengthening commitments to display BOP nutritional information, including nutrients such as added sugars, fiber, and micronutrient content, and to provide interpretive FOP labeling.

ATNI also recommends companies commit to only using health and nutrition claims on products (including fortified foods) that are determined as being healthy by a relevant Nutrient Profiling Model (NPM).

Category G: Engagement

The COVID-19 crisis has made clear the need for companies to take an active and constructive role in supporting government efforts to combat all forms of malnutrition, not only in their home countries, but in all markets in which they are active. ATNI recommends that global F&B manufacturers publicly commit to lobby responsibly, in-line with the Responsible Lobbying Framework, explicitly support only evidence-based measures that are designed to improve health and nutrition, and comprehensively disclose the extent of lobbying carried out.

ATNI also recommends that companies engage with a wide range of national and international stakeholders with specific expertise in nutrition-related topics during the design of their nutrition strategies, programs, and interventions, to maximize positive impact on public health.



Marketing of breast-milk substitutes (BMS) and complementary foods (CF)

Forty years after the original International Code of Marketing of Breast-milk Substitutes (The Code) was adopted, the 2021 BMS marketing assessment provides clear evidence that the marketing practices of the world's nine largest manufacturers of formula and foods for IYC are far from aligned with its recommendations.

ATNI encourages all of the nine major companies that make BMS and/or CF, which were assessed in the BMS/CF Marketing Index 2021, to adopt marketing policies that are fully aligned to the wording and scope of the 1981 Code, including all subsequent and relevant WHA resolutions.

ATNI recommends these marketing policies are applied to all product types. None of the six companies that have a BMS marketing policy extend this to all types of formula (i.e., none include growing-up milks for older infants from one to three years of age). Moreover, companies that make and market CF for children aged six months to three years of age need to incorporate the WHO guidance recommendations, issued in 2016 and associated with WHA 69.9. These are in relation to adhering to established standards and guidelines on CF product formulation, ensuring the appropriate use of marketing messages to support optimal feeding, avoidance of cross-promotions, and of conflicts of interest within the healthcare setting. It is critical that companies commit to uphold their policies in all markets (i.e., in both higher- and lower-risk countries) and apply them where there are no relevant regulations or where regulations do not fully implement The Code.

As for the companies that sell BMS products but do not yet have BMS marketing policies, ATNI encourages them also to publish such policies in which they commit to not only uphold relevant national regulations, but also implement The Code, in full, across all markets in which they operate currently or aspire to enter.

All companies are recommended to adopt effective, company-wide governance and management arrangements to ensure their policies are effectively and consistently implemented in all markets in which they operate, and to publish more information on their BMS and/or CF marketing policies and practices to provide greater transparency to all interest groups.



Future opportunities

ATNI embraces the evolution of the methodology in this iteration of the Global Index, including the incorporation of the assessment of the healthiness of companies' product portfolios and the incorporation of policies and actions targeting priority populations at high risk of malnutrition, in both low- and high-income markets.

The COVID-19 crisis and its negative impact on malnutrition in the world has made it very clear, however, that more efforts at a faster pace are needed by the food industry to achieve the end of malnutrition in all its forms in 2030.

ATNI will share and reflect on the outcomes of this Index with the companies assessed, and with ATNI's investor signatories that engage with the companies, to discuss required follow-up action. The Index results will also be discussed with a wider group of interested parties in nutrition and food systems during various on-line events, to determine ways in which the industry response to malnutrition can and should be strengthened to ensure healthier diets for all.

Moreover, ATNI is engaged in various working groups that are preparing for the United Nations Food Systems Summit (September) and for the Nutrition for Growth Summit (December). ATNI will disseminate the latest Index findings in these forums and share its experience on holding companies to account for their impact on nutrition. These events also provide all baby food companies with the ideal opportunity to make the commitments necessary to honor The Code.

The insights from the Index 2021 and the learnings from our 2020 COVID-19 project, in which F&B companies' responses to the pandemic in relation to nutrition were monitored, will be used to identify areas in our Index methodologies and other accountability tools that require further development to amplify ATNI's efforts to address malnutrition.



Amplifying impact

Companies urgently need to step up their game to deliver on the two key Sustainable Development Goals related to nutrition:

- SDG 2: End hunger, achieve food security, and improve nutrition.
- SDG 3: Ensure healthy lives and promote well-being for all.

In doing so, they can contribute to the realization of all the SDGs.

ATNI encourages all stakeholders to actively use the 2021 Index results and provide their feedback to ATNI. We hope the rated companies will commit to make changes based on our recommendations, and that their investors will use the recommendations in their engagement with those companies to press for improvements in their policies, practices, and disclosure. Furthermore, we hope that governments and policymakers, NGOs, academics, and others use our analysis and findings in their work to encourage better diets worldwide.



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