

December 2022



ACCESS TO
NUTRITION
INITIATIVE

ATNI Spotlight on
Lobbying 2022

Methodology
December 2022





Multipliers

Two sets of multipliers were used to assess the geographical coverage and comprehensiveness of relevant indicators.

Geographic multiplier:	
• Globally	1
• Multiple markets	0.75
• Home market only	0.5
• Other single market only	0.25

Completeness multiplier	
• Statement of completeness	1
• Partial/not specified	0.75
• Single example only	0.5

Full list of Indicators, answer options, available points, and multipliers used:

#	Indicators	Points	Multiplier
Policy commitments			
1	The company has a commitment to only lobby in support of (or not to lobby against) public health policies/measures that seek to:	a. Promote the consumption of healthy diets	2.5
		b. Restrict the marketing of unhealthy foods	2.5
		c. Promote front-of-pack (FOP) labelling requirements that assist consumers in understanding nutritional quality of products (e.g. with interpretive elements)	2.5
		d. Implement fiscal measures to address obesity, such as taxes on sugary products	2.5
2	The company explicitly commits that, in its lobbying activities, it will not undermine (or will actively support) governments' efforts to implement: *max 10 points	a. WHO Global Action Plan for the Prevention and Control of NCDs 2013-2030, and/or the Global Targets 2025: To improve maternal, infant and young child nutrition	5
		b. SDGs 2 and 3	5
		c. Nutrition-specific commitments made at N4G and/or UNFSS	5
		No commitment	0
3	The company explicitly commits to respect the following public policy frameworks and/or lobbying codes when lobbying: *max 10 points	a. The OECD Principles for Transparency and Integrity in Lobbying	3.33
		b. The Transparency International Standards for Lobbying Regulation	3.33
		c. The Responsible Lobbying Framework	3.33
		d. Scaling-Up Nutrition Movement Principles of Engagement	1.66
		e. Industry initiatives, such as the IFBA Guiding Principles for Stakeholder Engagement	1.66
4	Regarding political donations, the company commits:	a. To make no political donations in any markets	10
		b. If political donations are made, to disclose all political donations in all markets	5
		No commitment on making or disclosure of political donations	0
5	The company has a globally-applicable anti-bribery & corruption (ABC) policy covering employees' interactions with public officials which includes:	a. A specific link to lobbying	1.67
		b. An explicit reference that it applies to intermediaries also	1.67
		c. Specific guidance on what to do if one becomes aware of any potential or actual bribery/corruption	1.67
		d. specific guidance on gifts (what is permissible and what is not)	1.67
		e. A clear reporting process (who & how)	1.67
		f. Examples/scenarios of what constitutes bribery/corruption	1.67



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6	The company has controls over trade associations and industry policy groups that include:	a. An explicit statement that it will periodically review the positions of trade associations and industry policy groups to which it belongs and assess the extent to which they align with the company's own policy positions	5	
		b. An explicit statement that it will put in place controls over all lobbyists (in-house and intermediary) to ensure that they understand and adhere to organizational policies.	5	
		No statement to this effect	0	
7	Regarding 'crowding out', the company makes:	a. An explicit statement that it will respect and safeguard the opportunity for other interest groups to lobby	5	
		b. A commitment to take steps towards spending proportionate resources on lobbying, to safeguard access for other interests, regardless of legal caps on political donations.	5	
		No statement to this effect	0	
8	Regarding working with others in pursuit of the public health interest, the company makes:	a. A commitment to pursue opportunities to take part in multi-stakeholder partnerships to lobby together where a common position that supports key public health interest outcomes can be found	3.33	
		b. A commitment to pursue opportunities for cooperation between companies and CSOs to promote and support governments' efforts to adopt greater transparency and accountability standards relating to lobbying	3.33	
		c. A commitment to involve external stakeholders active in public health in the development of lobbying strategy, positions on specific issues, and in reviewing performance	3.33	
		No commitment	0	
Management systems				
9	Accountability and responsibility for policy implementation:	a. The company makes clear that the Board has oversight of the lobbying policy	2.5	
		b. The company makes clear that the Board has oversight of lobbying positions and activities	2.5	
		c. The company names an Executive / function with responsibility for implementing its policy on lobbying and engagement	2.5	
		d. The company provides clarity on control mechanisms (e.g. regular reporting to the Board, internal audits)	2.5	
		No description of such systems was found	0	
10	Regarding the 'revolving door', the company:	a. Has an approach to managing the issue, covering the hiring of former politicians and public officials, and secondments or placement of staff into the public sectors	2	
		b. Describes any evaluation mechanisms, controls and cooling off periods (minimum of 1 year) it has in place	2	
		c. Explains how it adapts job specifications and employment contracts to include specific restrictions	2	
		d. Describes its compulsory compliance training, with an annual certification of compliance	2	
		e. Describes its process for auditing compliance	2	
		No statements on these issues	0	
11	Regarding its anti-bribery and corruption (ABC) policy, the company describes:	a. A functional responsibility for implementing its ABC policy	2.5	
		b. Its process for auditing control capabilities relating to the ABC policy	2.5	
		c. Its process for payment and gift pre-approval and record-keeping	2.5	



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		d. The consequences of violating its ABC policy	2.5	
12	Regarding political donations, the company outlines:	Tracking systems and enforcement mechanisms that assure adherence to its policy on political donations	10	🌐
		No description of such systems was found	0	
13	The company has controls over membership of trade associations/industry organizations, including:	a. Reviews of trade association memberships by the Board	5	
		b. How the company approaches instances of misalignment between the company's positions/practices and the trade association's	5	
		No description of such systems was found	0	
14	The company has controls over lobbyists to ensure that they understand and adhere to the company's policies, including:	a. Processes to inform and train staff involved in lobbying about its policies, standards and systems	3.33	
		b. Processes to inform and train third parties involved in lobbying about its policies, standards and systems	3.33	
		c. Processes to investigate and sanction any breaches of the company's lobbying policies by both staff and third parties	3.33	
		No description of such systems was found	0	
15	The company states that it commissions periodic audits of its lobbying activities that include review of:	External audits:		
		a. All public disclosures, to ensure alignment with policy, accuracy and completeness	2.5	
		b. All lobbying activities undertaken by the organization and their alignment with the policy	2.5	
		c. Control over third-party membership organizations including trade associations, industry associations, intermediaries who lobby on the company's behalf (paid or unpaid), to ensure the effectiveness of the controls	2.5	
		Internal audits:		
		d. All public disclosures, to ensure alignment with policy, accuracy and completeness	0.83	
		e. All lobbying activities undertaken by the organization and their alignment with the policy	0.83	
		f. Control over third-party membership organizations including trade associations, industry associations, intermediaries who lobby on the company's behalf (paid or unpaid), to ensure the effectiveness of the controls	0.84	
		No description of such systems was found	0	
16	The company has a whistleblowing mechanism that:	a. Provides all employees the chance to raise anonymously any concerns or breaches of the organization's lobbying policies and codes of conduct, illegal or unethical lobbying activity	2.5	
		b. Is easily accessible and prominently displayed on the company's website	2.5	
		c. Has a clear process for following up on complaints and tracks progress and outcome of cases	2.5	
		d. Is communicated to employees as part of the onboarding process and/or training sessions	2.5	
		No description of such systems was found	0	

Disclosure

Quality of lobbying disclosure on important public health policy issues

17	Lobbying topic 1: Fiscal measures to address obesity, including taxes on sugary products. The company discloses:	a. That it lobbies on this topic (or not)	2	🌐 ●
		b. Its lobbying position on this topic	2	
		c. The public interest justification for its position	2	
		d. Specific examples of bills and/or legislation on this topic where the company (/its trade associations) has been active	2	



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		e. Relevant documents (e.g. consultation submissions)	2	
		The company publishes no such cases	0	
		Not applicable	-	
18	Lobbying topic 2: measures to regulate the marketing of unhealthy foods (to children). The company discloses:	a. That it lobbies on this topic (or not)	2	
		b. Its lobbying position on this topic	2	
		c. The public interest justification for its position	2	
		d. Specific examples of bills and/or legislation on this topic where the company (/its trade associations) has been active	2	🌐
		e. Relevant documents (e.g. consultation submissions)	2	🔍
		The company publishes no such cases	0	
		Not applicable	-	
19	Lobbying topic 3: Front-of-pack (FOP) labelling requirements. The company discloses:	a. That it lobbies on this topic (or not)	2	
		b. Its lobbying position on this topic	2	
		c. The public interest justification for its position	2	
		d. Specific examples of bills and/or legislation on this topic where the company (/its trade associations) has been active	2	🌐
		e. Relevant documents (e.g. consultation submissions)	2	🔍
		The company publishes no such cases	0	
		Not applicable	-	
20	Lobbying topic 4: Influencing national food-based dietary guidelines (FBDGs). The company discloses:	a. That it lobbies on this topic (or not)	2	
		b. Its lobbying position on this topic	2	
		c. The public interest justification for its position	2	
		d. Specific examples of bills and/or legislation on this topic where the company (/its trade associations) has been active	2	🌐
		e. Relevant documents (e.g. consultation submissions)	2	🔍
		The company publishes no such cases	0	
		Not applicable	-	
21	Lobbying topic 5: Other policies to improve public health and diets. The company discloses:	a. Other topics it lobbies on	2	
		b. Lobbying positions for these topics	2	
		c. The public interest justification for at least one of these positions	2	
		d. Specific examples of bills and/or legislation where the company (/its trade associations) has been active	2	🌐
		e. Relevant documents (e.g. consultation submissions)	2	🔍
		The company publishes no such cases	0	
22	Regarding its lobbying activities, the company publishes information on:	a. Identity of direct and intermediary lobbyists engaged	2	
		b. Offices/types of public officials with whom the company has interacted	2	
		c. Issues discussed	2	🌐
		d. Outcomes sought	2	🔍
		e. Frequency of interaction with public officials	1	
		f. Ultimate intended beneficiaries of lobbying	1	
		No information	0	
Disclosure regarding trade associations				
23	Regarding its memberships of trade associations, the company discloses:	a. List of memberships	7.5	
		b. Board seats held at these organizations (or statement that there are none)	2.5	🌐
		No information	0	🔍
24	Regarding the activities undertaken by its trade	a. Description of main purpose of each trade association membership	5	🌐



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	associations, the company discloses:	b. Description of principal lobbying activities undertaken by these trade associations	5		
		No publication of such documents	0		
25	Regarding alignment between the company's lobbying principles and its trade associations', the company publishes information on:	a. Reviews of its trade association memberships	3.33	🌐	
		b. Examples of engagement with trade associations to align their positions and standards to those of the company	3.33		
		c. Any decisions made where misalignment is found (or statement that no misalignments were found)	3.33		
		No information	0		
Disclosure of expenditures on lobbying:					
26	For the trade associations it discloses, the company discloses the following information on its expenditures:	a. The portion of dues paid to these organizations specifically for lobbying purposes	10	🌐	
		b. Total membership dues paid to trade associations only	5		●
		No information	0		
27	Regarding expenditures on lobbyists (in-house and third party), the company discloses:	a. Expenditures on lobbying per market	10	🌐	
		b. Total lobbying expenditure across all markets (aggregated figure)	5		
		c. Lobbying expenditure for specific market(s) only	2.5		
		No information on lobbying expenditure	0		
28	Regarding political donations and contributions, the company discloses:	a. Full itemized list, including details of recipients (name/party affiliation) and precise amounts given, for both direct contributions (from company treasury) AND indirect contributions (e.g. via PACs in the U.S.)	10	🌐	
		b. Full itemized list, including details of recipients (name/party affiliation) and precise amounts given, for direct contributions (from company treasury) only	7.5		
		c. Partial list (missing details on precise donation amounts, details of recipients, etc) or aggregate amounts per market only	5		
		No information on political expenditure	0		
		Not applicable (company commits to make no political donations in any market)	-		
Disclosure regarding implementation of lobbying management systems					
29	Regarding managing lobbying-related conflicts of interest, the company publishes:	a. Examples of where incidents of bribery & corruption were identified and how they were addressed (anonymized), or a statement that no such instances arose	5	🌐	
		b. Examples of where 'revolving door' issues arose and how they were addressed, or a statement that no such instances arose	5		
		No such examples/statements	0		
30	Regarding audits of lobbying activities, the company discloses:	a. The company publishes the results of its external audit of compliance with its lobbying policy	10	🌐	
		b. The company publishes the results of its internal audit of compliance with its lobbying policy	5		
		The company does not publish the results of its audits of compliance with its lobbying policy, or no audits take place	0		
31	Regarding whistleblowing mechanisms (in relation to lobbying), the company publishes information on:	a. No. of cases raised	2.5	🌐	
		b. No. of cases resolved	2.5		
		c. Breakdowns per issue type	2.5		
		d. Breakdowns by geography and/or business unit	2.5		
		e. Information on resolution, e.g. by type	2.5		
		No such information	0		



Other responsible lobbying disclosures				
32	The company discloses:	a. Examples of cooperation with NGOs in its nutrition-related lobbying	5	
		b. Examples of supporting regulatory measures to improve lobbying transparency	5	
		No such examples	0	
33	Regarding external stakeholder engagement in lobbying activities, the company publishes:	Examples of how it engaged external stakeholders in understanding key issues, developing lobbying positions and strategies, and reviewing performance	10	 
		No examples	0	
Accessibility and quality of disclosure				
34	Disclosure of lobbying policy	a. The company publishes a stand-alone, Board-approved, responsible lobbying policy	10	
		b. The company publishes a stand-alone responsible lobbying policy that is not clearly Board-approved	7.5	
		c. The company publishes its responsible lobbying policy as part of broader policy or document	5	
		The company does not publish such a policy	0	
35	The main disclosure regarding lobbying activities/expenditures the company publishes is:	a. Easy to find/accessible	2	
		b. Comprehensive (global)	2	
		c. Well-structured	2	
		d. Assured or included within corporate annual assurance processes	2	
		e. Presented using external reporting frameworks' taxonomies	2	
		No such examples	0	

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