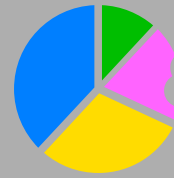


August 2022



ACCESS TO
NUTRITION
INITIATIVE

U.S. Index 2022

Methodology

August 2022





Disclaimer

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Abbreviations

ATNI	Access to Nutrition Initiative
F&B	Food and beverage
BOP	Back of pack
CFBAI	Children's Food and Beverage Advertising Initiative
FDA	Food and Drug Administration
FOP	Front of pack
HSR	Health Star Rating
NDA	Non-disclosure agreement
NPM	Nutrient Profile Model
SNAP	Supplement Nutrition Assistance Program
	The George Institute for Global Health
TGI	World Health Organization
USDA	United states Department of Agriculture
WHO	Special supplemental nutrition program for
WIC	women, infants and children



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About ATNI

ATNI is an international, independent not-for-profit organization based in the Netherlands. Its mission is to develop and deliver tools that track the contribution of the F&B sector to addressing the global nutrition challenges of overweight, obesity and diet-related diseases, as well as undernutrition.

Specifically, ATNI aims to encourage F&B companies to improve the nutritional quality of their products, to substantially increase sales of healthier products, and to change the ways in which they shape food environments (e.g., through marketing, product labeling, interaction with policymakers). Within this broad scope, infant and young child nutrition receives special attention.

In order to preserve its independence, ATNI does not accept funding from companies it assesses nor from the wider F&B industry. It is overseen by an independent unpaid Board. More information about ATNI's governance and operating policies is available online.

As of July 2022, 79 institutional investment organizations, representing US\$19.2 trillion in assets under management have signed the ATNI Investor Expectations on Diets, Health and Nutrition.¹ They use ATNI's research in their own investment research and engagement with companies in which they are shareholders, to encourage improved performance on nutrition to contribute to long-term shareholder value.

The Global Access to Nutrition Indexes are ATNI's flagship products. Published every two to four years, they provide companies, investors and other stakeholders with a rating of the world's largest F&B manufacturers, revealing how these companies are contributing to nutrition challenges and highlighting where they have potential to do more. ATNI's first global Index was developed between 2009 and 2013 by the Global Alliance for Improved Nutrition (GAIN), which built on the work of existing organizations, and particularly other benchmarks and indexes commonly used by the investment and finance community.

In addition to the Global Indexes, ATNI designs and publishes stand-alone Indexes for individual countries, called Spotlight Indexes. The methodology for these is tailored to local circumstances and developed in consultation with local stakeholders.

The first ATNI Spotlight Index was published for India in 2016 and was followed by the U.S. Index in 2018.² During this period, ATNI also worked with a team at the University of Oxford's Nuffield Department of Population Health, led by ATNI Expert Group member, Professor Mike Rayner, to develop an approach to evaluate the nutritional quality of each company's products (also known as the Product Profile). After pilot studies, ATNI concluded that Product Profiles would be a valuable element to include in each Index.

All of the ATNI Indexes follow a set of key design principles that were formulated when the organization was established in 2013 (see Annex I). ATNI's work on the U.S. Index 2022 Methodology is guided by ATNI's Theory of Change, stakeholder engagement, input from the U.S. Expert Group, and guidance from its Board members.

¹ ATNI. (n.d.). Our work with investors. Available at: <https://accesstonutrition.org/investor-signatories/>. (Accessed: 01/07/2022).

² A complete history of the development of the first U.S. Spotlight Index may be accessed [here](#).



1. Summary

The U.S. continues to face a nutrition crisis: 1 in 6 young people have obesity and close to 10% of the population experienced food insecurity in 2020. With COVID-19 and longstanding social inequities threatening recent progress made, effective accountability of the private sector is more important than ever to tackle this nutrition crisis. ATNI aims to encourage the 11 leading U.S. manufacturers, whose combined retail sales account for between 30-35% of total U.S. sales in 2021, to increase their sales of healthy foods and responsibly contribute towards creating a health-promoting environment for the U.S. population.

ATNI published its first [U.S. Index in 2018](#). For the first iteration, most companies engaged with ATNI during the research process, provided information through the data gathering platform, and engaged in follow-up conversations. However, the 2018 U.S. Index showed that, overall, the 10 largest food and beverage (F&B) manufacturers in the country lacked comprehensive strategies, policies and action to effectively address the pressing challenges of obesity and diet-related diseases in the U.S.

The methodology for the U.S. Index 2022³ is based on the previous 2018 U.S. Index and the ATNI Global Index 2021, but with significant adaptations following an internal ATNI evaluation, guidance from the ATNI U.S. Expert Group, and stakeholder consultations. The methodology assesses companies against U.S. and international guidelines, standards and norms, and accepted industry best practices. There are seven Categories (topic areas) within the methodology, each carrying a specific weight used to calculate the total Index score:

A. Governance (12.5%), B. Products (35%), C. Access (17.5%), Marketing (20%), E. Workforce (5%), F. Labeling (5%), and G. Engagement (5%)

A total of 127 indicators are distributed between the different Categories. All indicators, except Product Profile, provide predefined answer options (either yes, no, or multiple-choice options). In addition, there are two types of multipliers which affect selected indicators' performance. *Healthy multipliers* — derived from evaluating the quality and transparency of companies nutrient profiling models — are applicable to all indicators relating to 'healthy' products, and the *age scope multipliers* — defining to what extent companies apply their marketing policies to both children and teens — are only applicable in Category D (Marketing).

An important component of the Index methodology is the Product Profile — an independent analysis of the healthiness of companies' product portfolios — conducted in collaboration with The George Institute for Global Health (TGI). ATNI rates companies using the Health Star Rating (HSR) nutrient profiling model, serving as an independent metric to compare companies' portfolios. Compared to the 2018 U.S. Index, where the Product Profile ranking was presented as a separate analysis, for this 2022 iteration the results from the Product Profile are integrated in Category B. The Product Profile results account for 20% of the total Index score.

Research for the U.S. Index took place in spring 2022, led by ATNI research analysts with contributions from the Index companies through an interactive and confidential data-gathering platform.

The data-gathering process was followed by an analysis and internal quality-assurance processes within ATNI. The writing of both the Index Category findings and individual company scorecards took place in the second quarter of 2022.

³ A list of indicators included in this document as Appendix II.



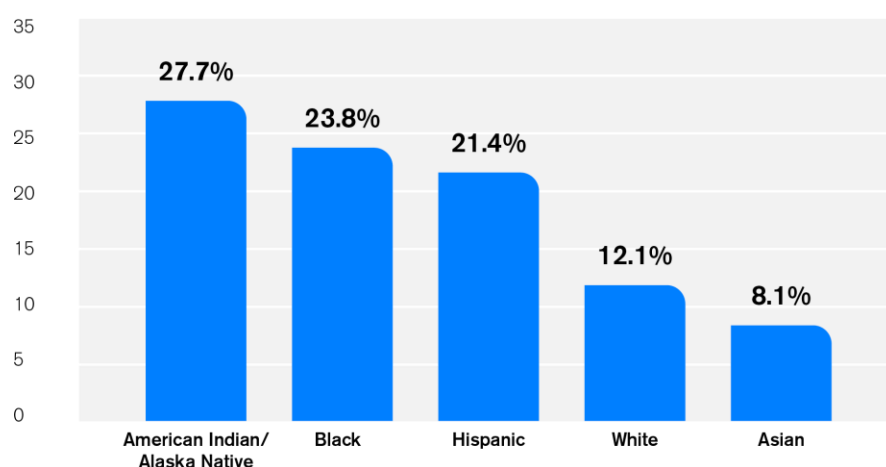
2. Background

2.1 Urgent action is needed to address U.S. nutrition crisis

The U.S. continues to face a nutrition crisis. Millions of Americans are affected by hunger, obesity, and diet-related diseases. About 20% of young people aged 2 to 19 years and 42% of adults have obesity, which increases the risk of heart disease, type 2 diabetes, and some cancers.⁴ At the same time, according to the USDA, 38 million people lived in food-insecure households in 2020.⁵

In the U.S., obesity rates among youth show that disparities by race and ethnicity persist,⁶ and emerging data suggests the COVID-19 pandemic and its related impacts have aggravated childhood obesity.⁷ Calories from foods commonly high in added sugar, fats and salt (associated with foods classified as ultra-processed by NOVA⁸) now comprise more than 2/3 of children's and adolescent's total caloric intakes.⁹

Figure 1: Obesity disparities among youth in the U.S.



Obesity rates by race, ethnicity and household income among youth ages 10-17 nationwide.

Source: Data from the 2019-20 National Survey of Children's Health (NSCH) in Robert Wood Johnson Foundation *State of Childhood Obesity* (2021) report.

⁴ National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP) (n.d.). Poor Nutrition. Available at: <https://www.cdc.gov/chronicdisease/resources/publications/factsheets/nutrition.htm> (Accessed: 01/07/22).

⁵ USDA (n.d.). Food Security in the U.S. Available at: <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/key-statistics-graphics/> (Accessed: 01/07/22).

⁶ Robert Wood Johnson Foundation. (2021). *State of Childhood Obesity*. Available at: <https://stateofchildhoodobesity.org/2021report/>. (Accessed: 01/07/22).

⁷ Lange, S.J., Kompaniyets, L., Freedman, D.S., et al. (2021) Longitudinal Trends in Body Mass Index Before and During the COVID-19 Pandemic Among Persons Aged 2–19 Years — United States, 2018–2020. *MMWR Morb Mortal Wkly Rep.* 2021;70:1278–1283.

⁸ NOVA is a classification system which categorizes foods into four groups based on the processing and ingredients used.

⁹ Wang, L., Martínez Steele, E., Du, M., et al. (2021). Trends in Consumption of Ultraprocessed Foods Among US Youths Aged 2-19 Years, 1999-2018. *JAMA.* 2021;326(6):519–530.



Given their scale and reach, leading U.S. F&B manufacturers can contribute to mitigation of the nutrition crisis by improving their product portfolios through reformulation and innovation, by enhancing responsible marketing practices, and influencing U.S. food environments in a way that supports nutrition, health and equity. Accelerated action is more important than ever, as the U.S. continues to face a health and nutrition crisis.

2.2 Aims of the U.S. Index

The U.S. Index 2022 builds on the first iteration of the Index published in 2018 to:

- 1 Track the contribution of the F&B industry to address overweight and obesity, diet-related diseases, and food and nutrition insecurity, with special attention to specific population groups in the U.S. at higher risk of malnutrition and/or food insecurity (for the purpose of this report we refer to these groups as 'nutrition priority populations,' see Box 1).
- 2 Serve as a tool used by stakeholders to hold companies accountable for fulfilling their commitments to tackle these critical national nutrition challenges.
- 3 To provide specific recommendations for companies on how they can improve, highlight new developments and describe and share best practices of companies on nutrition-related topics.

Box 1: Priority populations

The Index aims to track the contribution of the F&B companies in improving nutrition for all, with special attention to nutrition priority populations. Throughout the methodology, 'priority populations' is a term used to refer to groups experiencing (or at risk of) malnutrition and/or food insecurity at a higher rate than the general population, due to factors outside of their direct control. In the U.S., this applies primarily to those disproportionately experiencing obesity and/or food insecurity,¹⁰ in association with multiple complex (and often overlapping) factors, such as:

- Low incomes
- Geographic factors (e.g., grocery stores far away or communities in which stores only have a limited range of healthy products)
- Other social determinants of health¹¹ (e.g., how race/ethnicity influence marketing (all aspects beyond advertising) of low-nutrition foods)

¹⁰ The U.S. Department of Agriculture provides data and interactive charts on various aspect of food security in the U.S. (State level): <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights/>

¹¹ The U.S. Office of Disease Prevention and Health Promotion defined defines social determinants of health as conditions in the environments where people are born, live, learn, work, play, worship, and their age, that affect a wide range of health, functioning, and quality-of-life outcomes and risks. More information: <https://health.gov/healthypeople/objectives-and-data/social-determinants-health>



Box 2: Outside the scope of the U.S. Index

- Products intended to address special nutrition needs or dietary needs, such as products for athletes and people whose dietary requirements are supervised by healthcare professionals.
- Products or activities that are a part of a formal weight management program, including products intended, marketed or branded for this type of program.
- Practices related to legal compliance with regulations or federal, state or local laws.
- Social and environmental impacts of F&B companies which are not directly related to nutrition and health, including:
 - Food safety
 - Water management practices
 - Environmental sustainability, including sourcing of ingredients
 - Impact on climate change
 - Fair treatment of workers and communities (other than workforce nutrition and breast-feeding support elements included in Category E)
 - Crop breeding (e.g., hybridization and genetic modification).

2.3 Development and methodology revision

ATNI organizes multi-stakeholder consultations for companies, investors and other interested parties after each iteration of its Indexes. Consistent with this approach, ATNI undertook a methodology revision for this U.S. Index 2022, starting with the revision of the previous 2018 U.S. Index methodology (see Annex I for a list of organizations consulted).



Box 3: Evaluation of ATNI's research methodology and process

Following the publication of the Global Index in 2021, ATNI conducted an evaluation study to explore how it could improve the understanding of indicators and Index processes, while maintaining its research integrity. This included an exit survey sent to all Global Index companies to request their feedback on the process and rationale of key themes in the Global Index methodology. Furthermore, ATNI undertook cognitive interviews with company representatives to assess their understanding of key indicators and made sure companies have a comprehensive understanding of what is being measured in the different Index topic areas. A cognitive interview is a one-on-one activity during which the participant shares her/his interpretation of a survey question. The goal is to ensure that a survey question measures the intended concept while also making sense to the participant. Notes are taken and thematically organized to understand if and how to revise a survey question.

The following summarizes the key outcomes and recommendations from the study, which ATNI took into account for the development of the U.S. Index 2022:

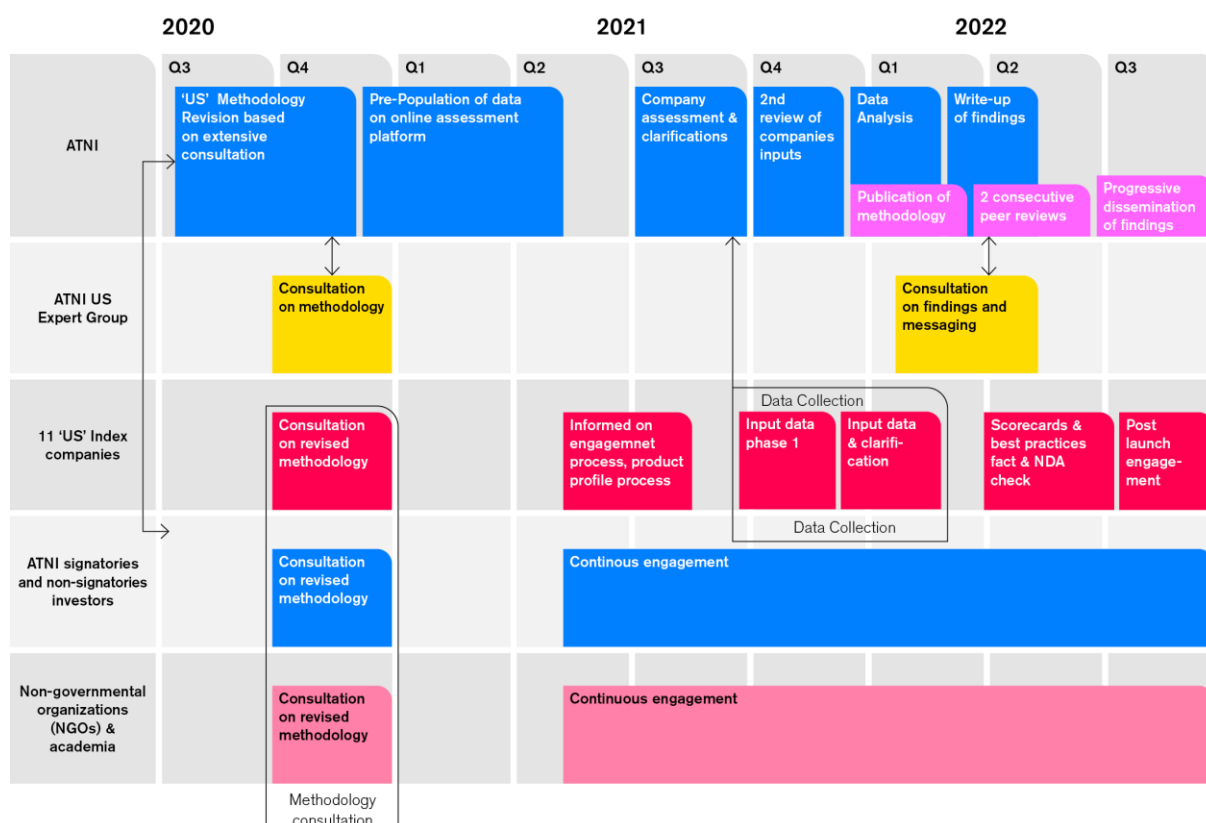
- Simplify answer options and reduce number of indicators.
- Consistently evaluate requests for public disclosure; e.g., some indicators required public disclosure and others did not.
- Clarify and simplify definitions, such as that of U.S. priority populations.
- Include more information about the rationale of indicators, and guide companies to find supplemental information.

In an effort to further streamline the research process, in the fourth quarter of 2020, ATNI developed a short survey to gather feedback on indicators and data collection during the Global Index 2021. Additionally, in the first quarter of 2021, the 11 companies selected for the 2022 U.S. Index were invited for a cognitive interview, which aimed to gain a deeper understanding of how companies understood the indicator questions (see Box 3).

A review of the methodology for the U.S. Index 2022 took place from the end of 2019 until January 2022. The Index planning, research and engagement process, including the anticipated dissemination of results, is shown in Figure 2.



Figure 2: ATNI Index methodology development: engagement process with stakeholders



The remainder of this document describes the key changes in the methodology and research methods, including the complete U.S. Index 2022 survey with indicators on which companies are assessed, scored and ranked (found in Annex II).

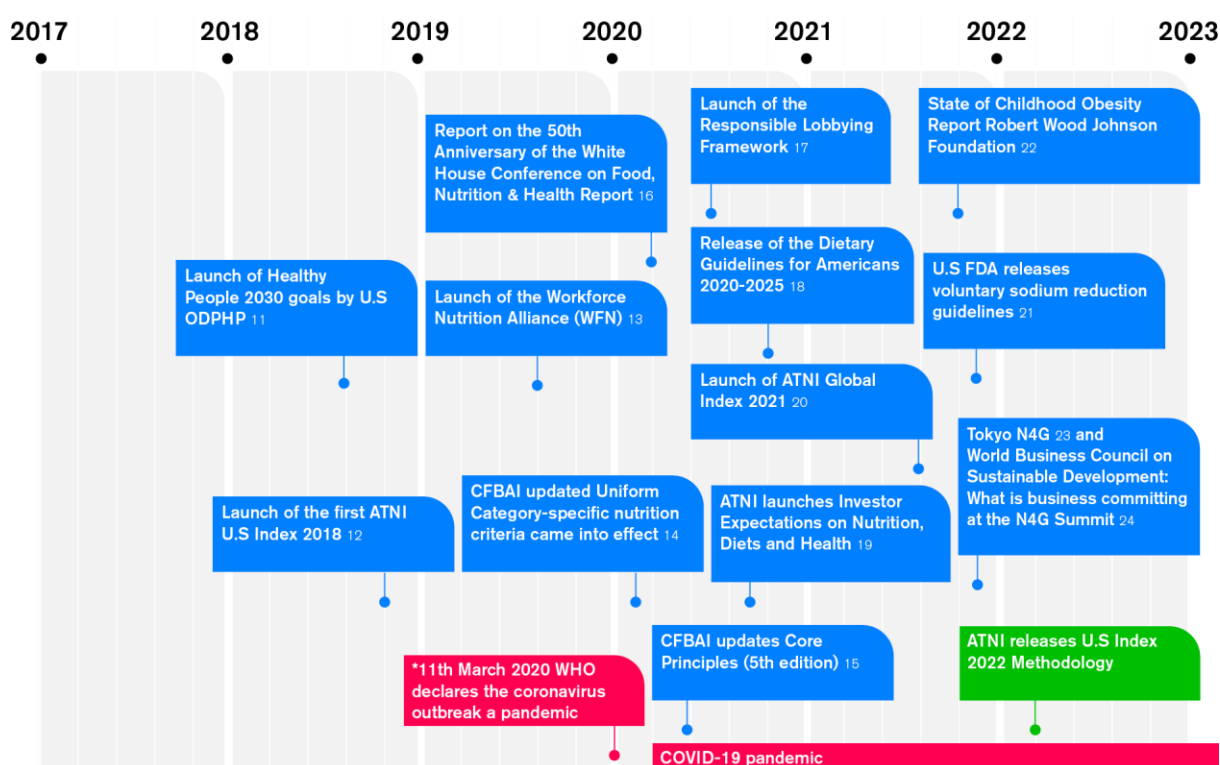


3. U.S. Index 2022: methodology

3.1 Major changes in U.S. Index 2022

As a result of the methodology revisions explained in the previous section, the U.S. Index 2022 has fewer indicators in all categories (190 indicators in 2018; 127 in 2022). To avoid missing the collection of essential information in the process, some new indicators were developed and other indicators have been adjusted to align with recent developments and input gathered through the review process. These include: international guidance, reports, academic studies, recommendations drawn from stakeholder consultations, experience gained through the ATNI Global Index 2021, and advice from the ATNI U.S. Expert Group. Selected key documents and events that informed the methodology are shown in Figure 3.

Figure 3: Key events and documents guiding the methodology revision for the U.S. Index 2022





Overall, the 2022 methodology reduces the focus on companies' non-commercial nutrition-related activities to favor the development and continuation of healthy food and better nutrition policies, and practices embedded in companies' commercial strategies. Aside from changes in the number of indicators, there are five major methodology differences compared to the U.S. Index 2018:

- 1 **Simplified scoring:** The scoring system of the Index has been updated and simplified to make it easier to understand and improve the quality control processes related to the automated scoring system through the online data gathering platform. The number of weighting steps has been reduced by replacing the weighting of commitment (25%), performance (50%) and disclosure (25%) indicators with an allocation of a maximum of 10, 20 and 10 points to these, respectively. Details of the scoring system are explained in the 'Scoring approach' section (page 18).
- 2 **Adjustment in Category weightings:** The weighting of Categories B, C and D has been adjusted, related to the integration of the Product Profile. A summary of the changes at the Category level can be found in Appendix I.

¹² Office of Disease Prevention and Health Promotion. (n.d.). Healthy People 2030: Nutrition and Healthy Eating. Available at: <https://health.gov/healthypeople/objectives-and-data/browse-objectives/nutrition-and-healthy-eating#cit1>. (Accessed: 01/07/22).

¹³ ATNI. (2018). *U.S Spotlight Index 2018*. Available at: https://accesstonutrition.org/app/uploads/2020/02/Spotlight_Index_US-Index_Full_Report_2018.pdf. (Accessed: 01/07/22).

¹⁴ Workforce Nutrition Alliance. (n.d.). What we do. Available at: <https://workforcenutrition.org/#/home>. (Accessed: 01/07/22).

¹⁵ BBB National Programs. (May 2021). CFBA Nutrition Criteria. Available at: <https://bbbprograms.org/programs/all-programs/cfbai/cfbainutritioncriteria> (Accessed: 01/07/22).

¹⁶ BBB National Programs. (May 2021). Companies Agree to Strengthen their Children's Advertising Commitments with CFBAI's Updated Core Principles. Available at: <https://bbbprograms.org/media-center/blog-details/insights/2020/05/06/cfbais-updated-core-principles>. (Accessed: 01/07/22).

¹⁷ Mande, J., Willett, W., Auerbach, J., et al. (2020). Report of the 50th Anniversary of the White House Conference on Food, Nutrition, and Health: Honoring the Past, Taking Actions for our Future. Boston, MA; March 2020.

¹⁸ Responsible Lobbying. (n.d.). The Responsible Lobbying Framework. Available at: <https://www.responsible-lobbying.org/the-framework>. (Accessed: 01/07/22).

¹⁹ U.S. Department of Agriculture and U.S. Department of Health and Human Services. (2020) *Dietary Guidelines for Americans, 2020-2025*. 9th Edition. December 2020. Available at: <https://www.dietaryguidelines.gov/>. (Accessed: 01/07/22).

²⁰ ATNI. (2020). *Investor Expectations on Nutrition, Diets and Health*. Available at: <https://accesstonutrition.org/app/uploads/2020/06/Investor-Expectations-on-Nutrition-Diets-and-Health-FINAL.pdf>. (Accessed: 01/07/22).

²¹ ATNI. (2021). *Global Access to Nutrition Index 2021*. Available at: <https://accesstonutrition.org/index/global-index-2021/>. (Accessed: 01/07/22).

²² FDA. (2021). Guidance for Industry: Voluntary Sodium Reduction Goals. Available at: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-voluntary-sodium-reduction-goals>. (Accessed: 01/07/22).

²³ Robert Wood Johnson Foundation. (2021). *From Crisis to Opportunity: Reforming Our Nation's Policies to Help All Children Grow Up Healthy.* Available at: <https://stateofchildhoodobesity.org/2021report/>. (Accessed: 01/07/22).

²⁴ Nutrition For Growth. (n.d.). Join Us For A Year of Action. Available at: <https://nutritionforgrowth.org/>. (Accessed: 01/07/22).

²⁵ World Business Council on Sustainable Development (2021). 'What is business committing at the Nutrition for Growth Summit?' Available at: <https://www.wbcsd.org/Programs/Food-and-Nature/News/What-is-business-committing-at-the-Nutrition-for-Growth-Summit-2021#:~:text=In%20collaboration%20with%20the%20BCG,commitments%20at%20the%20N4G%20Summit>.



- 3 **Product Profile integration:** The Product Profile — an analysis on the healthiness and nutritional quality of companies' portfolios using the Health Star Rating (HSR) nutrient profiling model — has become an integral part of the overall Index score. It is integrated in Category B of the Corporate Profile, which assesses whether companies formulate healthy and appropriate products, and the Product Profile carries a weight of 20% in the final overall Index score.²⁶
- 4 **Introduction of the 'age' scope multiplier:** ATNI awards a higher score to companies that apply their responsible marketing policies to children under the age of 18. The age multiplier ranges from 0.25 (i.e., reducing the score of a relevant indicator for companies using a lower age threshold than 18y) to 1 (i.e., no effect on the score of a relevant indicator, for companies using an age threshold of 18y). Details of the age multiplier are explained in 'Scoring approach' (page 18).
- 5 **The Breast Milk Substitute (BMS) Marketing Assessment:** The U.S. Index 2022 does not include a specific assessment on BMS marketing, as per its previous iteration. This is because, in 2021, ATNI launched a its first stand-alone BMS and complementary foods Index, which includes some of the largest baby foods manufacturers in the U.S.

3.2 Company selection

The U.S. Index 2022 focuses on 11 leading manufacturers, who were selected based on their retail sales of food and non-alcoholic beverages in the U.S. in 2021 (see Table 1). All 10 companies included in the previous US Index iteration in 2018 are included. Campbells moved into the top 10 and is therefore now included in the 2022 U.S. Index, bringing the total number of companies assessed to 11. One other company-related change pertains to Keurig Dr Pepper, as the company formed following the 2018 merger of Keurig Green Mountain and Dr Pepper Snapple Group.

Most of the companies included in the Index sell a wide range of food and non-alcoholic beverage products; only two predominantly produce beverages (Coca-Cola and Keurig Dr Pepper). Nine of the 11 companies are headquartered in the U.S. (except Nestlé and Unilever). At the time of the research, 10 of the 11 companies were public companies; only Mars Inc. is privately held. ATNI estimates these companies hold between 30-35% of the U.S. packaged food and non-alcoholic beverage market share, with combined revenues in 2021 of around \$190 billion.²⁷

²⁶ Criteria B1 is new in the U.S. Index 2022 and includes the Product Profile results as a scored element. Criteria B2 is similar to Criteria B1 in 2018 and assesses the commitment and disclosure of companies' reformulation targets. Criteria B3 is similar to Criteria B2 in 2018, and assesses how rigorously companies identify healthy products by using a Nutrient Profiling Model (NPM) for their U.S. product portfolio.

²⁷ ATNI estimates derived from Euromonitor International.



Table 1. U.S. Index 2022 list of companies

Company*	U.S. headquarters	Ownership	Estimated U.S. retail sales 2021 (ranges in US\$ million) ²⁸
Campbell Soup Company (Campbell)	Camden, New Jersey	Public	10,000 – 15,000
The Coca-Cola Company (Coca-Cola)	Atlanta, Georgia	Public	25,000 – 30,000
ConAgra Brands (ConAgra)	Chicago, Illinois	Public	10,000 – 15,000
General Mills, Inc. (General Mills)	Minneapolis, Minnesota	Public	10,000 – 15,000
Kellogg Company (Kellogg)	Battle Creek, Michigan	Public	5,000 – 10,000
Keurig Dr Pepper Inc (KDP)	Plano, Texas	Public	10,000 – 15,000
The Kraft Heinz Company (Kraft Heinz)	Chicago, Illinois	Public	20,000 – 25,000
Mars, Inc. (Mars)	McLean, Virginia	Private	10,000 – 15,000
Nestlé S.A. (Nestlé)	Arlington, Virginia	Public	20,000 – 25,000
PepsiCo, Inc. (PepsiCo)	Purchase, New York	Public	45,000 – 50,000
Unilever USA (Unilever)	Englewood Cliffs, New Jersey	Public	5,000 – 10,000

* In parenthesis companies' short names used throughout the report.

3.3 Index structure

The Index scores companies based on their contributions to healthier food and better nutrition. It assesses commitments, practices and transparency related to nutrition in the U.S. market. This includes an independent assessment on the healthiness of their product portfolios (see pg. 21, 'Product Profile').

The Index is divided into seven categories or thematic areas, as outlined in Table 2. A total of 127 indicators (all with predefined answer options, except for the Product Profile) are distributed between seven Categories. A full list of indicators is included in this document as Appendix II.

²⁸ Euromonitor International (2021) industry publications of Drinks, Food and Nutrition.



Table 2. Overview of U.S Index Categories

Category* /criteria	Rationale for inclusion	What the indicators measure, in brief
A. Governance (12.5%) A1: Corporate nutrition strategy A2: Nutrition governance and accountability Total no. indicators: 11	Companies can better prioritize, sustain and scale their nutrition-related activities if their commitments start at the top and are integrated into core business strategies and management systems.	Commitments (2 indicators): Intention to play a role in comprehensively tackling U.S. nutrition challenges linked to overweight/obesity and diet-related diseases. Performance (5 indicators): Evidence of board/senior executive leadership nutrition-related accountability; clear plan to deliver nutrition strategy with key metrics disclosed; and regular and U.S.-specific reporting. Disclosure (4 indicators): Public disclosure of commitments, strategies, and accountability arrangements.
B. Products (35%) B1: Product Profile B2: Product Formulation B3: Nutrient Profiling Model (NPM) — defining 'healthy' products Total no. indicators: 30	<p>The Product Profile is an independent analysis of the healthiness of companies' product portfolios. ATNI rates companies using the HSR NPM.</p> <p>Improving product formulation must be a major strand of a company's strategy to help address the U.S. population's diets and health challenges.</p> <p>A robust nutrient profiling model (NPM) is critical in classifying healthy and less healthy products, to e.g., underpin (re)formulation and to drive promotions and marketing of healthier products.</p>	Commitments (14 indicators): Commitment to increase sales of healthy products and targets to reduce negative nutrients and increase positive nutrients or food components. Performance (7 indicators): Sales derived from healthier products and/or product categories as measured by the independent HSR NPM. Use(s) of healthiness criteria and/or NPMs; alignment to government dietary recommendations and standards. Disclosure (9 indicators): Public disclosure of (re)formulation targets and annual reporting of healthy sales.
C. Access (17.5 %) C1: Product Pricing C2: Product Distribution Total no. indicators: 20	Healthy products need to be accessible and affordable — especially to those with low incomes.	Commitments (6 indicators): Intention to play a role in addressing food insecurity by having a specific strategy to improve affordability and distribution of healthy products. Performance (6 indicators): Working with retailers and/or distributors to prioritize sales of healthy foods and ensure donations to the charitable food system are predominantly healthy. Disclosure (8 indicators): Disclosure of access and affordability-related strategies and targets, as well as publishing a clear donation policy.
D. Marketing (20%) D1: Responsible marketing to all audiences D2: Responsible marketing to Children	Companies can positively influence the food environment by promoting healthy diets. They need to ensure their advertising is responsible and that their marketing policies extend to cover children including teens (under 18) and all forms of media.	Commitments (16 indicators): Marketing budget/spending for healthy foods. Adopting a responsible marketing policy for all consumers in alignment with the ICC Framework. How far children up to 18 years are protected by marketing policies in covering all forms of media, including restrictions beyond those set by CFBAI. Performance (13 indicators): Evidence of working with retailers to increase marketing of healthy products. Adoption



<p>D3: Auditing and compliance</p> <p>Total no. indicators: 33</p>		<p>of an audience threshold of 25% or less for marketing to children and auditing of compliance with marketing policy.</p> <p>Disclosure (4 indicators): Publish marketing policy and disclose individual company compliance levels for TV and digital media and of changes in advertising spending in support of healthy diets.</p>
<p>E. Workforce (5%)</p> <p>E1: Supporting employee health and nutrition</p> <p>E2: Supporting breastfeeding mothers at work</p> <p>Total no. indicators: 12</p>	<p>Through workforce nutrition programs, companies can not only support the nutritional status of their staff and their infants, but can foster a nutrition-focused company culture, in addition to boosting productivity and reducing costs. The methodology has been aligned with priorities set out by the Workforce Nutrition Alliance.</p>	<p>Commitments (4 indicators): Public commitment to support employee nutrition programs and breastfeeding practices.</p> <p>Performance (5 indicators): Provide evidence of programs providing healthy food at work, nutrition education, nutrition-focused health-checks, and support for breastfeeding mothers. Expand programs to cover all full and part-time employees in all locations and evaluate outcomes of the programs.</p> <p>Disclosure (3 indicators): Parental leave policies and program evaluations.</p>
<p>F. Labeling (5%)</p> <p>F1: Product Labeling</p> <p>Total no. indicators: 8</p>	<p>Back-of-pack (BOP) labeling is regulated in the U.S. and therefore not in this Index. Companies have, to a large extent, control over front-of-pack (FOP) labeling and provision of nutrition content information online.</p>	<p>Commitments (2 indicators): To provide information on the FOP in all products, aligned with external NPM.</p> <p>Performance (5 indicators): Evidence of disclosing percentage of grains that are wholegrains on products and amounts of fruits and vegetables on products.</p> <p>Disclosure (1 indicator): FOP labeling approach.</p>
<p>G. Engagement (5%)</p> <p>G1: Responsible lobbying</p> <p>G2: Engaging with stakeholders</p> <p>Total no. indicators: 13</p>	<p>It is important for companies to engage responsibly with government on policy measures to address obesity and diet-related diseases. Companies taking part in relevant stakeholder initiatives should be transparent about their roles and positions.</p>	<p>Performance (6 indicators): Having management systems in place to control lobbying activities and providing examples of lobbying responsibly on important nutrition-related topics. Demonstrating systematic and meaningful engagement with U.S. stakeholders regarding the company's nutrition-related activities.</p> <p>Disclosure (7 indicators): Comprehensively disclosing trade association memberships and payments, expenditures on lobbying and political donations.</p>

* In parenthesis % = weight of this Category/topic in total U.S. Index score. A total of 9 unscored indicators are included in the methodology description.



3.4 Scoring approach

Figure 4 illustrates how the different components of the Index are combined to generate the final Index score and ranking.

Indicator level: Indicators are closed questions and the basic ‘units’ of information, each of which assesses a specific aspect of the company’s activity. Indicators have a number of scoring options and a fixed maximum score.²⁹ Three types of activities are measured: the companies’ commitments, performance and disclosure. The maximum score for commitment and disclosure indicators is 10, while for performance indicators this is 20, this to ensure the indicators assessing what companies put in practice have double the weight on the final scoring. **A full list of indicators can be found in [Appendix II](#).**

Multipliers: Two types of multipliers are applied to selected indicators that assess companies’ commitments, performance and disclosure:

♡ A healthy multiplier is identified by a heart symbol and may be found alongside indicators related to a company’s definition for ‘healthy’ products. ATNI awards a healthy multiplier based on the score of indicators in criterion B3, which assesses a company’s Nutrient Profiling Model and the rigor of its definition for ‘healthy’ products. The healthy multiplier ranges from 0.4 (i.e., reducing the score of a relevant indicator) to 1 (i.e., no effect on the score of a relevant indicator).³⁰ The purpose of the multiplier is to put more emphasis on the importance of a strong definition of ‘healthy’ products to guide companies’ wider nutrition-related strategies.

↔ This symbol denotes an Age Scope multiplier. The age multiplier ranges from 0.3 (i.e., reducing the score of a relevant indicator) to 1 (i.e., no effect on the score of a relevant indicator), based on the extent to which companies’ responsible marketing policies are inclusive of children below the age of 18.³¹

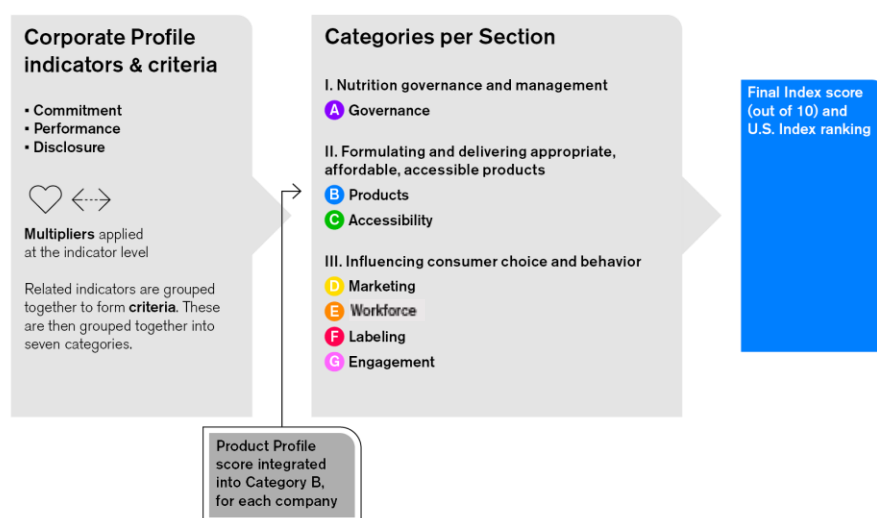
²⁹ Some indicators are organized on a sliding scale, with the top level receiving a score of 10 (or 20) and lower levels being awarded lower scores on a standardized scale typically of 5 (or 10), 2.5 (or 5) and 0. Other indicators are scored using multiple, equally valid options. In this case, each answer carries an equal number of points that are totaled for the indicator score.

³⁰ If a company scores 8 points or more in criteria B3, the healthy multiplier is 1; between 6 points and 7.9 points, the multiplier is 0.8; between 4 and 5.9 points, the multiplier is 0.6, and between 0 and 3.9 points, the multiplier is 0.4.

³¹ If a company defines children as below the age of 18, the age multiplier is 1; if it defines children as under 13 only, the age multiplier is 0.6; if it defines children as under 12 only, the age multiplier is 0.5; if it defines children as under 6 only, the age multiplier is 0.3.



Figure 4: U.S. Index 2022 methodological approach



3.5 Data sources

A combination of publicly available and privately held data is used to assess companies in the U.S. Index 2022. Information is collected from corporate websites and third-party sources (e.g., CFBAI) and complemented by information directly provided to ATNI by companies, which they can choose to share under a non-disclosure agreement (NDA). Information shared under NDA will be considered for scoring on commitment or performance indicators only.

For the Product Profile of the U.S. Index 2022, a U.S. market-specific database with nutrient, food group and energy data at product level is initially used based on the Global Index 2021 Product Profile. This database contains label information from the FoodSwitch USA Database (developed by TGI) and Innova Market Insights Databases. All companies are invited to provide additional feedback to a list of the products they sell in the U.S., to reflect changes between 2020 (the time of the product portfolio of the global index) and 2022 in their product portfolios and reformulation of specific products. In most cases, data is obtained directly from the manufacturer and supplemented with data from company websites and in-store visits where required.

3.6 Product Profile

The Product Profile refers to the analysis of the nutritional quality of a company's product portfolio using an NPM. For each company, the Product Profile results are integrated into Category B, to complement the assessments of the Index categories.

The Product Profile methodology for the U.S. Index 2022 will be applied according to the same principles as the previous U.S. Index. The Product Profile is completed in partnership with TGI and using additional data input from Innova Market Insights and information shared by the companies. A detailed account of the way TGI's study and validation of the Product Profile were done for the 2021 ATNI Global Index may be found [here](#).

For the Product Profile nutrient information is shared by ATNI with each company to offer them the opportunity to provide corrections or additions regarding products marketed in the U.S. This is important to verify that the top five best-selling product categories within the scope of ATNI's assessment in the



Product Profile match their internal records, as well as nutrient and ingredient information. Companies have the opportunity to update databases with recent product renovations, new brands and/or indicate recent divestments.

Product category selection: ATNI identifies up to five of the best-selling product categories for each company using FY2021 retail sales value estimates from Euromonitor International. All packaged foods and non-alcoholic beverages marketed in the U.S. are included in the analyses, except those in excluded categories.³² Selected product categories are shared with the companies prior to the analysis to ensure the most relevant (based on sales values) categories are included.

Nutrient Profiling Model: ATNI uses the HSR for its Product Profile assessments.³³ The selection of this NPM was based on a set of criteria developed by ATNI's Expert Group to identify the most appropriate systems from a catalogue of 67 criteria developed for the World Health Organization (WHO). An NPM was considered suitable if it:

- Was developed with appropriate stakeholder consultation
- Covered the majority of categories of processed F&B products
- Took into account both 'positive' and 'negative' food components/nutrients
- Was well-validated, with results of the validation published in peer-reviewed literature demonstrating that the model produces internally consistent classifications of 'healthy' and 'unhealthy' foods, in-line with general nutrition principles
- Enabled differentiation of nutritional quality within and between categories
- Was available in the public domain and allowed free access to the full algorithm (i.e., not a proprietary model)
- Would generate meaningful results across all countries

³² Excluded categories include 'non-nutritive' products, such as plain coffee and tea, to which the HSR cannot be applied. In addition, categories outside the scope of assessment are excluded, such as baby food, complementary foods, sports nutrition, medical nutrition, and weight-loss products. So-called 'private label' or 'white label' products, which may be manufactured by companies included in ATNI's analysis, but are marketed and sold by other parties under different brand names, are also not included in the analysis.

³³ Other ATNI Product Profiles include a supplemental analysis using WHO Regional Nutrient Profile Models to assess which products are suitable to be marketed to children. For the U.S. Index 2022, ATNI will report in the marketing chapter (Category D) results from the Global Index U.S database which used the Pan American Health Organization nutrient profiling model. This component is only a supplemental analysis and does not impact companies' final scores or performance in the Index.



Box 4: Health Star Rating (HSR)

Introduced in 2014, HSR is a voluntary FOP labeling scheme developed in Australia and New Zealand, but applicable in any market. The underlying HSR NPM assigns points based on grams or milliliters of specific nutrients per 100g or 100 mL of the product. The HSR assigns 'baseline' points for product components associated with risk factors for chronic diseases (*energy, saturated fat, sugars, sodium*) and 'modifying points' for positive product components (*protein, dietary fiber, fruits, vegetables, nuts and legumes*). A final HSR score is calculated by subtracting the HSR modifying points from the HSR baseline points. Products are, depending on the food category they belong to, then assigned an HSR rating between 0.5 stars (least healthy) to 5 stars (most healthy). Those that achieve 3.5 stars or more are considered to meet the 'healthy' threshold in the ATNI Product Profile.³⁴

Importantly, the HSR model does not score some 'non-nutritive' products, such as tea and instant coffee; as a result, these products are not included in the analysis. This means that the results for some companies 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.

After the release of the HSR system's five-year-review in 2020, the Australia and New Zealand Ministerial Forum on Food Regulation endorsed an updated HSR model and established an implementation start date of 15 November 2020. The U.S. Index 2022 Product Profile methodology will be using this new model. In addition, ATNI will report on the company results using the previous edition of the HSR algorithm, which was used for the 2018 U.S. Index. This will enable ATNI to report on like for like progress made, while at the same time establishing a new baseline to measure progress in future Indexes. More information about the HSR changes can be found [here](#).³⁵

The Product Profile score is calculated and integrated into the methodology in Criterion B1: Product Profile results. The steps below describe the calculation of the elements that make up the Product Profile score.

Calculation of the HSR: The HSR assigns a rating between 0.5-5 stars for each individual product. This rating is first calculated for each unique product selected for assessment for a given company.³⁶ The category's mean HSR is the sum of all the product HSRs in a category, divided by the total number of products in the same category. Mean HSR scores are calculated for all product categories included.

Overall healthiness of the product portfolio (sales-weighted mean HSR): ATNI calculates this for each company by: (1) calculating the mean HSR for each products category; (2) multiplying the mean

³⁴ Dunford, E., Cobcroft, M., Thomas, M., and Wu, J.H. (2015). Technical Report: Alignment of the NSW Healthy Food Provision Policy with the Health Star Rating System. Sydney, NSW: NSW Ministry of Health; 2015. Available at: <http://www.health.nsw.gov.au/heal/Publications/health-star-rating-system.pdf>. (Accessed: 20/07/22).

³⁵ Health Star Rating System. (2020). HSR system changes - 2020. Available at: <http://www.healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/HSR-system-changes2020>. (Accessed: 20/07/22).

³⁶ A food or beverage is considered as a unique item based on the brand name and description, regardless of serving size and packaging. For example, a specific brand of juice sold in 330mL cans is considered to be the same beverage item as the same brand of juice sold in 600mL bottles.



HSR of the food category by the percentage sales for the subset; (3) summing the values obtained for all subsets.



4. U.S. Index research process

4.1 Research process

The process of the assessment for each of the 11 companies is as follows:

- 1 ATNI research analysts use an online data-gathering platform, which also serves as a tool to engage with companies. Analysts independently enter publicly available information from company websites into the platform and make preliminary assessments based on this information.
- 2 After the initial filling in, another analyst reviews all indicators for a specific category, discrepancies in the assessment were resolved by internal discussion and agreement.
- 3 ATNI provides companies with a time bound, read-only access to review the preliminary assessment and the resources used for this assessment on the platform. Companies may comment on an assessment for a given indicator and submit additional information/evidence for ATNI to review. Importantly, companies cannot make changes or edit the assessment itself on the platform.
- 4 The ATNI research team reconvenes and evaluates a company's comments. New information is considered to adjust of the company assessment, or to formulate clarification questions to companies.
- 5 Companies have a second opportunity to access the platform to review their assessment and/or answer clarification questions raised by ATNI analysts. New information and documents are accepted if shared before the research deadline, which for the U.S. Index 2022 is March 31 2022. This is also the cut-off date for input by companies in the Product Profile lists, upon which any renovations or portfolio changes can be taken into account.
- 6 Before calculating the total scores for each company, a final peer review and quality assurance is conducted by the ATNI research team; more details are described in the next section. The Product Profile results are reviewed together with ATNI's research partner TGI.
- 7 Once preliminary findings are written, they are discussed with the Expert Group.
- 8 Afterwards, Scorecards are developed for each company, showing the main findings and providing key recommendations and presenting the Product Profile results. At this point, the final report is written which includes, along with the scorecards, an executive summary and thematic chapters. The scorecards and company specific sections in the report are shared with companies for fact checking a few weeks before publication and the entire report is shared with the companies 24 hours before publication under embargo.

4.2 Quality assurance

The validity of ATNI's analysis and related scoring depends on the accurate and consistent assessment of the material submitted or published by the companies. One dedicated research analyst from ATNI's team completes the initial assessment of a category to ensure optimal knowledge and understanding and assurance of consistent scoring between companies for the same indicator.

Before the initial pre-assessment of the survey by ATNI analysts, based on publicly available information, the ATNI research team conducts a workshop focused on aligning analyst interpretation of all indicators and answer options — with the final goal of providing the most consistent information on the pre-assessment of companies.



To ensure fair and consistent scoring, an internal peer-review is conducted towards the end of the assessment the process to check the consistency of assessments for all companies and indicators. This process takes place after the second company engagement. Another research analyst reviews the assessment of all indicators within one category and across all companies, to ensure that a consistent approach is applied. After peer review a meeting with the analyst, reviewer and research project manager is set up. Unclearities and disagreements are discussed based on which final adjustments in the assessment can be made. All seven categories are reviewed in this way.

4.3 Final scores and ranking

The final Index score is calculated as follows:

$$\text{Step 1. Criterion score} = \frac{\Sigma (\text{Commitment} + \text{Performance} + \text{Disclosure indicator scores})}{\text{Maximum total indicator score}}$$

$$\text{Step 2a. Category A, C – G scores} = \bar{x} \text{ Criteria score}$$

$$\text{Step 2b. Category B score} = (0.571 \times B1) + (0.214 \times B2) + (0.214 \times B3)$$

$$\text{Step 3. Weighted Category scores [A – G]} = \text{Category } i \text{ score} \times \text{Category } i \text{ weight}$$

$$\text{Step 4. Index score} = \Sigma (i \text{ weighted categories})$$

To selected indicators the healthy and age scope multipliers are applied before step 1. The scores are rounded to one decimal place, organized in numerical order, and companies are ranked 1-11. The U.S. Index results will be published on ATNI's website in online-friendly and downloadable formats, including company scorecards.

4.4 Research limitations

Product Profile: Ideally, the analysis would include all products sold by all companies — but, for practical reasons, ATNI limits the analysis to the five best-selling categories. Product-level sales data would ideally be used to calculate the sales-weighted figures, rather than the product category-level sales data that is used instead. However, ATNI is currently unable to obtain this data set at an affordable cost from information providers. In addition, the HSR model does not score some 'non-nutritive' products, such as tea and instant coffee; as a result, these products are not included in the analysis. This means that the results for some companies (namely, Nestlé, Keurig Dr Pepper, Kraft Heinz, and Unilever) are based on their sales excluding these products, which can contribute to different estimates by the company. Further details about the Product Profile and its limitations can be found in the Global Index methodology (available [here](#)) and in the Global Index 2021 TGI Product Profile report (available [here](#)).

Balance new developments and comparability over time: As an independent organization with a wide range of stakeholders, including assessed companies, ATNI methodologies aim to recognize the current state of knowledge and remain flexible to continually evolve. This means indicators are removed, added and changed over the different iterations. Therefore, a direct like for like assessment is not always possible. Furthermore, a key ATNI principle is to ensure relevance and applicability to a range of company types — for example, companies with different product portfolios (primarily food, primarily beverages, or a mix of both). For more information, see Key ATNI design principles outlined in Annex I.



Company commitments and self-reported performance: The majority of indicators rely on companies' self-reported information and data, as it is not feasible to perform independent, on the ground assessments of companies' practices across all topics covered in the Index. Therefore, ATNI requires companies to provide evidence of performance and to implement independent auditing where relevant.³⁷

Research process: Due to the interactive nature of the Index research process, which involves engagement with company representatives, it is not feasible for two separate analysts to assess each company independently. In addition, no inter- and intra-rater reliability statistics can be generated to support ATNI's quality assurance process. Instead, ATNI ensures that the assessments are accurate, consistent and fair across companies by applying an internal peer review system and conducting frequent alignment within the research team (see page 22, 'quality assurance' for more information).

NDAs: Some of the data shared by the companies is provided under NDA and therefore cannot be referenced explicitly in the report. However, it is reviewed by ATNI research analysts and, if relevant, incorporated into their scores for commitment and performance indicators. By default, data shared with ATNI that is not publicly available is not taken into account for disclosure indicators.

Limited or no disclosure: Scores for companies with limited or no disclosure are lower and may not give a full representation of the companies' nutrition-related activities. The U.S. Index aims to stimulate transparency and public disclosure of nutrition and health information for the benefit of all stakeholders.

Different financial years and time periods assessed: Some relevant data may be published following the deadline for data collection, as companies have asynchronous financial years and publishing timetables for their corporate reports. Any information that is published or disclosed to ATNI after the deadline can only be considered for reporting purposes but won't impact companies' scores.

Time constraints: Completing the Index assessment survey and providing feedback on the Product Profile product lists requires significant time from the companies. Time constraints may limit the amount of information that companies share, which is not already publicly available.

Legislative uncertainty: ATNI's team also considered issues regarding uncertainties deriving from proposed upcoming regulation. For example, the methodology was developed at a time when FDA had not yet released its updated definition of 'healthy'.

4.5 Future of the U.S. Index

Following the Index's publication, ATNI will gather feedback from a range of stakeholder consultations about the results and how the methodology could improve. ATNI will propose how to incorporate the feedback, then share and discuss it with the U.S. Expert Group. Additional areas of assessment could be added in the future. For example, the Index could measure companies' spending on marketing healthy and less healthy foods and beverages, pricing of healthier foods, or assess in more detail the design and strength of their employee and nutrition education programs. Moreover, with increased funding, the Index could grow to assess more manufacturers, or expand to parallel Indexes that assess food retailers, food service and quick-service restaurants' performance on improving access to nutrition in the U.S.

³⁷ For example, in Category D, which addresses responsible marketing practices, companies are assessed regarding their public commitments, whether they have commissioned third-party audits of their marketing practices and show evidence of performing in-line with their commitments.



5. Appendix I

5.1 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. 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's publications 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

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

5.2 How consultations shaped the Index

List of organizations/ Experts Consulted:

- ATNI U.S Expert Group (listed above)
- Healthy Eating Research (HER) Conference, March 2020
- National Salt and Sugar Reduction Initiative (NSSRI)
- Portion Balance Coalition
- UConn Rudd Center for Food Policy & Health
- ATNI U.S. Investor Signatories Group



5.3 Key ATNI design principles

Box 5: Key design principles that guide ATNI Indexes

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

ATNI Indexes aim to reflect the existing consensus on best practice, not to define such practices. Prevailing international and national 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

ATNI 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

ATNI 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. The Indexes do not intend to 'name and shame' companies. The Index methodology, 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

ATNI 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 food security 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 inclusive approach applies to the Global Index methodology, and subsequently, the Spotlight Index methodology.

5.4 Methodology changes between 2018 and 2022 by category

Category	Weight		Indicators		Summary of changes
	2018	2022	2018	2022	
A. Corporate nutrition strategy, governance, and accountability	12.5	12.5	29	11	<ol style="list-style-type: none"> 1. Greater focus on the quality of the strategy to address obesity and diet-related chronic disease in the U.S., including for priority populations. 2. Several indicators considered not relevant to the U.S. context, such as risk assessments and reporting formats, given that these are regulated, have been removed. 3. As such, criterion A3 on quality of reporting has been removed, also considering that reporting is assessed throughout the Index through disclosure indicators.
B. Formulating appropriate products	27.5	35	44	30	<ol style="list-style-type: none"> 1. A new criterion was created to integrate the Product Profile results for each company (B1). According to Expert Group consensus the Product Profile should account for 20% of final index scores, therefore the total weighting of Category B has been increased to 35%. 2. Removed commitment indicators on R&D expenditures due to low levels of reporting. 3. New focus on companies' having a target to improve overall sales of healthy products and disclosing sales from healthy products annually. 4. Assess companies' benchmarking of their internal nutrient profiling models (NPM) with externally validated systems.
C. Delivering affordable, accessible products	22.5	17.5	23	20	<ol style="list-style-type: none"> 1. Further shift in focus to commercial approaches for affordability and accessibility, including a greater emphasis on improving the price differential between healthy vs. less healthy products. 2. For non-commercial activities focused on food donations, greater emphasis is placed on ensuring that these are made responsibly, i.e. being predominantly healthy products.



D. Responsible marketing and auditing of compliance	22.5	20	53	33	<ol style="list-style-type: none"> 1. The Category weighting has been reduced by 2.5% points due to the introduction of the Product Profile elements in Category B. 2. New alignment with updated ICC Framework for Responsible Food and Beverage Marketing Communications, 2019. 3. Reduced the number of criteria from 6 to 3, with more focus on marketing to children practices, including teens (up to age 18) and efforts that go beyond Children's Food and Beverage Advertising Initiative (CFBAI) core commitments. 4. Introduced an 'age' multiplier, to evaluate the extent to which companies marketing policies cover both children and teens. 5. Auditing and compliance practices assessed together for both, marketing in general and marketing to children policies.
E. Supporting healthy diets and nutrition programs in the workforce	5.0	5.0	27	12	<ol style="list-style-type: none"> 1. Greater alignment with the 'four pillars' of the Workforce Nutrition Alliance: healthy food at work, nutrition education, nutrition-focused health check-ups, and breastfeeding mothers at work. 2. Criterion E3 on non-commercial consumer education and healthy eating programs has therefore been removed, to put greater emphasis on workforce nutrition programs and to reduce emphasis on non-commercial programs.
F. Product labeling	5.0	5.0	4	8	<ol style="list-style-type: none"> 1. New exploratory performance indicators (disclosing whole grain content and total amounts of fruits and vegetables) were introduced based on stakeholder interests and potential regulations (Food Labeling Modernization Act 2021). 2. The indicator assessing commitments to back-of-pack labeling on total or added/free sugars has been deleted, given the updated U.S. FDA regulation.
G. Responsible lobbying and stakeholder engagement	5.0	5.0	10	13	<ol style="list-style-type: none"> 1. New indicator on management systems for lobbying, derived from the Responsible Lobbying Framework. 2. More weight on examples of lobbying in support of policy measures in the interests of public health 3. More detailed indicators regarding trade association memberships, political expenditures, and lobbying disclosure. 4. Greater alignment with the AccountAbility 1000 Stakeholder Engagement Standard, as well as transparency regarding both the engagement and how it is used by the company. 5. Indicator on quality of partnerships and third-party leadership for non-commercial consumer education and healthy eating programs (moved from E3).
	100	100	190	127	



6. Appendix II: U.S. Index 2022: detailed methodology

Note: This methodology may be subject to revision depending on insights gained during the initial research by ATNI analysts. Such changes will be kept at a minimum and will be highlighted in any future iterations of this methodology.

Category A: Corporate nutrition strategy, governance, and accountability

Rationale: A company will be likely to better sustain and scale up its nutrition-related activities if its commitment starts at the top (i.e. at Board/executive management level) and is integrated into its core business strategy. It is then more probable that the company will prioritize resources for nutrition, track its performance on the issue and report regularly to its stakeholders.

A1: Corporate nutrition strategy

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Strategy					
	1	1. Does the company publicly commit to strategically focus	a. Mission statement, or equivalent (e.g. purpose statement)	5	A strategic focus on nutrition and health must be related to the company's core (commercial) business strategy.
			b. Commercial growth strategy	5	



		on nutrition and health in the U.S. through its: (Tick all that apply)	No/no information	0	It is not mandatory that 'nutrition' and 'health' are explicitly mentioned, but it should be unambiguous that both elements are covered in the company's mission/strategy.
	2 Adapted	2. Does the company commit to address obesity and diet-related diseases through its U.S. commercial strategy?	Yes, with explicit reference priority populations * (see i-button)	10	<p>*ATNI defines priority populations as groups (at risk of) experiencing malnutrition at a higher rate than the general population due to factors outside of their direct control. In the U.S. this applies primarily to those disproportionately experiencing obesity and/or food insecurity in association with multiple complex (and often overlapping) contributing factors, such as:</p> <ul style="list-style-type: none"> - Low incomes. - Geographic factors (e.g., grocery stores far away or communities in which stores only have a limited range of healthy products). - Other social determinants of health (e.g., how race/ethnicity influence marketing (all aspects beyond advertising) of low-nutrition foods). <p>USDA provides data and interactive charts on various aspect of food security in the U.S. (state level): https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights/</p>
			Yes, without reference to priority populations	5	
			No/no information	0	



					https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us.aspx Feeding America conducts an annual 'Map the Meal Gap' study to improve understanding of food insecurity and food costs at the local level (state and county). https://map.feedingamerica.org/county/2019/overall/ * Obesity rates among youth (ages 10-17) in the U.S. show that disparities by race and ethnicity persist. In 2019-2020, non-Hispanic Asian children had the lowest obesity rate (8.1%), followed by non-Hispanic White children (12.1%). Obesity rates were significantly higher for Hispanic (21.4%), non-Hispanic Black (23.8%), and non-Hispanic American Indian/Alaska Native (28.7%) children ³⁸ .
PERFORMANCE					
	3 Adapted	3. How comprehensive is the company's commercial nutrition action strategy or plan to address obesity and diet-related chronic disease in the U.S? (Tick all that apply)	a) Multiple approaches (e.g. product (re)formulation, marketing, portion control) b) Time-bound targets, with baseline c) Presented in a cohesive format (i.e. webpage, strategy document, report section) d) Reference to international/national guidance (See 'I button')	5 5 5 5	Examples of relevant international/national guidance: - U.S. Dietary Guidelines for Americans - The Healthy People 2030 objectives ³⁹ - Institute of Medicine's 2012 Report Accelerating Progress in Obesity Prevention. - WHO Global Action Plan for the Prevention and Control of NCDs 2013 – 2020
	4 Adapted	4. How does the company comprehensively show	Substantial company-specific U.S reporting or U.S. specific section in its global reporting	20	Given the importance of the U.S. market for companies and the public health priorities it faces, U.S.-specific

³⁸ <https://media.stateofobesity.org/wp-content/uploads/2021/10/12132618/State-of-Childhood-Obesity-10-13-21-Final-WEB.pdf>

³⁹ <https://health.gov/healthypeople/objectives-and-data/browse-objectives/overweight-and-obesity>



		progress on its nutrition strategy in the U.S.?	Limited U.S. company-specific reporting	10	reporting is valuable for U.S. stakeholders to understand the company's specific commitments, performance and activities there, and to be distinguishable from the company's global practices. 'Substantial' indicates that the company includes specific (sub-)sections on U.S., and/or a significant amount of U.S.-specific information on multiple nutrition-specific topics.
			No/ no information	0	

DISCLOSURE

Commitment

	5	5. Does the company disclose its commitment to addressing obesity and diet-related disease through its commercial strategy? (Linked to indicator 2)	Yes	10	
			No/no information	0	

Strategy

	6 Adapted	6. Does the company disclose its strategy for addressing obesity and diet-related chronic disease? (Linked to indicator 3)	Yes	10	
			No/no information	0	

A2: Nutrition governance and accountability

Multiplier	Indicator	Description	Answer options per indicator	Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
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PERFORMANCE					
Accountability					
	1	1. Who has formal accountability for implementing the company's nutrition strategy in the U.S.?	CEO or another Senior Executive (e.g. Vice President or Chief Officer)	20	Note that the accountable person is the individual who is ultimately answerable for the activities or decisions involved in executing the strategy. This includes “yes” or “no” authority and veto power. Only one person or body can be assigned formal accountability.
			Committee that reports to the Board or Executive Manager	10	
			Senior manager below Executive	5	
			No oversight assigned/ no information	0	
	2	2. Is this accountable person's remuneration concretely linked to performance in targets or objectives in the U.S.?	Yes, for nutrition-related objectives specifically, in the U.S.	20	Linking remuneration to nutrition-related goals would mean that directors and executives are financially motivated to act in the best interest of the nutrition strategy.
			Yes, on broader ESG-related performance (with nutrition clearly being part of these) in the U.S.	10	
			No link/ no information	0	
Strategy Review					
	3	3. Is the delivery of the company's U.S. nutrition strategy/program subject to the following: (Tick all that apply)	a. Nutrition strategy/ program is approved by the Board	6.67	Management review is the routine evaluation of whether management systems are performing as intended and producing the desired results as efficiently as possible. It is the ongoing “due diligence” review by management that fills the gap between day-to-day work activities and periodic formal audits. Management reviews have many of the characteristics of a 1st party audit. They require a similar system for scheduling, staffing, and effectively evaluating all RBPS (risk-based performance standard) elements, and a system should be in place for
			b. Regular audit of strategy/program delivery is in place	6.67	
			c. Regular management review of strategy/program delivery is in place	6.67	



					implementing any resulting plans for improvement or corrective action and verifying their effectiveness.
			No/no information	0	
DISCLOSURE					
Accountability					
	4 Adapted	4. Does the company disclose its accountability arrangements for delivering the company's nutrition strategy (Linked to indicator 1)?	Yes	10	
			No/no information	0	
	5 New	5. Does the company disclose remuneration arrangements for accountable person (Linked to indicator 2)?	Yes	10	
			No/no information	0	

Category B: Product Profile & product formulation

Rationale: ATNI's Product Profile- an independent analysis on the nutritional quality of companies' product portfolios using the Health Star Rating (HSR) nutrient profiling model- is undertaken in partnership with The George Institute for Global Health (TGI). Assessing the healthiness of companies' portfolios using a consistent metric is important to compare different companies, monitor changes over time and improve accountability. Since 2020, ATNI has incorporated the Product Profile into the Corporate Profile methodology, resulting in one comprehensive ranking which incorporates the independent results.



B1: Product Profile

Multiplier	Indicator	Description	Answer options per indicator	Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
PERFORMANCE				
Product Profile				
	1 New	1. Assessment of the overall healthiness of the product portfolio, measured as the sales-weighted mean HSR score.: [the 0-5 star mean HSR is multiplied to get a value between 0 and 20]		<p>This value is calculated in the Product Profile and imported in this indicator. No company input is required during the U.S Index engagement phase.</p> <p>All packaged foods and non-alcoholic beverages within company's top 5 best-selling categories in their U.S portfolios are included in the Product Profile. The HSR is first calculated for each unique product. Then the mean HSR for a category is determined. Finally, the sales-weighted mean HSR is calculated by multiplying category mean HSR by their corresponding retail sales values.</p>

B2: Product formulation

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Strategy					
♥	1 New	1. Has the company set a target to increase either the	Yes, according to sales of products at portfolio-level	10	Healthy multiplier applies for this indicator.
			Yes, according to number of products at portfolio-level	7.5	Definition of healthy can be according to company's criteria, however companies that have more



		sales of or proportion of healthy products in U.S?	No target/ no information	0	comprehensive criteria will receive a higher score according to the healthy multiplier. Companies obtain higher score if the target is defined by number of sales (by value or volume).
	2 New	2. Does the target include: (Tick all that apply)	Baseline year	5	Baseline means target with a baseline year (base for measurement) and timeframe means the target is time-bound. ATNI encourages companies to set SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) commitments.
			Target year	5	
			No/ no information	0	
	3	3. Does the company commit to sell products that meet Smart Snacks standards for foods sold in schools in retail settings outside schools?	Company already formulates all products (with the same name or appearance) with the same nutrition standards	10	Maximum score of 10 points. The U.S Department of Agriculture (USDA) Smart Snacks in School standards is a federal requirement which applies to all snacks and beverages sold in a la carte, in school stores, vending machines, and 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 retail- and other outlets, do not. Such products are referred to as 'copy-cat' or 'look-alike' products. The U.S Spotlight Index in 2018 found that only 2 companies provided evidence of formulating all products in the Smart Snacks program in the same way irrespective of the distribution channel. Harris, J.L., Hyary M. and Schwartz, M.B. (2016). Effects of Offering "look-alike" products as Smart Snacks in schools. Childhood Obesity, 12 (6), pp. 432-439.
			Yes, and commitment is timebound with a baseline	10	
			Yes, but without a baseline/timeframe	5	
			No commitment/ no information	0	
			Not applicable	-	



Sodium reduction					
	4	4. Has the company set a target to reduce levels of sodium?	Yes, aligned with FDA guidance or equivalent, in ALL relevant categories	10	The average sodium intake in the U.S is about 3,400 mg per day. However, the Dietary Guidelines for Americans recommends adults limit sodium intake to less than 2,300 mg per day (and even less for children under 14). FDA sodium reduction ambitions were released in October 2021 and cover 163 food categories with potential for meaningful sodium reduction. The short-term targets aim to support reduction of average sodium intake to 3,000 mg/day. Industry guidance by FDA on sodium reduction can be found here . This indicator is <u>not applicable</u> for companies only selling dairy or beverage products, as sodium use is limited and sodium content is generally not of concern.
			Yes, aligned with FDA guidance or equivalent in some categories	7.5	
			Yes, but not aligned with FDA guidance or equivalent	5	
			No target/ no information	0	
			Not applicable	-	
	5	5. Does the sodium target include: (Tick all that apply)	Baseline year	5	
			Target year	5	
			Not applicable	-	
Saturated fat reduction					
	6	6. Has the company set a target to reduce levels of saturated fat?	Yes, in all relevant products/categories	10	The Dietary Guidelines for Americans 2020-2025 recommend limiting daily calories from saturated fats to less than 10% of the total calories. According to the FDA, general requirements for foods carrying a health claim , products must not exceed 4.0 g of saturated fat to be allowed to carry a claim. In addition, health claims for saturated fat regulated by the FDA (e.g. “low in saturated fat”) are applicable if a product contains 1 g or less and 15% or less calories from saturated fat.
			Yes, in some relevant products/categories	5	
			No target/ no information	0	
			Not applicable	-	



					While the FDA definition of healthy is under review, current guidance states that foods that use the term “healthy” on their labels that are not low in total fat should have a fat profile makeup of predominantly mono and polyunsaturated fats (i.e., sum of monounsaturated fats and polyunsaturated fats are greater than the total saturated fat content of food). The science related to public health recommendations for intake of saturated fats continues to evolve and currently no benchmarks for industry are available.
	7	7. Does the saturated fat target include: (Tick all that apply)	Baseline year	5	
Target year			5		
Not applicable			-		
Sugar reduction					
	8	8. Has the company set a target to reduce levels of added sugar?	Yes, in ALL relevant products/categories	10	The National Salt and Sugar Reduction Initiative (NSSRI) is a voluntary program convened by the NYC Health Department. In February 2021, the initiative released its target for sugar reduction across 15 categories of foods and beverages. Companies have the option of publicly committing to sugar reduction targets or use the targets to inform internal decision making and (re)formulation efforts. However, these sugar targets are not part of the Food and Drug Administration (FDA) targets, therefore this indicator is for information only. However, the NSSRI is a national initiative supported by state and local health authorities, therefore considered relevant by ATNI.
			Yes, in some relevant products/categories	5	
			The company makes use of NSSRI guidance or equivalent to define its targets (UNSCORED, tick for information only)	-	
			No target/ no information	0	
	9		Baseline year	5	



		9. Does the sugar target include: (Tick all that apply)	Target year	5	
Fruits & vegetables in packaged foods					
	10	10. Has the company set a target to increase levels of fruits, vegetables, nuts, and legumes (FVNL)?	Yes, in all relevant products/categories	10	In scope are fruits, vegetables, nuts and legumes in alignment with the WHO Healthy Diet fact sheet 394. This excludes starchy roots such as potato, sweet potato and cassava. Furthermore, constituents, isolates or extracts of a food are excluded.
			Yes, in some relevant products/categories	5	
			No target/ no information	0	
			Not applicable	-	
	11	11. Does the FVNL target include: (Tick all that apply)	Baseline year	5	
				5	
			Target year		
			Not applicable	-	
Whole grains in packaged foods					
	12	12. Has the company set a target to increase levels of whole grains, contributing to lower carbohydrate-to-fiber ratio's?	Yes, in all relevant products/categories	10	ATNI follows the <u>Australia and New Zealand Food Standards definition</u> : 'Wholegrain food is any food which uses every part of the grain including the outer layers barn and germ.'
			Yes, in some relevant products/categories	5	
			No target/ no information	0	
			Not applicable	-	
					In 2006 <u>FDA issued draft guidance on whole grain labeling</u> , defining whole grains foods as "Cereal grains that consist of the intact, ground, cracked or flaked caryopsis, whose principal anatomical components - the starchy endosperm, germ and bran - are present in the same relative proportions as they exist in the intact caryopsis. "
					A <u>carbohydrate-to-fiber ratio</u> of less than 10:1 is one of the criteria developed by the American Heart Association (AHA) to identify whole grains in a food product and considered by researchers at the Harvard



					School of Public Health to be the most effective measure in identifying foods with more fibre, less sugars and sodium, and less likely to contain trans-fats, without energy increases.
	13	13. Does the whole grain target include:	Baseline year	5	
		(Tick all that apply)	Target year	5	
			Not applicable	-	
Alignment with U.S. Dietary Guidelines					
	14	14. Does the company publicly state that its approach to (re)formulating products is aligned with the 2020-2025 Dietary Guidelines for Americans?	Yes	20	The Dietary Guidelines for Americans 2020-2025 provide science-based advice on what to eat and drink to promote health, help reduce risk of chronic disease, and meet nutrient needs. Every five years, the U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) jointly published the guidelines.
			No mention of Dietary Guidelines for Americans / no information	0	
PERFORMANCE					
Smart Snacks in School					
	15	15. What percentage of Smart Snacks products sold by the company outside of school are formulated with the Smart Snacks nutrition standards?	More than 75%	20	First answer option is selected if company can show supporting evidence. First answer option in indicator 2 above “Company already formulates all products (with the same name or appearance) with the same nutrition standards” would also be credited.
			50-75%	10	
			Less than 50%	0	
			No information	0	
			Not Applicable	-	
Portion size					
	16 New	(UNSCORED) 16. In the last 3 years, has the company invested in or developed products with smaller	Yes, across multiple products or product categories	20	This indicator applies particularly to product categories that typically have a high sugar or energy content and low ‘beneficial’ nutrient density (confectionery,
			Yes, limited to one type of product or product category	10	



		packaging sizes or serving sizes, aimed to improve consumer portion control in the U.S. market?	No/ no information	0	carbonated drinks, juice, sports & energy drinks, Asian specialty drinks, savory snacks, ice creams).
DISCLOSURE					
♥	17 New	17. Does the company publicly disclose the percentage (or sales) of “healthy” products in its U.S. portfolio? (Linked to indicators 1 & 2)	Yes, annually	10	<i>Healthy multiplier applies for this indicator.</i>
			Yes, less frequently than annually	7.5	
			No/ no information	0	
	18	18. Does the company publicly disclose commitment to sell Smart Snacks with the same nutrition standards outside schools? (Linked to indicator 3)	Yes	10	First answer option is also applicable if company can show evidence that it formulates all products that it sells under the Smart Snacks in School program in the same way for sales outside schools and a statement is available in the public domain.
			No/ no information	0	
			Not applicable	-	
	19	19. Does the company publicly disclose: (Linked to indicators 4 & 5) (Tick all that apply)	Its sodium target	5	
			The percentage of products/sales that met its sodium/salt target by FY 2020	5	
			Not applicable	-	
	20	20. Does the company publicly disclose: (Linked to indicators 6 & 7) (Tick all that apply)	Its saturated fat target	5	
			The percentage of products/sales that met its saturated fat target by FY 2020	5	
			Not applicable	-	
	21	21. Does the company publicly disclose: (Linked to indicators 8 & 9) (Tick all that apply)	Its sugar target	5	
			The percentage of products/sales that met its sugar target by FY 2020	5	
	22		Its FVNL target	5	



		22. Does the company publicly disclose: (Linked to indicators 10 & 11) (Tick all that apply)	The percentage of products/sales that met its FVNL target by FY 2020	5	
			Not applicable	-	
	23	23. Does the company publicly disclose: (Linked to indicators 12 & 13) (Tick all that apply)	Its whole grains target	5	
			The percentage of products/sales that met its whole grains target by FY 2020	5	
			Not applicable	-	

B3: Nutrient profiling model- defining 'healthy' products

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
PERFORMANCE					
	1	1. Does the company have a NPM to guide product (re)formulation?	Company has a NPM that generates scores based on more than one attribute, enabling foods to be ranked on their healthiness	20	According to the WHO Nutrient profiling is the science of classifying or ranking foods according to their nutritional composition for reasons related to preventing disease and promoting health. Nutrient profiling models (NPM) are algorithms which convert the levels of nutrients and other components of foods into classifications or scores. All products covered in the scope of the Product Profile are considered here. This excludes specialty products such as BMS products, medical nutrition, weight-loss products, etc.
			Company has a NPM that classifies foods according to nutrient levels, but which does not calculate overall nutritional quality	10	
			No system/ no information	0	
	2		All products and product categories	20	



		2. Which products and categories are covered by the criteria/NPM?	Some products or product categories	10	For the highest score, a company must show that all its products developed and/or reformulated are guided by its NPM or similar tool. Exclusion of products and products categories will reward the second answer option unless the company can explain the reason for exclusion.
			No system/ no information	0	
	3	3. What types of food components does the NPM/ the criteria assess?	Both positive and negative food components	20	Positive components include whole grains/fiber, protein, fruits, vegetables, and nuts/legumes. Negative components include energy, saturated fat, sugars and salt/sodium.
			Negative food components only	10	
			No system/ no information	0	
	4 New	4. Does the company provide evidence that its criteria/NPM aligns with external benchmarks for product (re)formulation?	Yes, with smaller than 10% deviation	20	External benchmarks are considered relevant if they are internationally recognized and/or endorsed by the U.S Government. Currently, as part of its Nutrition Innovation Strategy, the FDA has started a public process to update the “healthy” nutrient content claim for food labeling. More information on the current definition can be found here: https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-use-term-healthy-labeling-human-food-products Another applicable example is to demonstrate comparability with FDA's general requirements for foods carrying health claim. More information available here: https://www.fda.gov/food/food-labeling-nutrition/questions-and-answers-health-claims-food-labeling
			Yes, with > 10% deviation	10	
			No/no information	0	





					The 10% deviation refers to the estimated percentage of 'healthy' products or those meeting relevant nutrition criteria.
DISCLOSURE					
	5	5. Does the company publish its criteria/NPM? (Linked to indicator 1)	In a peer-reviewed journal	10	Companies are encouraged to fully publish their nutrient profiling models or criteria used to guide their product (re)formulation efforts to allow consumers and other stakeholders to assess and understand it.
			In full by the company itself	5	
			Limited information or on request only	2.5	
			Not published/ no information	0	
	6 New	6. Does the company publicly disclose results of applying company criteria/NPM to its portfolio vs results of applying an internationally recognized NPM to its portfolio: (Linked to indicator 4)	Yes	10	
			No/ no information	0	

Category C: Delivering healthy affordable, accessible products

Rationale: Food manufacturers can help consumers to access healthier options by improving their pricing and distribution strategies.



C1: Product Pricing

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Strategy					
	1	1. Does the company commit to improve the affordability of its 'healthy' products in the U.S. (relative to the rest of its portfolio)?	Yes, with an explicit focus on low-income populations	10	<i>Healthy multiplier applies for this indicator.</i> USDA provides data and interactive charts on various aspect of food security for households in the U.S. (state level). Feeding America conducts an annual ' Map the Meal Gap ' study to improve understanding of food insecurity and food costs at the local level (state and county level).
			Yes, without an explicit focus on low-income populations	7.5	
			General statement about affordability of its healthy products only	5	
			No commitments / no information	0	
	2 Adapted	2. Does the company have one or more quantitative targets to improve the affordability of its 'healthy' products in the U.S.?	Yes, with baseline and target year	10	<i>Healthy multiplier applies for this indicator.</i> Examples of targets may include: <ul style="list-style-type: none">• Number of consumers to reach with affordably priced healthy products by set date• Improve the price differential on healthy vs. less healthy products within product categories• Number or percentage of healthy variants offered at a Recommended Retail Price that is equal to or lower than its "parent" or standard product• Targets set with particular reference to <u>USDA definitions and ranges of food insecurity</u>
			Yes, unspecified (without baseline/target year)	5	
			No/ no information	0	
	3		Yes	-	





	New	3. (UNSCORED) Does the company's affordability strategy involve working with U.S. wholesale and distribution partners, and/or supermarket chains, to ensure the affordable pricing of its 'healthy' products in the U.S.?	No/no information	-	For information only, i.e. not scored.
PERFORMANCE					
♥	4 Adapted	4. Does the company have a clear U.S.-specific strategy to improve the affordability of its 'healthy' products?	Yes, for all the company's 'healthy' products	20	<i>Healthy multiplier applies for this indicator.</i>
			Yes, for 'healthy' products within specific products categories/brands	15	Only commercial activities are credited for this indicator.
			Yes, for specific 'healthy' products only	10	
			No/ no information	0	
♥	5	5. Can the company demonstrate that it has carried out analysis on appropriate pricing of 'healthy' products in the U.S.?	Yes, with specific attention to low-income populations	20	<i>Healthy multiplier applies for this indicator.</i>
			Yes, without specific attention to low-income populations	10	USDA provides data and interactive charts on various aspect of food security for households in the U.S. (state level).
			No/ no information	0	
♥	6 New	6. Can the company provide evidence of improving the price differential between 'healthy' vs. less 'healthy' products within multiple product lines or	Yes, within multiple product categories	20	<i>Healthy multiplier applies for this indicator.</i>
			Yes, within a single product category or multiple product lines/brands	10	
			No/ no information	0	



		product categories within the last three years in the U.S.?			
DISCLOSURE					
Commentary					
	7	7. Does the company disclose commentary on how it has improved the affordability of its 'healthy' products in the U.S. in the last 3 years?	Yes	10	
	New	(Linked to indicator 6)	No/no information	0	
Strategy					
	8	8. Does the company disclose commitment to address the affordability of its healthy products in the U.S. market? (Linked to indicator 1)	Yes	10	
			No / general statement only / no information	0	
	9	9. Does the company disclose its affordability strategy? (Linked to indicator 4)	Yes	10	
			No/no information	0	
	10	10. Does the company disclose its affordability targets? (Linked to indicator 2)	Yes	10	
	New		No/no information	0	



C2: Product distribution

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Strategy					
	1	1. Does the company commit to improve the commercial distribution of its 'healthy' products for low income/ food insecure households in the U.S.?	Yes, with explicit reference to USDA definitions and ranges	10	<i>Healthy multiplier applies for this indicator.</i> USDA provides data and interactive charts on various aspect of food security for households in the U.S. (state level).
			Yes, without reference to USDA definitions and ranges	7.5	
			General statement about accessibility of its healthy products only	5	
			No commitment/ no information	0	
	2 Adapted	2. Does the company have one or more quantitative targets to improve the accessibility of its 'healthy' products in the U.S.?	Yes, with baseline and target year	10	<i>Healthy multiplier applies for this indicator.</i> Examples of targets may include: <ul style="list-style-type: none">• Number of new consumers of healthy products to reach through improved distribution• Number or percentage of stores that sell healthy products as compared to all company products• Number or percentage of new retail partners to improve distribution as compared to baseline• Number or percentage of arrangements or incentives with distribution partners to for healthy products• Number of food insecure households to reach with healthy products through improved distribution using USDA definitions and ranges
			Yes, unspecified (without baseline/target year)	5	
			No/ no information	0	



Philanthropic food donations					
	3 New	3. Does the company have a policy for responsible food donations to the charitable food system?	Yes, aligned with the Healthy Eating Research (HER) Nutrition Guidelines for the Charitable Feeding System	10	The Healthy Eating Research (HER) Nutrition Guidelines outline nutrition criteria for classifying foods into three categories: “Choose Often/Green”, “Choose Sometimes/Yellow”, and “Choose Rarely/Red.” Aligned with the Dietary Guidelines for Americans, the nutrition criteria were developed with the aim of helping reduce intakes of sugar, saturated fat and sodium, and increase consumption of protein, fiber, and fruits and vegetables. The nutrition standards are specific to each food category.
			Yes, according to the company's own or other standards	5	
			No/no information	0	
			Not applicable (e.g. commits not to make any products donations in the U.S.).	-	
PERFORMANCE					
♥	4	4. Does the company have a U.S.-specific strategy to improve the distribution of its 'healthy' products?	Yes, for all the company's 'healthy' products	20	Healthy multiplier applies for this indicator.
			Yes, for 'healthy' products within specific product categories/brands only	15	
			Yes, for specific 'healthy' products only	5	
			No/ no information	0	
	5 Adapted	5. (UNSCORED) Has the company taken steps to improve the accessibility of its 'healthy' products for low income/ food insecure	a. Conducted analyses of the geographic availability of its healthy products in the U.S. in general versus_for low income/ food insecure households according USDA definitions and ranges?	-	For information only, i.e. not scored.



		households according to USDA definitions and ranges? (Tick all that apply)	b. Analyzed arrangements or incentives with retailers for prominent store placement for its healthy products in geographies with higher numbers food insecure households according to USDA definitions and ranges	-	
			c. Analyzed arrangements or incentives with distributors about how healthy products are distributed in geographies with high numbers of low income/food insecure households according to USDA definitions and ranges	-	
			d. Other	-	
	6	6. Can the company provide evidence of donating predominantly 'healthy' products to non-commercial public health and nutrition programs/organizations e.g. Feeding America?	More than 80%	20	
			More than 60%	10	
			No evidence/ no information	0	
			Not applicable	-	

DISCLOSURE

Strategy

	7	7. Does the company disclose a commitment to address the accessibility of healthy products in the U.S.? (Linked to indicator 1)	Yes	10	
			No/no information	0	
	8 New	8. Does the company disclose its accessibility strategy? (Linked to indicator 4)	Yes	10	
			No/no information	0	



	9	9. Does the company disclose its accessibility targets? (Linked to indicator 2)	Yes	10	
			No/no information	0	
	10	10. Does the company disclose commitment on responsible food donations? (Linked to indicator 3)	Yes	10	
			No/no information	0	
			Not applicable	-	

Category D: Responsible marketing and auditing of compliance

Rationale: Responsible advertising, especially towards children and taking steps beyond the voluntary CFBAI, is another essential component in driving purchases of healthy foods and beverages.

↔ = age multiplier. ATNI awards a higher score to companies that apply their marketing to children policies to all children, meaning all people under the age of 18, as defined by the convention on the rights of the child. It therefore awards an age multiplier based on the age range the company applies their marketing policy to. The age multiplier ranges between 0.3 (i.e. reducing the score of a relevant indicator) and 1 (i.e. no effect on the score of a relevant indicator). Indicators to which the age multiplier is applied are identified by an infinity symbol.

D1: Responsible marketing for all audiences

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Strategy					
	1	1. (UNSCORED) Does the company have its own publicly	The company has a U.S. specific responsible marketing policy for all audiences	-	For information only, i.e. not scored.



		available policy on responsible marketing for all audiences in the U.S.?	The company has a global responsible marketing policy that also applies to the U.S.	-	
			No/ no information	-	
♥	2 Adapted	2. Has the company committed to and/or set a target to increase its marketing spending on its 'healthy' products (AND/OR decrease its marketing spending on unhealthier products) relative to its overall marketing, and target includes: (Tick all that apply)	Commitment	3.3	<p><i>Healthy multiplier applies for this indicator.</i></p> <p>Commitment: This should be a formal commitment, either on a company's website or within internal or public documentation</p> <p>Target year: A target year indicates by when the company aims to achieve its target</p> <p>Baseline: This could be the year in which the data for the target will be compared to and/or the current percentage of spending which the target will be compared to. Disclosure of a baseline helps to make the target measurable.</p>
			Target year	3.3	
			Baseline	3.3	
			No/ no information	0	
	3 Adapted	3. Which forms of marketing does the company's public U.S. marketing policy for all audiences apply to? (Tick all that apply)	a. All print media (newspapers, magazines, books, and printed advertising in public places)	1.67	This indicator applies only the company's responsible marketing policy for all consumers. The responsible marketing policy to children is assessed in D2.
			b. All broadcast media (traditional TV, radio)	1.67	
			c. All non-broadcast electronic and/or digital media (its own- & third-party websites, social media, mobile and SMS marketing, native online marketing, games and apps, CDs/DVDs)	1.67	
			d. All in-store or point-of-sales marketing, including packaging	1.67	




			e. Sponsorship (e.g. of sporting, entertainment or cultural events or activities)	1.67	
			f. All additional forms of marketing (cinema, outdoor, product placement in movies, TV shows, etc.)	1.67	
	4	4. Which of the following commitments does the company's public U.S. marketing policy for all audiences include: (Tick all that apply)	a. To ensure 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)	1	<p>The commitments are based on the ICC Framework* or industry best practices.</p> <p>Disclosure needs to be mandatory, therefore the policy needs to be public for the company to score.</p> <p>*International Chamber of Commerce Framework for Responsible Food and Beverage Marketing Communications, 2019, sets forth how general principles of the ICC Advertising and Marketing Communications Code, 2018, which governs all marketing communications, and includes separate sections on sales promotion, sponsorship, direct marketing, digital interactive marketing and environmental marketing, is applied in the context of food and beverage marketing communications.</p> <p>According to Article 7 ICC Advertising and Marketing Communications Code, 2018, "a communication promoting the sale of a product should not be disguised as, for example, market research, consumer surveys, user-generated content, private blogs, private postings on social media or independent reviews."</p>
			b. To ensure all nutritional and health-benefit information and claims for food and beverage products have a sound scientific basis (Article 6). And where claims or terminology used in marketing communications might reasonably be c. interpreted by a consumer as health or nutrition claims, they should be supportable with appropriate scientific evidence. (Article 4)	1	
			c. To present products in the appropriate portion size and context (and not to condone or encourage excess consumption) (Article 1)	1	
			d. Not to represent food products not intended to be substitutes for meals as such. (Article 5)	1	



			e. 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 9)	1	
			f. Not to undermine the concept of healthy balanced diets, or the importance of a healthy active lifestyle. (Article 17)	1	
			g. To clearly display the company or brand name when advertising on online media	1	
			h. To ensure that the true commercial purpose of marketing communications is transparent and recognizable as an advertisement; and to clearly differentiate, by labelling, advertising and content on virtual media, including so-called “native advertising” (Article 7)	1	
			i. Not to use any models with a BMI of under 18.5 (industry best practice)	1	
			j. To present products in the context of a balanced diet (industry best practice)	1	
	5 Adapted	5. Does the company commit to or demonstrate that its non-commercial U.S. programs relating to nutrition education exclude product branding?	Yes, all programs	10	
			Yes, some of its programs	5	
			No/ no information	0	
			Not applicable	-	



PERFORMANCE					
	6 New	6. Can the company provide evidence of increasing its marketing spending of healthier products relative to its overall marketing?	Yes, as part of a nation-wide commercial strategy	20	Healthy multiplier applies for this indicator.
			Yes, but limited to specific geographies or products	10	
			No/ no information	0	
	7 New	7. (UNSCORED) Can the company show evidence of working with retailer channels to increase marketing of healthier products relative to its overall marketing?	a. Position healthy products in more prominent locations (also online) or removing those not meeting healthy standards (slotting fees)	-	For information only, i.e. not scored.
			b. Use of price promotions	-	
			c. Use of reward/loyalty programs for promotion of healthy products	-	
			d. In its own direct-to-consumer online channel	-	
			e. In-store promotion, such as signs, sampling, and giveaways (including online)	-	
			f. Other	-	
DISCLOSURE					
	8 New	8. Does the company disclose its commitment to increase marketing spending of healthy products relative to products not meeting healthy standards? (Linked to indicator 2)	Yes	10	
			No/ no information	0	



D2: Responsible Marketing to children

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Scope and strength of policy					
	1	1. (UNSCORED) Does the company: (Tick all that apply)	a. Have a public policy that applies to the U.S., which explicitly addresses responsible marketing to children?	-	For information only, not scored. The Children's Advertising Review Unit (CARU) is a self-regulatory approach managed by the Better Business Bureau National Programs (BBBNP). In 2021, CARU released its revised Children's Advertising Guidelines. Notable changes include increasing the age definition of 'child' from under 12 years to under 13 years in alignment with the Children's Online Privacy Protection (COPPA). The Children's Food and Beverage Advertising Initiative (CFBAI) is a voluntarily pledge where companies commit, in advertising primarily directed to children under 12, they will either not advertise foods or beverages to children at all or advertise only products that meet CFBAI's strict Uniform Nutrition Criteria. Participants commit not to advertise in elementary schools. Recommendations for Responsible Food Marketing to Children by a panel of experts convened by Healthy Eating Research published in 2015 include defining child-directed marketing as any marketing that targets children from birth through 14 years of age.
			b. Commit to adhere to the Self-Regulatory Program for Children's Advertising of the Children's Advertising Review Unit (CARU)?	-	
			c. Make pledges to meet the Children's Food and Beverage Advertising Initiative (CFBAI) principles?	-	



↔	2 Adapted	2. Which standards does the company use to identify products suitable for marketing to children in the U.S.?	Company markets no products to children at all	10	<p><i>Age multiplier applies for this indicator.</i></p> <p>* Regional Nutrient Profile Models to implement recommendations on the marketing of foods and non-alcoholic beverages to children have been defined by the World Health Organization for all regions (except for Africa as of 22 August 2019, but the publication of that model is pending). Links to descriptions of those models can be found here: https://www.who.int/nutrition/reg_offices/en/</p> <p>The 2018 UNICEF document 'A Child Rights-Based Approach to Food Marketing: A Guide for Policy Makers' offers a legal analysis that links the 2010 WHO Set of Recommendations on the Marketing of Foods and Non-Alcoholic Beverages to Children with a human rights framework, particularly the CRC, and clearly defines that the approach should include all children and teens under the age of 18 years. It also references relevant research that this recommendation is based on.</p> <p>In the case that a company benchmarks its own criteria to the PAHO nutrient profiling system, the company will get credit for the second answer option.</p>
			Pan American Health Organization (PAHO) Nutrient Profiling System*	10	
			CFBAI's Category-Specific Uniform Nutrition Criteria	7.5	
			The company's own criteria	5	
			Not specified/no information	0	
	3	3. Which forms of marketing does the company's public U.S. marketing policy for children apply to? (Tick all that apply)	a. print media (newspapers, magazines, books, and printed advertising in public places)	1.67	<p>Disclosure needs to be mandatory, therefore the policy needs to be public for the company to score.</p> <p>**International Chamber of Commerce Framework for Responsible Food and Beverage Marketing Communications, 2019, sets forth how general</p>
			b. All broadcast media (traditional TV, radio)	1.67	
			c. All non-broadcast electronic and/or digital media (its own- & third-party websites, social	1.67	



			media, mobile and SMS marketing, native online marketing, games and apps, CDs/DVDs)		principles of the ICC Advertising and Marketing Communications Code, 2018, which governs all marketing communications, and includes separate sections on sales promotion, sponsorship, direct marketing, digital interactive marketing and environmental marketing, is applied in the context of food and beverage marketing communications.
			d. All in-store or point-of-sales marketing, including packaging	1.67	
			e. Sponsorship (e.g. of sporting, entertainment or cultural events or activities)	1.67	
			f. All additional forms of marketing (cinema, outdoor, product placement in movies, TV shows, etc.)	1.67	<p>For more information, see the ICC 2018 Advertising and Marketing Communications Code : https://cms.iccwbo.org/content/uploads/sites/3/2018/09/icc-advertising-and-marketing-communications-code-int.pdf</p> <p>And the 2019 ICC Framework for responsible food and beverage marketing communications: https://iccwbo.org/publication/framework-for-responsible-food-and-beverage-marketing-communications/</p> <p>According to Article 7 ICC Advertising and Marketing Communications Code, 2018, “a communication promoting the sale of a product should not be disguised as, for example, market research, consumer surveys, user-generated content, private blogs, private postings on social media or independent reviews.”</p>
↔	4	4. Does the company commit: (tick all that apply)	a. Not to create a sense of urgency (Article 18)	1.67	<i>Age multiplier applies for this indicator</i>
			b. Not to use inappropriate price minimization (Article 18)	1.67	Article 18 of the ICC Framework for responsible food and beverage marketing communications focusses on children and teens and can be read on page 6.
			c. Not to exploit a child's imagination in a way that could mislead him/her about the	1.67	



			nutritional benefits of the product involved (Article 18)		The U.S. Federal Trade Commission's (FTA) Children's Online Privacy Protection Rule ("COPPA") imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age.
			d. Supporting the role of parents or others responsible for guiding diet and lifestyle choices or not to undermine the role of parents or others responsible for guiding diet and lifestyle choices (Article 18)	1.67	
			e. To apply child online privacy and data protection standards (like COPPA) and monitor the audiences of their marketing techniques to determine whether it has become popular with children, even though they may not have been the intended audience.	1.67	
			f. Not to brand merchandise aimed at children except related to healthy products	1.67	
Marketing techniques and materials					
↔	5	5. Regarding marketing techniques and materials aimed at children, does the company commit: (Tick all that apply)	a. Not to sponsor people, materials or activities popular with children at all or only for healthy products	1.67	Age multiplier applies for this indicator For this indicator, the last two answer options are mutually exclusive, and therefore, only one of these two options may be selected.
			b. Not to use celebrities and other people with strong appeal to children in marketing of products at all, or only for healthy products	1.67	
			c. That if celebrities or others (including influencers) are used in marketing, they will not imply that their performance or status has improved through use of the product	1.67	
			d. Not to depict children on packaging at all or except for healthy products	1.67	



			e. Not to make use of promotional games, toys, vouchers, competitions etc. in their marketing to children, or only for healthy products	1.67	
			f. Not to use (third-party or own) fantasy or animated characters with a strong appeal to children in marketing of products at all, or only for healthy products, IN ALL FORMS OF MARKETING	1.67	
			f2. Not to use (third-party or own) fantasy and animated characters with a strong appeal to children in marketing of products, or only for healthy products, with an exception for point of sale marketing and packaging	0.83	
Digital marketing					
	6	6. (UNSCORED) Concerning digital marketing, does the company apply its marketing policy to the following: (Tick all that apply)	a. Influencer marketing	-	For information only, not scored.
			b. Branded environments and advergames	-	Digital media encompasses all media for which internet is needed to function.
			c. Livestreaming platforms and Immersive environments	-	The different types of digital marketing are based on the UNICEF discussion paper ' Children and Digital Marketing: Rights, risks and responsibilities '
			d. Native advertising	-	
			e. Viral marketing	-	Explanations of the types of digital marketing – taken from the discussion paper – are as follows:
			f. Location targeting	-	
			g. Sponsored search results	-	



			h. Neuromarketing and sentiment analysis	-	<p>Influencer marketing: Advertisers use individuals with a considerable online presence to promote a product, brand or service in exchange for financial or in-kind compensation. Influencers have thrived on social networks such as Facebook, Instagram, Twitter and – particularly relevant to children – on YouTube.</p> <p>Branded environments and advergames: Online branded environments designed for children incorporate music, video, games or other activities to immerse children in a playful and enjoyable experience that also promotes the relevant brand and often subliminally creates brand recognition. Advergames – specifically designed to promote a product, brand or service – are particularly appealing to children, but not easily recognized as marketing. Embedded advertisements in immersive experiences reduce conscious attention to advertising and have been found to “affect children’s behaviour without them being aware of it.”</p> <p>Native advertising: The representation of advertising content as editorial content. Websites such as BuzzFeed pioneered the use of native or sponsored content in the form of quizzes, posts and videos that match the look and tone of editorial content on the website.</p> <p>Viral marketing: Rich data sets on social media users provide the basis for viral marketing campaigns, which tap into the online ‘social graph’ to identify influential individuals who are likely to create and share user-</p>
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					<p>generated marketing messages and to provide incentives to encourage this type of brand promotion.</p> <p>Location targeting: Mobile marketing involves the use of location data to segment advertising audiences and deliver ads based on their location. Mobile marketing and location targeting are particularly relevant as more users access the Internet primarily through the use of mobile devices.</p> <p>Sponsored search results: Google AdWords is the largest and most pervasive form of sponsored search results. Research shows that even among adults using search engines, 43 per cent do not accurately identify sponsored results.</p> <p>Neuromarketing and sentiment analysis: More of a measurement technique than a tactic for delivering advertising, neuromarketing uses tools such as eye-tracking to measure subconscious levels of brain activity, and adjust marketing materials to correspond to attention, emotion and memory. In a similar vein, sentiment analysis is used by social networks to identify and track consumers' emotions and market to them accordingly</p>
	7	7. (UNSCORED) Concerning digital marketing, does the	a. Owned digital media	-	For information only, not scored.
			b. Third-party digital media	-	



		company cover in its marketing policy the following: (Tick all that apply)	c. User generated media	-	<p>Digital media encompasses all media for which internet is needed to function.</p> <p>Rapid advances in technology and entertainment platforms have led to the development of new marketing techniques. For example, research has shown that food and beverage marketing on livestream platforms is growing, with significant increase in the number of brands mentioned in stream titles for categories including energy drink, snacks and sodas. It is therefore important that companies' marketing policies include third-party sites and user generated media.</p> <p>Edwards, C. G., et al., (2021) "Prevalence and comparisons of alcohol, candy, energy drink, snack, soda, and restaurant brand and product marketing on Twitch, Facebook Gaming and YouTube Gaming," Public Health Nutrition. Cambridge University Press, pp. 1–12. doi: 10.1017/S1368980021004420.</p>
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Marketing in and around schools and other places where children gather

	8	8. To what extent does the company commit to a responsible marketing approach near and in primary schools for children below the age of 13?	No marketing or advertising in or near primary schools	10	This indicator refers to any formal school or schooling system that is attended by children up to age 12. In the U.S this applies to pre-K through 6 th grade.
			No marketing or advertising in primary schools	7.5	
			Only marketing or advertising 'healthy' products in primary schools in agreement with schools or parents	5	
			No commitment/ no information	0	



	9	9. To what extent does the company commit to a responsible marketing approach near and in secondary schools (for children between the age of 13 and 18)?	No marketing or advertising in or near secondary schools	10	This indicator applies to commitments linked to primary and secondary schools in the US (indicator 8 and 9)
			No marketing or advertising in secondary schools	7.5	
			Only marketing or advertising 'healthy' products in secondary schools in agreement with schools or parents	5	
			No commitment/ no information	0	
↔	10 Adapted	10. Concerning the form of advertisement and digital marketing in schools, does the company: (tick all that apply)	a. Extend its commitment to all media relevant to school environment, including educational websites and games.	3.33	<i>Age multiplier applies for this indicator.</i> For example, if a company only commits to extend its commitments but only in primary schools, they would receive a lower age multiplier.
			b. Include in its commitments not to provide any branded educational and other materials to be used in schools, or only in agreement with schools/parents	3.33	
			c. Include in its commitments not to provide any branded products to schools to serve in cafeterias and not to use branding on vending machines.	3.33	
	11 Adapted	11. To what extent does the company commit to a responsible marketing approach in other places where children gather*?	No marketing or advertising in and near these settings	10	This indicator relates to Rec. 5, WHO recommendations on the Marketing of Food and Non-Alcoholic Beverages to Children, 2012. *E.g. after-school clubs, Boys and Girls Clubs, YMCAs, other childcare and other educational establishments,
			No marketing or advertising in these settings	7.5	
			Only marketing or advertising 'healthy' products in (or near) these settings in	5	



			consultation with their management and users		family and child clinics, pediatric services or other health facilities, amusement parks or zoos, sporting or cultural events held at those premises.
			No commitment / no information	0	
PERFORMANCE					
Audience threshold for measured media					
↔	12	12. What percentage audience threshold does the company use to restrict its advertising on measured media?	25% or less	20	Age multiplier applies for this indicator. For measured media like television, the Children's Food and Beverage Advertising Initiative (CFBAI) voluntary pledge defines "child-directed" by reviewing the percentage of children under age 12 in the audience. In the updated 2021 guidelines, the required threshold is stricter, defining any program with an audience of 30% or more children as child-directed. Some companies apply a lower threshold.
			26 - 35%	15	
			36% - 50%	10	
			Less than 50%	0	
			No audience threshold/ No information	0	
Digital marketing					
↔	13	13. Which tools does the company utilize to ensure that its digital marketing does not reach younger age groups? (Tick all that apply)	a. Ensuring that the design of websites, pages, social media, or apps is appropriate to adults predominantly, and not designed to attract children.	4	Age multiplier applies for this indicator. Digital media encompasses all media for which internet is needed to function.
			b. Age screening prior to logging on/registering (e.g., enter date of birth or require parent to consent)	4	
			c. Reviewing age-related data to determine the demographic that is targeted by its digital marketing	4	



		d. Reviewing visitor profile of third-party websites that the company advertises on, to ensure children are not exposed	4	
		e. Assessing the nature of third-party websites chosen to advertise on (i.e. ages targeted)	4	

D3: Auditing and compliance

Multiplier	Indicator	Description	Answer options per indicator	Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
PERFORMANCE				
	1	1. Does the company audit its compliance with its marketing policy applicable in the U.S., including on marketing to children?	Yes, covering all audiences including children and/or teens Yes, but only for children and/or teens No audit/ no information	20 10 0
General policy				
	2	2. Who audits the company's compliance with its general marketing policy applicable to the U.S.?	Independent external auditor unrelated to an industry association An industry association or an industry association appointed third party auditor Internal company audit No audit/ no information	20 15 10 0
				This indicator applies to company's general marketing policies (for all consumers and not only children)



	3 New	3. How often is the audit undertaken?	Annually	20	
			Less than annually	10	
			No audit or no information	0	
Marketing to children policy					
	4	4. Who audits the company's compliance with its marketing to children policy applicable to the U.S.?	Independent external auditor unrelated to an industry association	20	Although an industry association or pledge organization (e.g. International Food and Beverage Alliance, Children's Food and Beverage Advertising Initiative, etc.) may appoint a third party auditor, the first answer option 'the company appoints an independent external auditor' is only credited if a company commissions additional independent auditing to complement industry association or pledge organization auditing, or if it commissions a comprehensive third party compliance audit on an individual basis.
			An industry association or an industry association appointed third party auditor	15	
			Internal company audit	10	
			No audit/ no information	0	
	5	5. How often is the audit undertaken? (Linked to indicator 4)	Annually	20	
			Less than annually	10	
			No audit or no information	0	
	6 Adapted	6. Does the audit cover all media specified in the company's marketing policy for children applicable in the U.S.?	The audit covers all media specified in the policy	20	
			The audit covers selected media specified in the policy	10	
			No specification on which media are covered/ no information	0	
Compliance and response mechanism					
	7	7. What is the company's individual compliance level for TV marketing to children?	Over 90%	20	
			Less than 90% or no information	0	



	8	8. What is the company's individual compliance level for digital media marketing to children?	Over 90%	20	
			Less than 90% or no information	0	
	9 New	9. Does the company have a response mechanism to ensure corrective measures are taken regarding any non-compliance with its marketing policy?	Yes, a robust and well-structured process	20	
			Yes, ad hoc or unstructured process	10	
			No response mechanism/ no information	0	
DISCLOSURE					
	10 Adapted	10. Does the company publicly disclose that (at least one of) its marketing policies applicable to the U.S. is audited? (Linked to indicator 1)	Yes	10	
			No/ no information	0	
	11	11. Regarding compliance levels for TV, does the company publicly disclose its individual compliance level for the U.S., based on an audit? (Linked to indicator 7)	Yes	10	
			No/ no information	0	
	12	12. Regarding compliance levels for digital media, does the company publicly disclose its individual compliance level for the U.S., based on an audit?	Yes	10	
			No/ no information	0	



(Linked to indicator 8)

Category E: Supporting healthy diets and nutrition programs in the workforce

Rationale: Companies can support the nutritional wellbeing of their staff by implementing workforce nutrition programs, ensuring their employees have access to healthy foods at work, and providing nutrition education and nutrition-focused health checks. In addition, by supporting parent-friendly working practices and providing appropriate facilities for breastfeeding mothers at work, companies can ensure their employees' infants have the healthiest start in life. These programs could also benefit workers in the supply chain of companies that are not direct employees.

E1: Supporting employee health & nutrition

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
E1 Supporting employee health & nutrition					
	1	1. Does the company make a public commitment to support employee health and nutrition in the U.S. through a workforce nutrition program, which includes expected outcomes?	Yes, with a focus on nutrition, including measurable and verifiable expected outcomes	10	According to the Global Alliance for Improved Nutrition (GAIN), “Workforce nutrition programmes are a set of interventions that work through the existing structures of the workplace to address fundamental aspects of nutrition amongst employees and/or supply chain workers. Ideally, these programmes aim to create improved access to – and demand for – safe and nutritious food, with the aim of changing employees’ behaviours around food consumption, and to improve their health and wellbeing.” A public commitment for this indicator can be a publicly available policy document or public statement regarding the company’s approach to employee nutrition, or a public description of its workforce nutrition program.
			Yes, with a focus on nutrition, without measurable and verifiable expected outcomes	5	
			No/no information	0	



					Measurable and verifiable expected outcomes can be defined in various ways, e.g. healthy behavior, health-related or employee absenteeism outcomes. Outcomes must be quantifiable.
	2 New	2. [UNSCORED] Does the company make a public commitment to improve the health and nutrition of groups across the food value chains it is involved in, that are not directly employed by the company through programs focused on nutrition?	Yes for supply chain partners in the U.S.	-	For information only i.e. not scored.
			Yes for supply chain partners abroad	-	Examples of groups not directly employed by the company include farmers, factory workers. Tick all that apply.
			No/no information	-	
	3	3. Who is eligible to participate in the company's workforce nutrition programs? (Tick all that apply)	a. All employees	5	Maximum score is applicable if program(s) are available to all employees and all family members.
			b. Some employees	2.5	
			c. All family members	5	
			d. Some family members	2.5	
PERFORMANCE					
	4 Adapted	4. Does the company's workforce nutrition program for employees include any of the following? (Tick all that apply)	a. Healthy food at work	6.67	The Workforce Nutrition Alliance identifies four main types of workforce nutrition intervention: <ul style="list-style-type: none">• Healthy food at work: programmes which focus on increasing employees' access to healthy and safe foods at work, either through direct provision or subsidy, or by increasing the availability of healthy food options in the setting.
			b. Nutrition education	6.67	
			c. Nutrition-focused health checks	6.67	



					<ul style="list-style-type: none"> • Nutrition education: programmes aiming to change the nutrition and/or lifestyle behaviours of employees through increasing employees' knowledge of beneficial health habits. This could be achieved through the following: (1) changing attitudes towards a specific behaviour; (2) addressing normative beliefs (i.e. the perceived norm); (3) modifying beliefs about self-control and the ability to change. • Nutrition-focused health-checks: periodic one-to-one meetings with a health or nutrition professional to assess, and usually discuss, the employee's nutritional health. • Breastfeeding support to working mothers, this is covered separately in criterion E2
	5	5. What percentage of U.S. staff participated in the workforce nutrition program in the U.S. in 2020?	Above 75%	20	
			Between 50 and 74%	10	
			Less than 50%	5	
			No workforce nutrition program/ no information	0	
	6 Adapted	6. Has the company evaluated the health impact of the workforce nutrition program in the U.S. in the last three years?	Yes, including measurable and verifiable expected outcomes	20	
			Yes, but it does not include measurable and verifiable expected outcomes	10	
			No evaluation/ no information	0	

DISCLOSURE

Evaluations



	7	7. Does the company disclose: (Tick all that apply) (Linked to indicator 1)	a. Quantitative information on the outcomes of the workforce nutrition program	5	
			b. Narrative and/or qualitative information about the results of the program	5	
	8	8. Does the company disclose evaluations of its workforce nutrition program? (Linked to indicator 6)	Full evaluation	10	
			Summary evaluation	5	
			No evaluation, or the company has no program/ no information	0	

E2: Supporting breastfeeding mothers at work

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
	1	1. Does the company commit to allowing parents to take paid parental leave, and to providing breastfeeding mothers with appropriate working conditions and facilities at work in the U.S.?	Formally commits to both granting paid parental leave, and to providing appropriate working conditions and facilities to facilitate breastfeeding	10	
			Formally commits to granting paid parental leave only	5	
			Formally commits to providing appropriate working conditions and facilities for breastfeeding mothers only	5	
			The company makes at least one commitment, but has no formal policy	2.5	
			No commitment or no information	0	



PERFORMANCE				
	2. Does the company offer the following arrangements to support breastfeeding mothers at work: (Tick all that apply)	a. Private, hygienic, safe rooms to express breastmilk	6.67	A total of 3 answer options required to obtain maximum score.
		b. Refrigerators to store breastmilk	6.67	
		c. Daily intermittent breaks to express breastmilk	6.67	
		d. Other flexible working arrangements to support breastfeeding mothers	6.67	
	3. How much time can parents take leave under the company’s paid parental leave policy in the U.S.?	26 Weeks or more	20	
		Between 14 and 26 weeks	15	
		14 weeks, in line with ILO recommendations	10	
		Between 8 and 14 weeks	5	
		No policy/ no information	0	
DISCLOSURE				
	4. Does the company disclose: (Tick all that apply) (Linked to indicator 1)	Its policy on supporting breastfeeding mothers	5	
		Its policy on paid parental leave	5	



Category F: Product Labeling

Rationale: Companies can help empower consumers to select healthier products that support healthy diets by providing them with accurate, easily understandable information about the nutritional composition of all products they sell, both in stores and online. As many elements of back-of-pack labeling and health and nutrition claims are regulated in the US, this section assesses' practices on front-of-pack labels, online information and other ways of providing reliable and transparent information to consumers.

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
COMMITMENT					
Front-of-pack labeling					
	1	1. How does the company provide information on the front-of-pack (FOP) in the U.S.?	Interpretive labeling systems	10	The World Health Organization (WHO) recommends FOP nutrition labelling as a key policy to promote healthy diets and reduce NCD prevalence worldwide.
			Showing % Daily Value (or similar measure) of multiple nutrients	7.5	
			Showing % Daily Value (or similar measure) of a single nutrient or energy only	5	
			Energy or caloric value	2.5	
			No FOP system in place/no information found	0	
	2 New	2. (UNSCORED) What nutrient profiling system/ criteria does the company use for the purposes of FOP labelling in the U.S.?	External widely recognized NPM, endorsed by governments	-	For information only i.e. not scored.
			Company's own NPM or criteria	-	
			Other	-	
			No information	-	
PERFORMANCE					
	3	3. What percentage of the company's F&B products in the	More than 80%	20	
			Between 50 - 79%	10	



		U.S. carry Front-Of-Pack labels?	Between 6 - 49%	5	
			Less than 5%/ no information	0	
	4 New	4. Can the company provide evidence of disclosing the percentage of grains that are whole grains on product labeling, contributing to lower carbohydrate-to-fiber ratios in the U.S.?	Yes, for all relevant products	20	ATNI follows the Australia and New Zealand Food Standards definition: 'Wholegrain food is any food which uses every part of the grain including the outer layers bran and germ.'
			Yes, for some relevant products	10	
			No/no information	0	
			Not applicable	-	In 2006 FDA issued draft guidance on whole grain labeling, defining whole grains foods as "Cereal grains that consist of the intact, ground, cracked or flaked caryopsis, whose principal anatomical components - the starchy endosperm, germ and bran - are present in the same relative proportions as they exist in the intact caryopsis." A carbohydrate-to-fiber ratio of less than 10:1 is one of the criteria used by the USDA to identify whole grains in a food product and considered by researchers at the Harvard School of Public Health to be the most effective measure of healthfulness of whole grain products.
	5 New	5. Can the company provide evidence of disclosing amounts of fruits and vegetables on product labeling in the U.S.?	Yes, for all relevant products	20	
			Yes, for some relevant products	10	
			No/no information	0	
			Not applicable	-	
Online					
	6	6. What percentage of the company's products have	More than 80%	20	The COVID-19 pandemic has accelerated the trend toward buying groceries online.
			Between 50 - 79%	10	
			Between 6 - 49%	5	



		nutrition information posted online in the U.S.?	Less than 5% / no information	0	
	7 New	7. If the company has an online direct-to-consumer channel, does it offer a filter function for healthy products?	Yes, a healthy filter aligned with front-of-pack information or at least 3 nutrient-based filters	20	Examples of nutrient base filters include low or zero sugar, low fat.
			Yes, maximum of 2 nutrient base filters	10	
			No/no information	0	
			Not applicable	-	
DISCLOSURE					
	8 New	8. Does the company disclose its front-of-pack labeling approach in the U.S.? (Linked to indicator 1)	Yes	10	
			No/no information	0	

Category G: Responsible lobbying and stakeholder engagement

Rationale: Companies can have a significant impact on consumers' access to healthy foods through the positions they take on government consultations and regulatory proposals on nutrition issues. They also have an influence through the industry and trade bodies to which they belong, which lobby on their behalf. Companies' transparency about their own public policy positions and their membership of organizations that lobby on their behalf is essential so that other stakeholders can understand the positions companies are taking. In addition, constructive engagement by companies with a wide range of other stakeholders is important to inform corporate nutrition strategies, policies and practices.

G1: Responsible lobbying

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
PERFORMANCE					
Lobbying					
	1 New	1. Does the company have the following systems in place to	a. Board oversight of U.S. lobbying policy positions, processes and practices	6.67	ATNI adopts Transparency International's definition of lobbying: "any direct or indirect communication with



		manage its lobbying positions and activities: (Tick all that apply)	b. Audits of the company's U.S. lobbying activities, including those undertaken by third parties	6.67	public officials, political decision-makers or representatives for the purposes of influencing public decision-making and carried out by or on behalf of an organized group. Lobbying can also include direct or indirect attempts to influence public opinion, outside of normal advertising and marketing activity, with a view to impacting public decision making” https://www.responsible-lobbying.org/the-framework
			c. A regular review of U.S. trade association memberships and alignment with their lobbying positions	6.67	
	2 Adapted	2. Can the company provide evidence of lobbying in support of government policies to address malnutrition (including obesity and diet-related NCDs) and public health in the U.S.? (Tick all that apply)	a. Supporting fiscal measures to address obesity (e.g. sugar/sugar-sweetened beverage taxes)	6.67	It must be clear how the company's lobbying position benefits the public health interest and/or addressing malnutrition in the U.S. to receive credit. This could be supported by authoritative research and organizations (such as WHO). Examples can be from federal, state, or municipal level. This indicator has a maximum score of 20 (i.e. three answer options are required to receive max score).
			b. Supporting more stringent restrictions on marketing/advertising unhealthy products to children	6.67	
			c. Supporting increased Front-of-Pack labelling requirements	6.67	
			d. Other (must be clear how it contributes to addressing malnutrition/public health)	6.67	
DISCLOSURE					
	3 Adapted	3. Regarding trade association memberships (501(c)(6))	a. A comprehensive list of memberships of trade associations in the U.S.	3.33	To qualify as a 'comprehensive' list, the company must disclose all trade association memberships with total



		relating to lobbying on nutrition issues, does the company publish on its own domain: (Tick all that apply)	b.1. The portion of dues paid to these organizations that are used for lobbying purposes	3.33	dues paid over \$10,000, including state-level associations. Disclosing only trade associations that lobby on the company's behalf is sufficient.
			b.2. Total membership dues paid to the organizations	1.67	To be credited or disclosure of 'dues' (b.1), the company must disclose the exact amount (to the nearest \$1000). General thresholds are not sufficient.
			c. Board seats held at these organizations (or a statement that there are none)	3.33	
					b.1 and b.2 are mutually exclusive: b.2 is only credited if the company does not satisfy b.1.
	4 New	4. Regarding political expenditures (i.e. contributions to political candidates or political parties), does the company publish on its own domain: (Tick all that apply)	a.1. Donations made directly (i.e. from the company treasury): full list, including with \$ amounts given to each recipient individual/party names OR explicit policy that prohibits this type of activity	5	All donations at a federal, state, and municipal level are considered, including ballot measures. A 'partial list' means that one of the following is missing: <ul style="list-style-type: none"> • Recipient names and party affiliation • Precise donation amounts. Disclosures made on the LDA website are not sufficient for credit: they must published on the company's own domain.
			a.2. Donations made directly: a partial list	2.5	
			b.1. Donations made indirectly (i.e. via PACs (527 entities)): full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	5	
			b.2. Donations made indirectly: a partial list	2.5	
	5 New	5. Does the company publish on its own domain the amount it spends on lobbyists in the U.S.?	Yes, both in-house and contracted lobbyists	10	Disclosures made on the LDA website are not sufficient for credit: they must published on the company's own domain.
			Yes, in-house lobbyists only	5	
			No / no information	0	
	6	6. Does the company disclose its policy position used in lobbying/governmental engagement, on the following: (Tick all that apply)	a. Fiscal measures to address obesity (e.g. sugar/sugar-sweetened beverage taxes)	2.5	**
			b. Restrictions on marketing/advertising unhealthy products to children	2.5	
			c. Front-of-Pack labelling requirements	2.5	
			e. Other	2.5	



G2: Engaging with stakeholders

Multiplier	Indicator	Description	Answer options per indicator		Additional information or 'I button text' (to provide companies with clarification about the indicator's aim)
PERFORMANCE					
Stakeholder engagement					
	1 New	1. Can the company demonstrate that it has engaged with a range of stakeholders regarding its nutrition strategy/ policies/programs in the U.S.?	Multiple stakeholders of different types (e.g. academics and non-profits) engaged	20	According to the AccountAbility 1000 Stakeholder Engagement Standard: Stakeholder engagement is the process used by an organization to engage relevant stakeholders for a clear purpose to achieve agreed outcomes. It is now also recognized as a fundamental accountability mechanism since it obliges an organization to involve stakeholders in identifying, understanding and responding to sustainability issues and concerns, and to report, explain and answer to stakeholders for decisions, actions, and performance.
			Limited range of stakeholders engaged	10	
			No engagement/ no information	0	
	2 Adapted	2. Can the company demonstrate that it has engaged with these U.S. stakeholders on:	Its commercial nutrition strategy AND multiple specific nutrition-related policies/programs	20	
			Its commercial nutrition strategy OR multiple specific nutrition-related policies/programs	15	
			One specific nutrition-related policy or program only	10	
			No evidence provided/ no information	0	
	3	3. Can the company provide specific examples of how input from its external stakeholder engagement has been used to adapt nutrition-related	Yes, multiple examples	20	
			Yes (single example only)	10	
			No evidence provided/ no information	0	



		policies/programs or change its practices?			
	4	4. For non-commercial nutrition education programs, to what extent does the company support or fund programs designed and implemented by / in partnership with external groups (e.g. CSOs) with relevant expertise?	Only supports such programs	20	
			Supports some, as well as its own programs	10	
			Only implements its own programs	0	
			No information	0	
			Not applicable (no programs)		
DISCLOSURE					
	5 New	5. Does the company disclose the names of stakeholders they engaged on nutrition-related strategy/policies/programs? (Linked to indicator 1)	Yes, of a wide range of stakeholders	10	If a company is credited for consulting an ‘advisory council’ (or equivalent) of external scientists, both their names and organizations must be disclosed to receive credit. For companies without such advisory councils, the names of specific organizations engaged suffices for credit.
			Yes, of a limited selection only	5	
			No/ no information	0	
	6	6. Does the company disclose specific examples of engaging stakeholders relating to nutrition-related strategy/policies/programs? (Linked to indicator 2)	Yes	10	According to the AccountAbility 1000 Stakeholder Engagement Standard, Communicating to stakeholders on the value and impact of engagement should go beyond providing feedback to stakeholders who participated in specific engagements. The organization should publicly report on the aggregate of its engagement activities together with overall outcomes and impact, to show the scope and breadth of its outreach, and to demonstrate how its engagements contribute value to its strategy and operations (4.4.4.)
			No/ no information	0	
	7		Yes	10	



	7. Does the company disclose specific examples of how input has been used to adapt policies/programs or change business practices? (Linked to indicator 3)	No/ no information	0	
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