



ACCESS TO
NUTRITION
INITIATIVE



India Spotlight Index 2020

Custom Report

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Introduction



"ATNI sees food and beverage companies in India showing their commitment to provide healthy food and engaging in a dialogue on how to support India's Eat Right Movement. Lifestyle changes in India have caused a shift in consumer habits – from the consumption of traditional food, to more urban food habits consisting of packaged and processed foods, high in sugar, fat and salt. In fact, India is among the top 10 consumers of fast food in the world. This, coupled with the fact that India is set to become the third largest consumer economy, presents an enormous opportunity for food and beverage companies to make nutrition a core part of their business plans, and to adopt comprehensive, public, formal and commercial strategies to address issues related to the double burden of malnutrition in India."

Inge Kauer, Executive Director,
Access to Nutrition Initiative

The Access to Nutrition India Spotlight Index 2020 has been developed by the Access to Nutrition Initiative (ATNI) to drive positive change in the food and beverage industry in India on diet, nutrition and health issues. It is the second iteration of the Index, first published in 2016. It aims to support efforts by all stakeholders, including the government-led Eat Right India movement, to address all forms of malnutrition. It focuses on the contribution being made by the 16 largest food and beverage (F&B) manufacturers in India, by providing comprehensive, independent, comparable and objective information about these companies' policies, practices and disclosure related to nutrition. As such, the Index serves as a private sector accountability tool, which stakeholders can use to hold the companies to account for delivering on their commitments to tackle these important national challenges.

The second India Spotlight Index covers the same topics and takes the same broad approach to assessing companies, and to scoring and ranking them, as the first iteration. After the successful launch of the 2016 Index, ATNI followed up with stakeholders and companies in India to solicit feedback. This input fed into the development of the India Spotlight Index 2020. In the intervening time, the impact of food and beverage companies on the nutrition and health of Indian consumers has risen and is better understood. Read the full research scope of this Index [here](#).

In February 2021, ATNI published the results and analysis of how the companies deal with nutrition beyond the nutritional quality of products, focusing on the following topics: Governance, Accessibility, Marketing, Employee and Consumer Lifestyles, Labeling and Engagement. The chapters also include an impression of how companies are dealing with the effects of the Covid-19 pandemic. The press release for this publication is available [here](#).

The India Spotlight Index 2020 shows an increased commitment to provide healthy food by the 16 largest food and beverage manufacturers in India.

The food and beverage industry is actively engaging and acting on initiatives and regulatory developments proposed by the Food Safety and Standards Authority of India.

Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Few companies provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas.

Of the 1456 products assessed in the Product Profile 16% meet healthy standards. All companies are to increase the healthiness of their portfolios.

Hindustan Unilever and Nestlé India rank joint first with a score of 6.9 out of 10.

Britannia Industries and Cola-Cola India have shown substantial individual progress across most elements of the Index since 2016.

Ranking

Overall Ranking

Hindustan Unilever and Nestlé India rank joint first with a score of 6.9 out of 10. There has been some progress among the nine previously assessed companies and their average score increased from 3 in 2016 to 4.2 in 2020. Two companies have shown substantial individual progress across most elements of the Index since 2016: Britannia Industries (1.6 to 4.9) and Coca-Cola India (2.4 to 4.4). However, the average Index score is 3.1 out of 10, similar to that of the 2016 iteration.

A Governance

B Products

C Accessibility

D Marketing

E Lifestyles

F Labeling

G Engagement

* Did not provide information to ATNI

India Spotlight Index 2020 Research Scope

URL: <https://accesstonutrition.org/index/india-spotlight-2020/>

Companies

The 16 largest food and beverage manufacturers were selected based on 2018 retail sales, for the India Spotlight Index 2020. Together, they accounted for 31% of India's packaged food and beverage market share with a combined total retail sales of just over INR 1800 billion.



Aavin TCMFP



Adani Wilmar



Amul GCMF



Britannia Industries



Coca-Cola India



Emami Agrotech



Hatsun Agro



Hindustan Unilever



ITC



KMF Nandini



Marico



Mondelez India



Mother Dairy



Nestlé India



Parle Products



PepsiCo India

Findings

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

The food and beverage industry is actively engaging and acting on initiatives and regulatory developments proposed by FSSAI. However, the overall 'healthiness' of Indian food and beverage manufacturers' product portfolios, as well as their public disclosure of nutrition-focused initiatives and progress, remain low.

- Ten of the 13 companies, for which staple food fortification is relevant, voluntarily fortify some or all of their products according to the standards set by FSSAI.
- Hindustan Unilever, Nestlé India and PepsiCo India have developed comprehensive, public, formal commercial strategies to address issues related to the double burden of malnutrition in India. Britannia Industries and ITC are the only India-headquartered companies that have a nutrition policy in place.
- The performance of the companies with the highest scores (Hindustan Unilever, Nestlé India) is comparable to their results in 2016. Both companies have evidenced plans to do more in future. Mother Dairy and Marico lead in Dairy and Edible Oils – their respective industry segments.
- Britannia Industries and Coca-Cola India have improved the most since 2016, with higher scores in at least five of the seven Index categories.
- Five of the companies' commercial strategies refer, to some extent, to the nutrition and health priorities set out by the Indian Government in the National Nutrition Strategy and *POSHAN Abhiyaan*. In its business strategy for the Indian market, Nestlé India does this comprehensively, defining how it aims to reach groups experiencing, or at high-risk of experiencing malnutrition.
- Most companies have limited disclosure of their activities and initiatives in India. Hindustan Unilever stands out with the highest score for public disclosure of its policies and practices.

Less than a third (27%) of the estimated 2018 sales of packaged foods and beverages in India of the 16 companies assessed is derived from healthy products. These sales come from 228 products (16% of 1456 assessed). Although the research did not find conclusive evidence of an increase in the percentage of healthy products across companies' portfolios since 2016, more companies provided data to allow for a more accurate assessment. This led to a modest increase in the estimated sales derived from healthy products.

- For the nine companies assessed in both Indexes, the estimated sales from healthy products increased from 15% in the 2016 India Index to 23% currently. However, the research found no increase in the percentage of healthy products, by number, in the companies' overall portfolios. The number of companies that provided comprehensive product nutrient content data to ATNI for the product assessments increased from three to seven, improving the quality of this assessment.
- Out of 13 companies that sell staple products covered under FSSAI's (Fortification of Foods) 2018 Regulation, 10 voluntarily fortify their staple products to help address micronutrient deficiencies in India. Only Mother Dairy and Britannia Industries fortify all products in their portfolios that are covered by the Regulation. The three companies that do not manufacture products covered by FSSAI's mandate (Coca-Cola India, Mondelez India and PepsiCo India) were found to fortify other products to address micronutrient deficiencies for specific consumer groups in India.
- Having joined FSSAI's initiatives to support the Eat Right Movement, six of the 16 companies have made public pledges to reformulate their products. Four additional companies make other commitments to make their products healthier.
- Hindustan Unilever, Nestlé India and PepsiCo India stand out as having the most comprehensive reformulation targets. Fewer than half of the companies define targets for reducing salt/sodium, saturated fat and added sugar/calories.
- Of the 16 companies, four have a strategy or target to address affordability and physical accessibility of their healthy products. This indicates that most companies are not showing if and how they market their healthier products to Indian consumers whose access to these products is constrained by low-income or by location. For example, targeting consumers living in certain rural or urban areas, or those present in aspirational districts.
- Seven of the 16 companies label sodium content on the back-of-packs, which is three more than in 2016. In terms of front-of-pack (FOP) labeling, five companies have made a public commitment to declare FOP nutrition information. A dialogue on interpretive FOP labeling is ongoing between the Government, industry and other stakeholders in India, but no interpretive FOP labeling has been implemented yet.

Given the high levels of undernutrition and rising obesity levels in children in India, it is important for companies to either selectively market their healthy products to children, or not to market any products to them at all. Presently, six of the companies have a responsible marketing policy that includes commitments about marketing to children. However, none of the companies specifically state that they apply the recently adopted World Health Organization (WHO) South-East Asia Region (SEAR)

nutrition criteria or incorporate them into their marketing policies.

- Only 12% (183 products) of the nearly 1,500 products analyzed meet the WHO nutrition criteria for marketing to children, highlighting the need to address responsible marketing in comprehensive policies.
- Coca-Cola India and Mondelez India commit not to market any of their products to children, an approach that is considered equivalent to applying the WHO SEAR nutrition criteria. They apply this commitment to children under the age of 12.

The Indian Context

India continues to face a double burden of malnutrition, defined as the simultaneous manifestation of both undernutrition and overweight and obesity. Malnutrition not only directly affects people's physical growth and health but also their cognitive development and abilities. It has been identified as one of the principal factors limiting India's economic growth potential. The opportunities are equally enormous; cost-benefit ratio analyses of nutrition interventions to reduce stunting in the first year of life report a monetary return (higher wages) later in life of 18:1 per child, and similar analyses found that a 1 cm increase in adult height due to nutrition interventions was associated with a 4% increase in wages for men, and 6% for women.

In recognition of India's nutrition challenges, in early 2018, the Government launched the National Nutrition Mission (NNM), also known as *POSHAN Abhiyaan*, with ambitious targets to reduce various forms of malnutrition and substantial associated budgets. It has also led many initiatives such as the Integrated Child Development Scheme (ICDS), the Mid-Day Meal Scheme, the Maternity Benefit Program and the Public Distribution System (PDS), which all provide food at subsidized rates. The Food Safety and Standards Authority of India (FSSAI) has developed a range of guidelines and standards for food manufacturers, and works with many stakeholders active in the food system.

Aligning with FSSAI's wide-scale staple foods fortification standards, the Ministry of Women and Child Development has issued new directives to mandatorily use fortified rice, as well as fortified wheat flour and edible oil, in the Mid-Day Meal schemes and public nutrition programs under the ICDS across India since December 2019. To further this agenda, in 2019, the Ministry of Consumer Affairs, Food and Public Distribution has approved a 3-year pilot scheme for the fortification of rice with iron, folic acid and vitamin B-12 under the PDS in 15 districts of India.

The food and beverage sector is the fifth largest manufacturing sector in India. Lifestyle changes in India have caused a shift in consumer habits – with an increased consumption of sugar, fat and salt. India is one of the top 10 consumers of fast food in the world and is set to be the third largest consumer economy by 2025.

Almost two-thirds of the disease burden in India is due to lifestyle diseases. Many of these diseases are diet-related non-communicable diseases that link with changes in diets and eating patterns. Several factors have led to the increased consumption of products from the fast-growing food and beverage segments in India (Breakfast Cereals; Savory Snacks; Seasonings, Dressings and sauces; Naturally Healthy Beverages; Ready Meals; Confectionery; Organic Food; Dairy Food; Bakery).

When considering these factors and segments, combined with the enormous total consumer base of over 1.25 billion, the opportunity is clear for existing as well as new players in the fast growing food and beverages market to develop healthy, affordable and tasty products to improve the diets and health of India consumers.

Novelties and Best Practices

- Britannia Industries has improved the most since 2016 across all Index categories. The company has formalized its commitments and approach to addressing malnutrition in India in its newly developed Britannia Nutrition Policy.
- Coca-Cola India has achieved the second greatest improvement across all Index categories due to new initiatives that aim to align with the Government's efforts for achieving *Kuposhan Mukh Bharat* – free from malnutrition, across the lifecycle. These include improving the distribution of its Minute Made Vitingo product to address iron deficiency in children, the launch of new healthy products within the Dairy product category, and the development of a 'Compare our Products' tool for its website so customers can find more nutrition information online.
- Adani Wilmar publicly discloses its support to Government programs and interacts with stakeholders to address undernutrition in India by focusing on food security.
- Mother Dairy has committed to tackling undernutrition and micronutrient deficiencies in India through its strategic focus on food fortification and reformulation. The company voluntarily fortifies all relevant products – its entire range of Milk and Edible Oil products – according to FSSAI's (Fortification of Foods) Regulation, 2018. In addition, the company has implemented a robust employee health and wellness program called the Safe & Nutritious Initiative @ Mother Dairy. This is in line with FSSAI's Safe and Nutritious Food at Workplace nationwide campaign (SNF@Workplace), which provides guidance to help people eat safe and healthy diets at work (see the campaign's key resource [The Orange Book](#)).
- Hindustan Unilever has adopted notable nutrition-focused approaches to reformulation, market research and product pricing. Its Unilever Sustainable Living Plan outlines how it intends to reformulate products to reduce salt, sugar and saturated fat content. The company utilizes datasets from the People Data Centre report, and other sources, to gain insight into nutrition and health issues in regions where the company is active, and to identify unmet needs. Its strategy includes specifically defining appropriate price points for healthy products targeted towards consumer groups at high risk of malnutrition in India.
- Mondelez India has a comprehensive approach to responsible marketing to children. It's the only company to achieve full score with regards to its digital marketing arrangements in order to place age restrictions. Further, it does not conduct any marketing activities in primary or secondary schools. It is also the only company that excludes product or brand-level promotion from its consumer-oriented health and nutrition programs.
- Nestlé India comprehensively engages with internal and external stakeholders to improve its commercial nutrition strategy, and to support the development of public sector strategies aimed at tackling malnutrition in India. It also scores well by way of its strategies to prevent food loss and waste, such as its fresh milk district model for direct procurement in Moga.
- PepsiCo India has developed new healthy products in line with its Performance with Purpose 2025 agenda and its reformulation efforts, which align with FSSAI's Eat Right Movement.

Recommendations

ATNI recommends that the largest food and beverage manufacturers in India:

- Adopt clear and comprehensive commercial strategies to address India's malnutrition challenges, which include targets for all Index topics/categories, and which contribute to national initiatives, such as the National Nutrition Strategy and *POSHAN Abhiyaan*, and the Sustainable Development Goals of India.

Focus their efforts on population groups that are malnourished or are at high risk of malnutrition, by defining objectives adapted to the diverse nutritional needs of the states in which the companies are active.

- Adopt and implement policies that are appropriate and specific to India, and that align with various regulatory and stakeholder initiatives to address malnutrition in India.
- Define nutrition criteria for their products, aligned with an internationally recognized NPS, and increase investment in developing and selling products that meet healthy nutrition criteria.
- Manufacture healthier products across all categories and disclose the percentage of products that meet the company's healthy standard.
- Improve the affordability and physical accessibility of healthy products by defining in commercial strategies specific approaches and well-defined targets that relate to pricing and distribution, and that can be tracked.
- Adopt comprehensive responsible marketing policies, or strengthen existing ones, by explicitly codifying general responsible marketing principles and specific commitments regarding marketing to children – including teenagers. This should involve application of the WHO SEAR criteria and addressing marketing in and near schools.
- Implement an interpretive FOP labeling system as soon as possible, by working with other companies via industry associations, and in partnership with the Government and other relevant stakeholders.
- Be more transparent in reporting on all nutrition commitments, policies and practices as they relate to India and/or specific states, and especially in reporting progress on meeting nutrition-related targets.
- Provide ATNI with relevant information to allow for the best possible, comprehensive assessment of their policies and practices.

Future Opportunities

The Access to Nutrition India Spotlight Index is a private sector accountability tool. ATNI's goal in compiling the Index is to enable all stakeholders to use its findings and recommendations in their work to encourage India's largest food and beverage manufacturers to address the country's substantial, and mounting, health challenges linked to diet and nutrition. By providing objective, comparable information and data, ATNI hopes to enable the companies themselves, and their stakeholders, to track the progress of these influential manufacturers in improving policies, practices and disclosure, as well as the nutritional quality of their products over time.

After the publication of this second India Spotlight Index, ATNI will follow up with one-to-one meetings with each company to review the findings and recommendations. It will also present and solicit feedback on the results at different fora in India. ATNI will also publish, on a rolling basis, thematic 'deep dives' that outline the findings for specific categories of the Index following the publication of the main results.

Category Rankings



Category A: Governance

Corporate strategy, management and governance (12.5% of overall score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic Categories.

The results of Category A are presented here. For a food and beverage company to improve all aspects of the business that affect access to nutrition, its commitment must depart from its commercial strategy.

This allows the prioritization of the better nutrition outcomes from the moment of planning, as well as in the allocation of resources, implementation and evaluation. It is equally important that companies also support or join governments' initiatives to prevent and address obesity and / or undernutrition, not only to ensure alignment with public health priorities as identified by the relevant authorities, but also because they are needed to and can make a significant contribution. This Category A assesses the extent to which a company's strategy for the Indian market includes a specific commitment to contributing to better diets and whether its approach is embedded within its governance and management systems. The quality of its reporting is also analyzed.

Category A consists of three criteria:

- A1 Corporate nutrition strategy
- A2 Nutrition governance and management systems
- A3 Quality of reporting

To perform well in this category, a company should:

- Have a mission and commercial strategy focused on health and nutrition factored into all major business decisions and functions;
- Take action to address the double burden of malnutrition in line with national nutrition priorities and has a focus on people experiencing or at high risk of malnutrition
- Assign oversight of its nutrition strategy and/or programs to the CEO and undertakes regular internal audits and reviews;
- Implement a certified food safety management system and track and prevent food loss and waste centrally
- Comprehensively report on its approach to preventing and tackling all forms of malnutrition in India

Hindustan Unilever and Nestlé India rank first and second in Category A, with the most comprehensive nutrition strategies, management systems and reporting among the companies assessed. Since the India Spotlight Index 2016, where nine of the current 16 companies were assessed, Britannia Industries shows the most significant improvement in this Category, moving from a score of 3.3 to 5.6 in 2020. With a new score of 5.9, Coca-Cola India also improves considerably upon its 2016 score of 4.9.

- A1** Nutrition strategy
 - A2** Nutrition management
 - A3** Reporting quality
- * Did not provide information to ATNI

Context

Malnutrition is one of the principal limitations of India's global economic potential (Copenhagen Consensus, 2012). should commit to delivering more affordable, healthy products, while making specific references to reaching groups that experience or are at a high risk of malnutrition with such products. As a result, how a company comprehensively addresses all forms of malnutrition (including undernutrition, micronutrient deficiencies, obesity and diet-related diseases) should be based on the specific nutrition issues in the Indian market, as defined by public authorities. The results from the first phase of the fifth and the latest round of the National Family Health Survey (NFHS-5), conducted in 2019-2020, indicate a decline in nutritional status of children under 5 years. Anemia among women also remains a major cause of concern and obesity among adults is increasing.

Socioeconomic, geographic (urban/rural, states, districts, etc.) and health and nutritional factors are relevant in identifying the needs of groups experiencing or at a high risk of . In addition, companies should also recognize the nutrition and health priorities set out in the and Vision 2022 – Kuposhan Mukh Bharat and/or POSHAN Abhiyaan (Prime Ministers' Overarching Scheme for Holistic Nourishment) as part of India's National Development Agenda in the development of their nutrition strategies .

How are nutrition strategy, management systems and reporting relevant to the COVID-19 crisis?

- India's focus on the dual burden of malnutrition (NITI Aayog's National Nutrition Strategy 2017, and *POSHAN Abhiyaan*) is very relevant in light of COVID-19, as overweight/obesity increases risk of negative COVID-19 outcomes, and undernutrition and micronutrient deficiencies may reduce immune function.
- It is essential that India's leading food and beverage companies focus more than ever on healthy diets and good nutrition during crisis. They should redouble their efforts to adhere to all relevant product standards, responsible marketing practices and responsible use of health and nutrition claims in line with government/Food Safety and Standards Authority of India (FSSAI) guidance. Product fortification should be intensified and efforts to ensure such products reach those who need them increased, as recommended by FSSAI.
- As highlighted in ATNI's report on the impact of COVID-19 in India, for the companies assessed in the India Spotlight Index 2020 publicly disclosed information about their response against COVID-19 at the country level is limited. This has hampered ATNI's work in assessing the impact of actions taken in almost a year since the pandemic began. India Index companies are encouraged to report publicly on their approaches to dealing with COVID-19.
- Companies must also ensure value chain stability, employee safety and job security. Although the India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19, ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020. ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main messages

- Hindustan Unilever is a leader in the area of corporate strategy, governance and management, with a score of 7.8; followed by Nestlé India (7.3). While the latter ranked first in the 2016 Index, Hindustan Unilever's strong disclosure has boosted its score and resulted in it leading this Category Governance overall.
- In general, most companies (14) commit to placing a strategic focus on nutrition and health, and to delivering more healthy products. Eight of them also make specific references to reaching groups that experience or are at risk of malnutrition when committing to deliver more healthy products.
- In contrast, only five companies make the commitments in their nutrition strategy specific by recognizing the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 and/or in *POSHAN Abhiyaan*. Nestlé India stands out for its comprehensive approach: it is the only company to refer to all groups experiencing or at risk of malnutrition.
- Companies' performance on other elements that are indicative of integrating a focus on nutrition into their core commercial strategies and management systems is similarly variable. Nine companies reported that healthy products have contributed positively to their financial performance in the last three years, five conduct regular nutrition-related business risk assessments and seven state that they have assigned oversight for implementing their nutrition strategy to a CEO or board-level committee. Only Hindustan Unilever and Nestlé India report having undertaken comprehensive market research to assess unmet needs of groups experiencing or at high risk of undernutrition and/or micronutrient deficiencies. Together with PepsiCo India, these are the only three companies that specifically address the double burden of malnutrition in their commercial strategies. Further, all but three companies (for which no information was found) obtained recognized food safety certifications.
- A new aspect of the 2020 India Index is an assessment of the extent to which companies have mechanisms in place to prevent and reduce food loss and waste in the production process. In this regard, six companies include food loss and waste tracking and prevention tools in their management systems, which include value stream mapping and setting key performance indicators (KPIs).
- Only six of the companies publish formal, regular reports on their approach to preventing and tackling malnutrition in India, with most of those covering the dual burden of malnutrition to some extent. Indian subsidiaries of companies with headquarters outside India report most comprehensively and attain the highest scores in Category A overall but, compared to the 2016 India Index, India-headquartered companies, such as Britannia Industries and Marico, have decreased the reporting gap by reporting formally.

Novelties and best practices

Hindustan Unilever undertakes market research to assess unmet needs of groups experiencing or at high risk of malnutrition

Hindustan Unilever is one of two companies that have undertaken comprehensive market research to assess unmet needs of groups experiencing or at high risk of undernutrition and/or micronutrient deficiencies. Hindustan Unilever uses datasets from Government-led surveys such as the National Family Health Survey (NFHS) and the National Nutrition Monitoring Bureau (NNMB) to identify nutritional gaps and needs that the company wishes to meet.

Nestlé India prevents food loss in its Moga milk procurement program

Among the initiatives Nestlé has in place to prevent food loss and waste, its India's fresh milk district model in Moga for direct procurement is notable, which enables the company to provide logistical support to farmers to prevent wastage of milk or compromise its quality during transit. The model is an easy-to-implement, cost-efficient measure that helps the company to ensure that only high-quality milk is used in its products. The company also deploys cold chain mechanisms to secure the quality of milk during transit, collects milk twice a day so that farmers have zero storage expenses, while ensuring uniform storage conditions for milk throughout the value chain and avoiding milk waste.

India-headquartered companies Britannia Industries and ITC publish nutrition policies

Britannia Industries and ITC are the only two India-headquartered companies to have formalized their commitments and approaches on addressing nutrition and nutrition-related issues in India. [Britannia Industries' Nutrition Policy](#) (newly adopted since the 2016 assessment) is publicly available. The policy provides consumers with the company's overarching nutrition-related objectives on various parameters such as nutrients to limit and encourage; the company's R&D focus on development of healthier product choices; commitments to address country-specific malnutrition, defining nutrition criteria; and commitments on nutrition labelling, claims and responsible marketing. [ITC's Food Products Policy](#) (also publicly available) outlines elements to tackle undernutrition through micronutrient fortification and affordability strategies and overweight and obesity through reformulation.

A1 Corporate nutrition strategy

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

How widespread are companies' strategic commitments to delivering better nutrition in India?

- As Table 1 shows, there is clear evidence that most companies commit to placing a strategic focus on nutrition and health in India, articulated either through their mission statement, a strategic commitment to grow through health and nutrition, or both. This commitment had already been made at the time of ATNI's 2016 Index by all the companies assessed at the time, except for Amul. It is encouraging to see that Amul has now also articulated this commitment, as well as many of the companies being assessed for the first time in 2020. In 2016, only Nestlé India, Hindustan Unilever and PepsiCo India articulated such a commitment through both a mission statement and a commitment to grow through health and nutrition and to be leaders in this area. This 2020 Index shows that ITC, Mother Dairy, Marico, and Britannia Industries have followed suit.
- While the majority of companies (14) state a commitment to deliver healthier foods in India, only seven make a specific reference to reaching groups experiencing or at high risk of malnutrition. Still, in comparison with the 2016 Index (where only Nestlé India and PepsiCo India demonstrated leadership in this area), this is a notable improvement.
- Further, only five companies recognize the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 – *Kuposhan Mukh Bharat* and/or *POSHAN Abhiyaan* as part of India's National Development Agenda in their nutrition strategy. Nestlé India is the only company comprehensively referring to the priorities set out by national authorities.

Table 1. Commitments to health and nutrition, including malnutrition

	Commits to placing a strategic focus on health and nutrition	Commits to delivering more healthy products	Commits to reaching groups that experience or are at high risk of malnutrition
Aavin TCMPPF* (new)	•	•	•
Adani Wilmar* (new)	•	•	
Amul GCMMF*	•	•	•
Britannia Industries	•	•	•
Coca-Cola India	•	•	
Emami Agrotech* (new)			
Hatsun Agro Product* (new)			
Hindustan Unilever	•	•	•
ITC* (new)	•	•	•
KMF Nandini (new)	•	•	•
Marico* (new)	•	•	
Mondelez India	•	•	
Mother Dairy	•	•	•
Nestlé India	•	•	•
Parle Products*	•		
PepsiCo India	•	•	

* Did not provide information to ATNI

- Table 2 highlights important elements of companies' performance with respect to integrating nutrition in their decision-making process. However, fewer companies succeed in translating the commitments shown in Table 1 into governance practices. For instance, only five companies conduct nutrition-related business risk assessments at least every 2 years.
- In addition, Table 2 shows that only five companies undertook a strategic review of commercial opportunities available to them by addressing the specific needs of groups that experience or are at high risk of malnutrition. However, none of the five conducted a comprehensive assessment that was then reviewed by their respective board.
- Only four companies were found to have undertaken market research or other types of studies to assess unmet needs of groups experiencing or at high risk of undernutrition and/or micronutrient deficiencies. Nestlé India and Hindustan Unilever are the only companies that have conducted such research for all states where they are present.
- In ATNI's 2016 Index, five of the currently assessed companies (Mondelez India, Nestlé India, PepsiCo India, Coca-Cola India, and Hindustan Unilever) recognized that they had a role to play in tackling India's challenges of increasing levels of obesity and diet-related chronic diseases. For the 2020 Index, ATNI has raised the bar: companies were asked about how they intended to tackle those issues, as described in their formal commercial strategies. Not all of the previously mentioned companies have met this new standard, although some newly assessed companies do (ITC, KMF Nandini, Marico). Furthermore, six of the 16 Index companies set out how they intend to address undernutrition and/or micronutrient deficiencies in their formal commercial strategies, as Table 2 shows.
- Finally, one way to evaluate whether companies deliver on the strategic commitments they make is to assess how healthy products contribute to the company's financial performance. Nine of the 16 companies provided such information to ATNI (growth of the revenue of healthy products, either in absolute or relative terms). However, four lead the way by publicly disclosing this information – ITC, Marico, Hindustan Unilever and Amul.

Table 2. Overview of performance indicators linked to integrating nutrition in the decision-making process

	Conducts nutrition-related risk assessments (at least) biannually	Conducted a strategic review of commercial opportunities re. addressing malnutrition	Conducted market research to assess needs re. undernutrition	Addresses undernutrition in its formal commercial strategy	Addresses obesity in its formal commercial strategy
Aavin TCMPPF* (new)					
Adani Wilmar* (new)					
Amul GCMMF*					
Britannia Industries		●		●	
Coca-Cola India	●	●	●	●	
Emami Agrotech* (new)					
Hatsun Agro Product* (new)					
Hindustan Unilever	●	●	●	●	●
ITC* (new)					●
KMF Nandini (new)					●
Marico* (new)					●
Mondelez India	●	●			
Mother Dairy	●			●	
Nestlé India		●	●	●	●
Parle Products*					
PepsiCo India	●		●	●	●

* Did not provide information to ATNI

Recommendations

To improve and accelerate efforts towards improving consumers' nutrition, food and beverage manufacturers in India are encouraged to:

- Further integrate nutrition considerations in their core business functions. Companies taking this approach are likely to have a greater and more sustainable impact on improving Indian consumers' access to nutritious foods, and on the population's health, than those companies that attempt to address these issues as isolated from other corporate decisions. Thus, companies are encouraged to develop a formal nutrition policy or strategy that is part of their overall commercial strategy, including their objectives and activities related to nutrition (specific to India), and to publicly disclose the strategy.
- Further translate commitments into specific actions. Compared to the 2016 Index, the 2020 Index results show stronger and renewed commitments in this area. However, these commitments must now be translated into concrete and measurable governance practices.
- Determining business opportunities to address malnutrition requires a careful analysis of the population's nutritional needs, as defined by public authorities – a complex process. Yet only a few companies have taken steps in this direction, by means of strategic reviews or market research. More opportunities would be discovered to tackle malnutrition if more companies were to do this.
- Demonstrate how they support the nutrition and health priorities set out in the National Nutrition Strategy and *POSHAN Abhiyaan* through their commercial operations.
- Promote healthy products further. All companies should already have clear plans and targets in place to increase sales of their healthy products. Companies are also encouraged to publicly report on progress towards these targets.

A2 Nutrition governance and management systems

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Do companies have effective management systems to deliver their commitments on nutrition?

- The level at which companies assign ultimate accountability for implementing their nutrition strategies is indicative of the priority assigned to achieving results. As Table 3 shows, Britannia Industries, Hindustan Unilever, Mondelez India and Nestlé India are the only four companies that assign such responsibility to a CEO or an executive that reports directly to the board. Britannia Industries and Hindustan Unilever lead in this regard by publicly disclosing this information. Furthermore, Mondelez India has improved since ATNI's 2016 Index, when the company assigned this responsibility to a committee that reported to the board.
- Another way to evaluate whether companies have effective management systems to deliver their commitments on nutrition is to assess whether the delivery of their nutrition plans or strategies is subject to an annual standard internal audit and/or an annual management review. Significantly, only Nestlé India and Hindustan Unilever report conducting both; the latter leads this area by publicly disclosing this information.
- All but three companies (for which no information was found) obtained recognized food safety certifications. Thirteen of the sixteen assessed companies obtained ISO 22000:2005 certification; and Coca-Cola India is the only company among these that has already moved on to ISO 22000:2018 certification.

Table 3. Oversight mechanisms in place for companies' nutrition strategy and/or programs

	Who (what function) has oversight for implementing the company's nutrition strategy and/or programs?						Is such strategy/program subject to an annual internal audit and/or management review?	
	CEO or executive reporting directly to the Board	Committee reporting to the Board	Senior manager one level below Executive	Less senior staff member	No oversight	No information	Annual internal audit	Annual management review
Aavin TCMPF* (new)						•		
Adani Wilmar* (new)						•		
Amul GCMMF*						•		
Britannia Industries	•							
Coca-Cola India		•						
Emami Agrotech* (new)		•						
Hatsun Agro Product* (new)						•		
Hindustan Unilever	•						•	•
ITC* (new)				•				
KMF Nandini (new)				•				
Marico* (new)						•		
Mondelez India	•							
Mother Dairy		•						
Nestlé India	•						•	•
Parle Products*						•		
PepsiCo India						•		

* Did not provide information to ATNI

What are companies doing to prevent food loss and waste?

- A new element of the 2020 Index is consideration of the actions taken by companies to prevent food loss and waste (FLW). Minimizing FLW makes a substantial contribution to increasing access to food but it is a topic that few companies seem to be addressing. However, six companies have incorporated FLW tracking and prevention tools into their management systems. Nestlé India leads in this area not only because of the number of measures in place but also because it published a commitment to reduce FLW in 2015. Nestlé India's fresh milk district model in Moga for direct procurement is highlighted as best practice.

Recommendations

To improve and accelerate their efforts towards robust nutrition governance and management systems, food and beverage manufacturers in India are encouraged to:

- Ensure that accountability for implementing the nutrition strategy is clearly assigned to specific, relevant functions within the business with the capacity to drive the nutrition agenda.
- Ensure that nutrition plans and strategies are assessed regularly by internal audit and/or are subject to an annual management review to monitor progress. ATNI is concerned that only two companies have such measures in place.
- Food adequacy is intrinsically linked to sustainability. Food needs to be available and accessible at all times, in the present and for future generations; FLW threatens both current and future food accessibility.

Table 4. Food loss and waste tracking and prevention tools included in management systems

	Including FLW within KPIs at executive management level	Value stream mapping along production chain	Application of FLW Accounting and Reporting Standard	Other(s)
Aavin TCMPPF* (new)				
Adani Wilmar* (new)				
Amul GCMMF*				
Britannia Industries		•		
Coca-Cola India				•
Emami Agrotech* (new)				
Hatsun Agro Product* (new)				
Hindustan Unilever	•			
ITC* (new)				
KMF Nandini (new)				
Marico* (new)		•		
Mondelez India		•		
Mother Dairy				
Nestlé India	•			•
Parle Products*				
PepsiCo India				

* Did not provide information to ATNI

A3 Quality of reporting

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

How frequently and comprehensively do companies report on their efforts to tackle the double burden of malnutrition in India?

- Six of the sixteen companies in the 2020 Index publish formal, annual reports that discuss their respective approaches to tackling nutrition issues in India. Such transparency is considered best practice. Nestlé India, Hindustan Unilever and Coca-Cola India all published annual reports at the time of the India Spotlight Index 2016 and continue to do so. Britannia Industries used to be the only India-headquartered company to publish an annual report in 2016. Currently, both Britannia Industries and Marico (new to the 2020 India Index) do so. Since the 2016 Index, PepsiCo India, which used to occasionally publish sustainability reports that addressed nutrition issues, now publishes them on an annual basis.
- All six companies encompass obesity and diet-related diseases in their reports, and five report on implementing strategies to address undernutrition and micronutrient deficiencies through product fortification (an improvement since the 2016 Index). The remaining companies do not yet publicly disclose their efforts to address India's nutrition challenges.

Reporting on tackling obesity and diet-related diseases in India

- In the 2016 Index, Hindustan Unilever was the only company of the ten assessed at that time, which reported comprehensively with respect to its work to prevent and address overweight and obesity and diet-related chronic diseases. Now, Nestlé India and PepsiCo India also provide more extensive explanations of their efforts to tackle these challenges in India, as Table 5 shows. However, no company publicly reports on its performance against all of their own objectives and targets for India. Britannia Industries, Coca-Cola India and Marico report to some degree, although their reporting is not as comprehensive as that of their peers.

Reporting on tackling undernutrition and/or micronutrient deficiencies in India

- Regarding undernutrition, the four companies that provided a limited commentary on their work to prevent and address undernutrition in India in 2016 – Britannia Industries, Coca-Cola India, Hindustan Unilever, Nestlé India – have all increased their level of disclosure. Their reporting is not limited simply to general statements on product fortification and consumers reached: most of them also provide an outlook on future plans for the Indian market, and challenges faced. Again, no company publicly reports on its current performance against all objectives and targets for India.
- Notably, PepsiCo India has also started to publish information on these issues specifically for the Indian market in a comprehensive manner which represents great improvement in the quality of its reporting. Britannia Industries is the only Indian-based company that publishes such annual reports.

Recommendations

To improve their transparency about how they are improving consumers' access to nutrition, the 16 major food and beverage manufacturers in India assessed for this Index are encouraged to:

- Publicly and comprehensively report on their approach to tackling all forms of malnutrition issues in India on an annual basis, within the standard corporate reporting cycle.
- Report clearly on progress against commitments made and targets set.
- Set out a clear future plan for further improvement.

Table 5. Companies' reporting on their efforts to tackle nutrition issues in India

	Reporting (annually)	Reporting includes clear information about...				
		Strategy in relation to overall business strategy and nutrition context in India	Current performance against objectives/targets	Outlook on future plans/targets	Challenges faced	Impact of reached efforts
Aavin TCMPF* (new)						
Adani Wilmar* (new)						
Amul GCMMF*						
Britannia Industries	●	▲		◆ ▲		
Coca-Cola India	●	◆ ▲		◆ ▲	▲	
Emami Agrotech* (new)						
Hatsun Agro Product* (new)						
Hindustan Unilever	●			◆ ▲	◆ ▲	◆ ▲
ITC* (new)						
KMF Nandini (new)						
Marico* (new)	●	◆		◆		
Mondelez India						
Mother Dairy						
Nestlé India	●	◆ ▲		◆	◆ ▲	
Parle Products*						
PepsiCo India	●	◆ ▲		◆ ▲		◆ ▲

* Did not provide information to ATNI

◆ Reporting refers to tackling obesity and diet-related diseases in India

▲ Reporting refers to tackling undernutrition and/or micronutrient deficiencies in India



Category B: Products

Formulating appropriate products (35% of overall score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic Categories. The results of Category B are presented here.

Companies in India can help consumers in improving the quality of their diets by making healthier food available to them. In addition to analyzing the healthiness of the company's product portfolios in the Product Profile, this Category B addresses companies' efforts to achieve this goal through research and development, new product formulation, reformulation of existing products, and tackling undernutrition and micronutrient deficiencies by developing fortified products. It also assesses the quality of the Nutrient Profiling System (NPS) that companies use (if any) to guide their product reformulation and innovation efforts.

Category B consists of three criteria:

- B1 Product Profile (20% of overall score)
- B2 Product formulation (7.5% of overall score)
- B3 Defining healthy and appropriate products (7.5% of overall score)

To perform well in this category, companies should:

B1 Product Profile

- Have a healthy product portfolio overall, measured objectively in the Product Profile using the Health Star Rating (HSR) Nutrient Profiling System (NPS)
- Have healthier products than other companies within the same product category

B2 Product formulation

- Commit to improving the nutritional quality of their products in India and have public reformulation targets in place to reduce nutrients of concern
- Introduce new healthy products and products to address undernutrition or specific micronutrient deficiencies
- Have a clear and robust approach to micronutrient fortification

B3 Defining healthy and appropriate products

- Adopt a robust and publicly disclosed NPS and apply it to all products in the Indian market

Nestlé India ranks first in Category B, followed by Hindustan Unilever and PepsiCo India. Aside from their respective Product Profile results (B1), these companies publicly disclose more information than most peers, have reformulation and innovation strategies that are aligned with national nutrition initiatives and have adopted a Nutrient Profiling System. Since the India Spotlight Index 2016, where nine of the current 16 companies were assessed, Mother Dairy shows the most significant improvement in this Category, moving from a score of 0.8 to 5.2 in 2020. With a new score of 3.8, Parle Products also improves greatly upon its 2016 score of 0. As the figure 1 shows, these improvements respond to the inclusion of the Product Profile Criterion B1 in this Category (new to the India Index 2020).

- B1** Product Profile
 - B2** Product formulation
 - B3** Defining healthy products
- * Did not provide information to ATNI

Indian context

The Government of India, and in particular the FSSAI, has made great progress in developing initiatives to tackle the double burden of malnutrition in India. The FSSAI's initiatives address and involve the food and beverage industry, with a focus both on reformulating products to make them healthier and on staple product fortification to address micronutrient deficiencies.

The Eat Right Movement, launched in 2018 and led by FSSAI, is a collective effort, which incorporates both demand- and supply-side interventions, to promote the consumption of more healthy and safe foods. As part of the Eat Right Movement, companies have been encouraged to publish pledges that include commitments to reformulate their products by cutting down on salt, sugar, and trans-fats. Reducing these nutrients is critical to stem the growing challenges of overweight, obesity and diet-related chronic diseases in India.

In October 2016, FSSAI drafted fortification standards for staple foods which came into force in August 2018 as the Food Safety and Standards (Fortification of Foods) Regulations, 2018. These standards are applicable to all food manufacturers that voluntarily fortify the following staple food products: wheat flour and rice (with iron, vitamin B12 and folic acid), milk and edible oil (with vitamins A and D) and double-fortified salt (with iodine and iron). Although fortification of these staple foods is voluntary, if companies decide to fortify staple food products, they have to comply with the minimum and maximum fortification levels and other aspects of the FSSAI regulation. When they do, the '+F' logo has to be shown on the product package. The FSSAI guidance only covers staple foods and therefore does not address other types of products that may be fortified or micronutrient-rich. The fortification of other products is allowed under some conditions in India, but these cannot carry the '+F' logo.

Why is formulating appropriate products even more crucial during the COVID-19 crisis?

- As highlighted in ATNI's report on the impact of Covid-19 in India, India is the country with the third-highest mortality rate due to Covid-19 in the world. Even though more than 30% of India's population is under 18 and thus likely to escape most of the virus' direct health consequences, the economic impacts of the pandemic will surely take a toll on the whole population. Nutrition will be severely impacted as a consequence, amongst other basic needs.
- In this regard, companies must intensify their efforts to deliver healthier products and ensure rapid response to Government recommendations during these times. Further, it is fundamental that companies offer continued support and adherence to government programs such as *POSHAN Abhiyaan* (aimed at improving nutritional outcomes for children, pregnant women and nursing mothers), as the pandemic has threatened their success. Special attention should be placed on women nutritional needs, as they are disproportionately impacted by the economic consequences of the pandemic. Stunting and micronutrient deficiency is expected to increase also in the upcoming years, for which companies should intensify their efforts towards product fortification, as recommended by the FSSAI.

The India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19. But ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020 and ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main Messages

- Nestlé India leads Category B with a score of 6.9 out of 10, followed by Hindustan Unilever (6.4), and PepsiCo India (5.4). Aside from their respective Product Profile results, these companies show better disclosure practices than most peers, have adopted an NPS and demonstrate evidence on their reformulation and innovation strategies, as well as fortification efforts, in alignment with national nutrition initiatives. The performance of these companies in this category contributes significantly to their overall performance in the Index.
- Of the 1,456 Indian food and beverage products assessed in the Product Profile across all companies, 16% achieve a HSR of 3.5 stars or more out of 5 and thus meet the 'healthy' threshold. An estimated 27% of the companies' combined 2018 packaged foods and beverages retail sales value was derived from these healthy products. This is a modest increase on 2016, which may be partially attributed to improved data quality and the higher number of products assessed. A particularly positive development was that seven companies provided up-to-date product nutrition information to ATNI, four more than in 2016, contributing towards a more accurate assessment of the healthiness of packaged food and beverage products on the Indian market.
- Mother Dairy ranks first in the Product Profile with a score of 7.5 out of 10. Adani Wilmar performs best on the 'mean healthiness' score, achieving the highest sales-weighted HSR across its portfolio of Edible Oil products. Parle Products performs best in the 'relative category' score as it ranks better than its peers across three product categories: Savoury Snacks; Confectionary; and Sweet Biscuits, Snack Bars and Fruit Snacks.
- Companies have responded well to Government initiatives run by the Food Safety and Standards Authority of India (FSSAI) which focus on making products healthier and promote micronutrient fortification of staple products. In total, 10 out of 16 companies make relevant commitments to investing in or developing healthier products and six of those 10 companies have made a public pledge to the FSSAI on product (re)formulation. Ten out of 13 companies, for which staple food fortification is relevant, voluntarily fortify staple products according to FSSAI regulation to help address micronutrient deficiencies. Mother Dairy and Britannia Industries are the only two companies that voluntarily fortify all relevant staple foods in their portfolios.
- In their efforts to develop a healthier product portfolio, companies are encouraged to adopt clear, time-bound product reformulation targets, define nutrition criteria for healthy products and report regularly and comprehensively on their progress. Currently, seven of the 16 companies have defined one or more reformulation targets to reduce nutrients of concern, and five have adopted an NPS to guide their activities. Britannia Industries has adopted and implemented a new NPS since the India Index 2016. None of the five companies benchmark their NPS against an internationally recognized NPS, such as the HSR and the healthy threshold of 3.5 stars or more.

Novelties and best practices

Hindustan Unilever's approach to product reformulation, innovation and annual public reporting on progress in India

As part of its Unilever Sustainable Living Plan and focus on nutrition, Hindustan Unilever has defined and published its Highest Nutritional Standards (HNS) to define category-specific criteria for its healthy products. In addition, the company has published a pledge to FSSAI with reformulation targets to reduce sodium and calories in its products. Hindustan Unilever is the only Index-assessed company that annually reports on the percentage of Indian sales that are generated by products meeting its nutrition criteria (reported as sales volume), and thereby highlighting progress against its target to reach 60% HNS products by 2020.

The company also actively supports the aims of FSSAI. In June 2019, Hindustan Unilever received the Eat Right Award as recognition for its efforts to adopt healthy food choices whilst focusing on the delivery of safe and nutritious food. Further, it was recognized by FSSAI for reducing the levels of salt, sugar and saturated fat in its products.

Mother Dairy fortifies all milk and edible oil products according to FSSAI guidance

Mother Dairy has committed to tackling undernutrition and micronutrient deficiencies in India by placing a strategic focus on food fortification and reformulation. Currently, the company voluntarily fortifies its entire range of milk and edible oil products according to FSSAI's Fortification of Foods standard. This makes it one of only two companies to voluntarily fortify all products covered by FSSAI guidance in their portfolio. These products are sold under brand names Mother Dairy and Dhara. In addition, Mother Dairy focuses on improving nutrition by selling healthy fruit and vegetable products and having introduced low-sugar variants of its Mishti Doi Lite and Dietz beverages.

Britannia Industries' new NPS

Britannia Industries' nutrition guidelines are incorporated in the 'Britannia Health and Wellness Nutrition Profiling System,' newly developed since the India Index 2016. The guidelines are part of Britannia Industries' overall nutrition strategy to define guidelines for its product development and reformulation, as described in the Britannia Nutrition Policy. The NPS takes into account levels of sugar, fat, saturated fat, trans fats and sodium, along with positive nutrients like dietary fiber, whole grains and micronutrients.

India Index 2020 Product Profile

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

The Product Profile is an objective assessment of the nutritional quality of the packaged foods and beverage market in India. The Product Profile analyses the 'healthiness' of food manufacturers' products using the HSR system, which is determined by the levels of energy, saturated fat, salt and sugar, the content of fruit, vegetables, nuts, legumes and the quantities of other components like protein and fiber. New to the 2020 iteration of the Product Profile is the relative performance analysis which compares companies that market products in the same categories.

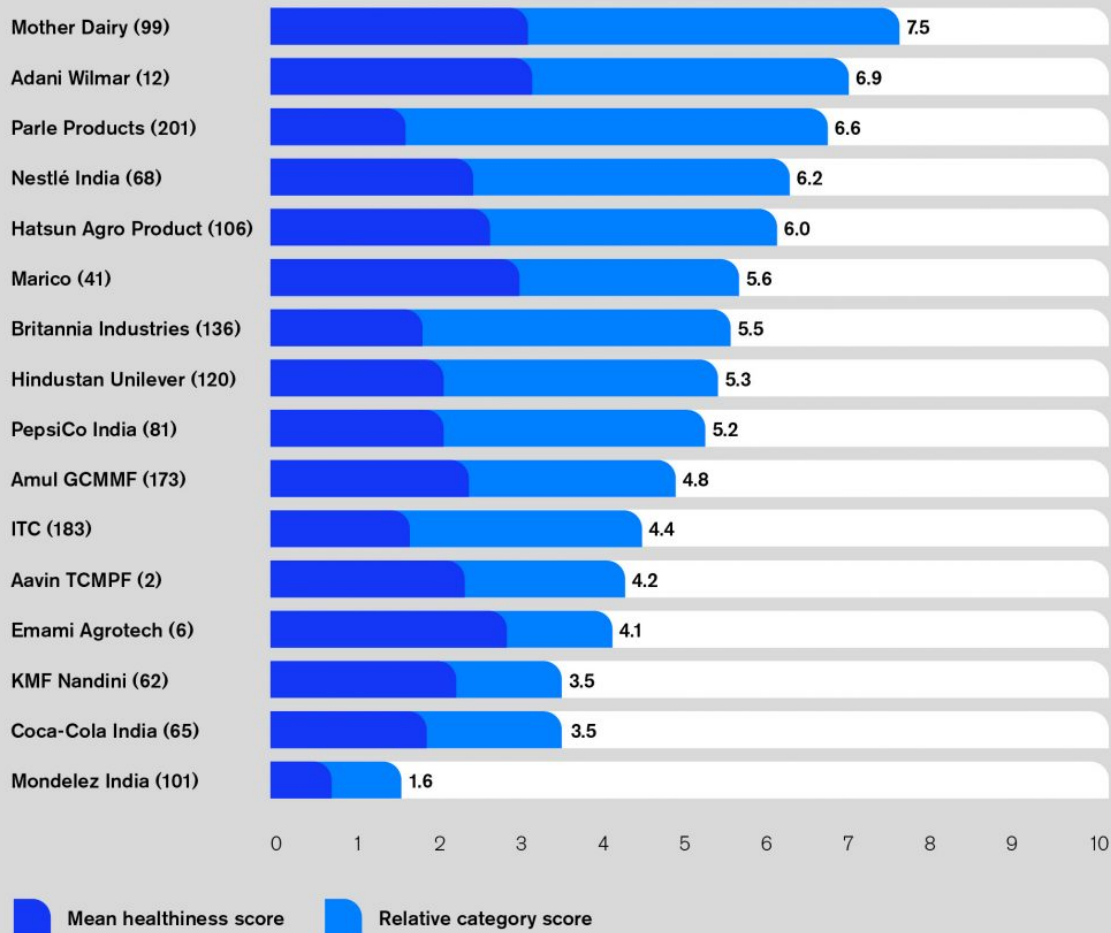
The internationally recognized HSR system, in use and endorsed by governments in Australia and New Zealand, is used to analyze all products to assign a score between 0.5 and 5 stars.

The healthy threshold (having an HSR of 3.5 stars or more) categorizes products into those that are considered healthy and those that do not meet the threshold. ATNI commissioned an independent organization – The George Institute for Global Health (TGI) – to execute the nutrient profiling element of the Product Profile. More details on the methods, results, and limitations of the study are available in TGI's report [here](#). An analysis of the products found to be suitable to be marketed to children according to the World Health Organization (WHO) South-East Asia Region (SEAR) criteria will be described in Chapter D.

The score is made up of two scored elements; each with an equal weight in the final score:

- **Mean healthiness score:** a representation of the nutritional quality of each company's overall product portfolios (the sales-weighted mean HSR).
- **Relative category score:** a representation of the companies' product categories' performance against peers that sell products in the same category (based on the ranking within product categories).

Figure 2. Product Profile ranking and scores



Note: In parenthesis the total number of products by company included in the Product Profile. Maximum possible score = 10.

What is assessed in the Product Profile?

Nutrition information for a total 1,495 packaged foods and beverages products sold by the 16 companies of the Index were initially selected to be included in the Product Profile. These products represented an estimated retail sales value of more than INR 1,800 billion in 2018, which accounted for a little over 30% of all Indian food and beverage sales.

The Product Profile captures the majority of the 2018 estimated retail sales for most companies. It is important to point out that for Hindustan Unilever, between 30 and 40% of the company's 2018 retail sales in India is covered in the Product Profile; the company derived a significant proportion of its sales from products excluded from the assessment, for example, packaged tea, coffee and wheat flour products. Similarly, for Nestlé India, the Product Profile covers 60-70% of the company's estimated 2018 retail sales, as the HSR system does not apply to packaged baby foods and coffee .

Therefore, the Product Profile only assesses the healthiness of a part of the overall product portfolios for both companies. The percentage of each company's 2018 sales covered in the Product Profile, the categories selected, and the total number of products assessed for each company are shown in Table 1.

The total number of products assessed for each company ranged from two for Aavin TCMPF to 202 for Parle Products. Only two products could be assessed for Aavin TCMPF because the nutrition information necessary to conduct the analysis for the remaining products was insufficient. In total, of the 1,495 products initially selected, sufficient information was available for 1,456 products across all companies for assessment using the HSR system.

What percentage of the companies' products sold in India are healthy?

The Product Profile found that out of all products analyzed, 16% met the healthy threshold, (having a HSR of 3.5 or more). The average HSR for all companies' products combined was low (1.9 out of 5). These results illustrate the need for much greater commitments to product formulation and innovation to improve the nutritional quality of packed foods and non-alcoholic beverages in India.

Although it is not a scored element of the Product Profile, Figure 3 provides an overview of the percentage of products, by number, that meet the healthy threshold for each company. The results of this assessment may be influenced by the number of products in the analysis, especially if the number of products for which sufficient nutrition information is limited. For most companies (9 out of 16) between 10% and 49% of their product portfolios meet the healthy threshold.

The company with the overall highest proportion of healthy products is Marico, with 25 out of 41 products meeting the healthy threshold (61%), followed by Aavin TCMPF, with one out of two products meeting the healthy threshold (50%) and Adani Wilmar, with 6 out of 12 products meeting the healthy threshold (50%). It should be noted that for Aavin TCMPF, insufficient nutrition information was available for 16 products, rendering the analysis inconclusive regarding the healthiness of their full portfolio. Nutrition information was insufficient for only one product of Adani Wilmar and for none of Marico's products.

With sales-weighting incorporated into the analysis, an estimated 27% of total 2018 sales are attributed to products that meet the HSR 'healthy' threshold. Mother Dairy is estimated to have derived the largest proportion (53%) of its 2018 retail sales from healthy products. Nevertheless, for most companies, the estimated healthy product-derived sales are low, with four estimated to have derived less than 10% of their 2018 retail sales in India from healthy products.

Product Profile company findings

- Mother Dairy leads the Product Profile with a score of 7.5 out of 10, before Adani Wilmar (6.8) and Parle Products (6.7). Mother Dairy is active in product categories that score relatively well overall (Dairy, Edible Oils, Processed Fruits and Vegetables). The company ranks second for both the mean healthiness score (6.1 out of 10) and relative category (8.8 out of 10) score of the Product Profile. Mother Dairy is estimated to have generated 53% of its 2018 sales from products meeting the healthy threshold – the highest proportion among companies assessed.
- Among companies from the edible oil industry segment, Adani Wilmar ranks first in the Product Profile with a score of 6.8 out of 10, followed by Marico (6.5) and Emami Agrotech (4.1). Of all companies assessed in this Index, Adani Wilmar achieves the highest sales-weighted mean HSR of 3.1, resulting in a mean healthiness score of 6.2 out of 10. When compared to the other four companies that sell edible oils in India (as part of their top-selling categories), Adani Wilmar achieves the second highest mean HSR of 3.1 out of 5 in the category and the highest among companies from the edible oil industry segment.
- Among companies from the dairy industry segment, Mother Dairy is the top performer (7.5 out of 10), followed by Hatsun Agro Product (6.0), and Amul GCMMF (4.8). Mother Dairy's products in the Dairy category achieve a higher mean HSR (3.0) than the other companies within the dairy industry segment. Furthermore, its non-dairy sales are mostly derived from two relatively healthy categories, Edible Oils and Processed Fruit and Vegetables, and to a lesser extent from the less healthy Ice Cream and Frozen Desserts category.
- Among companies with a mixed product portfolio, Parle Products leads the Product Profile with a score of 6.6 out of 10, followed by Nestlé India (6.2) and Britannia Industries (5.5).
- Parle Products performs relatively well in the Product Profile thanks to ranking first in the relative category score. The company's products in all three categories selected for assessment (Confectionery; Savoury Snacks; and Sweet Biscuits, Snack Bars and Fruit Snacks) achieved a higher mean healthiness score than its peers. Although the variation in HSR scores across companies was limited in these categories, Parle Products' Confectionery and Savoury Snacks products scored best in relation to the respective category averages. Parle Products' Confectionery products have low levels of saturated fat compared to products from other companies.

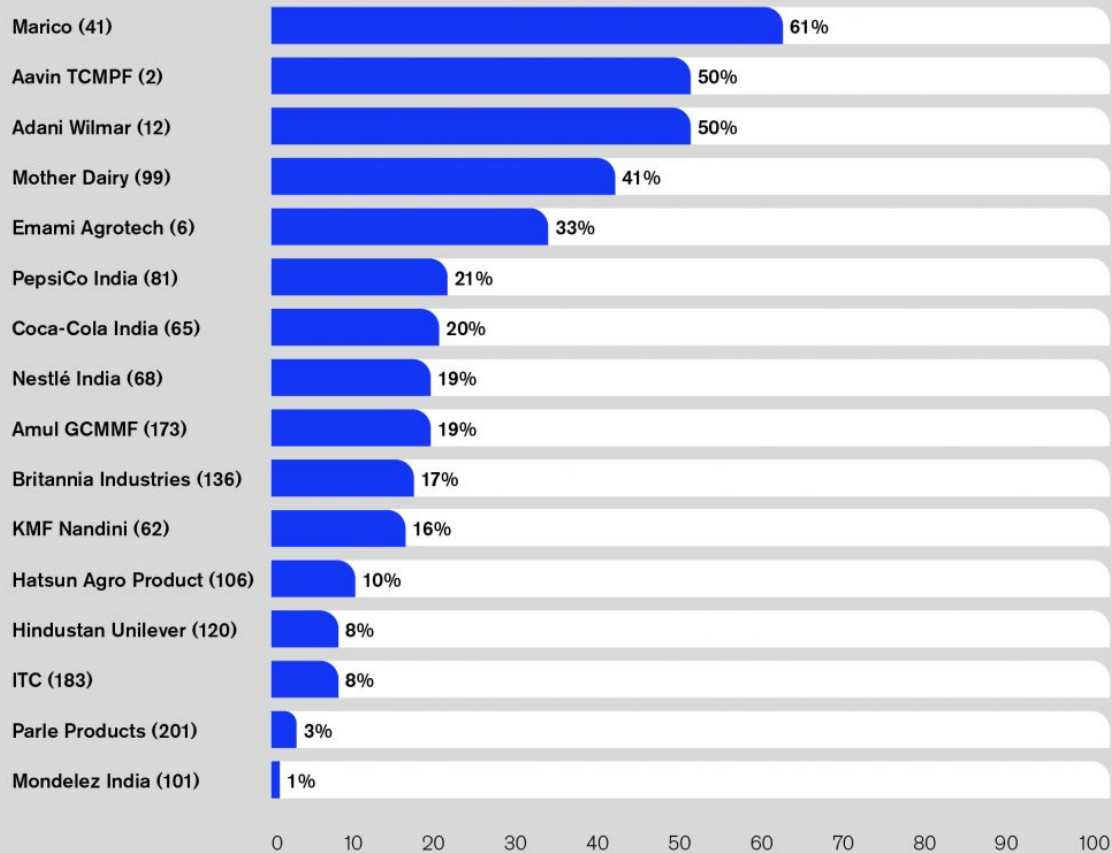
The Product Profile analyzes the healthiness of 1456 food and beverage products sold by the 16 largest food and beverage manufacturers operating in India



16%
of products meet the healthy threshold, i.e. a HSR of 3.5 or more out of 5

Corresponding to 27% of these companies' 2018 sales

Figure 3. What proportion of companies' products are healthy?



Note: In parenthesis the total number of products by company included in the Product Profile.

How healthy are companies' product portfolios?

One of the scored elements in the Product Profile is an assessment of the companies' overall product portfolio 'healthiness.' A score of 7 or more for this element would indicate that a company's portfolio consists of 'healthy' products on average..

Companies such as those in the dairy or edible oil industry segments that manufacture products within healthier categories are expected to perform better. That is why this Index also measures the relative category scores (explained in the next section).

- Overall, the average HSR was low at 1.9 stars out of 5.0 for all companies combined. Before sales-weighting, there is substantial variation in the average HSR among companies, ranging from 0.6 for Mondelez India to 3.5 for Marico. After sales-weighting, the average HSR ranges from 0.5 for Mondelez India to 3.1 for Adani Wilmar.
- Companies in the edible oil industry segment perform relatively well in the mean healthiness assessment as they derive most of their estimated sales from this category alone. Adani Wilmar shows the highest sales-weighted mean healthiness score (6.2 out of 10); the analysis was based on 12 Edible Oil products, which achieved a mean HSR of 3.1 out of 5.
- Mother Dairy (6.1 out of 10) is the second-best performing company in the mean healthiness assessment. Although Mother Dairy's overall HSR is higher than Adani Wilmar's for its Edible Oil products (3.8 out of 5), the company is estimated to have derived much less (between 10-20%) of its 2018 retail sales from this category. Mother Dairy also markets products in less healthy categories including Ice Cream and Frozen Desserts. Therefore, after applying sales-weighting, Adani Wilmar is the top-performer in the mean healthiness assessment with a score of 6.2 out of 10.
- Mondelez India shows the lowest mean healthiness score (1.1 out of 10) as its portfolio of 101 products (73%) comprises predominantly of confectionery items.

How healthy are companies' products within a category compared to those of their peers?

The second scored element of the Product Profile is an assessment of the companies' relative category performance against their peers within the same category. Category subsets where there are significant differences in the mean HSR of company products indicate big opportunities for companies' to improve their relative performance.

- Parle Products is the top performer in this element of the Product Profile, ranking first in all three product categories in which it competes with one or more peers (Confectionery; Savoury Snacks; and Sweet Biscuits, Snack Bars and Fruit Snacks). Parle Products therefore achieves the maximum relative category score of 10. The next best performing company in this scored element is Mother Dairy, which ranks first among its peers in the Edible Oils category, joint second in the Dairy category and third for Ice Cream and Frozen Desserts.
- For the relative category score, the best performing company in the dairy industry segment is Mother Dairy (8.8 out of 10), followed by Hatsun Agro Product (6.8 out of 10). For the companies in the edible oil industry segment, Adani Wilmar performs best (7.5 out of 10), followed by Marico (5.2 out of 10) and Emami Agrotech (2.5 out of 10).
- There is considerable variation in the mean HSR values between different companies within the same product categories (e.g. ranging from 2.2 to 3.5 in the Dairy category, from 2.8 to 3.8 in the Edible Oils category, and from 1.4 to 2.2 for Ice Cream and Frozen Desserts). These results demonstrate that relatively low-scoring companies have an opportunity to improve the healthiness of their products marketed in India.

Companies with a lower average 'healthiness' score in a given category are encouraged to step up their efforts to reformulate these products and to develop new healthy products. Detailed results can be accessed in Table 2.

Changes since 2016 in the Product Profile results

In the previous India Index completed in 2016, the Product Profile analyzed 918 packaged food and beverages sold by 11 large manufacturers in India. The mean healthiness score was found to be low overall at 1.9 out of 5. Although five new companies (Aavin TCMPF, Adani Wilmar, Emami Agrotech, Hatsun Agro Product and Marico) and more products (1,456) were assessed for this Product Profile, the mean healthiness score remained the same.

In 2016, approximately 16% of the products were found to meet the healthy threshold which, again, is the same proportion as the 2020 Product Profile. Among the companies that were assessed for both Indexes, the estimated sales from healthy products increased from 15% in 2016 to 23% in 2020. However, no increase was found in the percentage of healthy products within the companies' portfolios.

Recommendations for improvement

Product Profile findings show that food and beverage manufacturers in India can and must do much more to improve the overall nutritional quality of their product portfolios, and offer Indian consumers more healthy options. Companies are encouraged to:

- Provide more nutrition information on their labels beyond that required by local regulations. The presentation of this information should align with Codex Alimentarius standards and guidelines to allow for more comprehensive and accurate Product Profile analysis. Companies are encouraged to engage with ATNI to further improve the accuracy and comprehensiveness of the Product Profile.
- Adapt and publicly disclose a stringent NPS to guide new product development, product reformulation and innovation.

Changes in the companies' weighted and unweighted mean HSR between the 2016 and 2020 Product Profile results are compared in Table 3.

For most companies, the number of products selected for the 2020 Product Profile is significantly higher than in 2016. PepsiCo India is one of the exceptions, with fewer products analyzed in the 2020 Product Profile. Despite this, the company shows the largest improvement in the sales-weighted mean HSR score, improving from 1.2 to 2.1 out of 5.

TGI's detailed report on the 2016 and 2020 Product Profile results can be found [here](#). Access the 2016 Product Profile results [here](#).

- Accelerate reformulation efforts to improve the nutritional quality of products and increase the proportion of marketing efforts dedicated to healthier categories to amplify public health impact.
- Adopt and define India-specific SMART targets (Specific, Measurable, Achievable, Relevant and Time-bound) for key nutrients critical to public health – e.g. reductions in sodium – and improve accountability through better reporting.

Product Profile results from the analysis of the products found suitable to be marketed to children, according to the WHO SEAR criteria, can be found in Category D.

B2 Product formulation and B3 Defining healthy and appropriate products

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

What are companies doing to make their products healthier or to introduce new healthy products?

- In response to FSSAI's calls as part of the Eat Right India Movement, six of the assessed companies have made a public pledge that is published on FSSAI's [website](#). These pledges all contain one or more product reformulation target to make products healthier (according to their own criteria or definitions). Some companies have made other commitments as well, e.g. regarding responsible marketing to children or influencing consumers to lead healthier lifestyles.
- Four other companies have made similar commitments regarding product reformulation and developing new healthy products in general, or related to products suitable to address micronutrient deficiencies and undernutrition. Therefore, in total, 10 of the 16 assessed companies make relevant commitments regarding healthy products. An overview of companies that have published a pledge or commitment is shown in Table 4.
- In addition to forward-looking commitments, it is important to assess what evidence companies provide of having delivered healthy products through reformulation or new product development. Only one of the companies reports annually on the percentage of healthy products (as the percentage of sales volume) that are sold in India: Hindustan Unilever reports on the percentage of products that meet its HNS criteria.
- On a positive note, 11 companies report having introduced new healthy products in the last 3 years, showing that the majority of the companies assessed are focusing on improving the healthiness of their product portfolio in this way. An overview of this information is shown in Table 4. Although this development is not yet positively reflected in improved Product Profile outcomes, companies should maintain their focus in this area and increase the sales of their (new) healthy products.
- In line with FSSAI's focus on reducing salt, fat and added sugars, ATNI assesses whether companies have product reformulation targets in place to reduce these nutrients, distinguishing two fat-related targets – to eliminate industrially-produced trans fat and to reduce saturated fat. An overview of nutrient reduction targets currently in place for 7 out of 16 companies is shown in Table 5. Hindustan Unilever, Nestlé India and PepsiCo India stand out in this overview, as they have all four relevant targets (to reduce salt, added sugar, trans fat and saturated fat) in place and disclose them publicly. Britannia Industries has developed new product reformulation targets since the 2016 India Index, whilst ITC and Marico also have relevant targets in place (none of which were assessed in 2016). All companies could further improve transparency by making their targets fully externally verifiable.
- Depending on the companies' product portfolios, not all reformulation targets are relevant for all companies. For example, although there are some naturally occurring trans fats in dairy and meat products, a trans fat reduction target is only relevant with regard to industrially produced trans fat. A total of 6 out of 10 companies, for which this is relevant, have a trans fat target, and 6 out of 13 have a salt reduction target. However, the number of targets related to reducing added sugar and saturated fat is much lower. Overall, the 16 companies have defined 20 targets out of a possible total of 49.
- Of the five companies with an NPS, Nestlé India, Hindustan Unilever, PepsiCo India and Mondelez India have explicit nutrition criteria to define healthy products; these criteria are applied to all of their products. However, none of these companies benchmark their definition of healthy products against the HSR system or equivalent systems.

Table 4. Overview of commitments, quantitative reporting and new product introductions in relation to healthy products

	Public FSSAI pledge or other commitment to improve product composition / healthiness	Public reporting on the percentage of healthy products* in India	New healthy products* introduced in the last 3 years
Aavin TCMPF			•
Adani Wilmar			
Amul GCMF			
Britannia Industries	FSSAI		•
Coca-Cola India	other		•
Emami Agrotech			
Hatsun Agro Product			
Hindustan Unilever	FSSAI	Annually	•
ITC	FSSAI		•
KMF Nandini	other		•
Marico	FSSAI		•
Mondelez India	other		•
Mother Dairy	other		•
Nestlé India	FSSAI		•
Parle Products			
PepsiCo India	FSSAI		•

* Products are considered healthy according to companies' own definitions

Table 5. Availability of product reformulation targets regarding nutrients of concern.

	Salt/sodium target	Trans fat target	Saturated fat target	Added sugar / calorie target	Public disclosure of targets
Aavin TCMPF	*	n/a			
Adani Wilmar	n/a			n/a	
Amul GCMMF	*	n/a			
Britannia Industries	●	●		●	some
Coca-Cola India	n/a	n/a	n/a		
Emami Agrotech	n/a			n/a	
Hatsun Agro Product	*	n/a			
Hindustan Unilever	●	●	●	●	all
ITC		●		●	some
KMF Nandini	*	n/a			
Marico	●				some
Mondelez India	●	●			some
Mother Dairy	*	n/a			
Nestlé India	●	●	●	●	all
Parle Products					
PepsiCo India	●	●	●	●	all

● indicates a relevant reformulation target is in place
n/a indicates that the reformulation target is not relevant in relation to the company's portfolio
* For dairy products a salt/sodium target is only relevant for products with added salt

Which companies use an NPS to define healthy products and how robust are these systems?

- When making commitments to introduce healthy products, it is important that companies clearly define what a healthy product is using objective nutrition criteria. Five of the assessed companies have adopted an NPS to do so. An overview of the main characteristics of these companies' systems is shown in Table 6.
- Hindustan Unilever, Mondelez India, Nestlé India and PepsiCo India have adopted a formal NPS that covers all of their products on the Indian market. Hindustan Unilever and Nestlé India perform best by publishing their full NPS on their own websites as well as in peer-reviewed journals.
- Britannia Industries is the only India-headquartered company that has adopted an NPS, which they introduced following the India Index 2016. Currently, the company refers to general aspects of its NPS in its nutrition policy, but details have not been disclosed publicly.

- Although companies could adopt the HSR system or another internationally recognized NPS that is endorsed by governments or relevant authorities, ATNI recognizes that there are reasons why companies develop or adopt other systems that may be tailored to their specific product ranges, featuring more specific or detailed product reformulation-related parameters. To ensure the appropriateness and comparability of the companies' systems, ATNI assessed whether the companies benchmark their NPS and/or nutrition criteria against the HSR (using the healthy threshold of 3.5 stars or more) used in the Product Profile. None of the companies were found to benchmark their NPS against the HSR system or any other internationally recognized NPS.

Table 6. Companies with an NPS

	Type of Nutrient Profiling System	Comprehensiveness of product coverage	Public disclosure status
Aavin TCMPF			
Adani Wilmar			
Amul GCMMF			
Britannia Industries	precursor system*	some products	not published
Coca-Cola India			
Emami Agrotech			
Hatsun Agro Product			
Hindustan Unilever	formal system	all products	in full / peer reviewed
ITC			
KMF Nandini			
Marico			
Mondelez India	formal system	all products	limited / on request
Mother Dairy			
Nestlé India	formal system	all products	in full / peer reviewed
Parle Products			
PepsiCo India	formal system	all products	limited / on request

* New NPS adopted since the India Index 2016. A precursor to a full and formal NPS does not calculate overall nutritional quality and is limited in the way it is used to assess nutrient levels.

Are companies addressing micronutrient deficiencies in India by fortifying staple foods and other products?

- There has been a strong industry response to the Food Safety and Standards (Fortification of Foods) Regulations which were operationalized in October 2016. Ten of the companies assessed voluntarily fortify at least some of their staple products that are covered by the regulation. Two companies, namely Britannia Industries and Mother Dairy, fortify all of the relevant products within their portfolio. Three companies (Coca-Cola India, Mondelez India and PepsiCo India) confirmed that they do not sell any staple products covered by the regulation, rendering this point not applicable to them.
- Amul GCMMF, Hatsun Agro Product and Parle Products are the only three companies not showing evidence of voluntary fortification according to FSSAI guidance. Parle Products might not have relevant staple products in its portfolio, but ATNI was unable to verify this.
- The most commonly sold voluntarily fortified staple products are milk and edible oils with added vitamin A and D; five Index assessed companies were found to fortify their milk, and four their edible oils. Two companies fortify wheat flour, but no evidence was found of companies selling double-fortified salt or fortified rice. It is not clear which of the assessed companies sell these products, if any at all. An overview of companies and their voluntary fortification of staple products according to FSSAI guidance is shown in Table 7.
- Many of the products that companies sell are not covered by the FSSAI regulation, but it is important that all product fortification is done according to sound scientific principles. The following seven companies committed to using international guidance on fortification (i.e. CODEX CAC/GL 09-1987 or equivalent): Britannia Industries, Coca-Cola India, Hindustan Unilever, Mondelez India, Mother Dairy, Nestlé India and PepsiCo India.
- The same seven companies have introduced new fortified products, or other products that specifically address undernutrition or micronutrient deficiencies, in the last 3 years. Table 8 provides an overview of population groups that the new products are targeted towards to help address the nutritional issues they face. On aggregate, women of childbearing age and children between 6 and 36 months are the most commonly targeted groups, with the strongest focus on reducing iron deficiency in relation to anaemia among women of childbearing age.

Table 7. Company overview of voluntary product fortification according to FSSAI guidance.

	Double fortified salt	Edible oil	Milk	Rice	Wheat flour (atta, maida)	Comprehensiveness of voluntary product fortification under FSSAI regulation
Aavin TCMPF			•			some products
Adani Wilmar		•				some products
Amul GCMMF						
Britannia Industries			•			all products
Emami Agrotech		•				some products
Hatsun Agro Product						
Hindustan Unilever					•	some products
ITC					•	some products
KMF Nandini			•			some products
Marico		•				some products
Mother Dairy		•	•			all products
Nestlé India			•			some products
Parle Products*						
Coca-Cola India						not applicable
Mondelez India						not applicable
PepsiCo India						not applicable

*No relevant Parle products under the voluntary FSSAI regulation were identified by ATNI, but no confirmation was obtained that the regulation is not applicable to any of its products.

Table 8. Overview of the consumer groups that companies are targeting with products developed in the last 3 years to address micronutrient deficiencies or undernutrition.

	Women of childbearing age	Children 6-36 months	Children 3-5 years	Children 6 years and older	Other population groups
Aavin TCMPF					
Adani Wilmar					
Amul GCMMF					
Britannia Industries			•	•	•
Emami Agrotech				•	
Hatsun Agro Product					
Hindustan Unilever					
ITC	•				
KMF Nandini					
Marico					
Mother Dairy					
Nestlé India	•	•			
Parle Products*	•	•			
Coca-Cola India		•	•	•	•
Mondelez India					
PepsiCo India	•				

Recommendations for improvement

To improve and accelerate their healthy product formulation efforts, food and beverage manufacturers in India are encouraged to:

- Make a public pledge with FSSAI, showing their explicit support for this important Government initiative in India and their assistance to FSSAI's efforts to inform and educate the public.
- Define a set of product reformulation targets that cover all products and all nutrients of concern relevant to their product portfolio, as Hindustan Unilever, Nestlé India and PepsiCo India have done. It is important that product formulation and reformulation are addressed comprehensively at the portfolio level to ensure that all company products becomes healthier over time, rather than improving the healthiness of selected products or product categories only.
- Publicly disclose the percentage of their product portfolio that meets their criteria for healthy products in India, as Hindustan Unilever does, to improve transparency about progress towards increased product healthiness. Similarly, companies could highlight their efforts to innovate in this regard by publishing comprehensive lists of newly introduced healthy products.
- Adopt an NPS to define which products are considered healthy using objective nutrition criteria. To ensure the appropriateness and comparability of companies' definitions of healthy products, all companies should consider benchmarking their NPS and/or nutrition criteria against the HSR (using the healthy threshold of 3.5 stars or more) or another internationally recognized NPS.
- Fortify all staple products within their portfolio that are covered under FSSAI guidance (with their first priority being to ensure good alignment with local priorities and the Government's work). For other fortified foods and beverages, companies should always ensure compliance with relevant Codex Alimentarius (*General Principles for the Addition of Essential Nutrients to Foods*) and WHO/Food and Agriculture Organization of the United Nations (*Guidelines on Food Fortification with Micronutrients*) guidance.



Category C: Accessibility

Delivering affordable, accessible products (15% of overall score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic Categories.

Category C assesses companies' efforts to make their healthy products more affordable and accessible to Indian consumers through their approaches to pricing and distribution. Producing healthier options is necessary to improve consumers' access to nutritious foods and beverages but is insufficient on its own to improve the consumption of healthy products. Therefore, companies must offer healthier products at competitive prices and distribute them widely to reach all consumers in need, especially those who are vulnerable to malnutrition.

Category C consists of two equally weighted criteria:

C1 Product Pricing

C2 Product Distribution

To perform well in this category, companies should generally:

- Make clear commitments, which will extend into an action plan, to promote accessibility and affordability of over less healthy products;
- Include practical actions as part of its commercial nutrition strategy, including category-level access and affordability commitments with incentives for wholesale and distribution partners, engagement of local sales teams, etc.
- Disclose these commitments and action.

And specifically, companies should:

- Adopt and publish a formal policy to improve the affordability of **healthy** products, and products aimed at addressing micronutrient deficiencies, with specific attention to low-income consumers across all Indian states where the company operates; and show evidence of actions taken.
- Provide evidence of pricing analysis and examples of discounts offered, price promotions or coupons on **healthy** products at the same or greater rate as products not meeting healthy standards.
- Take guidance from relevant national development initiatives, such as the [Transformation of Aspirational Districts program](#), to develop company initiatives for improving affordability and accessibility.
- Adopt and publish a formal policy to improve the physical accessibility of **healthy** products and products aimed at addressing micronutrient deficiencies across all Indian states where the company operates, with specific attention to consumers living in urban slums, remote rural areas, etc., and show evidence of actions taken.
- Provide evidence of initiatives that have delivered **healthy** products to all consumers, including groups that lack access due to geographical factors, e.g. isolated rural areas, poor urban areas, etc.

Hindustan Unilever ranks first in the thematic area of affordability and accessibility of healthy products (Category C), followed by Nestlé India and Coca-Cola India. KMF Nandini ranks fourth, along with PepsiCo India, and is the highest scoring India-headquartered company in this Category. Among the companies which were also assessed in 2016, Coca-Cola India has shown the greatest improvement. The company has achieved this by strengthening its commitments and offering non-carbonated, low-sugar beverages (e.g. Aquarius Glucocharge), as well as micronutrient-fortified beverages (e.g. Minute Maid Vitingo), at low prices. Moreover, they have an India-wide distribution approach whilst capturing the needs of low-income and rural groups.

C1 Product pricing * Did not provide
C2 Product distribution information to ATNI

Context

Consuming a healthy and nutritious diet can be expensive, which requires healthy foods to be both made available and affordable, and adequately distributed, especially considering the needs of groups with lower socioeconomic status. In India, it is estimated that 22.5% of the population lives with less than US\$1.90 (World Bank 2011, PPP) per day while the Indian Planning commission estimates that 21.9% of the population are poor and living below the national poverty line. At the same time, as of 2019, approximately one third of the Indian population lives in urban cities with some affluent groups having improved standards of living. This type of socioeconomic heterogeneity is visible in the variety of nutrition issues Indians face, where prevalence of overweight, obesity and diet-related diseases coexist with a high burden of undernutrition and micronutrient deficiencies, which further complicates the country's nutrition challenges.

India has the sixth largest food and grocery market in the world, with retail contributing up to 70% of total sales. In 2019 around 90% of the Indian retail market was served by small corner stores (kirana) and other informal sellers such as street vendors, with only 8% by supermarkets and just 2% online. The food and beverage sector is the fifth largest manufacturing sector in India. The Ministry of Food Processing Industries expects the total value of the food and beverage segment in India to increase to US\$1.142 trillion by 2025. As a result, a wide range of packaged foods and beverages are reaching Indian consumers from national and international companies, which offer them a range of convenience and staple foods. Lifestyle changes have also caused a shift in the habits of Indian consumers – from the consumption of traditional food to new food habits consisting of increased sugar, fat and salt. Worryingly, despite this increasing food availability, India ranks 94th among 107 countries on the Global Hunger Index 2020.

A study estimated that 63-76% of the rural poor could not afford the national recommended diet (based on the Food Based Dietary Guidelines for Indians) when compared against India's wage data. Furthermore, in December 2019, India saw the worst consumer inflation since July 2014 at 7.35%, primarily due to high food prices. These issues indicate that there is a gap in affordability and access to healthy and nutritious foods and the food and beverage manufacturers, among other stakeholders, play a key role in closing the gap.

The Indian government has taken several actions to improve the country's nutrition status, such as the flagship Poshan Abhiyaan program to improve nutritional outcomes for children, pregnant women and lactating mothers. The Food Safety and Standards Authority of India (FSSAI), with its existing and new regulations and guidance, the Eat Right India movement, etc., promotes safe and nutritious foods and raises awareness among consumers about healthy and fortified foods. Another government-led initiative is the Transformation of Aspirational Districts program, which ranks districts on several socioeconomic indicators, including health and nutrition, and aims to combat socioeconomic disparities between the most and least developed areas in India. The National Institution for Transforming India (NITI Aayog) has called for more participation from the private sector for the success of this program. Indian food and beverage companies, therefore, can look to these government-led initiatives for guidance in order to broaden the scope of their pricing and distribution efforts. Specifically, companies can incorporate the needs of aspirational districts in their overarching affordability and accessibility strategies. To support the Poshan Abhiyaan mission; the Eat Right India movement; and other government initiatives; as well as the nutritional needs of Indian consumers, more healthy, accessible and affordable products can and should be introduced to make a real difference.

How are the pricing and distribution of healthy products affected by the COVID-19 crisis in India?

- In India, food and nutrition security for the poor deserves special attention amidst the COVID-19 pandemic. Supply chain disruptions can cause food-price rises, increase the overall cost of nutritious foods and make a healthy and diverse diet less affordable.
- Since the start of the pandemic, FSSAI had stepped up its efforts in encouraging the fortification of food by announcing that fortification of edible oil and milk with vitamins will be mandatory by the end of 2020. In order to ensure these products will also be available to populations experiencing or at high-risk of micronutrient deficiencies, it is essential that companies commit to providing such products at an affordable price.

- Companies in India play an important role to secure the accessibility and affordability of healthy products; for example, by not increasing the price of healthier products despite the economic shocks of COVID-19. As highlighted in ATNI's report on the impact of COVID-19 in India, currently none of India-based companies have made commitments on their websites to keep prices low.

The India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19. But ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020 and ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main messages

- Hindustan Unilever achieves the highest score (5.5 out of 10) for its comprehensive pricing and distribution strategies that make its healthy products more accessible to all Indian consumers. The company captures consumers' needs by having strategically analyzed price points and rural distribution techniques as demonstrated in the [Shakti Project](#) for its healthy products across all Indian states where the company operates. Nestlé India (4) and Coca-Cola India (2.7) follow Hindustan Unilever on the leaderboard. Worryingly, the average score achieved by all companies assessed is very low (1.4 out of 10), which makes this the lowest scoring thematic area of the . This is similar to the average score in the 2016 Index, which confirms that limited progress has been made to improve accessibility and affordability of healthy products overall.
- Nestlé India and ITC are the only companies to have embedded their commitments to ensure the affordability and physical accessibility of healthy products in formal policies, although only ITC has evidence of having policies for both. Other companies show limited and/or specific commitments for either healthy products or products, which aim to address undernutrition and micronutrient deficiencies, such as fortified products. However, the research for this Index did not find evidence of any comprehensive approach to address accessibility and affordability of healthy food, nor did it show clear changes in the approach Indian food and beverage manufacturers have compared to 2016. Strikingly, some companies, such as Adani Wilmar, Amul GCMMF, Emami Agrotech, Hatsun Agro Product, Marico, Parle Products and Mondelez India, do not appear to have developed any commitments or policies towards this key issue to help consumers eat nutritiously.
- Many companies assessed in this Index do not have a clear way of defining their . As a result, these companies are unable to formalize any specific accessibility strategy towards delivering healthy products and therefore score poorly in this category. Among the four companies found to have some approach for delivering affordable, healthy products , none of them have publicly disclosed any targets with regards to these strategies. There is therefore an urgent need for companies to define the products that meet healthy standards; formalize their approach to making these products accessible in a clear strategy; and set SMART (Specific, Measurable, Achievable, Relevant, Time-bound) targets for achieving their strategic objectives.
- None of the companies have developed their commitments, policies, or strategies by specifically identifying or addressing the nutritional needs of groups in aspirational districts of India. The Indian government's national development agenda has defined priority districts for development, with specific socioeconomic indicators measuring poverty, health and nutrition. While some companies have shared examples of initiatives aimed at low-income consumers and those that lack regular and proximate access to nutritious food (for example, rural areas/urban slums), the lack of alignment with the national development agenda is concerning.
- Companies show more emphasis – in terms of commitments, policies, and practices – on improving the physical accessibility and distribution of their healthy products than on making their healthy products affordable through appropriate pricing. This is indicated by the greater quantity of commercial and non-commercial initiatives addressing the physical accessibility of healthy products.

Novelties and best practices

Hindustan Unilever's new approach to affordable pricing and focus on rural distribution

Hindustan Unilever has developed an approach to improve the affordability of its healthy products using specifically defined price points, which ensures that products meeting its Highest Nutrition Standards (an in-house standard for defining its healthy products) are affordable for middle- and low-income groups. The company's Living Standards Measure research and marketing tool is used to segment the Indian population into 18 sections based on their standard of living and disposable income. As part of the company's innovation process, further research is conducted to evaluate pricing and purchase intention among people on low incomes. The company has also launched a cost-managing platform that allows it to minimize currency fluctuations or material inflation, thereby preventing it from passing extra costs onto consumers.

Further, Hindustan Unilever demonstrates a continued commitment to improving the accessibility of its healthy products through its Shakti project, which is an initiative to financially empower rural women and create livelihood opportunities. According to the latest figures, 100,000 Shakti entrepreneurs distribute Hindustan Unilever brands in many thousands of villages across 18 Indian states. The company provides training on basic accounting, sales, health and hygiene, and relevant IT skills. Entrepreneurs are also equipped with smartphones containing a mini 'Enterprise Resource Package' to help them run their business efficiently. The project provides a regular income stream for the Shakti entrepreneurs and their families. It focuses on making accessible products that meet Unilever's Highest Nutrition Standards, which can help address micronutrient deficiencies in villages and rural communities that experience or are at high-risk of undernutrition and micronutrient deficiencies.

KMF Nandini's milk distribution approach

KMF Nandini is the best performing India-headquartered company in this category, which can largely be attributed to the company's distribution approach. While the company mainly operates in rural areas, and is oriented to stimulating rural incomes, dairy productivity, and rural employment, it also aims to supply good quality milk at lower prices to urban consumers in all area where the company operates. The company states its objectives, which include: "Achieve economies of scale to ensure maximum returns to the milk producers, at the same time facilitate wholesome milk at reasonable price to urban consumers."

The company also shared evidence of building a strong network to increase milk product sales by opening depots within and outside Karnataka State. It has 14 milk unions, covering all districts, which procure milk from Primary Dairy Cooperative Societies (DCS) to distribute milk to consumers across towns, cities and rural areas in Karnataka.

Mother Dairy's distribution of healthy and fortified products at affordable prices

Mother Dairy has undertaken several initiatives to improve affordability of its healthy and fortified milk. For instance, since implementing its approach to fortify all milk products in the National Capital Region (NCR), Mother Dairy has maintained the low price of milk products, making it especially relevant considering the food consumption and expenditure among Indian consumers. The company sells bulk-vended milk fortified with Vitamin A and, since 2016, with Vitamin D in the NCR. Furthermore, Mother Dairy's horticulture products, such as fruits and vegetables directly sourced from farmers, are sold all year long in the company's own retail outlets at lower price points. Mother Dairy also sells fortified edible oil products under the brand name *Dhara* in smaller stock keeping units of 200 ml each at low prices.

Mother Dairy has also shown improvement in its strategies to increase physical accessibility of its healthy and fortified products. Mother Dairy operates around 3,000 bulk milk vending units installed at its consumer touchpoints which include milk booths, franchise shops, kiosks, mini shops, insulated containers, *Kamdhenu* mobile units, container-on-wheels (COW), etc. thereby offering convenience and plastic-packaging free milk to reach village areas and urban slum areas. *Kamdhenu* are eco-friendly milk vending machines set up by Mother Dairy to distribute milk across the NCR.

C1 Product pricing

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

What commitments, policies and strategies have companies defined to improve the affordability of their healthy products and products that intend to address undernutrition and micronutrient deficiencies (e.g. fortified products)?

- Eight out of 16 companies have made commitments to address the affordability of their healthy products, although Nestlé India and ITC are the only two companies to specify these commitments in a formal policy (See Table 1). Only, Hindustan Unilever, Nestlé India and ITC disclose their commitments publicly. In 2016, four out of the nine assessed companies made similar commitments. As a result, the findings of this Index show some improvement in the number of companies that acknowledge their role in addressing affordability issues in India. However, there is pressing need for Indian companies to adopt more formalized public policies.
- Seven out of 16 assessed companies have made a commitment to commercially address the affordability of products specifically designed to reduce micronutrient deficiencies in groups experiencing – or at high-risk of – undernutrition, micronutrient deficiencies and related diseases. However, Nestlé India, ITC and Coca-Cola India are the only companies that make specific references to low-income groups. Nestlé India shows its commitment through its [Popularly Positioned Products \(PPP\) Strategy Fact Sheet](#), which highlights the company's ambition to improve the price of products aimed at addressing micronutrient deficiencies in low-income consumers. ITC's commitment is embedded in its [Food Products Policy](#) to offer fortified food products with affordable and appropriate nutrition.
- Hindustan Unilever is the only company that has set internal targets within its strategy to improve the affordability of its healthy products relative to products not meeting healthy standards. This is reflected in the company's newly developed pricing strategy that allows the company to segment the income-demographic of Indian consumers and offer healthy products on a range of price points. The company links this pricing strategy to its global ambition of doubling the proportion of its product portfolio meeting its Highest Nutritional Standards.
- For improving the affordability of products aimed at addressing micronutrient deficiencies, Nestlé India and PepsiCo India have also shown strategic improvements. For instance, since the 2016 India Index, Nestlé India has continued to develop its PPP strategy with an ambition to reach consumers with nutritional products at an affordable price, including products designed to address micronutrient deficiencies. PepsiCo India's approach has been to minimize the price differential between their healthy and less healthy products, which is also applied to their fortified products. The company shared examples of low-priced Quaker oats products and , an iron-fortified beverage that has been modified by adding 10% more juice content in seven flavors, whilst maintaining the price at ₹ 10 per pack.

Table 1: Overview of commitments to improve the affordability of healthy products, as well as those aimed at reducing micronutrient deficiencies

	Commitment to improve the affordability of healthy products		Commitment to improve the affordability of products aimed at reducing micronutrient deficiencies	
	In a formal policy	Not in a formal policy	With reference to aspirational districts and/or low-income consumers	Without reference to aspirational districts and/or low-income consumers
Aavin TCMPF		●		
Adani Wilmar				
Amul GCMMF				
Britannia Industries		●		
Coca-Cola India		●	●	
Emami Agrotech				
Hatsun Agro Product				
Hindustan Unilever		●		●
ITC	●		●	
KMF Nandini		●		●
Marico				
Mondelez India				
Mother Dairy		●		●
Nestlé India	●		●	
Parle Products				
PepsiCo India				●

Is there any evidence that Indian companies have analyzed what the appropriate pricing of healthy products would be in India for low-income groups, and offered them at low prices?

- Most companies do not conduct a comprehensive pricing analysis of what appropriate pricing would be for products that meet healthy standards in order to ensure affordability of such products. Similar to 2016, Hindustan Unilever and Nestlé India have done this to some extent with Hindustan Unilever having the most comprehensive approach to identifying appropriate pricing for healthy products in a variety of package sizes at different price points across all the states where it operates. Coca-Cola India shared evidence of doing an India-wide pricing analysis too although it does not have a clear definition of healthy products or a Nutrient Profiling System (NPS).
- Mother Dairy showed evidence of promoting bulk vended milk at lower prices than other packaged milk. None of the other companies shared examples that indicate that they have offered discounts, price promotions or coupons on healthy products at the same or greater rate as products that do not meet their healthy standard.

Is there any evidence that Indian companies have improved the affordability of products that intend to address undernutrition and micronutrient deficiencies?

- Seven companies have shown examples of improving the affordability of products that could help fight undernutrition and micronutrient deficiencies. Top performers among them are Nestlé India and Coca-Cola India. Nestlé India provided the example of fortified *Chottu Maggi*, a product that is part of its 'popularly positioned products' for low-income consumers. The company uses its hyperlocal model for marketing and distribution, which focuses on distributing affordable products to consumers across India. Coca-Cola India provided the example of Minute Maid Vitingo fortified with iron, Vitamin A, Vitamin C, Folic Acid, Vitamin B2 and B12, which is made available at low prices in selected states where the company operates.
- Mother Dairy shared the example of maintaining prices of its fortified bulk vended milk despite increasing procurement costs, which it sells at lower prices than other packaged milk in selected states.

C2 Product distribution

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

What commitments, policies and strategies have companies defined to improve the physical accessibility of their products that intend to address undernutrition and micronutrient deficiencies?

- Five companies have made some form of commitment to address the physical accessibility of their healthy products (See Table 2), whereas in 2016, only two (Hindustan Unilever and Nestlé India) of the nine companies assessed showed any focus on this topic. ITC embeds its commitment in its Food Products Policy by disclosing that it will ensure the widest accessibility of its healthy food products. It will do so by ensuring a national geographic distribution across both urban and rural centers, using its fast-moving consumer goods distribution infrastructure and its related rural distribution reach. Nestlé India, PepsiCo India and Aavin TCMPF describe some approach but not in a clear strategy and without the presence of any targets.
- Four companies commit to improving the physical accessibility of products designed to address micronutrient deficiencies in groups experiencing or at high-risk of undernutrition and micronutrient deficiencies. Hindustan Unilever (clear commitment) and Coca-Cola India (broad commitment) strengthen theirs by referring to the needs of groups that live in rural, village areas. For instance, Hindustan Unilever aims to offer fortified foods at an affordable price to bring them within the reach of as many people as possible. Britannia Industries (clear commitment) and Nestlé India (broad commitment) pledge without referring to specific needs of people with limited physical access.

Is there evidence that Indian companies have improved the physical accessibility of healthy products for all consumers including groups that lack access due to geographical factors, e.g. isolated rural areas or urban slums?

- Six companies provided evidence of improving the physical accessibility of their healthy products: Hindustan Unilever scores the highest with its Shakti project, which continues to play a significant role in improving the physical accessibility of healthy products in remote villages.
- While Mother Dairy does not share evidence of an explicit commitment or strategy, the company has shared examples of distribution techniques for its healthy products by having operational bulk vending units installed at its various consumer touchpoints.
- KMF Nandini and Aavin TCMPF do not define healthy products nor do they refer to specific groups that lack access due to geographical reasons. However, considering the inherently healthy nature of milk, their milk distribution efforts have been credited as examples of initiatives that improve distribution of healthy products. For instance, KMF Nandini is building a network of depots within and outside Karnataka to increase milk sales and distribution. The company has 14 Milk Unions covering all the districts of the State which procure milk from Primary Dairy Cooperative Societies, and distribute milk to the consumers in various towns, cities and rural areas in Karnataka.

Table 2: Overview of commitments to address the physical accessibility of healthy products and products designed to address micronutrient deficiencies in groups experiencing or at high-risk of undernutrition and micronutrient deficiencies.

	Commitment to improve the physical accessibility of healthy products		Commitment to address the physical accessibility of products designed to address micronutrient deficiencies	
	In a formal policy	Not in a formal policy	With reference to aspirational districts and/or urban slums/rural groups	Without reference to aspirational districts and/or urban slums/rural groups
Aavin TCMPF				
Adani Wilmar				
Amul GCMMF				
Britannia Industries				●
Coca-Cola India			●	
Emami Agrotech				
Hatsun Agro Product				
Hindustan Unilever		●	●	
ITC	●			
KMF Nandini		●		
Marico				
Mondelez India				
Mother Dairy				
Nestlé India		●		●
Parle Products				
PepsiCo India		●		

Is there evidence that Indian companies have improved the physical accessibility of products that address undernutrition and micronutrient deficiencies?

- Six companies provided evidence of improving the physical accessibility of their products aimed at addressing undernutrition and micronutrient deficiencies through commercial channels. Hindustan Unilever highlights the work of Shakti project which helps them to distribute micronutrient rich Malt Based Food (MFD), such as Horlicks and Boost, to remote rural areas across India. Coca-Cola India shares the example of Minute Maid Vitingo, which it distributes through partnerships with pharmacies in rural areas.
- Nine companies provided examples of non-commercial initiatives to improve the physical accessibility of their products. KMF Nandini, Mother Dairy, Nestlé India, Hindustan Unilever, Britannia Industries and PepsiCo India distribute their healthy and/or fortified products through school feeding programs across the country. For instance, Mother Dairy's 'gift milk' initiative helps the company donate milk to government school children in Delhi and Nagpur regions.

- Other companies, such as Adani Wilmar, show initiative by supporting programs designed to address undernutrition. For instance, Adani Wilmar, in association with the Adani Foundation (the Corporate Social Responsibility arm of the Adani Group), publicly discloses its work with the *SuPoshan* project by which it aims to combat malnutrition and anemia among children in the 0–5-year age group and adolescent girls, as well as women in the reproductive age group. The project also aims to create village level resource pools to support efforts aimed at reducing Infant Mortality Rate & Maternal Mortality Rate. In special Severe and Acute Malnutrition cases, the Adani Foundation supports with ready-to-use therapeutic food as well as nutrient supplements.

Recommendations

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

To improve and accelerate their efforts towards affordable and accessible healthy products, food and beverage manufacturers in India are encouraged to:

- Clearly define their healthy products based on objective nutrition criteria that align with national and international standards and make commitments to improve their affordability and accessibility.
- Adopt and publish a policy and strategy to improve the affordability and physical accessibility of their healthy products, which take into account how these products can reach low-income populations or groups that lack regular access to healthy, affordable food.
- Adopt and publish a policy and strategy to improve the affordability and physical accessibility of products designed to address undernutrition and micronutrient deficiencies.
- Set concrete pricing and distribution targets for reaching consumers across all the states where the company operates to encourage more purchases of healthier products over less healthy products.
- Conduct periodic/regular state-level pricing and distribution analysis to assess and address the unmet needs of consumers with low incomes and based in remote locations. Furthermore, consider taking guidance from national development initiatives, such as the Transformation of Aspirational Districts program, and take appropriate action.
- Include distribution partners, local sales teams and manufacturing departments in consideration of affordability and accessibility strategies.
- Disclose evidence of actions undertaken to improve the pricing and distribution of healthy products, as well as products designed to address undernutrition and micronutrient deficiencies, and report on progress made against their commitments to deliver healthy products across all regions of India.



Category D: Marketing

Responsible marketing policies, compliance and spending (20% of overall score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic Categories.

This thematic Category D on Marketing captures the extent to which companies support all Indian consumers, especially children and teenagers, to make healthy choices by adopting responsible marketing practices and by prioritizing the marketing of their healthier products. This Category makes up 20% of the overall Index score companies can achieve.

Category D has three equally weighted criteria:

- D1 Marketing policy
- D2 Marketing to children
- D3 Auditing and compliance

To perform well in this Category, companies should:

- Establish and implement a responsible marketing policy covering all consumers.
- The marketing policy should be comprehensive in its scope, i.e. considering all media channels and should embrace the principles of the International Chamber of Commerce (ICC) general marketing code, as well as the Framework for Responsible Food and Beverage Marketing Communications.
- Establish and implement a marketing policy that explicitly covers responsible marketing arrangement for children, including channels, location/settings (like schools) and type of products.
- Companies should commit not to market any unhealthy products to children and teens below the age of 18.
- Commission or participate in industry-level independent audits to assess compliance with marketing policies, as well as disclosure of individual results for all types of media.

Nestlé India has the highest scores (7.9 out of 10) in this Category on marketing, followed by Hindustan Unilever (7.5 out of 10). In addition to having a marketing policy, companies that have specific arrangements for marketing to children perform comparatively better in this thematic Category. With a new Marketing Communication Policy, Britannia Industries achieves the highest score among Indian-headquartered companies and ranks 6th with a score of 5.3 out of 10. The company also showed the greatest progress compared to 2016 Index results . Overall, disclosure regarding companies marketing approaches and auditing practices in India remains very limited.

D1 Marketing policy

D2 Marketing to children

D3 Auditing and compliance

* Did not provide information to ATNI

Context

Rates of obesity and diet-related chronic diseases in India are rapidly rising. According to a recent study that forecasted prevalence using survey data, the number of overweight people will more than double and the number of obese people could triple between 2010 and 2040 to reach a prevalence of overweight and obesity of 30.5% by 2040. At the same time, the latest National Family Health Survey 2019-20 (NFHS-5) indicated a decline in nutritional status of children under 5 years, and anemia among women remains a major cause of concern. In this context, companies can support consumers in making healthy choices by marketing their products responsibly and prioritizing the marketing of healthier products over energy-dense, nutrient-poor foods and beverages.

There is evidence that marketing of unhealthy food negatively impacts food choices, dietary patterns, and health. It is widely agreed by researchers and child advocates that children need special consideration with respect to marketing (see pop out box) because they are unable to fully understand the persuasive intent of advertisements. Although studies on the impact of food and beverage companies' marketing practices in India are limited, in 2017, a study which surveyed 560 adolescents (age 10-18 years) in Pune in Maharashtra State shows that marketing strategies, such as repetition of messages, brand image, celebrity endorsements and other techniques were associated with negative changes in food choices.

In addition, India's rapidly changing demographics and lifestyles are impacting dietary patterns. After China, India has the world's highest number of internet users, with around 570 million internet users in 2019, growing at a rate of 13 per cent annually. The expansion of mobile internet access and growing connection speeds had led to a growth in demand for digital media, with concerns about increase screen times for children during COVID-19 related lockdowns. The World Health Organization (WHO) has urged countries worldwide to monitor the exposure of children and teens to digital marketing, while the Food Safety & Standards Authority of India (FSSAI) is studying advertisements in television and other media targeted at children of foods high in fat, sugar and salt.

In India, marketing practices among food and beverage manufacturers are, to some degree, regulated, for example to protect consumers from false and misleading claims. In November 2019, FSSAI proposed a regulation to forbid foods high in fat, salt and sugar (HFSS) from being sold in food school canteens and within 50m of school campuses. As of September 2020, this regulation has been finalized as the Food Safety and Standards (Safe food and balanced diets for Children in School) Regulations, 2020. The regulation also prohibits advertising HFSS foods to children in school premises or within 50m of school campuses.

In support of government efforts, Indian food and beverage companies should adopt responsible marketing practices and ensure they commission independent audits to guarantee compliance and transparency. ATNI's research in this Category D on marketing has been simplified to three criteria instead of four in the previous Index. To place higher emphasis on companies' commitments to protect children from harmful or misleading marketing practices, new indicators have been included. These new indicators include one on companies' commitment to clearly display the company or brand name when advertising in virtual media, and another indicator on marketing arrangements related to age thresholds and tools like age screening used in digital settings. In addition, criterion D2 has expanded its scope to include children of all ages under the age of 18 in order to align with recent changes made in the ICC Code for responsible marketing to children which now includes teens (Article 18 – ICC Advertising and Communication Code).

Compared to the first India Index published in 2016, some companies have demonstrated enhanced commitment to responsible marketing by adopting their own policies or adhering to codes developed by organizations such as The **Advertising Standards Council of India** (ASCI) or the stronger consolidated **ICC Code**.

How is food marketing affected and relevant in the COVID-19 crisis?

- The COVID-19 pandemic and associated measures have impacted the diets of millions of Indians. In the early stages of the pandemic, some regions showed demand for packaged foods and online grocery services had significantly increased compared to pre-COVID-19 levels. In response, food and beverage companies' have adjusted their supply chains, production priorities and marketing strategies.
- A survey conducted in May-June 2020 with parents of school-age children revealed that screen time for Indian children 5 to 15 years has increased by 100 percent since the first lockdown. Changes in livelihoods and lifestyles, including lockdown measures, could significantly worsen childhood obesity. As highlighted in ATNI's report on the impact of COVID-19 in India, none of the companies researched by ATNI for this report include a statement on their websites reiterating any commitment to responsible marketing to children during the pandemic. ATNI urges companies not to relax existing marketing commitments and recommends that they continue to prioritize marketing of healthier products, particularly to children (see above).
- With raised awareness on health and diet-related risk factors for COVID-19, consumers have become more interested in health and wellness. Demand for so-called 'immunity-boosting' products has boomed, with many manufacturers launching new products with functional (bioactive) ingredients like turmeric. Claims made in advertisements during and beyond the pandemic should be evidence-based.
- In the context of COVID-19, food and beverage manufacturers in India have an opportunity to build upon and strengthen their responsible marketing practices, especially those targeting children in the digital space. This can be achieved through companies' marketing practices to make healthier products, including those that are fortified, more desirable for Indian citizens.

The India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19. But ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020 and ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main messages

- Overall, seven out of 16 companies have a policy for responsible marketing, and six published it in full detail: Nestlé India, Hindustan Unilever, Mondelez India, PepsiCo India, Coca-Cola India, and Britannia Industries. The same six companies have some policy for responsible marketing towards children and/or support the Food and Beverage Alliance of India (FBAI) [pledge](#).
- With a new marketing policy, Britannia Industries shows the greatest improvement in this thematic Category, increasing its score from 0.8 in 2016 to 5.3 out of 10 in 2020. It is the only Indian-headquartered company that has codified some commitments towards responsible marketing to children. For example, the company commits to only selectively market products to children which meet the company's own nutrition criteria.
- Nestlé India is the only company that commits not to direct any marketing communications to children in and near primary schools; however, the commitment near the school settings is limited to specific product categories, such as confectionery or sugar-sweetened beverages. Mondelez India is the only company that makes a global commitment to prohibit all advertising and any type of commercial messaging in primary and secondary schools. There is no commitment from any of the companies not to market any product in nor near secondary schools. Britannia Industries does commit to only marketing/advertising 'healthy' products in (or near) primary and secondary schools in agreement with schools/parents.
- Five companies: Nestlé India, Mondelez India, Hindustan Unilever, PepsiCo India and Coca-Cola India, audit compliance with their responsible marketing policy. Nestlé India was the only company to audit its compliance with its policy in India for all groups, including marketing to children. Furthermore, Nestlé India discloses its 2019 auditing results online showing best practice.
- ATNI's Product Profile study undertaken in collaboration with The George Institute for Public Health, found that out of all products (1,456) analyzed for all Indian companies combined, 16% met the healthy threshold. An additional and unscored Product Profile analysis indicates that only 12% of 1,495 products assessed, were eligible to be marketed to children according to the World Health Organization South East Asia Region (WHO SEAR) nutrition criteria. These findings underline the importance and need for more companies to adopt responsible marketing to children policies, particularly in accordance with the [FSSAI order restricting the sale of HFSS foods in schools and prohibiting sale and advertisement within 50m of a school campus](#).
- Overall, the Indian subsidiaries of companies assessed in ATNI's Global Index align their responsible marketing policies and practices in India with those of their parent companies. Similar to 2016 findings, some of the Indian-headquartered companies are ASCI members but very few companies mention that they adhere to its principles.

Novelties and best practices

Britannia Industries releases new Marketing Communications Policy

Since the last Index in 2016, Britannia Industries has adopted its Britannia Marketing Communications Policy, through which the company commits to market its products responsibly to all consumers, including specific references to responsible marketing to children. Britannia Industries is the only India-headquartered company to have its own responsible marketing policy. Furthermore, it is the only India-headquartered company to commit to only market products meeting its own healthy standards in and near primary and secondary schools.

Nestlé strengthens its marketing commitments globally and performs audit in India

According to Nestlé's documents, its marketing expenditure rose 18.5 percent year-on-year to ₹4.7 billion in the first half of 2019. Therefore, it is essential that the company adheres to its responsible marketing policy and is transparent about its auditing results so that stakeholders can hold the company to account. Nestlé India's global Marketing Communication to Children Policy was updated in 2018. The company commits to using only responsible techniques in marketing aimed at children below the age of 12 and restricts its advertising on all media where 25% or more of the audience is of that age group. Nestlé also commits to not direct any marketing communications to children in primary schools, nor near school campuses for product categories such as confectionery or water-based sweetened beverages.

Nestlé India shows industry best practice by commissioning an independent audit of compliance with its marketing to children policy. The audit from 2019 is available in the public domain and covers all forms of advertisement and media (including point-of-sale visits), showing individual compliance levels above 90%. The company also commissioned a survey across 50 primary schools in 12 states to assess whether there was any evidence of Nestlé branded material within Indian primary schools.

D1 Marketing policy

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

To what extent did the companies strengthen their commitments to market responsibly to all consumers?

Category results show that six out of 16 companies – Coca-Cola India, Mondelēz India, Nestlé India, PepsiCo India, Britannia Industries and Hindustan Unilever – have responsible marketing policies aimed at all consumers, see Table 1. Five out of these six companies, except Britannia Industries, implement policies in India that were developed by their global parent companies. Britannia Industries is the only India-headquartered company to have its own responsible marketing policy. For the most part, companies' policies adhere to the ICC Code, an industry best practice. This code is a globally-applicable self-regulatory framework developed by industry sectors worldwide.

Although the research did not find evidence of ITC having a marketing policy, the company states in its [Food Product Policy](#), which is available online, that it adheres to the [ASCI Code for Self-Regulation in Advertising](#). The code provides a commitment to honest advertising and to fair competition in the market-place. The ASCI code is aligned with the principles of the ICC Code and ITC's commitment was credited accordingly.

Overall, little progress in this Category D1 of the Index (Marketing Policy) is observed compared to results from the [previous India Index in 2016](#). Britannia Industries is the only company that demonstrates improvement by adopting a new marketing and communications policy.

Table 1. Companies with active responsible marketing policies

	Marketing policy in 2016	Marketing policy in 2020	Commitment to adhere to ICC Principles*	Policy publicly available
Aavin TCMPF				
Adani Wilmar				
Amul GCMMF				
Britannia Industries		●	✓	✓
Coca-Cola India	●	●	✓	✓
Emami Agrotech				
Hatsun Agro Product				
Hindustan Unilever	●	●	✓	✓
ITC			✓	
KMF Nandini				
Marico				
Mondelez India	●	●	✓	✓
Mother Dairy				
Nestlé India	●	●	✓	✓
Parle Products				
PepsiCo India	●	●	✓	✓

Notes: ● indicates company has a general policy on responsible marketing; not filled in indicates no policy and/or not specified.
 * International Chamber of Commerce (ICC) Advertising and Marketing Communications Code 2018.

Are all media channels covered in companies' marketing policies?

Overall, the media channels covered by the companies that have adopted a marketing policy or that at least make a commitment related to responsible marketing (like ITC) are similar. Table 2 shows that the biggest gap in channels covered is 'additional forms of media', which includes, for example, cinema, outdoor events, sponsorship, product placement in movies, TV shows, online games and apps).

Only two out of six companies that have a responsible marketing policy, Hindustan Unilever and Nestlé India, apply their commitments to all media channels.

Recommendations

To improve and accelerate their efforts to support all Indian consumers, especially children and teenagers, to make healthy choices, food and beverage manufacturers in India are encouraged to:

- Develop and implement a responsible marketing policy for all consumers, including specific arrangements for children and teens up to 18 years old. The policy should adhere to the ICC principles, and respect or go beyond compliance with Indian regulations.
- Ensure marketing approaches explicitly cover all relevant media, including non-traditional channels such as product placements and social media.

Table 2. Media channels covered in companies' responsible marketing policies

	Print media (printed advertisements, news papers, etc)	"Broadcast media (TV, radio)"	Non-broadcast/digital media (websites, social media, etc)	In-store or point-of-sale	Additional forms of media*
Britannia Industries	•	•	•	•	
Coca-Cola India	•	•	•	•	
Hindustan Unilever	•	•	•	•	•
ITC	•	•	•		•
Mondelez India	•	•	•	•	
Nestlé India	•	•	•	•	•
PepsiCo India	•	•	•		•

Notes: An empty cell indicates 'no and/or not specified'; remaining Index companies not in this table were not found to have a marketing policy. Six out of 16 companies in the India Index have responsible marketing policies aimed at all consumers, ITC does not have a formal marketing policy but specifies relevant commitments online, therefore table excludes rest of the companies. *For example, cinema, outdoor, sponsorship, product placement in movies, TV shows, online games and apps etc;

D2 Marketing to children

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Did companies make progress since 2016 in adopting or strengthening their responsible marketing to children policies?

Limited progress was found regarding Indian food and beverage companies adopting responsible marketing policies towards children. At the time of research and engagement with companies (in 2019), little regulation on marketing to children was implemented. Table 3 shows that, overall, only 6 companies have adopted responsible marketing to children policies and or commitments.

Since 2016, Britannia Industries was the only company that has implemented a new policy. In its 'Britannia Marketing Communications Policy,' the company commits to "only selectively market products to children which the Company qualifies as having requisite nutritional content which is good for consumption by children."

In addition, Britannia commits to only market products meeting its own **healthy standards** in and near primary and secondary schools. All the multinational companies with headquarters outside India adopt their global practices or commitments in India, and they are also signatories of the FBAI Pledge.

Audience thresholds are used by companies to restrict advertising on measured media to avoid inappropriately reaching younger age groups. Index results show that most companies have set the threshold at 35%, meaning they will restrict their practices in medium where 35% of more of the audience is of the restricted age group. Nestlé India is the only company that has defined a lower threshold, at 25%.

Table 3. Key characteristics of companies that have adopted responsible marketing to children policies in India

	Company supports FBAl Pledge*	Product restriction basis (own nutrition criteria, FBAl criteria, no marketing at all)	age restrictions	audience thresholds (%)	Marketing in primary schools allowed	Marketing in secondary schools allowed
Britannia Industries		own nutrition criteria	12	35	only healthy products in agreement with schools/parents	only healthy products in agreement with schools/parents
Coca-Cola India	●	no products	12	35	no	yes
Hindustan Unilever**	●	company's and FBAl criteria	12	35	no	yes
Mondelez India	●	no products	12	35	no	no
Nestlé India	●	own nutrition criteria	12	25	no, including near school restriction	yes
PepsiCo India	●	own nutrition criteria	12	35	no	yes

Notes: *The Food and Beverage Alliance of India (FBAl) Pledge for Responsible Marketing to Children; FBAl pledge additional companies not in the ATNI India Index include General Mills, Kellogg's, Mars and Ferrero. **After publication of the India Index, in February 2020, Unilever globally committed to stop all marketing to children under 12 in traditional media like TV and radio, and to children under 12 on social media. In addition, the company will decrease the audience representation threshold from 35 to 25%. Six out of 16 companies in the India Index have responsible marketing policies aimed at all consumers, therefore table excludes rest of the companies.

To what extent have companies addressed digital arrangements related to age thresholds in their marketing policies?

Table 4 shows that significant gaps remain regarding companies' practices towards ensuring their digital media marketing and advertising are not targeted at children. For example, Index results revealed that **only two out of the six companies**, Mondelez India and Nestlé India, **have a responsible policy for marketing to children using age screening tools prior to logging or registering on websites.**

Most of the companies have tools to ensure the design of their websites and the third-party sites they chose to advertise do not appeal or target predominantly children under 12 years old. Companies are encouraged to continue strengthening and monitoring their marketing practices in the digital media. Companies that have not yet adopted responsible marketing practices and/or policies covering children must include digital media when designing and implementing such policies.

Table 4. Tools companies use to ensure its digital marketing does not reach younger age groups

	Ensuring design of website/pages is appropriate to over 12s predominantly	Age screening prior to logging on/registering	Review of traffic data to determine demographic visiting sites	Ensuring adverts are designed deliberately not to appeal to children younger than 12	Nature of third-party websites chosen to advertise on (i.e ages targeted)
Britannia Industries	●				●
Coca-Cola India	●		●	●	●
Hindustan Unilever	●			●	●
Mondelez India	●	●	●	●	●
Nestlé India	●	●		●	●
PepsiCo India					

Notes: blank cells indicate no and/or not specified; ● indicates the digital marketing tool used by the company is in its marketing policy/guidelines. Six out of 16 companies in the India Index have responsible marketing policies aimed at all consumers, so these are the only companies included in the table.

Recommendations

To improve and accelerate their efforts to support all Indian consumers, especially children and teenagers, to make healthy choices, food and beverage manufacturers in India are encouraged to:

- Adopt a responsible marketing policy with special arrangements for children and teens and publicly disclose their commitments to ensure stakeholders can hold the company to account.
- Ensure marketing approaches explicitly cover all relevant media i.e. traditional and digital channels including social media. Companies must adopt tools to ensure the websites, sponsorships, third-party sites, etc., do not appeal or target predominantly children and teens under 18 or only include healthy products.
- Companies must do as much as they can to avoid the marketing and provision of branded materials in primary and secondary schools in support of the new FSSAI (Safe food and healthy diets for school children) regulation banning the sale of HSSF products and within 50 m of school campuses. Companies can expand their commitments on marketing to children and teens to include places where children typically gather, i.e. public parks and sport facilities.

D3 Auditing and compliance

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Do companies audit compliance against their policies for responsible marketing for all audiences and for children specifically and do they disclose the results?

ATNI assesses companies' public commitments and evidence of performing accordingly by assessing whether third-party audits of their marketing practices are in place and results are disclosed publicly. At present, ATNI does not have the means to assess companies' marketing practices directly.

Results show that only four out of six companies – Coca-Cola India, Hindustan Unilever, Mondelez India, and PepsiCo India – have responsible marketing policies covering all consumers as well as specific arrangements for children. These same companies have auditing practices in place for all audiences.

The International Food & Beverage Alliance (IFBA), of which some companies in this Index are members, commissions Accenture to conduct annual, global audits of TV, print, radio and internet advertising. However, India specific results are not published. Table 5 shows that the only company that commissioned an independent, third-party audit covering all relevant forms of media for marketing to children is Nestlé India.

Five out of 6 companies report having response mechanisms for corrective action regarding their marketing practices. For example, in its new Marketing Communications, Policy Britannia Industries states its commitment to "undertake internal audits (annually or more frequently, if required) on marketing practices covering all audiences including children and/or teens, and, wherever required, corrective action will be taken."

Table 5. Companies' auditing practices regarding responsible marketing

	Scope of audit	Type of audit	Response mechanism for corrective action in place
Britannia Industries	no audit	n/a	●
Coca-Cola India	only children	industry association	●
Hindustan Unilever	only children	industry association	●
Mondelez India	only children	industry association	●
Nestlé India	all audiences	appoints an independent external auditor to assess compliance	●
PepsiCo India	only children	industry association	no information

Note: Six out of 16 companies in the India Index have responsible marketing policies aimed at all consumers, so these are the only companies included in the table.

Recommendations

To improve and accelerate their efforts to support all Indian consumers, especially children and teenagers, to make healthy choices, food and beverage manufacturers in India are encouraged to:

- Audit compliance with its policy in India covering all audiences, including children and teens.
- Appoint an independent external auditor to assess compliance with its policies or take part in an auditing process of an external body (not industry association) undertaken by independent company.
- Annually assess compliance of all aspects of marketing covering all audiences to the same standards that are applied in assessing compliance for children and teens.

Products found suitable to be marketed to children

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

(Element that does not impact companies' scores in Category D)

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios undertaken by analyzing the levels of fat, salt, sugar, and other components within individual products. ATNI commissioned an independent research organization, The George Institute for Global Health, to undertake the nutrition profiling element of the Product Profile.

Similar to the process of the previous India Spotlight Index, two sets of results are generated for each company: one to determine the nutritional quality of the company's products, by applying the Health Star Rating (HSR) both at the Category and portfolio level, and another by using the WHO South-East Asia Region (SEAR) regional standard to determine what percentage of products are suitable to be marketed to children. The latter system is used to examine, on average, what percentage of companies' portfolios are suitable to be marketed to children. The [WHO SEAR model](#) was published in 2016 and was used for the first time in the India Index Product Profile 2020.

This assessment did not investigate whether these products are in practice marketed to children and teens by the companies in scope. Instead, it provides an extra indication of the healthiness of the company's portfolios by checking whether the products, in theory, would be suitable to be marketed to children using the WHO nutrient profiling models. If companies are found to have a small number of products suitable to be marketed to children, it is of high priority that they implement responsible marketing policies to ensure these products are not undermining children's health.

Importantly, this assessment does not impact companies scoring in the Index, as the Product Profile results utilizing the HSR system are integrated in Category B. This assessment provides an additional perspective on the healthiness of companies' portfolios but it is not an indication of actual marketing practices and performance in relation to healthy/unhealthy products. A maximum of five best-selling product categories for each company were analyzed in this assessment, based on their estimated Indian retail sales in 2018. Details on the scope of this assessment are provided in Table 6 below.

Table 6. Percentage of 2018 India sales by company covered in the research and number of products suitable to market to children using the WHO SEAR nutrient profile model

	Type	% India 2018 sales* represented in the research	Total no. products used for marketing to children analysis	Categories included**
Aavin TCMPF	Dairy	90-100	17	Dairy.
Adani Wilmar	Edible oil	90-100	13	Edible Oils.
Amul GCMMF	mixed portfolio	90-100	136	Bakes Goods; Dairy; Savory Snacks; Sweet Biscuits, Snack Bars and Fruits Snacks.
Britannia Industries	mixed portfolio	90-100	72	Bottled water; Carbonates; Dairy; Juice; Sports Drinks.
Coca-Cola India	Edible oil	90-100	6	Edible Oils.
Emami Agrotech	Dairy	90-100	175	Confectionery; Dairy; Ice cream and Frozen Desserts.
Hatsun Agro Product	Dairy	90-100	106	Dairy; Ice cream and Frozen Desserts.
Hindustan Unilever	mixed portfolio	30-40	120	Concentrates; Ice Cream and Frozen Desserts; Sauces, Dressings and Condiments; Soup; Sweet Spreads.
ITC	mixed portfolio	90-100	188	Confectionery; Ready Meals; Rice, Pasta and Noodles; Savory Snacks; Sweet Biscuits, Snack Bars and Fruits Snacks.
KMF Nandini	Dairy	90-100	62	Dairy; Ice Cream and Frozen Desserts
Marico	Edible oil	90-100	41	Breakfast Cereals; Edible Oils
Mondelez India	mixed portfolio	90-100	101	Concentrates; Confectionery; Other Hot Drinks; Sweet Biscuits; Snack Bars and Fruit Snacks.
Mother Dairy	Dairy	90-100	106	Dairy; Edible Oil; Ice Cream and Frozen Desserts; Processed Fruit and Vegetables.
Nestlé India	mixed portfolio	60-70	68	Confectionery; Dairy; Rice, Pasta and Noodles; Sauces, Dressings and Condiments.
Parle Products	mixed portfolio	90-100	202	Confectionery, Savory Snacks, Sweet Biscuits, Snack Bars and Fruit Snacks.
PepsiCo India	mixed portfolio	90-100	81	Bottles Water; Breakfast Cereals, Carbonates; Juice; Savory Snacks.

Notes: Companies are grouped in this Index in three different industry segments: dairy, edible oil or mixed portfolio, based on the type of products they predominantly sell (i.e. contributing to 80% or more to their total F&B sales) * Euromonitor International: Packaged Food, Hot Drinks and Soft Drinks, 2018, India dataset. ** Based on Euromonitor International categorization, the top 5 best-selling product categories included for all companies using 2018 sales estimates.

Overall, only **12%** (183 out of 1,494) of products included in the analysis for all companies combined were found to be suitable to be marketed to children according to WHO SEAR criteria. This proportion is lower compared to Category B Product Profile results, which shows 16% of products meet the HSR 'healthy' criteria. This lower result reflects the more stringent criteria applied for eligibility to market to children, as entire categories are ineligible under the WHO SEAR criteria, whereas the HSR uses a cut-off point to determine healthiness.

Mondelez India and Parle Products, had no products in the research eligible for marketing to children at all, showing that it is essential for them to implement and audit its responsible marketing policies and commitments in India.

The sales-weighted proportion of products found suitable to be marketed to children (29%) was higher than the unweighted proportion of products (12%). This means, in general, that companies derive more sales from these products. Overall, company rankings did not change significantly when sales-weighting was applied. Hatsun Agro Product improves its sales-weighted ranking jumping from 11th to 8th place. In contrast, Hindustan Unilever moved from 7th to 11th place after applying sales-weighting. Details are shown in Table 7.

Marico significantly improves its performance when sales-weighting was applied. Although less than half (44%) of the company's products were found to be suitable to be marketed to children, the company was estimated to derive 76% of its 2018 sales from products found suitable to be marketed to children.

Table 7. Companies' products found suitable to be marketed to children according to WHO SEAR criteria.

	Products suitable to be marketed to children	Proportion of total products suitable to market to children (%)	Proportion of total sales from products suitable to market to children (%)	Company has a marketing policy covering children?
Aavin TCMPF	1	6	6	no
Adani Wilmar	12	92	92	no
Amul GCMMF	17	10	15	no
Britannia Industries	8	6	3	yes
Coca-Cola India	8	11	16	yes
Emami Agrotech	5	83	83	no
Hatsun Agro Product	8	8	26	no
Hindustan Unilever	20	17	12	yes
ITC	8	4	6	no
KMF Nandini	12	19	36	no
Marico	18	44	76	no
Mondelez India	0	0	0	yes
Mother Dairy	37	35	44	no
Nestlé India	17	25	40	yes
Parle Products	0	0	0	no
PepsiCo India	12	15	32	yes
All companies (n=1,494)	183	12	29	5

Notes: The number of products included in the assessment per company is shown in parenthesis.

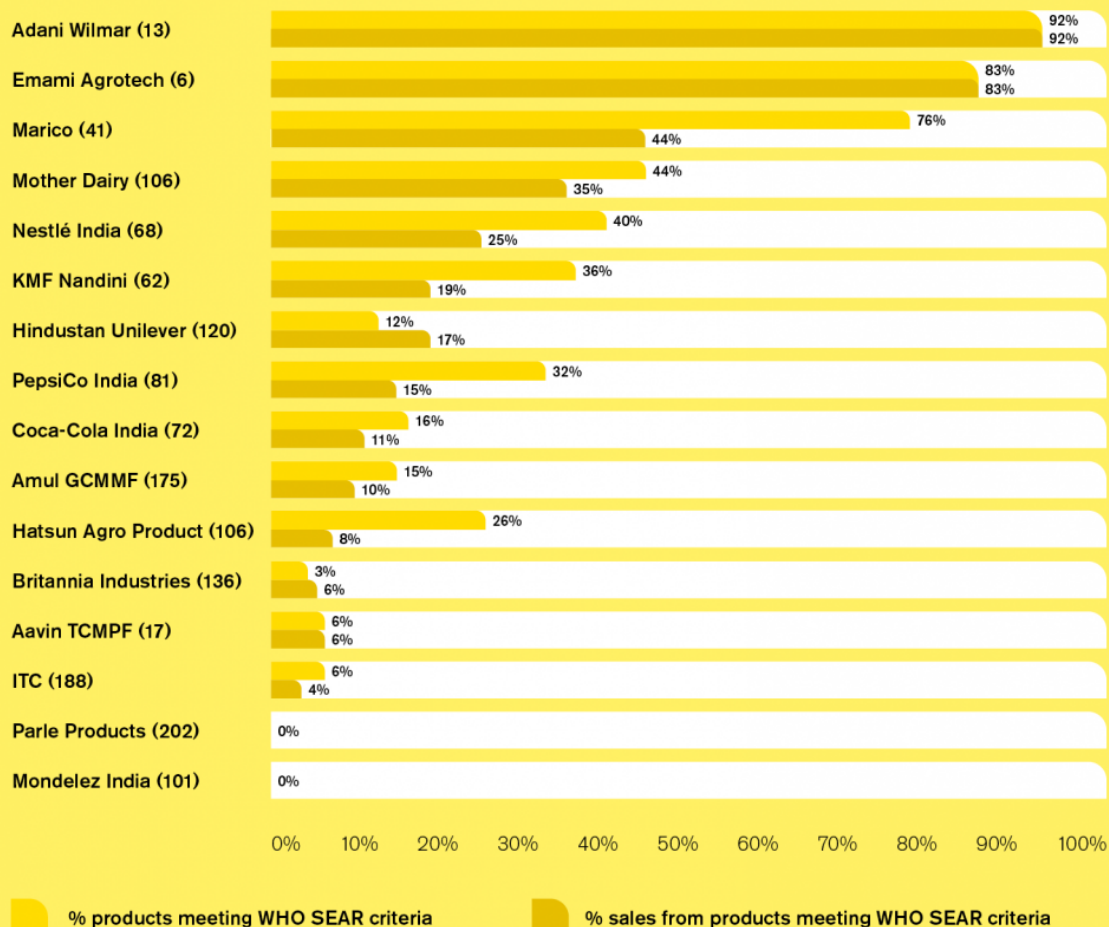
Figure 2 provides an overview of the percentage of products researched that were found suitable to be marketed to children for each company. The results of this assessment are impacted by the number of products in the analysis (in brackets), as well as the quality of nutrition information available.

The companies with the overall highest proportion of products suitable to be marketed to children are Adani Wilmar, with 12 out of 13 products found to meet WHO SEAR criteria, and Emami Agrotech, with five out of six products meeting the criteria. For both companies, only a limited number of edible oil products were assessed.

Only three out of the 16 companies in the Index, were found to have a considerable proportion of products suitable to be marketed to children (more than half the products in their portfolios meeting WHO SEAR criteria), with Marico improving performance when applying sales-weighting. This confirms, as Category B also highlights, there is ample scope for companies to focus more on changing their portfolio to offer healthier products.

More details on the methods, results, and limitations of the Product Profile study are available in the report by ATNI's research partner, The George Institute for Global Health.

Figure 2. Proportion of portfolio and sales from products found suitable* to market children



Notes: The total number of products included by company in the assessment is shown in parenthesis.
 *Based on criteria by the WHO SEAR Nutrient Profile Model.

Recommendations

To improve and accelerate their efforts to support all Indian consumers, especially children and teenagers, to make healthy choices, food and beverage manufacturers in India are encouraged to:

- Make a commitment not to market/advertise products to children and teens at all or to only market foods and beverages that meet specific nutrition criteria, preferably established by independent national or international bodies, for example, the WHO SEAR nutrition criteria.
- Improve disclosure of nutrition information and report on relevant metrics so that stakeholders can have a better understanding of performance.



Category E: Lifestyles

Supporting healthy lifestyles among employees and consumers (2.5% of overall score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. Further details about the India Spotlight Index Categories are explained in the research scope of this Index.




Food and beverages (F&B) manufacturers in India can support their staff to eat healthy diets and pursue active lifestyles by providing employee health and wellness programs. In addition to other benefits, these programs can help to facilitate a corporate culture focused on nutrition. Supportive working practices and the provision of appropriate facilities can ensure that companies support breastfeeding mothers in giving their infants the healthiest start to life. Companies can also help consumers to adopt healthy diets and active lifestyles by supporting education programs, especially by those that target groups suffering from various forms of malnutrition. This Category E assesses the extent to which companies support such efforts.

Category E consists of three criteria, each of which are weighted equally:

- E1 Supporting employee health and wellness
- E2 Supporting breastfeeding mothers at work
- E3 Supporting consumer-oriented healthy eating and active lifestyle programs

- Have programs that support employee health and wellbeing, with a focus on nutrition and physical activity and which are open to all employees and address workers across the food supply chain.
- Disclose quantitative and/or qualitative outcomes of independent impact analysis of its health and wellness programs.
- Have maternity policies which respect and go beyond current Indian regulations, including paid leave and flexible working arrangements, as well as appropriate workplace facilities for all breastfeeding mothers when they return to work.
- A commitment to support unbranded, evidence-based and consumer-oriented programs on nutrition literacy and education, healthy eating and active lifestyles, developed and implemented by independent organizations with relevant expertise.

The overall company scores for Category E can be found in Figure 1. Hindustan Unilever ranks first, followed by Nestlé India and PepsiCo India. Britannia Industries ranks sixth overall and is the highest ranked Indian-headquartered company. These companies have adopted a range of policies to support employee/consumer wellness through a variety of mechanisms, with the highest scoring companies applying their policies throughout the value chain. The 2016 India Index had HUL, Nestlé India and PepsiCo in the same positions, with Nestlé India improving on their previous performance and HUL and PepsiCo India with slightly lower scores.

-  Employee health
 -  Breastfeeding support
 -  Consumer health
- * Did not provide information to ATNI

Context

Employee Health

Within the Indian Food Industry, employees spend approximately a third of their day at work, with long or irregular working hours, unpredictable shifts alongside frequent travel and as a result they often adopt unhealthy food habits, sedentary lifestyles or show signs of work stress. The National Health Policy 2017 of India, emphasises “preventive and promotive health care” (i.e., helping people to increase control over and improve their health), to reduce stress and improve safety at work since the workplace offers an ideal setting to promote employee health.

Initiatives such as the Ethical Tea Partnership with partners like the Sustainable Trade Initiative (IDH), UNICEF and Hindustan Unilever (HUL) have set common goals for tea estate workers in Assam state in North-Eastern India (famous for its tea) that include:

- Workers, their families and communities have increased access to high-quality healthcare.
- Tea estate workers, their families and communities have access to food that meets their nutritional needs.
- Female workers have better access to equal employment opportunities and maternity benefits that protect the health and development of themselves and their children, enabling them to achieve a decent standard of living.
- Lactating women are better able to breastfeed in safe spaces without being penalised for taking time out of the working day

Indian Maternity Policies

Under the Indian Maternity Benefit (Amendment) Act 2017, maternity leave was raised from the previous 12 weeks to the current duration of 26 weeks. Prenatal leave was also extended from six to eight weeks.

A woman with two or more children is entitled to 12 weeks' maternity leave and the prenatal leave in this case remains at six weeks. The Act further requires an employer to inform a woman worker of her rights under the Act at the time of her appointment. The information must be given in writing and in an electronic form to ensure that the rights of the employee are clearly presented to them.

The current Indian regulations on maternity leave are comprehensive when compared to other countries. For example, the US does not offer national statutory paid maternity, paternity or parental leave. The US Family and Medical Leave Act enables some employees to take up to 12 weeks unpaid maternity leave but only 60% of workers are eligible.

Consumer Health

Nutrition literacy within the Indian context is currently underdeveloped. The National Nutrition Strategy (NNS) of India follows the rationale that investing in nutrition is globally well recognized as a critical development stage and it is crucial for the fulfillment of human rights — especially for the most vulnerable children, girls, and women. Nutrition literacy constitutes the foundation for human development by reducing susceptibility to infection and related morbidity, disability and mortality and enhancing productivity. Nutrition is acknowledged as one of the most effective entry points for human development, poverty reduction and economic development, with high economic returns. High levels of maternal and child undernutrition in India have persisted, despite strong constitutional and legislative commitments by government.

How are healthy diets and active lifestyles linked to the COVID-19 crisis?

- Indian companies must work to ensure the health and safety of their employees during the COVID-19 crisis. As demands for products and services have not diminished during the current outbreak, many companies have had to continue to operate at normal levels, which means that employees need sufficient protection to enable them to do their jobs without being put at risk. Following national and international guidelines is key. The Food Safety and Standards Authority of India FSSAI has issued guidance in three areas: i) maintaining high levels of personal hygiene, ii) practicing social distancing, and; iii) cleaning and sanitation (FSSAI, 2020). More detail is set out within the referenced FSSAI document.
- Companies need to adopt COVID-19 strategies to mitigate employee risk in addition to job loss prevention within the company and in the value chain. This at minimum would mean ensuring that employees are compensated appropriately for their work and suppliers for their services, and that support to breastfeeding mothers is protected. An illustration of an appropriate approach in action would be Nestlé India's policy in which the company has adopted stringent social distancing measures within its production facilities. It has also rolled out a program that will reward each operator for working during a stipulated period.
- Adopting or extending breastfeeding policies for their workers is another way companies can respond to COVID-19 (WHO, 2020). UNICEF has provided a 'Breastfeeding During COVID' document which provides guidelines on preventing breastfeeding disruption, in addition to necessary precautions and considerations that must be taken before, during, and after the crisis (UNICEF, 2020). Improving facilities to support breastfeeding mothers would be one way in which companies can help protect the health mothers and their infants.

The India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19. But ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020 and ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main messages

- Most companies (twelve out of sixteen) make a commitment to improve the health and wellness of their employees with programs designed to address physical health and nutrition. While most of these programs (ten out of twelve) are accessible to all employees, only six companies demonstrated a commitment to improving the health and wellness of groups across the wider food supply chain and not direct employees. In addition, most companies do not seem to monitor the impact of their health and wellness programs. Hindustan Unilever bucks this trend by conducting independent evaluations to capture this information and goes a step further by monitoring the impact of programs relevant to employees across the food supply chain.
- In respect to increasing nutrition literacy, nutrition education, healthy diet-oriented and active lifestyle programs aimed at groups that experience, or are at high risk of experiencing, malnutrition, eight companies publicly commit to sponsor/fund such programs. Mondelez India is the only company to demonstrate that all of its nutrition and health programs exclude product promotion or branding.
- Seven of the companies have a **public commitment** to support breastfeeding mothers with appropriate working conditions and facilities **beyond** legal requirements. Half of the overall companies provide at least some facilities to support working mothers. This support is though access to private rooms, flexible work hours etc., without a formal commitment to doing so (support is on an ad hoc basis).
- Three of the sixteen companies make **formal commitments** to supporting breastfeeding mothers at work. Coca-Cola India, Hindustan Unilever and Nestlé India have set out their commitment in a formal policy.
- Companies without formal commitments refer to less defined "other functional arrangements" to support breastfeeding mothers. Examples of these functional arrangements can be travel subsidies, creche access or alteration of workload.

Novelties and best practices

HUL Health & Wellness Strategy

The Hindustan Unilever's Health & Wellbeing strategy has been enhanced since 2016 and forms the cornerstone of the company's approach to supporting healthier diets and lifestyles for its customers, employees and throughout the wider value chain. Through the program, the company has worked to double the amount of products that meet their 'highest nutritional standards' (reducing salt, sugar and fat). Support throughout the wider value chain is provided by programs such as 'Seeds of Prosperity', which aims to improve the dietary diversity of smallholder farmers and also improve their hygiene facilities. The Hindustan Unilever Lamplighter Program helps employees to improve their diet/nutritional intake and lifestyles for improved health. Other facets aim to change habits by measuring the direct impacts of calorie intake and water intake, for example, in addition to measuring other impacts like employees' body mass index and blood pressure.

KMF Nandini's employee support approach

KMF Nandini focuses on the nutrition of all employees by distributing up to 1 L per day of free milk to all employees. It also helps employees to get periodic health checks and cardiologist consultations through its annual medical camps.

PepsiCo India's 2025 Agenda

The employee element of PepsiCo India's 2025 Agenda is designed to drive fair and safe working conditions throughout the value chain and address the most salient human rights issues (i.e., freedom of association, human right to water, land rights, vulnerable worker groups, working hours and wages, and workplace safety). PepsiCo India offers policies like 12 weeks of paternity leave, childcare policy, MatCare4U Program (which regularly sends women information on maternity issues), in addition to a multitude of flexible options to accommodate the needs of breastfeeding mothers at work. PepsiCo India also has the ambitious intention to extend the principles of the Supplier Code of Conduct to all franchises and joint ventures by 2025. The Code of Conduct is a 16-point document to ensure that those in the PepsiCo India supply chain uphold the company's expectations in areas of labor practices, health and safety.

E1 Supporting employee health and wellness

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Have companies improved their commitments to employee health and wellness?

- Since the previous India Index in 2016, the number of company commitments to support health and wellness has increased. Whereas in 2016, five of the nine companies assessed had a program designed to address health and wellness, 12 of the 16 companies of the 2020 Index now have a program.
- Hindustan Unilever performs the best in E1, followed by Marico and PepsiCo India. All three companies offer a comprehensive and accessible employee health and wellness program that includes nutrition components. Programs such as the Hindustan Unilever's Lamplighter program include expected outcomes for employees who participate, whereas Marico focusses on four areas of employee wellness (emotional, community, financial and health), and PepsiCo India's 2025 Agenda is comprehensive in its support for employees with an emphasis on flexible employee working hours (to allow a better work-life balance) and safety within the workplace.
- Despite 12 of the 16 companies in this Index having a program in place designed to address health and wellness issues, most companies still do not commission proper independent assessments of the effectiveness of these programs.

- In criterion E1, the company that has improved the most since the previous index is Mother Dairy. The improvement can be attributed to the company's development of programs like 'Sahi Poshan Swasth Jeevan' (right nutrition, healthy life) described in the best practices section above.
- Most companies have improved their E1 score since 2016; only two companies (Amul GCMMF and Parle Products) have not. In both the 2016 and 2020 iterations, neither Amul GCMMF nor Parle Products have reported on this topic.

Recommendations

To improve and accelerate their efforts to support healthy diets and active lifestyles among employees, food and beverage manufacturers in India are encouraged to:

- To increase their emphasis on improving the accessibility of their health and wellness programs, particularly on nutrition **and** physical activity elements that are accessible to **all**
- Implement robust impact assessment tools and monitoring mechanisms for employee health and wellness programs.

Table 1. Company commitments – Programs supporting health and wellness

	Program to support employees (nutrition/physical activity)	Availability of program to employees (all/some)	Evaluation of program	Program to support wider value chain
Aavin TCMPF				
Adani Wilmar	Yes, with a focus on physical activity	All	No	
Amul GCMMF				
Britannia Industries	Yes, with a focus on physical activity	All	No	
Emami Agrotech	Yes, with a focus on physical activity	No information	No	
Hatsun Agro Product				
Hindustan Unilever	Yes, with a focus on nutrition, and physical activity	All	Independent assessment	Yes
ITC	Yes, with a focus on nutrition and physical activity	No information	No	
KMF Nandini	Yes, with a focus on nutrition	All	No	Yes, but it does not include expected outcomes
Marico	Yes, with a focus on nutrition and physical activity	Some	Internal	Yes, but it does not include expected outcomes
Mondel z India	Yes, with a focus on nutrition and physical activity	All	No	Yes, but it does not include expected outcomes
Mother Dairy	Yes, with a focus on nutrition and physical activity	Some	No	Yes, but it does not include expected outcomes
Nestlé India	Yes, with a focus on nutrition and physical activity	All	No	Yes, but it does not include expected outcomes
Parle Products				
PepsiCo India	Yes, with a focus on nutrition and physical activity	All	No	
Coca-Cola India	Yes, with a focus on nutrition and physical activity	All	No	

E2 Supporting breastfeeding mothers at work

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Have companies improved support for breastfeeding mothers in the workplace?

- Seven of the sixteen companies make a commitment or have a formal policy to support breastfeeding mothers with appropriate working conditions and facilities at work (that respect and go beyond Indian regulations), compared to five out of nine companies in the previous Index.
- Of the companies that have a commitment or a formal policy, five provide flexible working hours to support breastfeeding mothers (Coca-Cola India, Hindustan Unilever, Mondelez India, Nestlé India and PepsiCo India), and four provide private, hygienic rooms for expressing breastmilk (Britannia Industries, Hindustan Unilever, Nestlé India and PepsiCo India) All companies have some form of support to breastfeeding mothers.
- The highest scoring companies on E2 are Hindustan Unilever and Nestlé India. Both companies have a comprehensive approach which provide working mothers with a variety of options to support them at work (such as fridges to store breastmilk, breaks in which to express milk, flexible working arrangements etc.), which are amongst the best practices in this area.

- PepsiCo India and Coca-Cola India are the third and fourth-placed companies, respectively. PepsiCo India is performing well with an extensive provision of facilities to support breastfeeding mothers, which was also acknowledged with the "Best in Benefits for Working Parents award" (from 'People Matters') in 2019.

Recommendation

To improve and accelerate their efforts to support breastfeeding mothers at work, food and beverage manufacturers in India are encouraged to:

- Increase transparency about the support extended to breastfeeding mothers at work and support to maternal health, within a formal company policy which is in line with, or ideally, goes beyond, Indian regulations. If more companies would formalise a commitment to support breastfeeding, this would provide women in the workplace with greater security
- Currently limited arrangements to support breastfeeding mothers should be expanded to: i) provide private, hygienic, safe rooms for expressing breastmilk; ii) allow breastfeeding mothers breaks to express breastmilk, and; iii) offer flexible working arrangements to support breastfeeding mothers.

Table 2. Company maternity commitments and facilities

	Level of commitment	Private, hygienic rooms	Fridges to store breastmilk	Breaks to express breastmilk	Flexible working arrangements	Other functional arrangements
Aavin TCMPF						
Adani Wilmar						
Amul GCMMF						
Britannia Industries	Commitment, no formal policy	•	•			•
Coca-Cola India	Yes, set out in a policy		•	•	•	•
Emami Agrotech						
Hatsun Agro Product						
Hindustan Unilever	Yes, set out in a policy	•	•	•	•	•
ITC						•
KMF Nandini						
Marico						
Mondel z India	Commitment, no formal policy				•	•
Mother Dairy	Commitment, no formal policy			•		
Nestlé India	Yes, set out in a policy	•	•	•	•	•
Parle Product						
PepsiCo India	Commitment, no formal policy	•	•	•	•	•

E3 Supporting consumer-oriented healthy eating and active lifestyle programs

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Have companies supported consumer-orientated healthy eating and active lifestyle programs?

- Since the previous India Index in 2016, where five of the assessed companies (Britannia Industries, Mondelez India, Mother Dairy, Nestlé India and PepsiCo India) committed to supporting consumer-orientated nutrition education and healthy diet programs, no additional companies have adopted such programmes. The number remains at five but two of the companies have changed and the programs are now offered by Coca-Cola India, Hindustan Unilever, Mondelez India, Nestlé India and PepsiCo India.
- Eleven companies have some form of nutrition education/nutrition literacy/healthy diet-oriented/active lifestyle programs aimed at the general population/consumers. These programs are adapted to meet the specific needs, background and nutrition literacy level of groups that experience or are at high risk of experiencing malnutrition. Of the eleven companies, eight have their own company program in addition to programs developed and implemented by independent groups. Five companies haven't publicly indicated to hosting any such programs, which are Emami Agrotech, Hatsun Agro Product, Marico, Parle Products and Aavin TCMPF.

- One of the most significant findings on consumer health approaches is the limited evaluation of the outcomes of company programs, with only five companies commissioning any evaluations by independent groups (i.e. third-party evaluation). Mondelez India is the only company to have commissioned evaluations for all programs by independent groups with relevant expertise. This was also the case for Mondelez India in the 2016 Index.

Recommendations

To improve and accelerate their efforts to support healthy diets and active lifestyles among consumers, food and beverage manufacturers in India are encouraged to:

- Expand the coverage of health and wellness programs to include more of those in the food supply chain that are not direct employees. Companies assessed within the Index demonstrated a limited commitment to supporting the health and wellness of people across their food supply chain **beyond** direct employees.

Table 3. Supporting consumer-oriented healthy eating and active lifestyle programs

	Exclude branding from programs	Programs aligned with national/ international guidelines	Programs the company offers/sponsors/funds	Adapted to at-risk groups	Evaluation of programs
Aavin TCMF					
Adani Wilmar			Only its own programs	Yes, company-supported adapted programs	
Amul GCMF					
Britannia Industries			Its own programs and some developed by independent groups	Yes, company-supported adapted programs	
Coca-Cola India	Some of its programs exclude product or brand-level branding		Its own programs and some developed by independent groups	Yes, company-supported adapted programs	
Emami Agrotech					
Hatsun Agro Product					
Hindustan Unilever	Some of its programs exclude product or brand-level branding	Some of its programs are aligned with national/international guidelines	Its own programs and some developed by independent groups	Yes, company-supported adapted programs	Some programs are evaluated by independent groups
ITC			Its own programs and some developed by independent groups	Yes, company-supported adapted programs	
KMF Nandini		All programs are aligned with national/ international guidelines	Its own programs and some developed by independent groups	Yes, company-supported adapted programs	
Marico			Only its own programs		
Mondel z India	All programs exclude product or brand-level branding	All programs are aligned with national/ international guidelines	Only its own programs	Yes, company-supported adapted programs	All programs are evaluated by independent groups
Mother Dairy		Some of its programs are aligned with national/international guidelines	Its own programs and some developed by independent groups	Yes, company-supported adapted programs	Some programs are evaluated by independent groups
Nestlé India	Some of its programs exclude product or brand-level branding	Some of its programs are aligned with national/international guidelines	Its own programs and some developed by independent groups	Yes, company-supported adapted programs	Some programs are evaluated by independent groups
Parle Product					
PepsiCo India	Some of its programs exclude product or brand-level branding	Some of its programs are aligned with national/international guidelines	Its own programs and some developed by independent groups	Yes, company-supported adapted programs	Some programs are evaluated by independent groups

Category F: Labeling and claims



Product Labeling and use of health and nutrition claims (10% of overall score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic Categories. The results of Category F are presented here.

One important means of promoting healthy diets and addressing malnutrition is to provide consumers with accurate, comprehensive and readily understandable information about the nutritional composition and potential health benefits of what they eat. This can promote better nutrition by helping consumers choose appropriate products to manage their weight and prevent or address diet-related chronic disease, and to raise awareness of products that address micronutrient deficiencies. This Category F assesses companies' approaches to product labeling and use of health and nutrition claims, across product portfolios and in accordance with local and international standards (Codex Alimentarius).

Category F consists of two equally weighted criteria:

- F1 Product labeling
- F2 Nutrition and health claims

To perform well in this Category, a company should:

- Adopt and publish a nutrition labeling policy to ensure that consumers have access to accurate information to help make informed choices about which products they consume.
- Commit to labeling all relevant nutrients, including but not limited to, saturated fat, trans fat, sodium, and dietary fiber on all of their products.
- Adopt and publish a claims policy to ensure terms used are not misleading and help consumers make informed choices, appropriate to their needs.

Hindustan Unilever ranks first in Category F, followed by Nestlé India and Mondelez India. Britannia Industries ranks fourth overall and is the highest ranked Indian-headquartered company. These companies have adopted a labeling policy and, compared to peers, publicly disclose more information on both their overall approach to nutrition labeling and the alignment of their policies with Indian labeling standards. Since the India Spotlight Index 2016, where nine of the current 16 companies were assessed, Britannia Industries shows the most significant improvement in this Category, moving from a score of 2.1 to 7.8 in 2020. With a new score of 5.8, Coca-Cola India also improves considerably upon its 2016 score of 2.0. Mondelez India follows closely, going from 5.5 (2016) to 8.5 (2020).

F1 Product labeling

F2 Claims

* Did not provide information to ATNI

Context

Food labeling informs consumers about the nutritional composition of packaged foods and beverages (other labels on food products show, for example, the shelf life of products). Nutrition information is usually found in panels at the back-of-pack and generally includes ingredients, nutrient content of the product and the total energy or calories provided.

Studies on the impact of nutrition labeling among Indian consumers are, however, limited. A 2014 cross-sectional study, which interviewed 1,832 consumers in New Delhi and Hyderabad, showed that the majority found it difficult to comprehend nutrition information on packaging. A different study which interviewed 300 educated youths (18-30 years old) found that over 50% of the respondents felt that labels influenced their food purchase choices.

Interpretative labels are a simpler and easier-to-understand alternatives to numeric labels, which can help people better understand the nutrition content of the products they buy. These interpretive labels are usually found in the front-of-pack (FOP) of packed foods and beverages. Different voluntary and mandatory FOP schemes have been adopted in over 30 countries around the world (see for example NOURISH framework from WCRF). Formats include color-coded labels, grading labels and warning labels.

At the time of research for the Index in 2019, FSSAI was working on new labeling regulations which included an interpretive labeling proposal. According to a draft regulation, all food companies would need to declare nutrition information front-of-pack. A red label would be applied to products that exceed stipulated total levels of calories, fats, trans fat, sugar and sodium per serving.

In a commentary about the new proposal, professionals from India's National Institute of Nutrition suggest that the 2019 draft proposal, at the time, failed to meet the needs of the Indian population who are illiterate (which makes up almost one quarter of the population). Authors suggested, a symbol-based system could be more beneficial. In addition, the authors highlight the importance of including food manufacturers in the policy development process and recognize their concerns related to using red, as consumers can relate it to danger.

After a dialogue in 2019 and 2020 between industry and government, the draft proposal was changed into a new regulation. On December 14, 2020, after the research period for this Index, the FSSAI published the "Food Safety Standards (Labelling and Display) Regulations, 2020" which will be enforced December 2021. The new regulation strengthens the scope of the requirements in alignment with international Codex Alimentarius standards (see Table 1). These developments are vital, allowing for more transparency for consumers and in support of Government campaigns like 'Eat Right India.' This new regulation, however, has very limited front-of-pack nutrition labeling requirements. The front-of-pack requirements in the new regulation are declaration on vegetarian or non-vegetarian, organic foods, as well as the addition of a logo when a product has been fortified. It does not include red FOP labels for products exceeding certain nutrient thresholds.

Apart from the new labeling regulation mentioned above, two other important regulatory changes have occurred since the previous ATNI India Index was published in 2016:

- The Food Safety and Standards (Fortification of Foods) Regulation, 2018:
 - This regulation makes it mandatory for food manufacturers to adhere to fortification guidelines when voluntarily adding micronutrients to the following staples: milk, oil, rice, "atta" (wheat flour), and "maida" (refined wheat flour). All products that are fortified according to this new regulation must use the +F logo on their labels.
- The Food Safety and Standards (Advertising and Claims) Regulations, 2018:
 - This regulation came into effect on July 1, 2019 and sets out the conditions that companies must follow when placing nutrition content or health-related claims on their products.

These two 2018 regulations are harmonized with globally recognized Codex Alimentarius standards. ATNI adapted the indicators used in the 2016 Index to assess in this 2020 Index the degree to which companies confirm and disclose their approach to implementing these regulations. The methodology and research for this Index was conducted before the publication of the new Food Safety Standards (Labelling and Display) Regulations, 2020, therefore, this category did not take into account the new standards included. As the previous (2011) Indian labelling regulations did not require companies to disclose amounts of sodium, added sugar, saturated and trans fats, and dietary fiber on all products, for this Index research ATNI did identify companies that went beyond legal requirements by committing to disclose these nutrients on their products on the back-of-pack and front-of-pack.

Table 1. Mandatory nutrition information on packaged foods and beverages in India

Nutrition information	Old regulation, 2011*	New regulation, 2020**	Codex Alimentarius standards***
Ingredients	✓	✓	✓
Front-of-pack labeling	●	●	●
Per 100 g/100 ml of product	optional	✓	✓
Per serve	optional	✓	✓
Per serve percentage (%) contribution to recommended dietary allowance	●	✓	optional
Energy value (kcal)	✓	✓	✓
Protein (g)	✓	✓	✓
Carbohydrate (g)	✓	✓	✓
Total sugars (g)	✓	✓	✓
Added sugars (g)	●	✓	●
Total fat (g)	✓	✓	✓
Saturated fat (g)	if claim is made/some products	✓	✓
Trans fat (g)	if claim is made/ some products	✓	if claim is made
Cholesterol (mg)	if claim is made	✓	if claim is made
Sodium (mg)	if claim is made	✓	✓
Dietary fiber (g)	if claim is made	if claim is made	if claim is made

Notes: ✓ symbol used when element is mandatory under FSSAI or as recommended by Codex Alimentarius.

*FSSAI's Food Safety and Standards (Packaging and Labelling) Regulations, 2011.

** FSSAI's Food Safety and Standards (Labelling and Display) Regulations, 2020, which will be enforced December 2021

*** Codex Guidelines on Nutrition Labeling CAC/GL 2-1985 last modified in 2017. The only front-of-pack requirement in the new regulation is declaration on vegetarian or non-vegetarian.

How is food labelling and use of claims affected and relevant in the COVID-19 crisis ?

- The pandemic has emphasized the need to provide accurate, comprehensive and readily understandable nutrition information for all packaged products and across different retail channels. As of June 2020, retailers and food companies reported that some packaged food sales had increased by between 5% and 15% during the lockdown. As the consumption of packaged foods and beverages in India rises, accurate and comprehensive nutrition information becomes more important given the role that healthy diets play in maintaining a strong immune system, a healthy weight and preventing the development of diabetes, hypertension, heart disease and other conditions implicated in more severe and fatal cases of COVID-19.
- As demand for online food delivery services and products that allegedly would have immunity benefits has increased during the COVID-19 crisis, the availability of accurate and evidence-based nutrition information for all products, including online, is increasingly important to empower consumers to make healthier food choices during the crisis and beyond.
- Another evident impact has been on companies' marketing and claims practices by which the food industry has been pivoting towards products that directly claim to (such as Ayurvedic products). This has been partly due to a surge in consumer demands for such products underpinned by the government and prime minister's message that, 'the COVID-19 situation is under control because every household is consuming immunity boosters like turmeric milk, the ashwagandha herb, kaadha etc.' However, such claims have not been formally supported by the FSSAI, who note the importance of consuming a nutritious and balanced diet.
- Companies should refrain from making COVID-19-related health claims and should reinforce commitments to base any claims only on scientific evidence, and in alignment with the regulations of the Food Safety and Standards Authority of India (FSSAI). Furthermore, companies must safeguard labeling standards and should not use the crisis as an opportunity to deviate from existing labeling commitments.

The India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19. But ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020 and ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main messages

- Hindustan Unilever leads Category F with a score of 9.1 out of 10, followed by Nestlé India (8.6) and Mondelez India (8.5). Britannia Industries, which ranks fourth, shows the largest improvement in Category F among companies also assessed in the first India Index in 2016, improving its score from 2.1 to 7.8 out of 10. This improvement can principally be attributed to the company's new Nutrition Policy, which includes both elements of nutrition labeling and use of claims, and which is available in the public domain.
- Since the first India Index in 2016, Britannia Industries, Coca-Cola India and Mother Dairy, have improved their labeling practices by committing to disclose the levels of more key nutrients, such as sodium, on the packaging. These advances are important, particularly in support of current government efforts like the Eat Right Movement which seeks to empower citizens to make healthier food choices. Overall, six out of the 16 companies publicly disclose which nutrients they commit to include on their labels. This illustrates the need for companies to increase transparency about their labeling practices, especially with the recently adopted food labeling regulation.
- Five companies — Coca-Cola India, Hindustan Unilever, Mondelez India, Nestlé India and PepsiCo India — commit to provide nutrition information on the front-of-pack (FOP). However, none of the companies assessed use an interpretive format to provide an indication of how healthy the product is. Instead, they provide numeric information which many consumers can find harder to interpret.
- 10 out of the 16 companies publish nutrition information on their websites, while only five companies — Britannia Industries, Coca-Cola India, Hindustan Unilever, KMF Nandini and PepsiCo India — confirmed with ATNI that they provide nutrition information for at least 90% of their products. In light of the COVID-19 crisis and the already rising online demand for food products, it is essential that companies empower consumers to make healthier choices by providing easily accessible nutrition information online.
- Five out of eight companies that commit to adhere to the Food Safety and Standards (Advertising and Claims) Regulations publicly disclose how they comply with this regulation (Britannia Industries, Hindustan Unilever, ITC, Mondelez India and Nestlé India).
- Overall, companies' public disclosure on labeling practices remains limited. Companies that did not provide information to ATNI rank lowest in this Category, with the exception of ITC. ITC's Food Products Policy includes some information on nutrition labeling and use of claims. Given the rapidly evolving regulatory environment in India, companies are encouraged to adopt and publish a comprehensive nutrition labeling policy that aligns both to Indian and Codex standards, and to publish that policy.

Novelties and best practices

Britannia Industries' Nutrition Policy

Britannia Industries has demonstrated the greatest improvement in Category F among the companies also assessed in the 2016 Index. Within its newly implemented [Britannia Nutrition Policy](#), the company commits to disclose nutrients not mandated under Indian regulations (as of June 2020) including, saturated fat, trans fats, sodium, and dietary fiber. In addition, the policy states that when health and nutrition claims are made, the company will comply with FSSAI and Codex Alimentarius standards and guidelines. The company's Nutrition Policy is publicly available and easily accessible through the website, which improves transparency about the company's overall approach to nutrition and enables stakeholders to hold Britannia Industries to account for adhering to its labeling and nutrition-related commitments.

Coca-Cola India 'Compare our products' online tool

Since the previous India Index in 2016, Coca-Cola India has designed an online [tool](#) which allows consumers to compare the nutritional quality of the company's products. In addition, the company provides a description of the functionality of the nutrients and ingredients found in each product, which improves transparency and empowers consumers to make better dietary decisions.

F1 Product Labeling

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

Have companies improved their commitments to provide nutrition information on the back and front of packs?

Since 2016, some food companies' have improved nutrition labeling by including more key nutrients such as sodium, saturated fat (separate from total fat), trans fat and dietary fiber, which at the time of research were not mandatory under FSSAI standards. For example, seven companies are committed to providing sodium content as part of nutrition labeling, an important improvement from the 2016 Index, due to Britannia Industries' and Mother Dairy's additional commitments (see Table 2). Companies that are subsidiaries of multinational food and beverage companies generally have global labeling policies, which apply in India.

Dietary fiber remains the nutrient least covered by Indian companies, while the labeling of saturated fat (separate from total fat) is the most covered among the companies assessed.

Six companies disclose their labeling commitments in a publicly available policy, yet Table 2 shows that only two companies (Hindustan Unilever and Britannia Industries) report a commitment to labeling all four relevant nutrients in their policy statement.

Britannia Industries' commitments have improved the most in terms of labeling key nutrients compared to the previous 2016 Index results, as shown in Table 2. The company has adopted a Nutrition Policy which outlines its commitments to nutrition labeling and use of claims, stating that the company commits to voluntarily label the content of sodium, dietary fiber, trans fats and saturated fat in all its products.

Table 2. Commitments to providing back-of-pack nutrition information on nutrients not covered by Indian regulation (in force in 2019)

	Saturated fat (separate to total fat)	Trans fat	Dietary fibre	Sodium (salt)	Publicly discloses list of nutrients included on labels as set out in a policy
Aavin TCMPF					
Adani Wilmar					
Amul GCMMF					
Britannia Industries	★	★	★	★	✔
Coca-Cola India	◆	★		◆	
Emami Agrotech					
Hatsun Agro Product					
Hindustan Unilever	◆	◆	◆	◆	✔
ITC		●			✔
KMF Nandini	●	●			
Marico					
Mondel z India	◆		◆	◆	✔
Mother Dairy	★	★		★	
Nestlé India	◆		◆	◆	✔
Parle Products					
PepsiCo India	◆	▲		◆	✔

Notes: ◆ same as 2016;
● new Index company;
★ new commitment;
▲ commitment as scored in 2016 was not found in 2020;
blank indicates no commitment/no information.

To what extent do companies' commit to labeling nutrient information on a per portion/ per serving basis in India?

In addition to disclosing the total content of nutrients in their products, companies can decide to label nutrient information on a per portion basis, which can help consumers choose a more balanced diet. Five companies commit to labeling nutrient information on a per portion or per serving basis: Coca-Cola India, Hindustan Unilever, Mondelēz India, Nestlé India and PepsiCo India. None of the Indian-headquartered companies have a commitment to providing nutritional information on a per serving or per portion basis, as quantified on the label, or on a per 100 g or per 100 ml basis, stating the number of portions or servings contained in the package.

With recent revisions to the Food Safety and Standards (Packaging and Labeling) Regulation 2011, the new draft proposal (to be enforced in December 2021) would mandate all food companies to declare nutritional information on a per serving basis.

Are companies' adopting FOP labeling in India?

Five companies — Coca-Cola India, Hindustan Unilever, Mondelēz India, Nestlé India and PepsiCo India — were found to have commitments to provide nutrition information front-of-pack. Nestlé India, for example, commits globally to providing FOP information on daily energy intake and key nutrients.

In its Nutrition Policy, Britannia Industries makes a general commitment to place nutrition information FOP, but does not specify what information it will provide.

No company was found to commit to providing FOP information using an interpretive (easily understandable, graphic) format.

To what extent do companies provide nutrition information online?

Ten of the 16 companies publish at least some product nutrition information online, either directly on the company website or on their brand sites. Five companies provide information for 90% or more products. This is a notable improvement compared to the 2016 Index, when only two companies, Britannia Industries and Coca-Cola India, confirmed that they provided nutrition information online for at least 90% of their products.

None of the companies, except Coca-Cola India, were found to publicly report that they provide nutrition information for products online. Coca-Cola India states in its Transparency Nutrition Information [webpage](#) "Information pertaining to nutritional content of our products is also available at the company's website." This kind of information disclosure is essential for consumers so they can be sure to easily find all the nutrition information they need.

Table 3. Disclosing product nutrition information online

Availability of online nutrition information on company website	Companies	Total no. of companies
For 90% or more of products	PepsiCo India; Coca-Cola India; Hindustan Unilever; KMF Nandini; Britannia Industries.	5
For 50-90% of products	Amul GCMMF; Aavin TCMPPF	2
For 10-49% of products	Mother Dairy; Nestlé India.	2
For less than 10% of products	ITC	1
No information/no information published	Adani Wilmar; Parle Products; Marico; Hatsun Agro Product; Emami Agrotech; Mondelez India	6

Note: Based on percentages as reported to ATNI by companies.

Recommendations

To improve and accelerate their nutritional information transparency efforts, in particular with regard to disclosure of nutrients of public health importance, such as sodium (salt), sugars and fats, food and beverage manufacturers in India are encouraged to:

- Adopt and publish a comprehensive nutrition labeling policy, in alignment with most recent regulations, that sets out which nutrients will be included on product on the back-of-pack and front-of-pack in understandable and consistent formats; companies are encouraged to go beyond Indian government regulations in their labeling practices and commitments.
- Adopt an interpretative front-of-pack (FOP) labeling scheme for all products, aligned with ongoing government policy development and in consultation with other relevant stakeholders. Interpretive labeling formats should be based on evidence, preferably government-endorsed, as they can have a positive impact helping Indian citizens distinguish between healthy and less healthier products (especially those individuals who are illiterate or have little nutrition knowledge)
- Publish nutrition information online for all products on the company website or branded websites. As e-commerce expands, ATNI encourages companies to work with retailers to ensure accurate and evidence-based nutrition information is available for all products.

F2 Health and nutrition claims

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

In addition to nutrition labels, claims can help consumers choose food and beverages that contain (or do not have) specific levels of nutrients or ingredient types. Properly used claims can also help consumers to manage certain health conditions, such as high cholesterol, high blood pressure or diabetes. In order for this to be the case, companies must use health and nutrition claims responsibly, and based on sound scientific evidence.

Criterion F2 assesses companies' commitments to responsibly use health and nutrition claims, reflecting the new FSSAI (Advertising and Claims) Regulations 2018, which came into force in July 2019.

Have companies improved their commitments to use health and nutrition claims appropriately?

Eight companies explicitly commit to only placing a health and/or nutrition claim on a product if it complies with either the Codex Alimentarius or FSSAI standards — the latter is aligned with Codex guidelines.

Table 4 shows that eight out of 16 companies assessed have commitments related to their responsible use of health and nutrition claims. Britannia Industries and Coca-Cola India have improved their performance compared to 2016.

Five companies — Britannia Industries, Hindustan Unilever, ITC, Mondelez India and Nestlé India —publicly disclose their commitments about using nutrition and health claims on products in India. For example, in its new Nutrition Policy, Britannia Industries states that when claims are made on product packaging, these “will comply with the FSSAI Regulations India, Codex Guidelines, and applicable regulations for the International Markets.”

Recommendations

The novelties and best practices shown in this category indicate some companies are stepping up transparency around nutrition labeling and responsible use of health and nutrition claims. To accelerate their efforts to support healthy diets and significantly contribute to India’s malnutrition challenges, food and beverage manufacturers in India are encouraged to:

- Adopt and publish a comprehensive policy covering use of health and nutrition claims. Companies are strongly encouraged to commit only to using health and nutrition claims on healthy products, or products meeting the company’s healthy criteria, to avoid consumer misconception about claims related to less healthy alternatives.
- Improve disclosure on labeling practices and report on relevant metrics, for example products in the market that have claims, so that stakeholders can have a better understanding of performance.

Table 4. Commitments and policy/statement on the use of health and nutrition claims on product packaging

	2016 Index commitment to use claims in alignment with Codex Alimentarius	2020 Index commitment to use claims in alignment with FSSAI/ Codex Alimentarius	Company publicly discloses its claims commitment/approach
Aavin TCMPF	n/a		
Adani Wilmar	n/a		
Amul GCMMF			
Britannia Industries		•	•
Coca-Cola India		•	
Emami Agrotech	n/a		
Hatsun Agro Product	n/a		
Hindustan Unilever	•	•	•
ITC	n/a		•
KMF Nandini	n/a	•	
Marico	n/a		
Mondelez India	•	•	•
Mother Dairy	•	•	
Nestlé India	•	•	•
Parle Products			
PepsiCo India	•	•	

Notes: n/a company was not selected for the previous India Access to Nutrition Spotlight Index in 2016. Blank indicates no commitment/no information.



Category G: Engagement

Influencing governments and policymakers, and stakeholder engagement (5% of total score)

The India Spotlight Index assesses companies' nutrition-related commitments, practices and disclosure and is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The sections are further divided into seven thematic Categories. Category G focuses on companies' engagement with governmental and non-governmental stakeholders on corporate nutrition practices and nutrition-related issues. By constructively engaging with policymakers and policymaking bodies and supporting the activities and priorities of the Indian government on nutrition policies, companies can have a positive impact on consumers' access to nutrition.

For example, support of the adoption or revision of regulations on improved product labelling, use of claims, etc., or adoption of national fortification standards or strategies. It is important that the companies are transparent with respect to the positions they take on such activities and the public health interest prevails. These public health and nutrition priorities are to be independently set by the authorities/government. In addition, constructive engagement with a wide range of other expert stakeholders (including international and national organizations, civil society and academics) can help companies to strengthen their strategies and policies and gain valuable feedback on their relevance and effectiveness.

This Category consists of two equally weighted criteria:

- G1 Engaging and influencing governments and policymakers
- G2 Stakeholder engagement and partnerships

To perform well in this Category, companies should:

- Commit to engage with the Indian government and policymakers in support of preventing and addressing obesity, diet-related chronic diseases, undernutrition and micronutrient deficiencies; and show evidence of support and actions taken.
- Disclose their positions on nutrition issues in India and ensure transparency around their membership and funding of industry associations, think-tanks, etc., and highlight potential conflicts of interest or present commentary on influencing activities.
- Demonstrate a comprehensive, structured approach to
- Provide evidence of extensive engagement with stakeholders and/or evidence of with expert organizations to solicit input on their nutrition strategies, policies and practices.
- Publish reports on how the input received through stakeholder engagement is used to improve the company's nutrition strategies, policies and/or practices.

Nestlé India scores the highest in this Category for monitoring the engagement on nutrition issues with external stakeholders. Marico, assessed in the 2020 India Spotlight Index for the first time, is the best performing India-headquartered company. Among companies which were also assessed in 2016, three companies have shown considerable improvements in their score: Mother Dairy increased by 4.9 points, PepsiCo India by 4.6 points, and Britannia Industries by 4.1 points. Overall, the average score of this Engagement Category has increased from 1.5 to 3.3 points. In 2016, this was the Category of the India Spotlight Index where companies showed the lowest scores.

 **Influencing
policymakers**

 **Stakeholder
engagement**

* Did not provide
information to ATNI

Context

Companies' interactions with respect to directly influencing public and government policies is not legally regulated in India. However, there are opportunities and channels for local and international food and beverage companies to engage with the Indian government and other policymaking bodies at various levels to support the national nutrition mission and help address India's most pressing nutrition challenges. These challenges remain a serious threat for the country to reach its full potential as shown by the results from the first phase of the fifth and the latest round of the National Family Health Survey (NFHS-5), conducted in 2019-2020. The data indicate a decline in nutritional status of children under 5 years, and anemia among women remains a major cause of concern. Obesity among adults is increasing. Companies for instance, can provide support through interest and advocacy groups (or individuals), the internal public affairs division, industry associations, think-tanks, etc. with whose help companies can facilitate and maintain their interactions with the government. In addition, companies can support and positively engage with regulatory bodies such as the [Food Safety and Standards Authority of India \(FSSAI\)](#), the apex government body mandating food regulations, on all issues concerning food and beverage manufacturers.

In recent years, FSSAI has strengthened the regulatory environment and encouraged and supported improved compliance of companies with its regulations. For example, in December 2017, FSSAI established a self-regulation platform, the Responsible Food Companies Score for food companies, retailers stocking packaged food, and fast-food restaurant chains.

At the same time, FSSAI withdrew all old cases of non-compliance against food business operators, including food manufacturers that were deemed redundant to its revised standards. Since then, engagement between the food regulator and major food companies has led to improved dialogues. Food and beverage companies therefore have a crucial role to play in voicing their support towards policy efforts that improve public nutrition.

Effective stakeholder engagement and partnerships are also vital to integrate food and beverage companies' work in order to have an impact on the wider-nutrition agenda in India. According to a report published by Global Corporate Governance Forum, poor stakeholder engagement has business and reputational risk. In contrast, a long-term, strategic approach that consists of a clear objective, thorough consultations, a focused-plan and greater understanding of stakeholder needs and priorities, can support sound business results, innovation and better nutrition. In this regard, national governmental and non-governmental organizations, such as the National Institute Nutrition, Tata Trusts (specially, with their India Nutrition Initiative), as well as other national/international institutions, such as Global Alliance for Improved Nutrition (GAIN), United Nations International Children's Emergency Fund (UNICEF), World Food Programme (WFP), Save the Children, etc., are some of the key organizations working on nutrition issues in India. Companies can solicit input from them to guide their commercial nutrition strategy and practices.

How do food and beverage companies engage with government and policymakers, and other stakeholders amidst the COVID-19 crisis?

- Food and beverage companies assessed in this Index can support government actions and efforts to assist the most vulnerable sections of society during the COVID-19 pandemic and improve access to food. Mother Dairy, for instance, made special arrangements to place its kiosks or small retail outlets that enable supply of milk and milk products at specific declared hotspots, and worked with local administrators to overcome supply challenges.
- Companies can also collaborate with international organizations, academic experts and/or NGOs to inform their nutrition-sensitive strategies and interventions. For instance, Hindustan Unilever worked with UNICEF to raise awareness about COVID-19 among tea-plantation workers and local communities in Assam State, including provision of hygiene products. PepsiCo India's website highlights that it has partnered with foundations and local authorities to distribute cooked meals and dry food to over 8,000 vulnerable families.
- In addition, companies could harness the collective power of the food and beverage industry by leading or joining industry-wide initiatives to address COVID-19-related nutrition challenges. For instance, companies were seen engaging through the support of trade associations, such as the Federation of Indian Chambers of Commerce and Industry (FICCI), the US India Strategic Partnership Forum and the All-India Foods Processors' Association, to gain 'essential service' status in order to maintain uninterrupted food supply to Indian consumers when the initial lockdown in March 2020 was announced and there were persisting ambiguities surrounding the lockdown restrictions for large food and beverage companies.

The India Spotlight Index 2020 research did not include indicators to score and rank companies' responses to the COVID-19. But ATNI did talk to companies about their initial coping strategies and responses to the pandemic between March and June 2020 and ATNI has been tracking publicly available information on industry's response globally to the COVID-19 crisis, including in India, and reported on trends, best practices and areas of concern in separate reports. Read more about how companies can positively contribute to addressing the global nutrition challenges in ATNI's COVID-19 Project.

Main messages

- Nestlé India achieves the highest score of 6.8 out of 10 for its overall performance in engagement with government and policymakers and other relevant stakeholders impacting nutrition-related activities and initiatives in India, similar to 2016. The company shows a comprehensive level of engagement with internal and external stakeholders to improve its commercial nutrition strategy, and to support the development of public strategies aimed at tackling malnutrition issues in India. Marico and PepsiCo India follow by sharing second place with 5.5 points each. Among the companies that were also assessed in 2016, eight out of nine have shown improvements in their overall score in this Category. Most of this increase can be attributed to the active interest these companies have shown in support of government efforts aimed at addressing all forms of malnutrition in India. For instance, five of them clearly commit to engage with policymakers in support of such measures, and all, except for Parle Products, provide one or more examples of their efforts supporting various national initiatives.
- Although just seven companies explicitly commit to engage with the government and policymaking bodies, in support of measures designed to address all forms of malnutrition in India, 12 were able to provide examples of playing an active and/or constructive role in supporting the Indian government's efforts in this regard. For instance, many companies have shown evidence of supporting and engaging with the food regulator to foster greater action on food safety and nutrition issues in India. This is a positive development since the 2016 Index, which indicates that the food and beverage companies are increasingly acknowledging their role in the development of public health and nutrition initiatives in India.
- None of the companies assessed in this Index provide any evidence of how they engaged with expert organizations and initiatives on specifically addressing malnutrition in . But eight indicate partnering with some organizations. ATNI found publicly available details of some of the partnerships with organizations such as , UNICEF, GAIN, WFP, Save the Children and other national organizations and government bodies. Working closely with such organizations in a long-term commitment can help companies evolve their nutrition business strategies and respond better to local perspectives and needs. When it comes to consulting with to solicit input on their corporate strategies, nutrition-related policies or activities at a broader level, 10 companies disclose some evidence. Nestlé India and Marico stand out in respect to their comprehensive, well-structured and focused engagement with Indian stakeholders around the development of their corporate nutrition strategies. Both companies have established regular interaction with stakeholders through trade associations, surveys, direct feedback and in-person meetings.
- Overall, companies' disclosure about their interaction with stakeholders, such as industry associations, think-tanks, or other such interest groups and organizations in India, is quite limited. None of the companies achieve a full score in transparency on this subject even though nine show some degree of disclosure – mostly regarding their membership with industry associations. None disclose their financial support to influencers (individuals or groups), think tanks, interest groups or other such organizations in India. Only Coca-Cola India discloses its board seats at industry associations and on advisory bodies related to nutrition issues. Therefore, all companies assessed in this Index can improve their disclosure by being transparent about how they engage with various stakeholders.

Novelties and best practices

Nestlé India's Council for Nutrition Affairs and other multi-stakeholder initiatives

Nestlé India aligns with its globally applied Policy on Transparent Interactions with Public Authorities 2017. The Governing Principles of such interactions include supporting public authorities in tackling societal issues such as malnutrition and diet related chronic diseases. Through this, the company commits to engage with policymakers, regulatory authorities and relevant public bodies for the development of public policies designed to address malnutrition. Nestlé India is also a member of the Confederation of Indian Industry National Committee on Nutrition, created in 2017. This National Committee works towards policy advocacy, building a consumer-connect, capacity building and knowledge creation in the area of nutrition. The Committee works in partnership with key stakeholders, such as National Institute for Transforming India (NITI *Aayog*), FSSAI, various ministries, NGO's and micro, small and medium enterprises, on aligning its actions with the National Nutrition Strategy and contributing to tackling the problem of malnutrition.

In addition, Nestlé India has established an extensive engagement with internal and external stakeholders to improve its commercial nutrition strategy, and to support the development of public strategies aimed at tackling the problem of malnutrition in India. Through the Nestlé Council for Nutrition Affairs, established in 2012, the company incorporates external professionals from the field of nutrition and administration to periodically advise on its nutrition strategy and programs. Moreover, the company organizes stakeholder meetings with top-level management and external stakeholders in the field of nutrition. Nestlé India also works with stakeholders across its value chain – from farmers and suppliers to trade associations and local communities – to improve the productivity and quality of produce and to create awareness regarding water and nutrition.

Marico's nutrition-related stakeholder engagement

Marico is the best performing India-headquartered company in this Category for its overall approach towards engaging with government bodies and stakeholders on nutrition-related issues. Marico indicates in its Annual Report 2018 that it contributes to regulatory and operational development, and other areas that affect industry and government bodies, for instance by working with FSSAI on food safety and consumer awareness. The company elaborates further in its Sustainability Report 2018 that it has engaged with FSSAI on various occasions, such as partnering with them (for 11 years) on Food Safety Training and Certification, a program that works towards capability development of government officials and working with them on school outreach programs in urban and rural areas on issues concerning nutrition and food safety (impacting more than 18,000 students).

Marico also has a well-structured approach to engaging with its various stakeholders. The Sustainability Report states that Marico engages with a broad spectrum of stakeholders, both internal and external, and with its approach rooted in principles of accountability and inclusive growth. The company further explains that it engages with each stakeholder group to work towards specific goals, one of which is related to developing its business strategy. The report goes on to present a list of key stakeholders the company has engaged with: investors, government and regulatory bodies, third party manufactures, supply chain partners, local community and NGOs. With their involvement, Marico developed a materiality matrix to identify the most important business (including nutrition issues) for the company and its stakeholders and established focus areas to set sustainability goals with measurable targets to be achieved by 2022. Some of the areas identified were in product responsibility with elements of 'customer health and safety' and 'marketing and labelling'. The company further states that it has developed a vision to ensure adherence to all consumer health and safety standards and promote consumer wellbeing (mainly surrounding heart-health and nutrition awareness).

G1 Engaging and influencing governments and policymakers

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

To what extent do companies engage with government and policymakers in support of measures designed to address all forms of malnutrition in India?

- Seven companies explicitly commit to engage with the government, policymakers and policymaking bodies, in support of measures designed to address all forms of malnutrition in India (i.e. not to engage against such measures (See Table 1). Marico indicates in its annual report that it, “contributes in the development of industry and government bodies in regulatory, operational and other areas by working along with these institutions. Food safety and consumer awareness are some of the areas where Marico has participated.” (p.72) The company also goes on to highlight its work in support of FSSAI’s nutrition education and food safety initiatives.
- PepsiCo India embeds its commitment in its Health and Wellness Approach and Engagement document and states, “PepsiCo is committed to engaging in conversations with governments and other stakeholders around the world on public health topics, such as improving nutrition, addressing undernutrition, supporting responsible marketing, promoting healthy lifestyles and developing nutrition programs.” The company indicates that it participates in public policy dialogue with government officials and other stakeholders where they can share their expertise and contribute ideas to solve policy issues.
- Among the 12 companies that have provided examples of playing an active/constructive role, nine have shared multiple examples of positive engagement with government initiatives and programs. These include engaging with FSSAI’s Eat Right Movement; taking voluntary steps to not promote/sell foods that are high in fat, salt and sugar (HFSS) in schools (according to FSSAI’s ‘Safe Food and balanced diet for Children in School’ regulation that bans such foods in school canteens); support national/state level initiatives, such as the Integrated Child Development Services, National Mid-day Meal Scheme, etc.; and/or other similar initiatives. Coca-Cola India, Mondelez India and Nestlé India provide most examples by showing evidence of support towards each of these initiatives. For instance, all three companies have strict responsible marketing policies that commit to not marketing or selling any of their products in schools, indicating their support to FSSAI’s ‘Safe Food and balanced diet for Children in School’ regulations. The remaining three companies have shared one example per company, indicating that there is ad-hoc engagement around these types of initiatives related to nutrition.

Table 1: Overview of companies’ level of engagement with government and policymakers in support of measures aimed at addressing all forms of malnutrition

	Commitment to only engage in support of measures aimed at addressing all forms of malnutrition	Evidence of one example of playing an active/constructive role in supporting government’s efforts	Evidence of multiple examples of playing an active/constructive role in supporting government’s efforts
Aavin TCMPF		•	
Adani Wilmar	•	•	
Amul GCMMF			
Britannia Industries	•		•
Coca-Cola India			•
Emami Agrotech			
Hatsun Agro Product			
Hindustan Unilever	•	•	
ITC			•
KMF Nandini			•
Marico	•		•
Mondelez India			•
Mother Dairy	•		•
Nestlé India	•		•
Parle Products			
PepsiCo India	•		•

How transparent are companies on influencing stakeholder groups in India?

- Most companies disclose limited information about their interactions with their key stakeholders, some of which engage on their behalf at the public policy level in India. Thus, none of the companies get a full score in this area. Nine companies limit their disclosure to their membership with industry associations. In 2016, only Nestlé India and Hindustan Unilever were found to disclose the details of their membership in the Confederation of Indian Industry (CII) and the Federation of Indian Chamber of Commerce and Industry (FICCI). In this 2020 Index, Britannia Industries, Coca-Cola India and PepsiCo India were also found to have published information about their memberships and engagement with such organizations. For instance, PepsiCo India indicated that the details of its membership in organizations such as CII, FICCI, ASSOCHAM, AFSTI, FBAI and IBA are publicly disclosed. Britannia Industries published in its Annual Report 2018 (annex Business Responsibility Report), that “working together with the institutions or associations engaged in policy advocacy like Confederation of Indian Industry (CII), The Associated Chambers of Commerce and Industry of India etc., will help the Company create positive social and environment impact while achieving its business goals. The Company’s approach to deal with these institutions is guided by the principles of the Code of Business Conduct i.e. honesty, transparency, integrity and accountability.”
- Among companies assessed in this 2020 Index for the first time, Adani Wilmar, ITC and Marico disclose evidence of their membership to industry associations or other organizations that lobby on its behalf. In its Business Responsibility Report (an annex to its Growth with Goodness Annual Report 2017-18), Adani Wilmar states that it is a member of CII, Independent Power Producers Association of India, Gujarat Chamber of Commerce and Industry and FICCI. The company also states that it has advocated on food security with respect to edible oil and pulses but does not describe the details of this process.
- None of the companies assessed in this Index disclose their financial support to industry associations, influencers (individuals or groups), think tanks, interest groups or other such organizations in India. This is similar to the findings of the 2016 Index.
- Coca-Cola India not only publishes the names of the stakeholder groups it is a member of but also discloses its board seats at industry associations and on advisory bodies related to nutrition issues. The company discloses this information in its Sustainability Report (Sustainability Update 2017/18 Supplementary Report, link on p.14) with a list of 15 organizations and Coca-Cola India’s association with some of them. For example, it is on the management committees of the Indian Beverage Association and Pet Packaging Association for Clean Environment.

Recommendations

To increase transparency and positively engage with government and policymakers to impact consumers’ access to nutrition, food and beverage manufacturers in India are encouraged to:

- Commit to engage with the Indian government and policymakers in support of measures designed to address all forms of malnutrition such as FSSAI’s Eat Right India campaign, Poshan Abhiyaan, etc. i.e., to not engage against such public health measures.
- Increase transparency around membership of industry associations, such as Confederation of Indian Industry, FICCI, think tanks, or interest groups. Similarly, companies should publicly disclose financial support to these organizations, including board seats at industry associations, advisory bodies related to nutrition issues and potential governance conflicts of interest.
- Disclose their policy positions and advocacy goals on key nutrition issues in India.

G2 Stakeholder engagement and partnerships

The India Spotlight Index 2020 shows some progress on nutrition among the 16 largest food and beverage manufacturers in India. These companies account for nearly a third of the food and beverage market. Most are taking action to fortify their products or have committed to reformulate their products in line with the Government's initiatives to address India's nutrition challenges. However, few provide evidence of comprehensively tackling undernutrition, micro-nutrient deficiencies, and overweight and obesity, in all relevant business areas. Current industry efforts are not sufficient to match the scale of the nutrition challenge that India faces.

To what extent do companies engage systematically with relevant stakeholders on nutrition issues in India?

- 10 companies provide evidence of engaging with stakeholders in developing their commercial nutrition strategies. The stakeholders were categorized into five groups: national bodies and institutions; civil society organizations/non-governmental organizations (CSO/NGOs), academic institutions or scientific experts and/or other relevant stakeholders the company consulted with (See Table 2). Marico and Mother Dairy provide evidence of consulting with the greatest number of stakeholders. In its Sustainability Report 2018, Marico provided a list of key external stakeholders (investors, government and regulatory bodies, third party manufacturers, supply chain partners, local community and NGOs) it engages with, in order to conduct materiality assessments through which it informs its efforts in research and development, product quality and safety, consumer wellbeing, and marketing and labelling.
- Nestlé India is best in the class when it comes to seeking specialist external expertise to design its commercial strategy, addressing both obesity and diet-related chronic diseases, and undernutrition or micronutrient deficiencies (at the board level). The company has organized its engagement through an advisory committee – Nestlé Council for Nutrition Advisory. Coca-Cola India also shows evidence of organizing its engagement into an advisory panel or expert group that meets regularly to form its Health & Wellness Advisory Council of Science. The Council guides the company to identify the evolving nutritional needs of Indian consumers and suggest viable locally relevant solutions for beverage applications. The Council also helps guide the company on strategic projects in line with new developments and trends in India.
- Eight companies indicate that they have partnerships with or formally support key national initiatives/organizations to address malnutrition among groups at high-risk. Some of the organizations that the companies indicate partnering with are Tata Trusts, GAIN, WFP, Save the Children and Narayana Health. Disclosure by the companies around the partnerships and related activities, as well as outcomes, were also found to be limited.
- KMF Nandini describes its collaboration with the National Dairy Development Board and Tata Trusts to take steps towards fortification of its Nandini toned milk, double toned milk, special toned milk and standardized milk with vitamins A and D. Britannia Industries, through its Britannia Nutrition Foundation, collaborates with Narayana Health, National Health Mission, Rajasthan and the Jaipur education department on the SUPOSHAN program. This program is designed as an action research study aimed at introducing iron fortification in a palatable manner, which would be an adjunct to the existing Weekly Iron Folic Acid Supplementation program in India.

Table 2: Overview of companies' engagement with key stakeholder groups to develop their corporate nutrition policy or programs

	National bodies and institutions	Civil society organizations/ Non-governmental organizations	Academic institutions or scientific experts	Others*	Quality of engagement with stakeholders to improve companies' nutrition policy/program
Aavin TCMPF	•				No information
Adani Wilmar					
Amul GCMMF					
Britannia Industries			•		No information
Coca-Cola India			•		Limited
Emami Agrotech					
Hatsun Agro Product					Limited
Hindustan Unilever	•		•		Limited
ITC					
KMF Nandini	•				Limited
Marico	•	•		•	Comprehensive
Mondelez India					
Mother Dairy	•	•	•		Limited
Nestlé India	•		•		Comprehensive
Parle Products					
PepsiCo India	•		•		Limited

*Note: Companies that share examples of engagement with other relevant stakeholders for developing their commercial nutrition strategies/policies/ programs are credited in this criterion. Quality of engagement is determined by assessing how companies solicit stakeholders' views to develop their nutrition strategy/policy. They can do this by showing evidence of a comprehensive, well-structured engagement. One-way communication that are typically ad-hoc are credited as limited.

Recommendations

To improve and accelerate their engagement with stakeholders in order to impact consumers' access to nutrition, food and beverage manufacturers in India are encouraged to:

- Conduct comprehensive, well-structured engagement with relevant stakeholders in India with the aim of improving their business strategy and performance relating to nutrition, as well as when developing new nutrition-related policies, setting new targets or developing new initiatives and programs.
- Engage systematically and/or establish formal, long-term partnerships and one-on-one discussions with credible international/local organizations, CSOs/NGOs, academic institutions and scientific experts, and other such organizations actively working towards addressing all forms of malnutrition in India in high-risk groups and to evolve companies' commercial approach.
- Disclose examples of engagement with key organizations and how their input has been used in developing the companies' policies, strategies or programs and what the outcomes are.

Amplifying Impact

Improving nutrition for all Indians



**End hunger, achieve
food security and
improved nutrition**



**Ensure healthy
lives and promote
well-being for all**

Driving the private sector's performance on healthy, affordable diets is a crucial factor to reach India's National Nutrition Mission and the goals of the Eat Right India movement. Reaching these goals for more than 1.25 billion citizens in India is also a prerequisite to reach the 2030 worldwide agenda of Sustainable Development including zero hunger and good health and well-being for all. This ATNI India Index finds food companies in India show their commitment to provide healthy food and discuss how to support the Poshan Abhiyaan mission and the Eat Right India movement. More innovative, healthy and affordable products can and should be introduced to make a real difference.

The Access to Nutrition India Spotlight Index 2020 would not have been possible without the generous support of the Bill & Melinda Gates Foundation, the UK Department for International Development, the Netherlands Ministry of Foreign Affairs.

The second India Spotlight Index was produced by the ATNI India Index project team which consists of Fiona Kirk, Osien Kumar, Paul Vos and Mark Wijne. For the company research, analysts Julia Lladós Vila, David Jerome and Estefania Marti Malvido complemented the team. ATNI executive director Inge Kauer, senior advisor Rachel Crossley and program intern Sofie van den Berg helped review texts and data.

As noted in the methodology section of the report, the ATNI team drew on the expertise and advice of two advisory groups, a group of expert reviewers in India and the ATNI international Expert Group. Their close engagement throughout the development process for the methodology of the India Spotlight Index 2020 has been a source of invaluable guidance, and this report benefited greatly from their input and advice (group composition and names in the full acknowledgment). The views expressed in this report, however, do not necessarily reflect the views of these two groups' members or of the institutions they represent.

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Ministry of Foreign Affairs



Acknowledgements

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Research/ Implementing Partners

The George InSTITUTE

Elizabeth Dunford and Fraser Taylor of The George Institute for Global Health (The George Institute), conducted the Product Profile assessment for the 16 companies in this 2020 Index and the analysis of changes in the nutritional profile of packaged food and beverage products from 11 large companies in India over a three year period for the Access to Nutrition Initiative.



Innova Market Insights

Innova Market Insights (Innova), a commercial knowledge supplier for the Food and Beverage industry, provided product composition data.



73BIT

Development 73BIT, a British IT developer, set up the online data platform used to collect and process company data. It also developed automatic scoring sheets and reports that fed into the scorecards.

Kummer & Herrman

Kummer & Herrman based in the Netherlands, design for identity, website and reports.

Studio September

Studio September based in the Netherlands, website development.

AvianWe

AvianWE, an integrated communications agency in India, is ATNI's public relations partner for this index.

WRENmedia

WREN*media*, a UK communication company did the language and copy editing of the report and scorecards.

Organizations Consulted

- Alive & Thrive India, FHI 360
- Centre for Responsible Business, India
- Confederation of Indian Industries
- Food Fortification Initiative
- Food Safety and Standards Authority of India
- Global Alliance for Improved Nutrition, India
- National Institute of Nutrition, Hyderabad
- Netherlands Embassy, New Delhi

- Oxfam India
- Rabobank India
- Save the Children, India
- Tata Trusts
- The Bill & Melinda Gates Foundation India
- UNICEF India
- World Business Council for Sustainable Development
- World Health Organization India

ATNI India Expert Review Panel and Global Expert Group Members

The mandate of the India expert Review Panel and global Expert Group is to provide input into the development of the Corporate Profile methodology and other aspects of the Index. This group consists of members with expertise in various aspects of nutrition (including health dimensions of malnutrition, marketing, labeling, use of claims, nutrient profiling, regulatory issues, etc.)

The members of the India expert Review Panel and Expert Group serve in their personal capacities and in an advisory role. The views expressed in this report do not necessarily reflect their views or the views of the institutions they represent. Members are listed below.

India Expert Review Panel

Dr. Rajan Sankar

Director Nutrition, Tata Trusts

Vivek Arora

Senior Advisor, Tata Trusts

Rohini Saran

Deputy Lead – Food Fortification Resource Centre, Food Safety and Standards Authority of India (FSSAI)

Dr. Avula Laxmaiah

Scientist 'G' & Head, Public Health, National Institute of Nutrition (NIN)

Devyani Hari

Director – Programmes, Centre for Responsible Business (CRB)

Rachna Sujay

Senior Technical Advisor – Diffusion States, Alive & Thrive

Dr. Antaryami Dash

Advisor – Nutrition, Save the Children

Shiva Mudgil

Vice President, RaboResearch Food & Agribusiness, Rabobank India

Global Expert Group

Shiriki Kumanyika

Chair, ATNI Expert Group;

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

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

Lindsay H. Allen

Director, USDA ARS Western Human Nutrition Research Center;

Research Professor, Department of Nutrition, UC Davis

Terry T-K Huang

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

Mike Rayner

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

Linda Meyers

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

Boyd Swinburn

Professor, Population Nutrition and Global Health at the University of Auckland and Alfred Deakin; Professor and Director, World Health Organization (WHO) Collaborating Centre for Obesity Prevention at Deakin University in Melbourne

Aavin TCMPF

Product Profile Categories

Dairy



Product Profile

Rank 12 / Score 1.4

Rank 12 / Score 4.2

Headquarters

India

Retail sales (INR – millions)

69991

Company Profile

Rank 12 **Score 1.4**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Aavin TCMPF is assessed for the first time in the India Index 2020. ATNI welcomes Aavin TCMPF as one of the dairy cooperatives assessed in this Index, and the company's interest in the Index methodology and participation in stakeholder meetings.
- Aavin TCMPF voluntarily fortifies some of its relevant products, such as milk products, with vitamins A and D in accordance with the Food Safety and Standards Authority of India (FSSAI)'s Food Safety and Standards (Fortification of Foods) Regulation, 2018. The company could further improve its approach by publicly disclosing its strategy to deliver micronutrient fortification across its product portfolio.
- The company has introduced healthier variants of products in recent years, such as sugar-free alternatives of its flavored yogurts. Although Aavin TCMPF does not publicly disclose that it aims to support the National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat – free from malnutrition, across the life cycle) and other Government initiatives through its commercial activities, the introduction of sugar-free variants is in alignment with national priorities to address the challenges of rising overweight/obesity levels and non-communicable diseases. Further, its fortification effort supports the Government's efforts to combat undernutrition and micronutrient deficiencies.
- Aavin TCMPF provides nutrition information for many products on its website, where the details are well-organized into food group categories and easily accessible to consumers. The company could further improve its performance by ensuring that comprehensive nutrition information is available for all products both on product packaging and online.
- Aavin TCMPF makes a general commitment to making healthy products more affordable, which is disclosed on its website, and relates to its aim to deliver value-added products to consumers through quality milk at affordable prices.

Priority areas for improvement

- Aavin TCMPF ranks joint twelfth overall in the Index, with a score of 1.4 out of 10.
- The company could improve its performance by adopting and disclosing a nutrition policy that specifies how the company contributes to improving nutrition and health through its commercial strategy and activities.
- The company ranks twelfth in the Product Profile with a score of 4.2 out of 10. Although a total of 18 dairy products were identified, sufficient nutrition information to assess was only available for two products, and of those, one was found to achieve a Health Star Rating (HSR) of 3.5 or more out of 5 – the 'healthy' threshold.
- Aavin TCMPF should define which of its products are healthy based on objective nutrition criteria using an internationally recognized Nutrient Profiling System. The company should also implement a strategy towards a healthier product portfolio by setting SMART – Specific, Measurable, Achievable, Relevant and Time-bound – product formulations and/or reformulation targets.
- Aavin TCMPF is advised to adopt and publish a responsible marketing policy for all consumer groups, with specific commitments for children and teenagers. Signing the Food and Beverage Alliance India Pledge could constitute a first step towards this aim. The company should also consider only marketing products to children that meet the World Health Organization (WHO) South-East Asia Region (SEAR) regional standard. The Product Profile found that 6% of company products currently meet this standard.
- To enable a better assessment of product healthiness, both by general consumers and by ATNI in the Product Profile, Aavin TCMPF should disclose more nutrition information on product packaging. The information should list all nutrients as recommended by the Codex Alimentarius and in compliance with local regulations, including for saturated fat, sodium and total sugars. Further, Aavin TCMPF is encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and is developed in partnership with the Government and other stakeholders.
- As a general recommendation, Aavin TCMPF could increase public disclosure about its nutrition-related commitments, policies and practices in India and is encouraged to engage with ATNI to allow for a more complete assessment.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

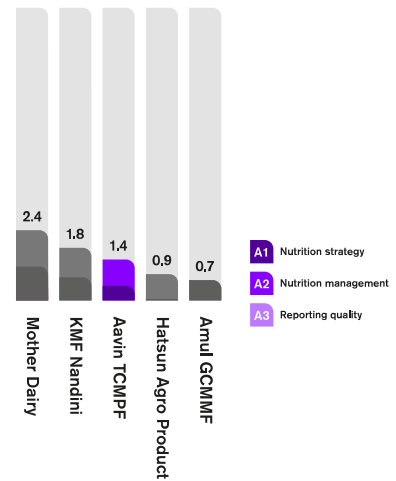
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

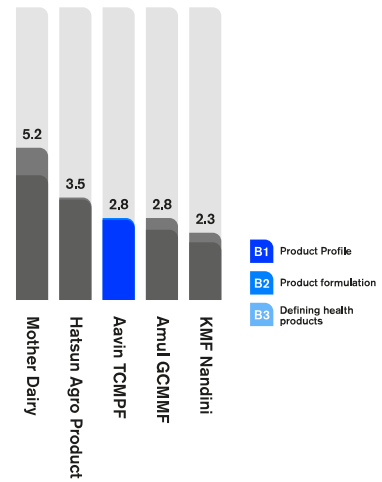
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

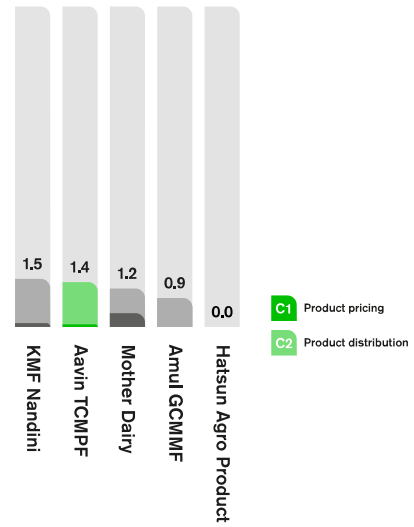
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

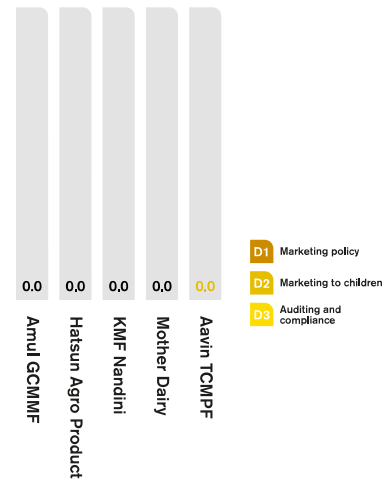
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Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

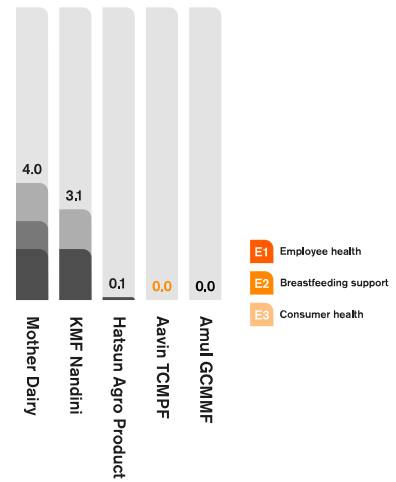
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

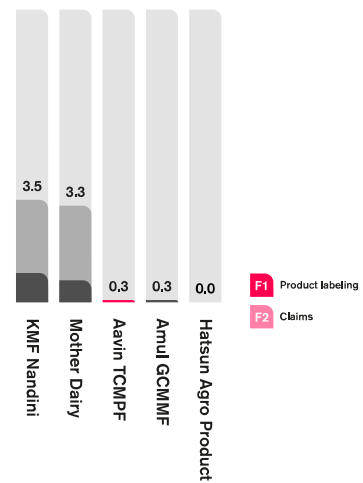
Performance

Disclosure

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Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

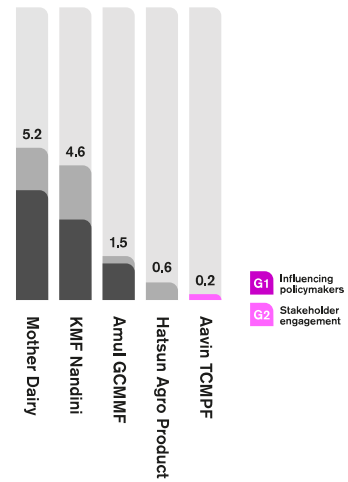
Performance

Disclosure

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Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



Product Profile



12

Rank 12 / Score 4.2

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
2.3	50%	50%	2	6%	6%	17	90-100%

- A total of 18 products from the Dairy category were included in the Product Profile, representing 90-100% of Aavin TCMPF's estimated 2018 sales. Of those, only two products were eligible for inclusion in the Product Profile HSR assessment due to a lack of sufficient nutrient information for the remaining products. Therefore, it was not possible to get a clear picture of the mean healthiness of Aavin TCMPF's portfolio in comparison to the other companies.
- As one of the two products was found to meet the HSR healthy threshold, the company is estimated to have derived 50% of its 2018 sales from healthy products.
- The company achieves an unweighted mean HSR of 2.3 out of 5, which remains the same after sales-weighting, resulting in a mean healthiness score of 4.6 out of 10.
- A total of 17 dairy products were assessed to determine their suitability to be marketed to children according to the WHO SEAR nutrient profile model. One dairy product, estimated to represent 6% of the 2018 sales, was found to meet these criteria.

Product Category Results

Category	Dairy
Mean HSR	2.3
% products healthy	50
% products suitable to market to children	6

- All of Aavin TCMPF's products selected for the Product Profile are in the Dairy category. The company's category-level results are therefore equivalent to its portfolio-level results.

Relative nutritional quality of Aavin TCM PF's products by category compared to competitors

Mean HSR	Dairy
Aavin TCM PF	2.3
Amul GCMMF	2.4
Arla	3.2
BRF	2.7
Britannia Industries	2.2
Coca-Cola	3.6
Coca-Cola India	3.5
Conagra	2.1
Danone	3.5
Ferrero	0.7
FrieslandCampina	3.4
General Mills	3.5
Hatsun Agro Product	2.7
KMF Nandini	2.2
Kraft Heinz	2.7
Lactalis	3.1
Mars	2.8
Meiji	3.2
Mengniu	3
Mondelēz	2.4
Mother Dairy	3.0
Nestlé	2.4
Nestlé India	3.0
PepsiCo	3.1
Suntory	3
Tingyi	2.7
Yili	3.1

- With a mean HSR of 2.3 out of 5 for its dairy products, Aavin TCM PF ranks sixth out of eight companies within the Dairy product category.
- Aavin TCM PF achieves a relative category score of 3.8 out of 10 based on its ranking within this category.

Conclusion

- Aavin TCM PF's mean healthiness score of 4.6 and relative category score of 3.8 result in an overall Product Profile score of 4.2 out of 10, which means the company ranks twelfth in this assessment.
- In addition to disclosing more nutrition information for all its products (with specific attention to the saturated fat, sodium and total sugars content), Aavin TCM PF should consider taking action to improve the nutritional quality of its dairy products, and adopting relevant and measurable targets and goals. Further, the company is encouraged to shift sales towards its healthier products within the Dairy category.

Adani Wilmar

Product Profile Categories

Edible Oils



Product Profile

Rank 11 / Score 1.8

Rank 2 / Score 6.9

Headquarters

India

Retail sales (INR – millions)

117565

Number of employees

1614

Company Profile

Rank 11 **Score 1.8**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Adani Wilmar ranks second in the Product Profile with a score of 6.9 out of 10. The company is estimated to have derived 50% of its 2018 sales from healthy products, i.e. those that achieve a Health Star Rating (HSR) of 3.5 or more out of 5. This result is based on the assessment of 12 products within the Edible Oils category, which make up the vast majority of the company's sales in India.
- Adani Wilmar commits to working 'for a healthy growing India' and towards delivering more healthy products. The company voluntarily fortifies some of its edible oil products with vitamins A and D in accordance with the Food Safety and Standards Authority of India (FSSAI)'s Food Safety and Standards (Fortification of Foods) Regulation, 2018. The company has also developed edible oil products aimed at specific target groups to help control blood sugar and cholesterol levels.
- Through its corporate social responsibility project, SuPoshan, Adani Wilmar commits to addressing issues of malnutrition and anemia in India by improving the nutritional status and enhancing nutrition literacy of children, adolescent girls and women of reproductive age at various locations in the country.
- The company publicly commits to supporting the health and wellness of its employees through various programs and has several initiatives in place with a focus on physical activity. Adani Wilmar could improve further in this area by extending its programs to cover broader aspects of nutrition and health.
- Regarding engagement with policymakers, the company discloses that it advocates on key areas of food security with respect to edible oils and pulses through its membership with the trade chamber. The company also publicly reports on its support to Government-run anganwadis (childcare centers) and schools.

Priority areas for improvement

- Adani Wilmar ranks eleventh overall in the India Index, with a score of 1.8 out of 10.
- Despite its commitment to grow through a focus on nutrition and health, the company does not disclose its commercial strategies in this regard. The company is advised to do so and to indicate how it could help address the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat – free from malnutrition, across the life cycle), and POSHAN Abhiyaan, through its core business model. Further, the company is encouraged to set up and publicly disclose nutrition-related auditing, risk assessments and annual management reviews.
- Adani Wilmar should define which of its products are healthy based on objective nutrition criteria. The company should also implement a publicly disclosed strategy for achieving and maintaining a healthy product portfolio by setting relevant objectives and targets. In addition, Adani Wilmar could improve its approach by voluntarily fortifying all relevant products according to FSSAI guidance and by disclosing its approach to do so.
- In regard to Category D – Marketing – Adani Wilmar could substantially increase its score by making commitments to market its products responsibly to all consumers and not to market any products to children (its products are unlikely to be marketed to children).
- The company is encouraged to adopt and publish a labeling policy to ensure that nutrition information is provided on all packaged foods according to the Codex Alimentarius guidelines, and in compliance with Indian regulations. Adani Wilmar could also publish the nutrition content information of its products online and is encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and developed in partnership with the Government and other relevant stakeholders.
- As a general recommendation, Adani Wilmar has considerable scope to increase public disclosure of its nutrition-related commitments, policies and practices in India, and is encouraged to engage with ATNI in future to allow for a more complete assessment of these aspects.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

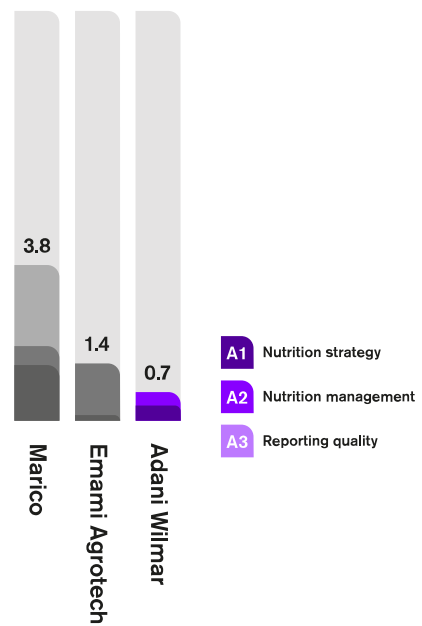
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Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

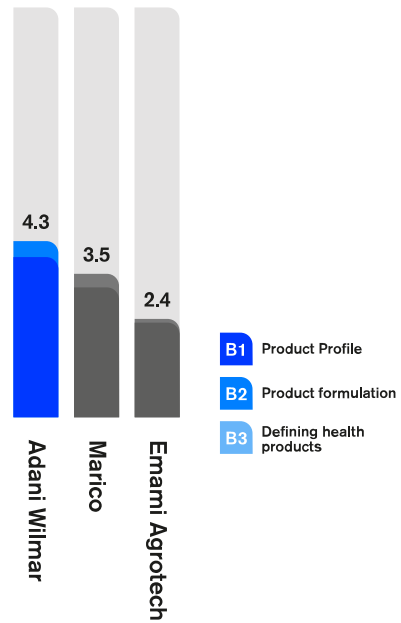
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

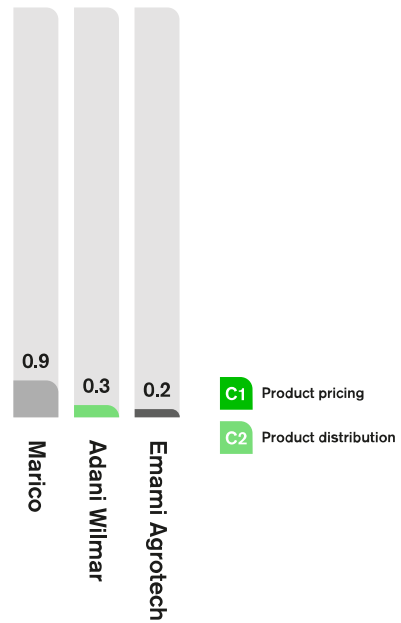
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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

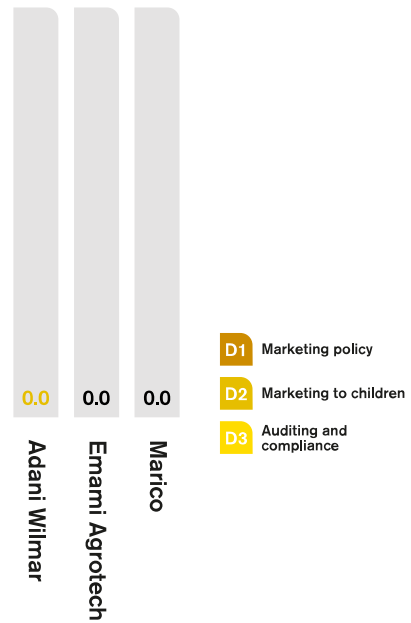
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Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

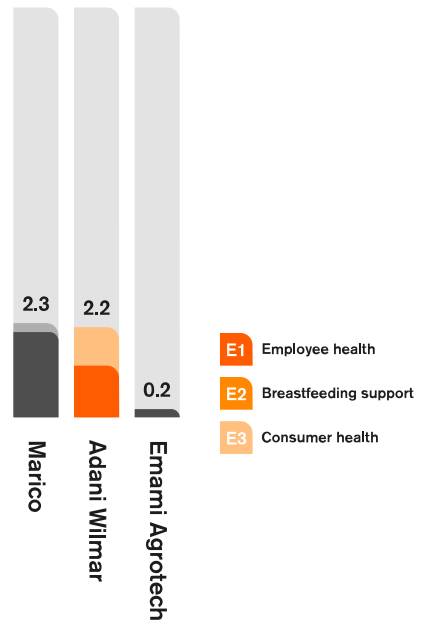
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Commitment Performance Disclosure

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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

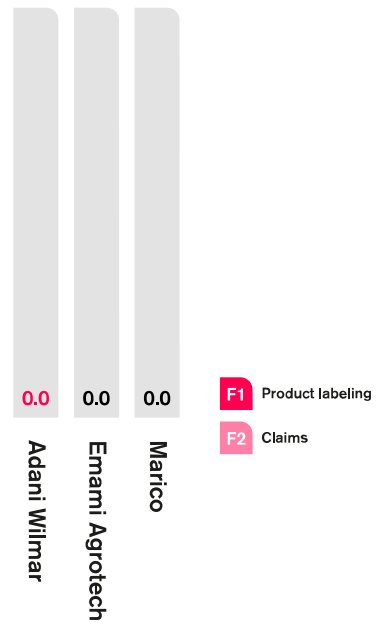
Performance

Disclosure

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

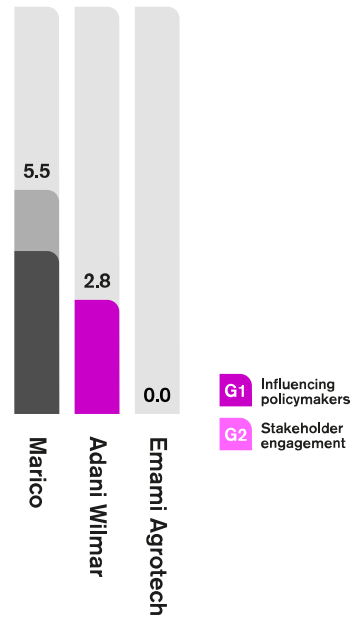
Performance

Disclosure

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Peer Comparison



Product Profile



2

Rank 2 / Score 6.9

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
3.1	50%	50%	12	92%	92%	13	90-100%

- A total of 13 products from the Edible Oils category, representing 90-100% of Adani Wilmar's estimated 2018 sales, were included in the Product Profile. Of those, 12 products could be assessed using the HSR. Six products (50%) were found to achieve an HSR of 3.5 or more out of 5 – the healthy threshold, and therefore, the company is estimated to have derived half of its 2018 sales from healthy products.
- The company achieves an unweighted mean HSR of 3.1 out of 5. After sales-weighting the company's mean HSR remains the same (3.1), resulting in a mean healthiness score of 6.2 out of 10.
- A total of 13 edible oil products were assessed to determine their suitability to be marketed to children according to the World Health Organization's (WHO) South-East Asia Region (SEAR) nutrient profile model. Twelve of the products (representing 92% of estimated 2018 sales) were found to meet the WHO SEAR criteria.
- When compared to the other companies ranked in this Index, Adani Wilmar has the highest proportion of products (92%) that are suitable to market to children, followed by other companies selling mainly edible oil products.

Product Category Results

Category	Edible Oils
Mean HSR	3.1
% products healthy	50
% products suitable to market to children	92

- Adani Wilmar is a company in the edible oil industry segment and derived most its 2018 estimated sales from the Edible Oils category. Therefore, the company's category results are equivalent to its portfolio-level results.
- Based on 12 of its products, Adani Wilmar's portfolio achieves the highest sales-weighted HSR of all companies assessed in this Index, with a score of 3.1 out of 5.

Relative nutritional quality of Adani Wilmar's products by category compared to competitors

Mean HSR	Edible Oils
Adani Wilmar	3.1
Conagra	4.3
Emami Agrotech	2.8
Marico	2.9
Mother Dairy	3.8

- When compared to the other four companies that sell edible oils in India (as part of their top-selling categories), Adani Wilmar achieves the second highest mean HSR of 3.1 out of 5 in the category.
- Adani Wilmar achieves a relative category score of 7.5 out of 10 based on its ranking within the category.

Conclusion

- Adani Wilmar's mean healthiness score (6.2) and relative category score (7.5) result in an overall Product Profile score of 6.9 out of 10, which means the company ranks second in this assessment.
- Adani Wilmar is encouraged to further shift its sales towards healthier products by setting relevant objectives and targets.

Amul GMMF

Product Profile Categories

Confectionery; Dairy; Ice Cream and Frozen Desserts



Product Profile

↓ Rank 15 / Score 1.3

Rank 10 / Score 4.8

Rank 9 (2016)

Headquarters

India

Retail sales (INR – millions)

281321

Number of employees

752

Company Profile

Rank 15 **Score 1.3**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Amul GCMMF performs best in Category B – Products – mainly due to the company's Product Profile score which is integrated into this category. The company is estimated to have derived between 90 and 100% of its 2018 sales from products in the Dairy category, which is a relatively healthy category as assessed using the Health Star Rating (HSR).
- Amul GCMMF has recently entered into a long-term agreement and collaboration with the Government of Gujarat to help tackle malnutrition issues through the production and distribution of energy-dense, micronutrient-fortified products aimed at children and women of childbearing age. By extending the distribution network for its dairy products, the company is addressing the poor physical accessibility of its healthy products.
- Amul GCMMF plays an active role in supporting the Government's efforts to combat malnutrition through its Tribhuvandas Foundation, which aims 'to uplift the health of the people, particularly women and children' through nutritional interventions and enhanced education around breastfeeding. Amul GCMMF could further improve its approach by explicitly addressing the problem of malnutrition within its commercial strategy, and including a focus on tackling obesity and diet-related diseases within the document.

Priority areas for improvement

- Amul GCMMF ranks fifteenth overall in the India Index with a score of 1.3 out of 10. Although this score is similar to its 2016 result, the company has gone down in ranking due to the inclusion of new companies that have performed better.
- The company ranks tenth in the Product Profile with a score of 4.8 out of 10 and is estimated to have derived 31% of its 2018 sales from healthy products, i.e. those that achieve an HSR of 3.5 or more. For the product categories in which Amul GCMMF sells products – Dairy, Confectionery and Ice Cream and Frozen Desserts – the average healthiness of its products does not compare well with those of its peers.
- Amul GCMMF should define which of its products are healthy based on objective nutrition criteria using an internationally recognized Nutrient Profiling System. The company should also implement a strategy towards delivering a healthier product portfolio by setting innovation and reformulation targets.
- Amul GCMMF does not voluntarily fortify its products according to the Food Safety and Standards Authority of India's Food Safety and Standards (Fortification of Foods) Regulation, 2018. The company is encouraged to reconsider this approach.
- Amul GCMMF is advised to adopt and publish a responsible marketing policy covering all consumer groups, with specific commitments regarding children and teenagers. The company should further commit to only marketing products to children that meet the World Health Organization's (WHO) South-East Asia Region (SEAR) nutrient profile model, as the Product Profile found that 10% of its products currently meet this standard.
- Amul GCMMF should adopt and publish a labeling policy that ensures nutrition information is provided on all products according to the Codex Alimentarius guidelines and in compliance with Indian regulations. Further, the company is encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and is developed in partnership with the Government and other stakeholders.
- The company could increase public disclosure about its nutrition-related commitments, policies and practices and is encouraged to engage with ATNI to allow for a more complete assessment of these aspects.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

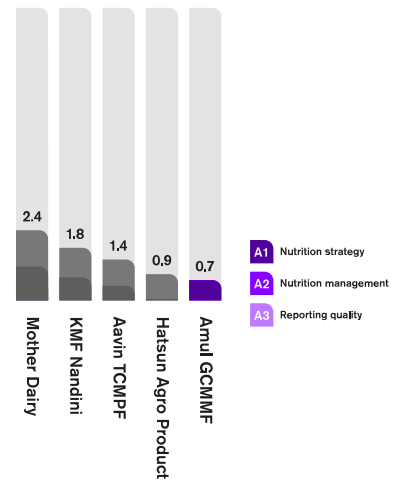
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Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

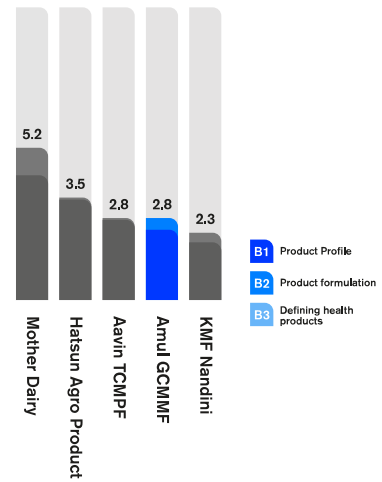
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

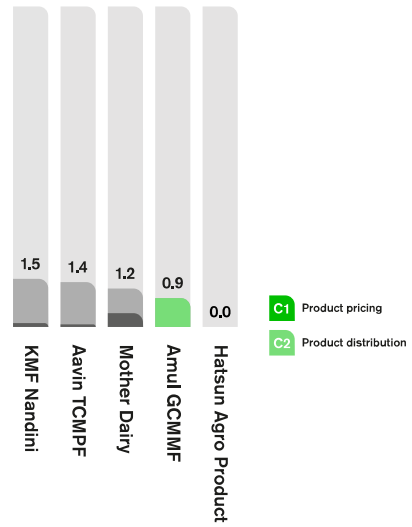
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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

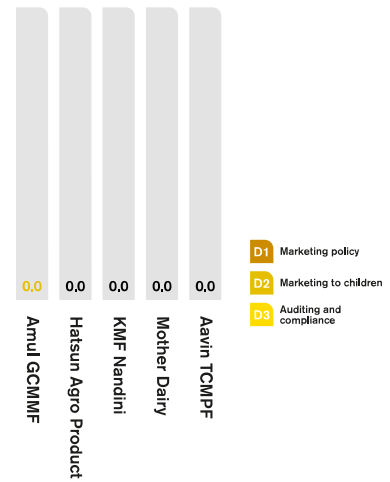
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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

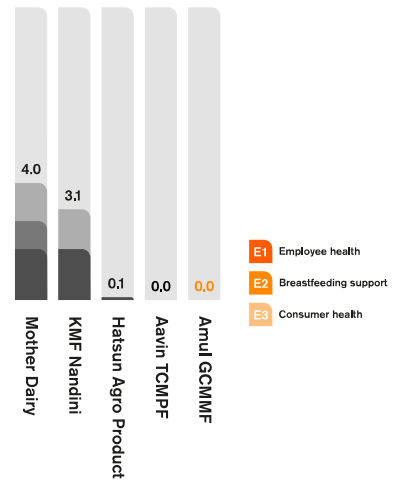
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Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

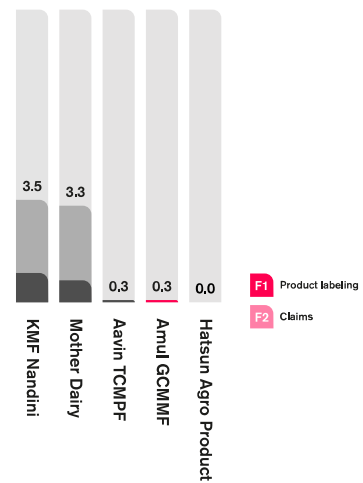
Performance

Disclosure

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

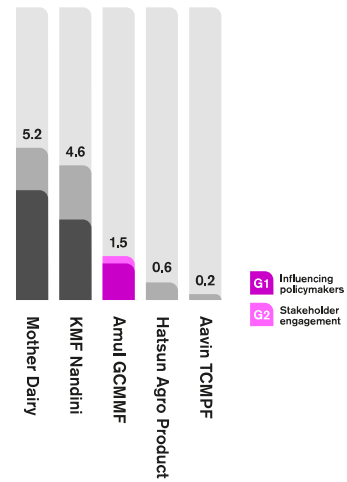
Performance

Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



Product Profile



10

Rank 10 / Score 4.8

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
2.3	19%	31%	173	10%	15%	175	90-100%

- A total of 175 products from across three categories, representing 90-100% of Amul GCMMF's estimated 2018 sales, were included in the Product Profile. Of those, 173 could be assessed using the Health Star Rating (HSR). Thirty-three products (19%), were found to meet the HSR healthy threshold and the company is estimated to have derived almost one third (31%) of its 2018 sales from healthy products.
- The company achieves an unweighted mean HSR of 2.0 out of 5. After sales-weighting the company's mean HSR improves to 2.3 out of 5, resulting in a mean healthiness score of 4.7 out of 10.
- A total of 175 products were assessed to determine their suitability to be marketed to children according to the WHO SEAR model. Seventeen products from the Dairy category and the Ice Cream and Frozen Desserts category – representing an estimated 15% of 2018 sales – were found to meet the WHO SEAR criteria.

Product Category Results

Category	Confectionery	Dairy	Ice Cream and Frozen Desserts
Mean HSR	0.6	2.4	1.8
% products healthy	0	34	0
% products suitable to market to children	0	16	2

- Amul GCMMF performs best in the Dairy category. About one third (34%) of the company's dairy products were found to meet the HSR healthy threshold and the company achieves a mean HSR of 2.4 out of 5.
- The company's products are less healthy in both the Confectionery category (mean HSR of 0.6 out of 5), and the Ice Cream and Frozen Desserts category (mean HSR of 1.8 out of 5).

Relative nutritional quality of Amul GCMMF's products by category compared to competitors

Mean HSR	Confectionery	Dairy	Ice Cream and Frozen Desserts
Amul GCMMF	0.6	2.4	1.8
Aavin TCMPF		2.3	
Arla		3.2	
BRF		2.7	
Britannia Industries		2.2	
Coca-Cola		3.6	
Coca-Cola India		3.5	
Conagra		2.1	
Danone		3.5	
Ferrero	0.9	0.7	
FrieslandCampina		3.4	
General Mills		3.5	1.8
Grupo Bimbo	1.2		
Hatsun Agro Product		2.7	2.2
Hindustan Unilever			2.1
ITC	1.1		
KMF Nandini		2.2	1.4
Kraft Heinz		2.7	
Lactalis		3.1	
Mars	1.3	2.8	
Meiji	0.9	3.2	2.2
Mengniu		3	2.3
Mondelēz	1.1	2.4	
Mondelēz India	0.5		
Mother Dairy		3.0	2.0
Nestlé		2.4	
Nestlé India	0.7	3.0	
Parle Products	1.1		
PepsiCo		3.1	
Suntory		3	
Tingyi		2.7	
Yili		3.1	2.1

- When compared to the seven other companies that sell products within the Dairy category in India (as part of their top-selling categories), Amul GCMMF's products achieve a mean HSR of 2.4 out of 5, ranking it fifth.

- Among the five companies that sell products in the Confectionery category, Amul GCMMF ranks fourth with a mean HSR of 0.6 out of 5. The company achieves the same ranking for the Ice Cream and Frozen Desserts category, with a mean HSR of 1.8 out of 5.
- When compared to other companies selling the same type of products across the three categories, Amul GCMMF achieves a relative category score of 4.9 out of 10 based on its ranking within these categories.

Conclusion

- Amul GCMMF's mean healthiness score of 4.7 and relative category score 4.9 result in an overall Product Profile score of 4.8 out of 10, which means the company ranks tenth out of 16.
- The relative category results show that Amul GCMMF has scope to improve the nutritional quality of its products, particularly in the Dairy category. The company should adopt relevant objectives and targets to guide its approach towards healthy product innovation and reformulation.

Britannia Industries

Product Profile Categories

Baked Goods; Dairy; Savoury Snacks;
Sweet Biscuits, Snack Bars and Fruit
Snacks



Product Profile

↑ Rank 4 / Score 4.9

Rank 7 / Score 5.5

Rank 6 (2016)

Headquarters

India

Retail sales (INR – millions)

109730

Number of employees

2077

Company Profile

Rank 4 **Score 4.9**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Britannia Industries ranks fourth out of 16 companies in the India Index 2020 with a score of 4.9 out of 10. It remains the highest-scoring Indian-headquartered company and has made improvements across all Index categories. Based partly on its newly implemented Britannia Nutrition Policy, the company has achieved the largest increase when compared to the other nine companies that were also assessed in the India Index 2016.
- The company focuses on addressing undernutrition and micronutrient deficiencies in India. It is one of two companies that voluntarily fortifies all relevant products in its portfolio according to the Food Safety and Standards Authority of India (FSSAI)'s Food Safety and Standards (Fortification of Foods) Regulation, 2018. For other products, it follows the guidance of international and national bodies, including Codex Alimentarius and the National Institute of Nutrition.
- Britannia Industries has pledged its support to FSSAI's Eat Right Movement and has set new targets to reduce the salt and sugar content of its snack products by 5% for over the next three years. The company has also shown leadership in the food sector by removing industrially-produced trans fat from its products since 2007.
- In 2016, Britannia Industries indicated that it was developing a nutrient profiling system (NPS) and since then, has set specific nutrition criteria within its newly implemented system. The NPS has been shared confidentially with ATNI.
- The company has broadened the scope of its responsible marketing policy to restrict its marketing to children to some degree. Britannia Industries commits to only selectively market products to children which meet the company's own nutrition criteria.
- The company has implemented its Britannia Cares program, among others, to offer fitness activities at work and supports active, healthy lifestyles among all employees.
- Britannia Industries has strengthened its commitment to providing nutritional information on-pack by incorporating this element in its publicly available Britannia Nutrition Policy.
- Through the company's Britannia Nutrition Foundation, and in partnership with the Government of Karnataka, Britannia Industries provides iron-fortified 'Tiger' glucose biscuits to anganwadis (childcare centers) in the Uttar Kannada district of Karnataka.

Priority areas for improvement

- Britannia Industries could further improve its performance regarding nutrition and governance by undertaking regular internal audits and management reviews of the delivery of its commercial nutrition strategy. The company is also encouraged to extend its strategy to comprehensively address priorities set out in the vision of India 2022 National Nutrition Strategy – Kuposhan Mukht Bharat (free from malnutrition, across the lifecycle), including addressing obesity.
- The company ranks seventh in the Product Profile with a score of 5.5 out of 10. Its products scored relatively well against those of its competitors within the same product category, e.g. for Sweet Biscuits, Fruit Snacks and Snack Bars – its major product category – Britannia Industries ranks second. The company is estimated to have derived 13% of its 2018 sales from products achieving a Health Star Rating (HSR) of 3.5 or more out of 5, i.e. the 'healthy' threshold. The company should therefore accelerate efforts to improve the overall nutrition quality of its product portfolio, and shift marketing efforts towards healthier products.
- Britannia Industries is encouraged to further develop its NPS by ensuring the system covers all products and categories, is benchmarked against internationally recognized systems, and is published fully.
- No evidence of a commercial policy or strategy to address the affordability or physical accessibility of Britannia Industries' healthy products was found. The company is encouraged to adopt such a strategy, ideally articulating how it intends to address the needs of groups at high risk of malnutrition, with specific attention to aspirational districts.
- Britannia Industries could further improve its marketing approach by committing to market products to children that meet the World Health Organization's (WHO) South-East Asia Region (SEAR) regional standard. The Product Profile found that 6% of Britannia Industries' products currently meet this standard. The company should also commission independent annual audits of compliance with its marketing policy and report publicly on the findings.
- Britannia Industries is encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and is developed in partnership with the Government and other relevant stakeholders.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

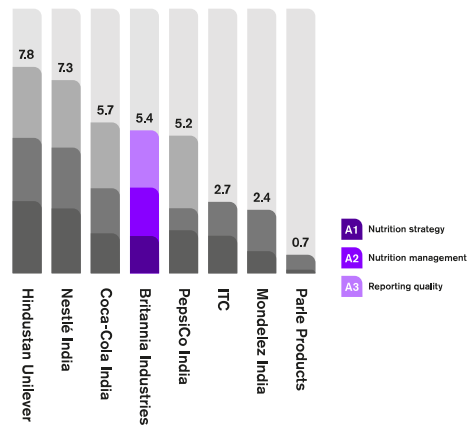
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

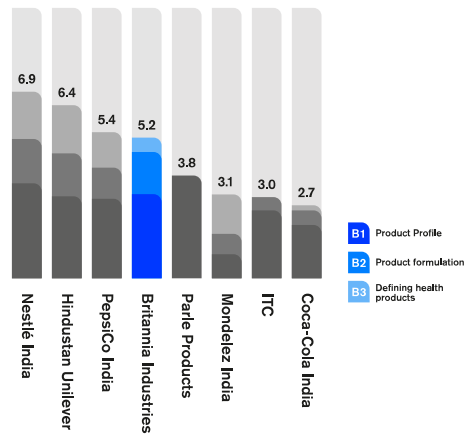
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

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Peer Comparison



- C1** Product pricing
- C2** Product distribution

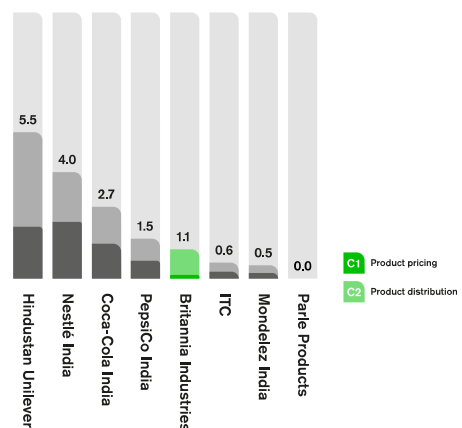
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Commitment **Performance** **Disclosure**

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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

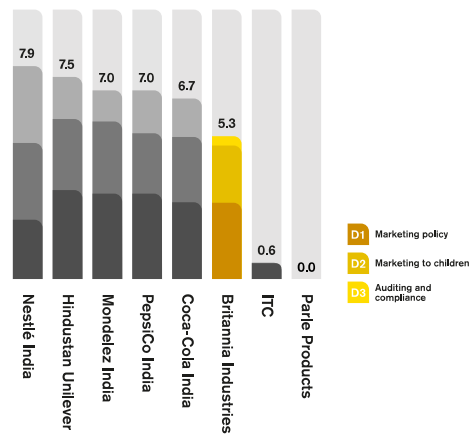
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

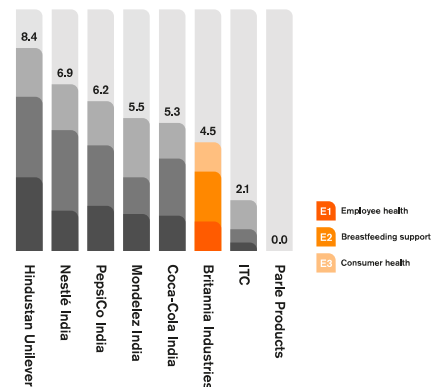
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



F1 Product labeling

F2 Claims

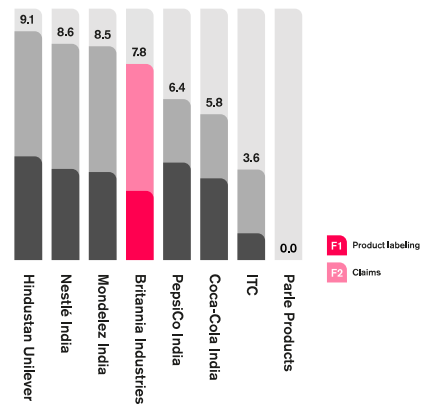
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Commitment **Performance** **Disclosure**

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

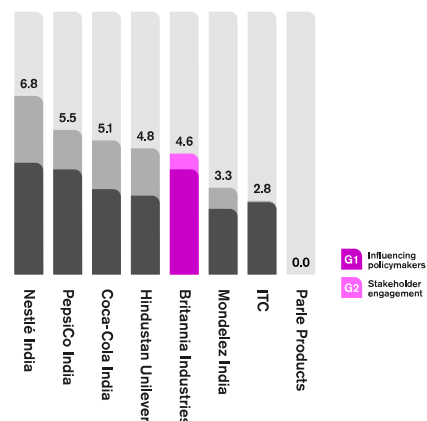
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

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Peer Comparison



Product Profile



Rank 7 / Score 5.5

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
1.8	17%	13%	136	6%	3%	136	90-100%

- A total of 136 products from across four categories, representing 90-100% of Britannia Industries' estimated 2018 sales, were included in the Product Profile. Twenty-three products (17%) were found to meet the HSR healthy threshold and the company is estimated to have derived more than one tenth (13%) of its 2018 sales from healthy products.
- The company achieves a mean HSR of 2.0 out of 5. After sales-weighting the company's mean HSR slightly declines to 1.8 out of 5, resulting in a mean healthiness score of 3.6 out of 10.
- A total of 136 products were assessed to determine their suitability to be marketed to children according to the WHO SEAR nutrient profile model. Eight products, estimated to represent 3% of 2018 sales, were found to meet these criteria, which were identified in the Baked Goods and Dairy categories.

Product Category Results

Category	Baked Goods	Dairy	Savoury Snacks	Sweet Biscuits, Snack Bars and Fruit Snacks
Mean HSR	2.9	2.2	2.2	1.4
% products healthy	62	12	13	0
% products suitable to market to children	17	9	0	0

- The best performing category for Britannia Industries is Baked Goods, for which it achieves a mean HSR of 2.9 out of 5. Eighteen (62%) out of the 29 products assessed in this category were found to meet the healthy threshold.
- In contrast, few of the company's products in the Dairy and Savoury Snack categories were found to meet the HSR healthy threshold, and none of the company's products in the Sweet Biscuits, Snack Bars and Fruit Snacks category were found to meet the HSR healthy threshold.

Relative nutritional quality of Britannia Industries' products by category compared to competitors

Mean HSR	Baked Goods	Dairy	Savoury Snacks	Sweet Biscuits, Snack Bars and Fruit Snacks
Britannia Industries	2.9	2.2	2.2	1.4
Aavin TCMPF		2.3		
Amul GCMMF		2.4		
Arla		3.2		
BRF		2.7		
Campbell	3.2		2.5	
Coca-Cola		3.6		
Coca-Cola India		3.5		
Conagra			2.5	
Danone		3.5		
Ferrero	1.1	0.7		1.2
FrieslandCampina		3.4		
General Mills	1.5	3.5		2.4
Grupo Bimbo	3		2.1	1.5
Hatsun Agro Product		2.7		
ITC			1.8	1.3
KMF Nandini		2.2		
Kellogg	2.9		1.7	2.3
Kraft Heinz	2.6	2.7	3.5	
Lactalis		3.1		
Mars		2.8		
Meiji		3.2		0.8
Mengniu		3		
Mondelēz	1.2	2.4	2.2	1.4
Mondelēz India				0.9
Mother Dairy		3.0		
Nestlé		2.4		2.3
Nestlé India		3.0		
Parle Products			2.3	1.5
PepsiCo		3.1		2.3
PepsiCo India			1.7	
Suntory	0.5	3		
Tingyi		2.7		
Unilever	1.8			
Yili		3.1		

- When compared with the other companies that sell products in the same categories (as part of their top-selling categories), Britannia Industries ranks second out of four companies for both the Sweet Biscuits, Snack Bars and Fruit Snacks category (mean HSR of 1.4 out of 5), and the Savory Snacks category (mean HSR of 2.2 out of 5).
- In the Dairy category, the company's products achieve the lowest mean HSR (2.2 out of 5), ranking them joint last (seventh) in this category.
- Competing with other companies in three categories, Britannia Industries achieves a relative category score of 7.3 out of 10 based on its ranking within these categories.

Conclusion

- Britannia Industries' mean healthiness score of 3.6 and relative category score of 7.3 result in an overall Product Profile score of 5.5 out of 10, which means the company ranks seventh in this assessment.
- The company's Product Profile score is largely driven by its relative performance when compared against other companies that sell products in the same categories (its relative category score). Britannia Industries is encouraged to continue and accelerate its innovation and reformulation activities to increase the healthiness of its product portfolio and to shift sales towards these healthier products.

Coca-Cola India

Product Profile Categories

Bottled Water; Carbonates; Dairy;
Juice; Sports Drinks



Product Profile

Rank 5 / Score 4.4

Rank 14 / Score 3.5

Rank 5 (2016)

Headquarters

U.S.

Retail sales (INR – millions)

127617

Number of employees

25000

Company Profile

Rank 5 **Score 4.4**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Coca-Cola India ranks fifth in the India Index 2020 with a score of 4.4 out of 10, up from 2.4 in the 2016 Index. The company achieved this improvement by strengthening its performance in all ATNI categories.
- Coca-Cola India is reshaping its growth strategy to expand and reformulate products in response to changing consumer needs and local preferences, putting a greater focus on nutrition and health. This is illustrated by their recent introduction of flavored-milk products. And although this product range is limited, Coca-Cola India ranks first in the Product Profile within the Dairy category with an average Health Star Rating (HSR) of 3.5 out of 5 (the 'healthy' threshold). This result is based on the analysis of two of the company's flavored 'Vio' milk drinks.
- Coca-Cola India has increased its focus on micronutrient fortification. For example, it has commercially launched a clinically tested, micronutrient-fortified beverage (Minute Maid Vitingo) in 2018, which aims to address iron deficiency in children. The drink is offered at low prices and distributed through specific channels to reach the target group. Further, the company has partnered with non-governmental organization Dharma Life to distribute the product with the help of women entrepreneurs.
- As noted in the India Index 2016, Coca-Cola India continues to be a leader in responsible marketing to children by committing not to market any products directly to children under 12. The company also commits not to market its products in primary schools.
- Coca-Cola India is one of the few companies in the Index to provide nutrition information for all products online. To further inform consumers, it also provides a description of the functionality of nutrients and ingredients, as well as an online tool to compare products' nutritional attributes.
- Coca-Cola India publicly supports the National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat – free from malnutrition, across the life cycle). Nutrition was also identified as one of the key focus areas in the company's Sustainability Report 2017-18.
- Coca-Cola India's Fruit Circular Economy program focuses on food loss and waste challenges throughout the value chain, indirectly addressing food insecurity and/or undernutrition in India.

Priority areas for improvement

- The company ranks fourteenth in the Product Profile with a score of 3.5 out of 10. It was estimated that 19% of the company's 2018 sales were generated from healthy products (i.e. achieving an HSR of 3.5 or more). Although this estimate is higher than in 2016, the company should continue its efforts to improve the overall nutrition quality of its product portfolio and/or to shift its marketing efforts to sell more healthy products.
- Coca-Cola India's strategies to reduce serving sizes, and to reformulate and expand its product portfolio, demonstrate its approach to help tackling India's challenges of obesity and diet-related chronic diseases. However, these strategies are not clearly set out in a formal commercial policy. The company is therefore encouraged to adopt such a document, and to define SMART - Specific, Measurable, Achievable, Relevant and Time-bound targets, for example to reduce added sugar in its products, as it does in other markets to some extent.
- As noted in the India Index 2016, the company does not have a Nutrient Profiling System (NPS) to define which of its products are healthy. By taking up an NPS, Coca-Cola India would be able to more clearly evidence its shift towards developing healthier products. Further, clearly defining healthy products would enable the adoption of strategies to make these more affordable and accessible.
- Coca-Cola India could strengthen its responsible marketing to children by expanding its scope regarding age (include children above the age of 12) and locations, i.e. to exclude inappropriate marketing in secondary schools and in places near schools. The company should also consider commissioning independent auditing of its marketing policy compliance and to publicly report its the India-specific findings.
- The company currently discloses calorie information on its front-of-pack (FOP) labeling. To further improve, the company is encouraged to implement an interpretive FOP labeling system as soon as possible that aligns with other companies or industry associations, and is developed in partnership with the Government and other stakeholders.
- The company is encouraged to improve its disclosure practices and improve its transparency on engagements with relevant stakeholders, particularly those that affect the company's commercial nutrition strategies.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

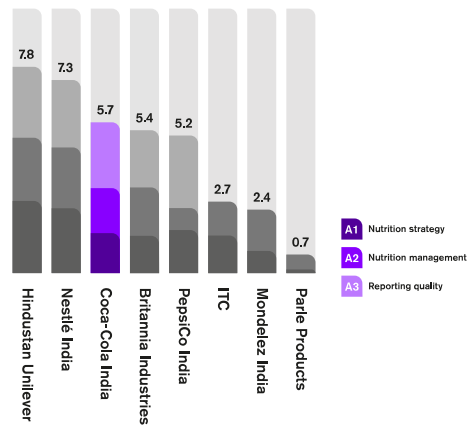
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

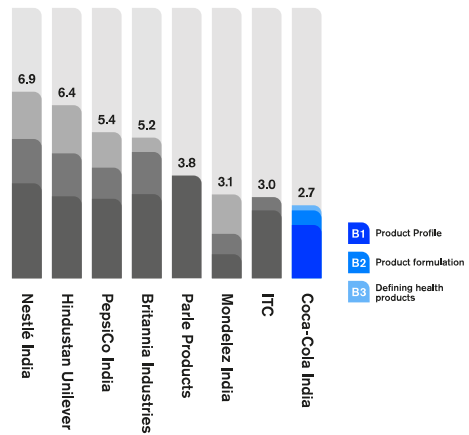
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

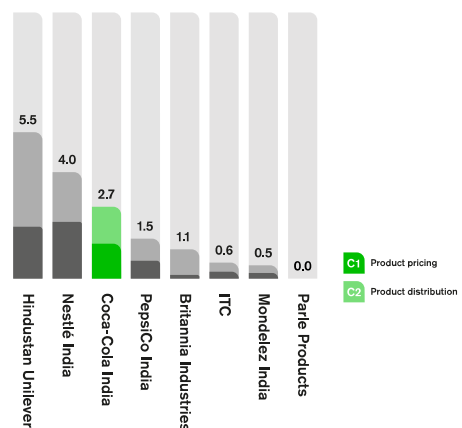
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

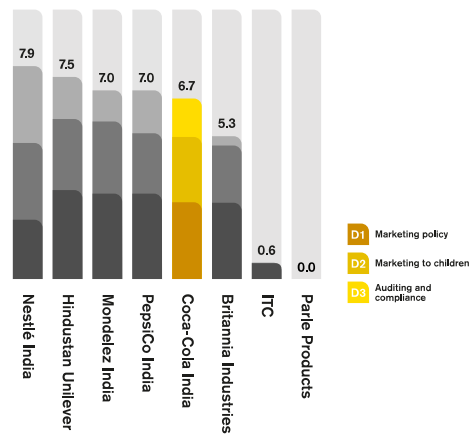
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Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

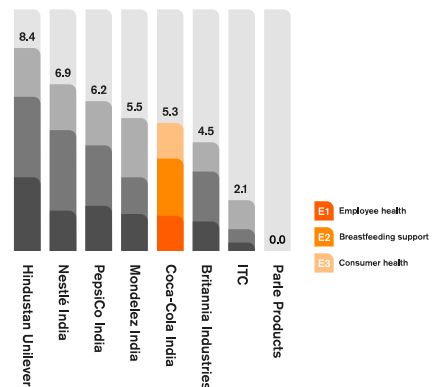
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

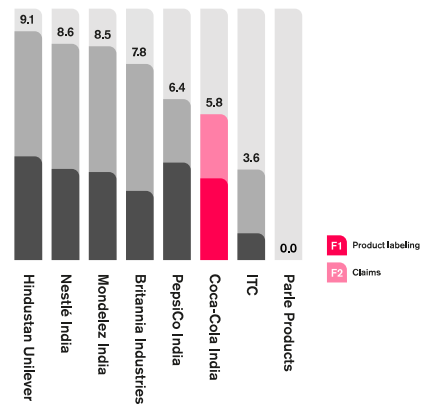
Performance

Disclosure

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

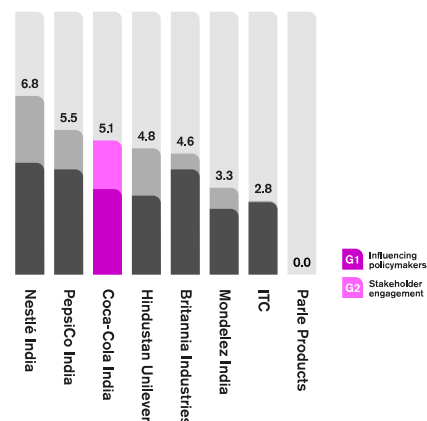
Performance

Disclosure

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Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



Product Profile



14

Rank 14 / Score 3.5

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
1.9	20%	19%	65	11%	16%	72	90-100%

- A total of 72 products from across five categories, representing 90-100% of Coca-Cola India's estimated 2018 sales, were included in the Product Profile. Of those, 65 could be assessed using the Health Star Rating (HSR). Thirteen products (20%) were found to meet the HSR healthy threshold and the company is estimated to have derived almost one fifth (19%) of its 2018 sales from healthy products.
- The company achieves an unweighted mean HSR of 1.8 out of 5. After sales-weighting the company's mean HSR slightly improves to 1.9 out of 5, resulting in a mean healthiness score of 3.7 out of 10.
- All 72 products were assessed to determine their suitability to be marketed to children according to the World Health Organization (WHO) South-East Asia Region (SEAR) nutrient profile model. Eight products in the Bottled Water and the Carbonates categories, representing an estimated 16% of 2018 sales, were found to meet the WHO SEAR criteria.

Product Category Results

Category	Bottled Water	Carbonates	Dairy	Juice	Sports Drinks
Mean HSR	5.0	1.7	3.5	1.3	1.5
% products healthy	100	11	100	10	0
% products suitable to market to children	80	15	0	0	0

- After the Bottled Water category, the second-best performing category for Coca-Cola India is Dairy. Although only two products were assessed in this category, both were found to meet the HSR healthy threshold, resulting in a mean HSR of 3.5 out of 5. Few products in the Carbonates or Juice categories were found to meet the HSR healthy threshold and none of its products in the Sports Drinks category were found to meet the threshold.

Relative nutritional quality of Coca-Cola India's products by category compared to competitors

Mean HSR	Bottled Water	Carbonates	Dairy	Juice
Coca-Cola India	5.0	1.7	3.5	1.3
Aavin TCMPF			2.3	
Amul GCMF			2.4	
Arla			3.2	
BRF			2.7	
Britannia Industries			2.2	
Campbell				3.3
Coca-Cola		1.5	3.6	2.7
Conagra			2.1	
Danone			3.5	
Ferrero			0.7	
FrieslandCampina			3.4	
General Mills			3.5	
Hatsun Agro Product			2.7	
KMF Nandini			2.2	
Keurig Dr Pepper		1.3		2.1
Kraft Heinz			2.7	3.6
Lactalis			3.1	4.3
Mars			2.8	
Meiji			3.2	
Mengniu			3	
Mondelēz			2.4	
Mother Dairy			3.0	
Nestlé		1.8	2.4	
Nestlé India			3.0	
PepsiCo		1.6	3.1	2.6
PepsiCo India	5.0	1.8		2.5
Suntory		1.6	3	3.5
Tingyi			2.7	3.6
Yili			3.1	

- When compared to the other companies that sell dairy products in India (as part of their top-selling categories), Coca-Cola India's dairy products achieve the highest mean HSR (3.5 out of 5), ranking it first out of eight in the Dairy category.

- Coca-Cola India and PepsiCo India were the only companies for which products of the Carbonates and Juice categories were included in the Product Profile. On average, PepsiCo's products were found to be healthier within these categories, although the difference within the Carbonates category is small with a mean HSR of 1.7 for Coca-Cola India and 1.8 for PepsiCo India.
- Coca-Cola India competes with other companies in four categories, and achieves a relative category score of 3.2 out of 10 based on its ranking within these categories.

Conclusion

- Coca-Cola India's mean healthiness score of 3.7 and relative category score of 3.2 result in an overall Product Profile score of 3.5 out of 10, which means the company ranks fourteenth.
- Coca-Cola India should continue and accelerate product innovation and reformulation activities, and shift sales efforts towards its healthier products such as the new dairy products.

Emami Agrotech

Product Profile Categories

Edible Oils



Product Profile

Rank 16 / Score 1.1

Rank 13 / Score 4.1

Headquarters

India

Retail sales (INR – millions)

89982

Number of employees

25000

Company Profile

Rank 16 **Score 1.1**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Emami Agrotech is assessed for the first time in the India Index 2020. ATNI welcomes Emami Agrotech's interest in the Index methodology and participation in the Index stakeholder meetings.
- A number of Emami Agrotech's products are voluntarily fortified with vitamins A and D according to the Food Safety and Standards Authority of India (FSSAI)'s Food Safety and Standards (Fortification of Foods) Regulation, 2018. The company could further improve its approach by voluntarily fortifying all relevant products according to FSSAI guidance, and publicly disclosing its approach to do so.
- Emami Agrotech demonstrates a focus on food quality and safety. The company discloses on its website an ISO-certified Food Safety Management System, and recently obtained further ISO certification for its quality control and research and development laboratory at its Haldia manufacturing facility.
- Emami Agrotech's limited number of edible oil products constitute only part of the company's overall portfolio and the company has no comprehensive nutrition strategy. However, the company publicly discloses how it has assigned managerial oversight of sustainability issues to two named executives.
- The company has an employee health and wellness program that focuses on physical activity. It could enhance the benefits of this program by adding elements related to nutrition and healthy diets.

Priority areas for improvement

- Emami Agrotech ranks sixteenth overall in the India Index with a score of 1.1 out of 10.
- Emami Agrotech ranks thirteenth in the Product Profile with a score of 4.1 out of 10. It is estimated that 33% of its 2018 sales were derived from products achieving a Health Star Rating (HSR) of 3.5 or more out of 5, i.e. the 'healthy' threshold. The company performs well in terms of its mean product healthiness – ranking fourth out of 16 companies. In contrast, when compared with its competitors within the edible oil industry segment, Emami Agrotech's peers score better. It is recommended that Emami Agrotech assesses the portfolios of competitors to explore opportunities to introduce healthier products.
- The company is encouraged to indicate how it could help address the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat – free from malnutrition, across the life cycle), and POSHAN Abhiyaan, through its core business model.
- Emami Agrotech should define which of its products are healthy based on objective nutrition criteria. It should consider adopting a policy to improve the accessibility of its healthy and/or fortified products, taking into account how it could reach low-income, rural or urban populations, including in aspirational districts.
- Emami Agrotech could substantially increase its score in Category D – Marketing – by making commitments to market its products responsibly to all consumers and not to market any products to children (its products are unlikely to be marketed to children).
- Emami Agrotech should adopt and publish a labeling policy to ensure that nutrition information is provided on all its products according to the Codex Alimentarius guidelines, and in compliance with local regulations in India. Further, it is encouraged to implement an interpretive front-of-pack labeling system as soon as possible, that is aligned with other companies or industry associations, and is developed in partnership with the Government and other relevant stakeholders.
- Emami Agrotech could increase public disclosure of its nutrition-related commitments, policies and practices in India and is encouraged to engage with ATNI to allow for a more complete assessment of these aspects.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

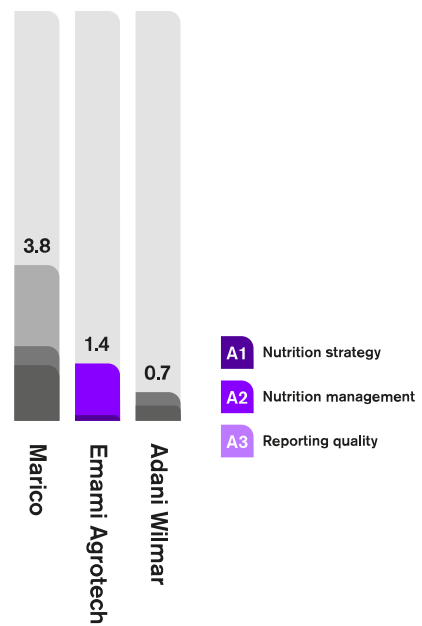
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Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

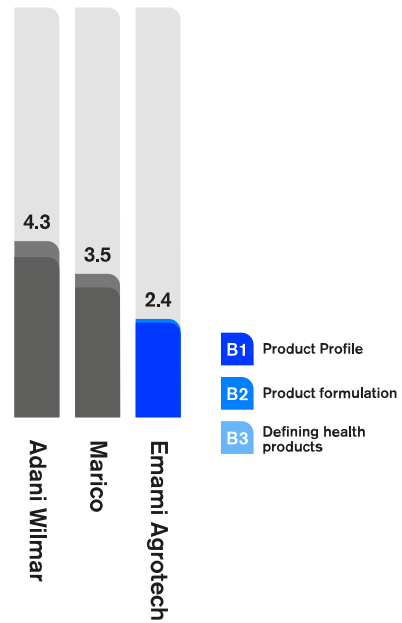
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

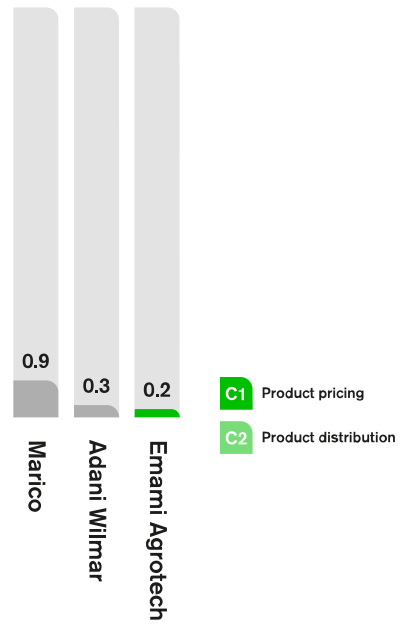
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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

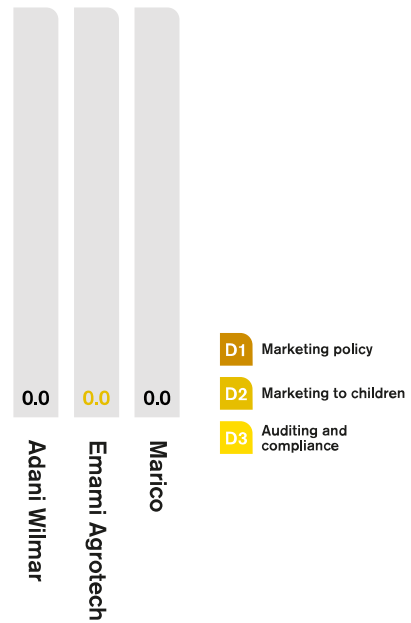
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Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

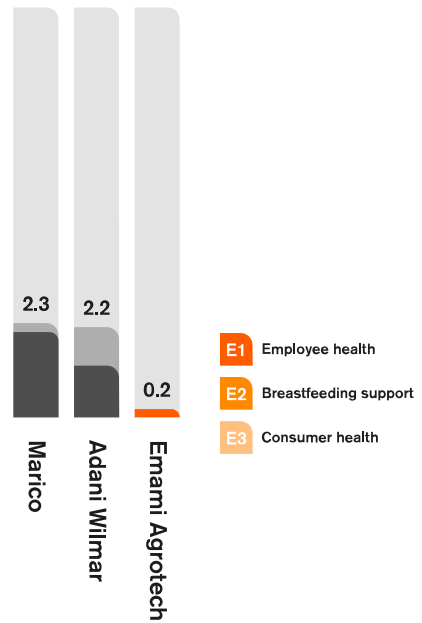
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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

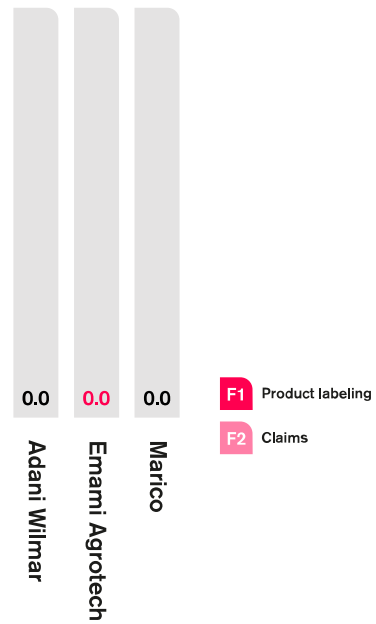
Performance

Disclosure

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

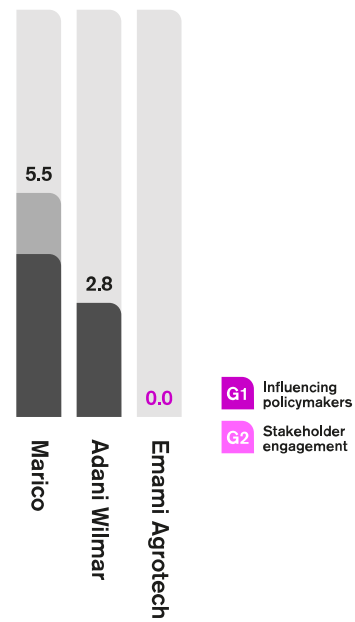
Performance

Disclosure

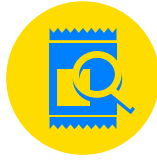
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Peer Comparison



Product Profile



13

Rank 13 / Score 4.1

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
2.8	33%	33%	6	83%	83%	6	90-100%

- A total of six products from the Edible Oils category, representing 90-100% of Emami Agrotech's estimated 2018 sales, were included in the Product Profile. Two products (33%) were found to meet the HSR healthy threshold and the company is estimated to have derived one third (33%) of its 2018 sales from these healthy products.
- The company achieves an unweighted mean HSR of 2.8 out of 5, which remains the same after sales-weighting, resulting in a mean healthiness score of 5.6 out of 10.
- A total of six edible oil products were assessed to determine their suitability to be marketed to children according to the World Health Organization (WHO) South-East Asia Region (SEAR) nutrient profile model. Five of these products, estimated to represent 83% of 2018 sales, were found to meet the WHO SEAR criteria.

Product Category Results

Category	Edible Oils
Mean HSR	2.8
% products healthy	33
% products suitable to market to children	83

- All of Emami Agrotech's products selected for the Product Profile fall into the Edible Oils category. Therefore, the company's category-level results are equivalent to its portfolio-level results.

Relative nutritional quality of Emami Agrotech's products by category compared to competitors

Mean HSR	Edible Oils
Emami Agrotech	2.8
Adani Wilmar	3.1
Conagra	4.3
Marico	2.9
Mother Dairy	3.8

- When compared to the other four companies that sell products in India in the Edible Oils category (as part of their top-selling categories), Emami Agrotech's products achieve the lowest mean HSR of 2.8 out of 5.
- Emami Agrotech achieves a relative category score of 2.5 out of 10 based on its ranking within this category.

Conclusion

- Emami Agrotech's mean healthiness score of 5.6 and relative category score 2.5 result in an overall Product Profile score of 4.1 out of 10, ranking the company thirteenth.
- Emami Agrotech's relative category results show that the company has scope to improve the nutritional quality of its products within the Edible Oil category and is encouraged to do so.

Hatsun Agro Product

Product Profile Categories

Dairy; Ice Cream and Frozen Desserts



Product Profile

Rank 12 / Score 1.4

Rank 5 / Score 6

Headquarters

India

Retail sales (INR – millions)

49947

Number of employees

1800

Company Profile

Rank 12 **Score 1.4**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Hatsun Agro Product is assessed for the first time in the India Index 2020. With its large portfolio of dairy products for consumers in India, and being the only privately-owned dairy company, it is an important addition to the group of assessed companies.
- Hatsun Agro Product ranks fifth in the Product Profile with a score of 6.0 out of 10. It is estimated that 41% of the company's sales in 2018 were derived from products achieving a Health Star Rating (HSR) of 3.5 or more out of 5, i.e. the 'healthy' threshold. The company is estimated to have derived 80-90% of its 2018 sales from products in its healthiest category, Dairy.
- The company performs well in terms of the mean healthiness of its products as well as in comparison to its peers within the same product categories. Notably, Hatsun Agro Product performs best compared to its peers within the Ice Cream and Frozen Desserts product category regarding healthiness.
- Hatsun Agro Product makes a broad commitment to improving nutrition in India by enhancing cattle feed and health to increase the nutritional quality of the milk used in its products. The company also demonstrates a focus on food safety and quality; its milk certification and quality process, for example, has been assessed by India's Food Safety and Standards Authority (FSSAI).

Priority areas for improvement

- Hatsun Agro Product ranks joint twelfth overall in the Index with a score of 1.4 out of 10. The company's score is based almost entirely on its Product Profile results.
- The company could improve its score by adopting and publishing a formal nutrition policy to address malnutrition challenges in India. The company should also observe the health and nutrition priorities set out in the National Nutrition Strategy and Vision 2022 (Kuposhan Mukht Bharat – free from malnutrition, across the life cycle), and POSHAN Abhiyaan, in its commercial strategy. Hatsun Agro Product should also consider to voluntarily fortify all relevant products as per the FSSAI's Food Safety and Standards (Fortification of Foods) Regulation, 2018.
- Hatsun Agro Product should adopt and publish a policy to improve the affordability and physical accessibility of its healthy products, taking into account how it can reach low-income, rural or urban populations that lack regular access to nutritious food, including in aspirational districts.
- Hatsun Agro Product is advised to adopt and publish a responsible marketing policy covering all consumer groups and with specific commitments regarding children and teenagers. It may consider signing the Food and Beverage Alliance India Pledge as a first step towards this. The company should also consider committing to only market products to children that meet the World Health Organization (WHO) South-East Asia Region (SEAR) regional standard. The Product Profile found that 8% of the company products currently meet this standard.
- Hatsun Agro Product should adopt and publish a labeling policy that ensures nutrition information is provided on all packaged food and beverage products according to the Codex Alimentarius guidelines, and in compliance with India's local regulations. Further, the company is encouraged to implement an interpretive front-of-pack labeling system as soon as possible, that aligns with other companies or industry associations, and is developed in partnership with the Government and other relevant stakeholders.
- More generally, Hatsun Agro Product could further increase public disclosure of its nutrition-related commitments, policies and practices in India and is encouraged to engage with ATNI to allow for a more complete assessment of these aspects.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

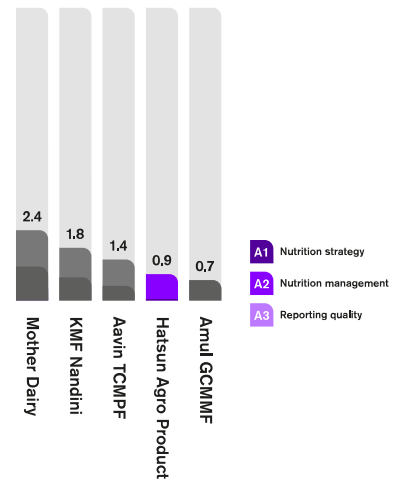
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Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

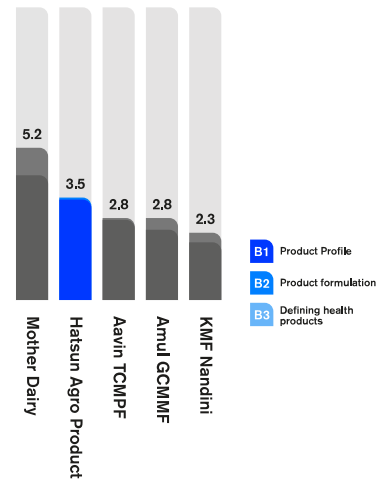
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

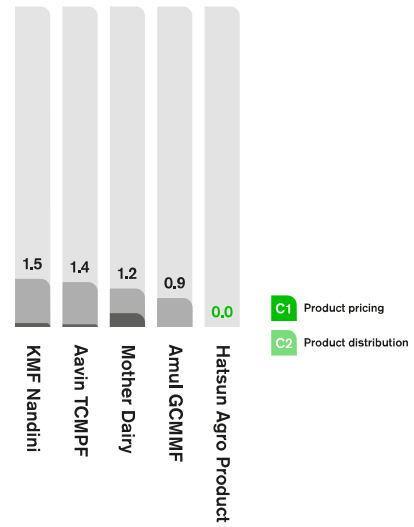
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Commitment Performance Disclosure

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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

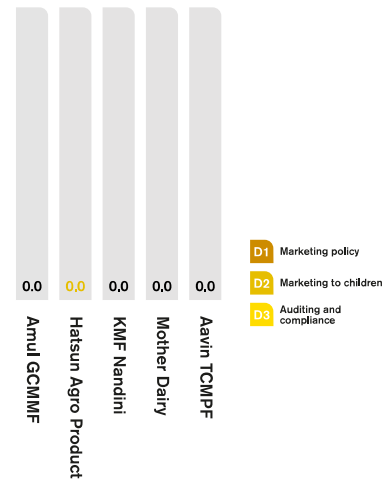
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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

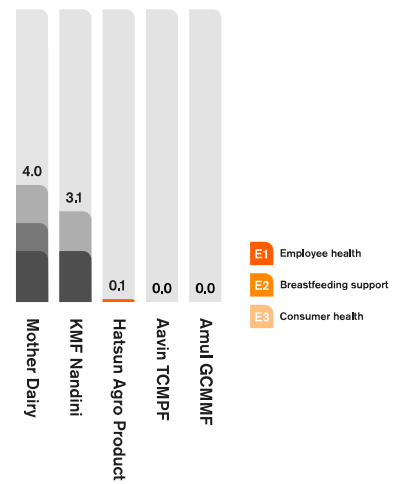
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

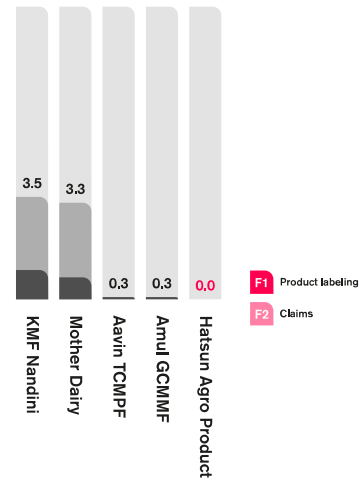
Performance

Disclosure

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

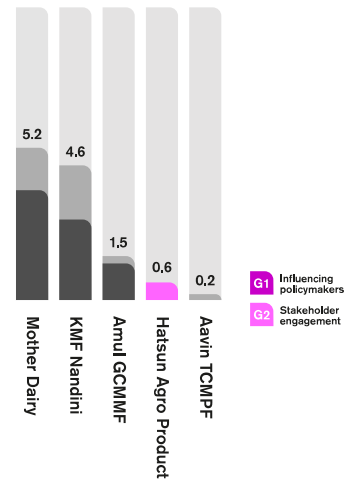
Performance

Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



Product Profile



5

Rank 5 / Score 6

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
2.6	10%	41%	106	8%	26%	106	90-100%

- A total of 106 products from two categories, representing 90-100% of Hatsun Agro Product's estimated 2018 retail sales, were included in the Product Profile. Eleven products (10%) were found to meet the HSR healthy threshold and the company is estimated to have derived less than half (41%) of its 2018 sales from these healthy products.
- The company achieves an unweighted mean HSR of 2.3 out of 5. After sales-weighting, the company's mean HSR improved to 2.6, resulting in a mean healthiness score of 5.2 out of 10.
- A total of 106 products were assessed to determine their suitability to be marketed to children according to the WHO SEAR nutrient profile model. Eight products, estimated to represent 26% of 2018 retail sales, were found to meet the criteria.

Product Category Results

Category	Dairy	Ice Cream and Frozen Desserts
Mean HSR	2.7	2.2
% products healthy	48	0
% products suitable to market to children	30	1

- The company's products in the Dairy category performed the best, with a mean HSR of 2.7 out of 5. Of the 23 dairy products assessed, almost half (48%) of them were found to meet the HSR healthy threshold.
- In contrast, none of the company's products in the Ice Cream and Frozen Desserts category were found to meet the healthy threshold, and only one product (1%) was found to meet the WHO SEAR criteria for marketing to children.

Relative nutritional quality of Hatsun Agro Product's products by category compared to competitors

Mean HSR	Dairy	Ice Cream and Frozen Desserts
Hatsun Agro Product	2.7	2.2
Aavin TCMPPF	2.3	
Amul GCMMF	2.4	1.8
Arla	3.2	
BRF	2.7	
Britannia Industries	2.2	
Coca-Cola	3.6	
Coca-Cola India	3.5	
Conagra	2.1	
Danone	3.5	
Ferrero	0.7	
FrieslandCampina	3.4	
General Mills	3.5	1.8
Hindustan Unilever		2.1
KMF Nandini	2.2	1.4
Kraft Heinz	2.7	
Lactalis	3.1	
Mars	2.8	
Meiji	3.2	2.2
Mengniu	3	2.3
Mondelēz	2.4	
Mother Dairy	3.0	2.0
Nestlé	2.4	
Nestlé India	3.0	
PepsiCo	3.1	
Suntory	3	
Tingyi	2.7	
Yili	3.1	2.1

- When compared to four other companies that sell products in the Ice Cream and Frozen Desserts category (as part of their top-selling categories), the company's products achieve the highest mean HSR of 2.2 out of 5, ranking them first in this product category.
- Hatsun Agro Product ranks fourth among eight companies that sell products in the Dairy category, with a mean HSR of 2.7 out of 5.
- Competing with other companies in two categories, Hatsun Agro Product achieves a relative category score of 6.8 out of 10 based on its ranking within these categories.

Conclusion

- Hatsun Agro Product's mean healthiness score of 5.2 and relative category score of 6.8 result in an overall Product Profile score of 6.0 out of 10, ranking them fifth out of 16.
- Hatsun Agro Product is encouraged to continue its efforts to improve the nutritional quality of its dairy and other products, and to shift sales towards its healthier dairy products.

Hindustan Unilever

Product Profile Categories

Concentrates; Ice Cream and Frozen
Desserts; Sauces, Dressings and
Condiments; Soup; Sweet Spreads



Product Profile

↑ Rank 1 / Score 6.9

Rank 8 / Score 5.3

Rank 2 (2016)

Headquarters

India

Retail sales (INR – millions)

86117

Number of employees

18000

Company Profile

Rank 1 **Score 6.9**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Hindustan Unilever is joint leader in the India Index 2019 with a score of 6.9 out of 10. Since the previous India Index in 2016, the company has improved its ranking and score in several Index categories.
- Hindustan Unilever continues to demonstrate its clear and well-structured nutrition strategy in India. The company publicly discloses its approach through policies that can be found on its website, and publishes the percentage of products that meet its Highest Nutritional Standards (HNS) in India each year.
- The company actively supports the aims of the Food Safety and Standards Authority of India (FSSAI) and was recognized by the authority in 2019 with the Eat Right Award for its efforts in driving safe and nutritious food. FSSAI also acknowledged its efforts in reducing the salt, sugar and saturated fat content of its products in relation to the Unilever Sustainable Living Plan.
- Hindustan Unilever has developed an approach to improve the affordability of its healthy products using specifically defined price points, and ensures that products meeting its HNS are affordable for key consumer groups. Further, Hindustan Unilever demonstrates a continued commitment to improving the accessibility of its products through its Shakti project, which helps addressing undernutrition and micronutrient deficiencies in villages and rural communities through the distribution of healthy foods (in addition to other products). There are now over 100,000 Shakti entrepreneurs involved in distribution across 18 states in India.
- The company's 'Health & Wellbeing' strategy has been enhanced since 2018. It aims to help deliver healthier diets and lifestyles for its employees and throughout the wider value chain. One element is the long-established Hindustan Unilever Lamplighter Program which helps employees to improve their nutritional intake and encourages healthy lifestyles. The program is regularly independently evaluated.

Priority areas for improvement

- Hindustan Unilever ranks eighth in the Product Profile with a score of 5.3 out of 10. The assessment is based on product categories that represent 30-40% of the company's 2018 sales in India (tea, coffee, wheat flour and salt products were not assessed). Within the assessed categories, the company is estimated to have derived 6% of sales from products that achieve a Health Star Rating (HSR) of 3.5 or more, i.e. the 'healthy' threshold. In comparison with its competitors, the company scored well in two product categories.
- In recent years, there has been no evidence of improvement in portfolio healthiness – either through company reporting or the Product Profile findings. The mean healthiness score was found to be lower than in 2016, which may be explained by the evaluation of a larger number of products. The company should accelerate improving the healthiness of its products.
- Hindustan Unilever voluntarily fortifies some of its whole wheat flour products according to the FSSAI's Food Safety and Standards (Fortification of Foods) Regulation, 2018, and iodizes salt products. The company should consider fortifying all wheat flour products and applying double fortification to salt products.
- The company's approach to improving the affordability and physical accessibility of its healthy products could further be strengthened by formalizing its policy, introducing quantitative targets, and reporting on progress.
- Hindustan Unilever could improve its marketing approach by committing to only marketing products to children that meet the World Health Organization (WHO) South-East Asia Region (SEAR) regional standard. The Product Profile found that 17% of the assessed products currently meet the criteria. The company could also explore options to include children above 12 years in the commitment, and by excluding inappropriate marketing in secondary schools and in places near schools. Notably, Hindustan Unilever plans to implement an improved marketing policy by the end of 2020, which is not currently reflected in ATNI's assessment.
- To further improve its labeling approach, the company is encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and developed in partnership with the Government and other relevant stakeholders.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

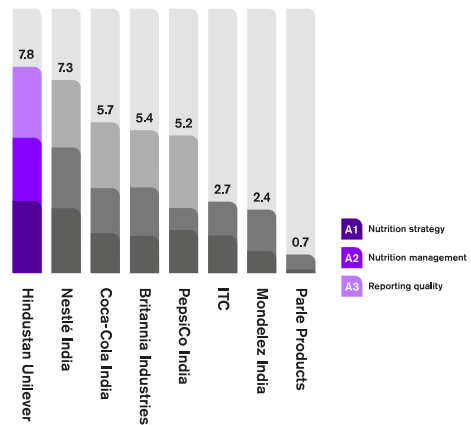
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

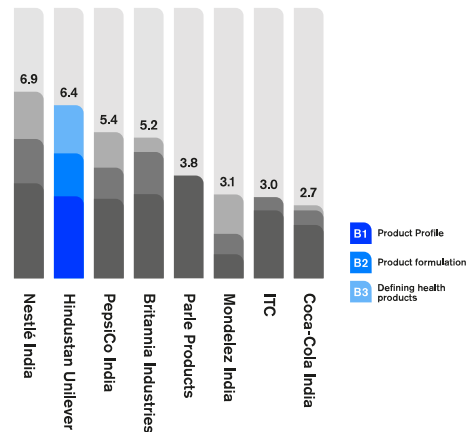
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- C1** Product pricing
- C2** Product distribution

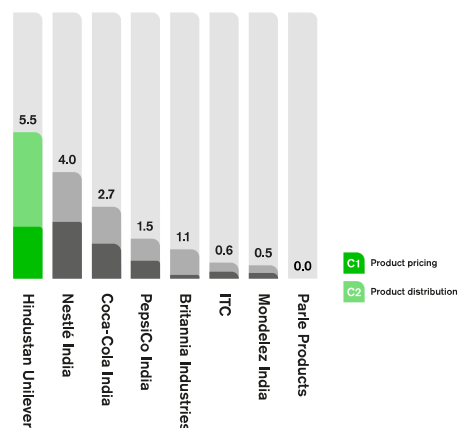
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

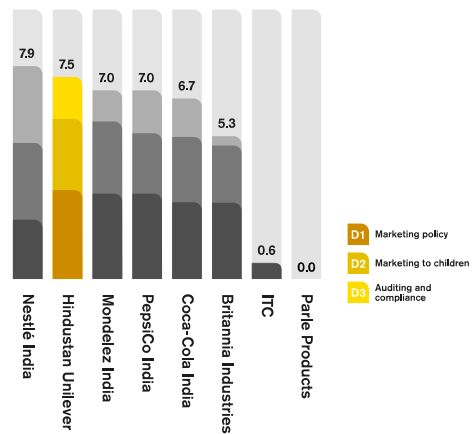
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

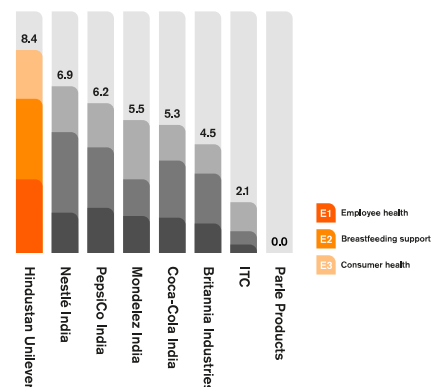
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

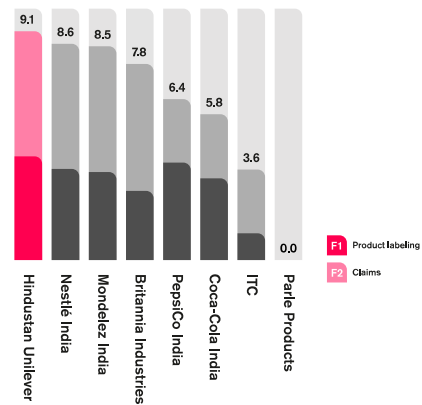
Performance

Disclosure

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

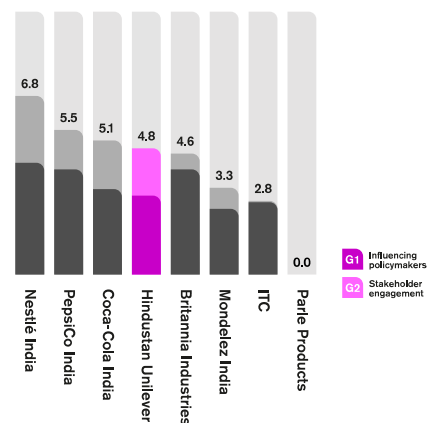
Performance

Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



Product Profile



Rank 8 / Score 5.3

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
2.0	8%	6%	120	17%	12%	120	30-40%

- A total of 120 products from across five categories, representing 30-40% of Hindustan Unilever's estimated 2018 retail sales, were included in the Product Profile (tea, coffee, wheat flour and salt products were not assessed). Ten products (8%) were found to meet the HSR healthy threshold, and the company is estimated to have derived 6% of its 2018 sales of included product categories from healthy products.
- The company achieves an unweighted mean HSR of 2.2 out of 5. After sales-weighting, the company's mean HSR slightly drops to 2.0 out of 5, resulting in a mean healthiness score of 4.1 out of 10.
- A total of 120 products were assessed to determine their suitability to be marketed to children according to the WHO SEAR nutrient profile model. Twenty products from the Soup category and the Sauces, Dressings and Condiments category were found to meet the criteria. These products are estimated to represent 12% of the 2018 sales from the five assessed categories.

Product Category Results

Category	Concentrates	Ice Cream and Frozen Desserts	Sauces, Dressings and Condiments	Soup	Sweet Spreads
Mean HSR	1.5	2.1	1.6	3.2	1.6
% products healthy	0	0	5	39	0
% products suitable to market to children	0	0	5	83	0

- The best performing product category for Hindustan Unilever is Soup, with a mean HSR of 3.2 out of 5.
- Few (5%) of the company's products in the Sauces, Dressings and Condiments category were found to meet the healthy threshold and none of the products in the other categories (Concentrates, Ice Cream and Frozen Desserts, and Sweet Spreads) were found to be healthy.

Relative nutritional quality of Hindustan Unilever's products by category compared to competitors

Mean HSR	Concentrates	Ice Cream and Frozen Desserts	Sauces, Dressings and Condiments	Soup	Sweet Spreads
Hindustan Unilever	1.5	2.1	1.6	3.2	1.6
Ajinomoto	0.5		0.9	0.9	
Amul GCMMF		1.8			
Arla			2.6	3.1	
Campbell			3.2	3.3	
Coca-Cola	1.5				
Conagra			2.6		4.2
Ferrero					0.8
General Mills		1.8	3.5	3.5	1.2
Hatsun Agro Product		2.2			
KMF Nandini		1.4			
Kraft Heinz	1.1		2.2	3.6	2.5
Mars				1.9	
Meiji		2.2			
Mengniu		2.3			
Mondelēz	0.5				
Mondelēz India	0.5				
Mother Dairy		2.0			
Nestlé India			1.7		
PepsiCo	1.5		3.6		
Suntory	1.5				
Unilever			1.9	2.7	2.5
Yili		2.1			

- When compared to the four other companies that sell products in the Ice Cream and Frozen Desserts category in India (as part of their top-selling categories), Hindustan Unilever's products achieve a mean HSR of 2.1 out of 5. This score ranks them second in this product category. For the Concentrates category, Hindustan Unilever scores the highest out of two companies, with an HSR of 1.5 out of 5.
- Competing with other companies in three categories, Hindustan Unilever achieves a relative category score of 6.5 out of 10 based on its ranking within these categories.

Conclusion

- Hindustan Unilever's mean healthiness scores of 4.1 and relative category score of 6.5 result in an overall Product Profile score of 5.3 out of 10, which means the company ranks eighth.

- Hindustan Unilever's Product Profile score is driven more by the company's relative performance against its peers (the relative category score) than by its mean healthiness score. The company is encouraged to continue and accelerate efforts to improve the nutritional quality of its products, and to shift its sales towards its healthy products.



Product Profile Categories

Confectionery; Ready Meals; Rice, Pasta and Noodles; Savoury Snacks; Sweet Biscuits, Snack Bars and Fruit Snacks



Product Profile

Rank 9 / Score 2.1

Rank 11 / Score 4.4

Headquarters
India

Retail sales (INR – millions)
96763

Company Profile

Rank 9 Score 2.1

Commitment Performance Disclosure

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- ITC is assessed in full for the first time in the India Index 2020. With its large and diverse portfolio of packaged foods and beverages in India, it is crucial the company is assessed as part of the current India Index iteration.
- In 2016, the company was interviewed regarding its approach to address undernutrition. ITC has since demonstrated a continuous commitment to micronutrient fortification as an approach to help address undernutrition and micronutrient deficiencies in India. Further, the company shows examples of product innovation and reformulation to help address challenges related to obesity and non-communicable diseases.
- ITC publishes annual Sustainability Reports with relevant information regarding the company's packaged food products, including new product launches and how specific formulations aim to address identified health needs. The company also discloses its Food Products Policy, which covers important elements related to labeling and micronutrient fortification.
- The company fortifies some of its products voluntarily. For example, one of its Aashirvaad Atta-branded products and its Sunfest Marie Light biscuits are fortified with B vitamins, iron and other nutrients. The company could further improve its approach to fortification by disclosing how it voluntarily aligns with the Food Safety and Standards Authority of India (FSSAI)'s Food Safety and Standards (Fortification of Foods) Regulation, 2018.
- The company is committed to reducing the quantities of fat, salt and sugar within its products in alignment with FSSAI's pledge and Eat Right Movement. ITC also states that none of its snack products contain industrially-produced trans fats and commits to 'disclose added trans fats, if any, in all food products', supporting FSSAI's goal to eliminate industrially-produced trans fats from the food supply by 2022.
- The company focuses on pricing and distribution strategies to ensure the affordability and physical accessibility of its healthy products, particularly for economically disadvantaged groups.
- ITC's corporate social responsibility initiatives, such as its Women Economic Empowerment Program, are helping to address nutrition and health issues in India. The company also supports FSSAI's Safe and Nutritious Food at School initiative which works to build awareness amongst children about healthy and hygienic food practices.

Priority areas for improvement

- ITC ranks ninth in the India Index with a score of 2.1 out of 10.
- The company ranks eleventh in the Product Profile with a score of 4.4 out of 10. It is estimated that 11% of its 2018 sales in India were derived from products that achieve a Health Star Rating (HSR) of 3.5 or more out of 5 - the 'healthy' threshold. In the Confectionery category, ITC scores better than its peers in terms of healthiness, but in other product categories, the company's relative performance is not as good. Overall, the Product Profile results demonstrate that the company has substantial scope to improve the nutritional quality of its product portfolio.
- ITC should define which of its products are healthy based on objective nutrition criteria using an internationally recognized Nutrient Profiling System. The company should also implement a strategy towards a healthier product portfolio by adopting SMART – Specific, Measurable, Achievable, Relevant and Time-bound – formulation and/or reformulation targets, to ensure stakeholders can hold the company accountable.
- The company publicly adheres to the Advertising Standards Council of India code, which addresses some general aspects of responsible marketing. To improve its performance, ITC is advised to adopt a responsible marketing policy covering all consumer groups, with specific commitments regarding children and teenagers. The company should further consider committing to only marketing products to children that meet the World Health Organization (WHO) South-East Asia Region (SEAR) regional standard. The Product Profile found that 4% of its products currently meet this standard.
- The company could improve its labeling practices by ensuring nutrition information is provided on all products according to the Codex Alimentarius guidelines, and in compliance with local regulations in India. ITC is encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and is developed in partnership with the Government and other relevant stakeholders.
- ITC could further increase public disclosure about its nutrition-related commitments, policies and practices in India and is encouraged to engage with ATNI to allow for a more complete assessment of these aspects.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

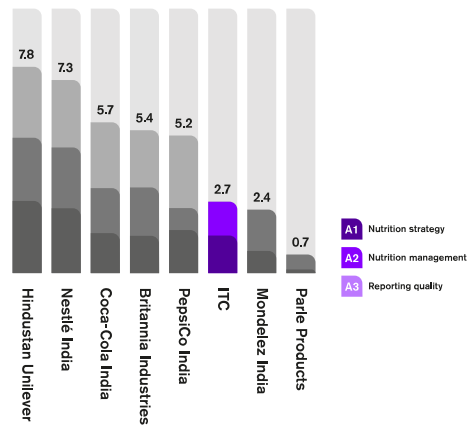
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

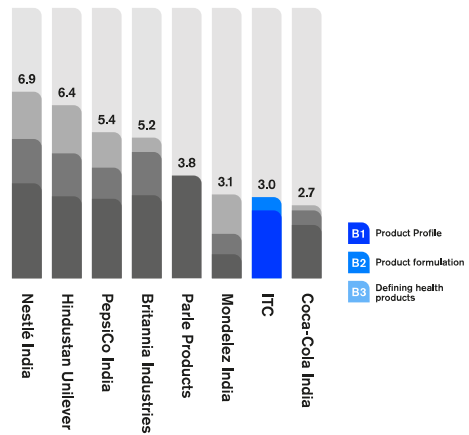
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

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Peer Comparison



Commitment **Performance** **Disclosure**

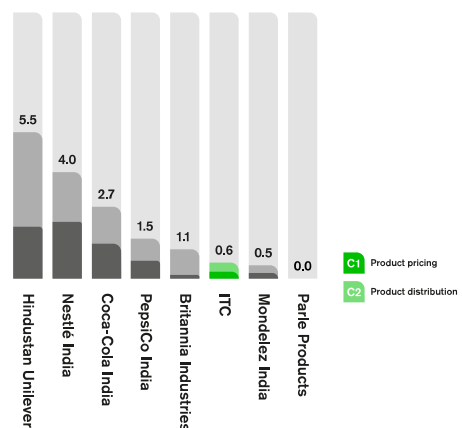
The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

- C1** Product pricing
- C2** Product distribution

All category, criteria, commitment, performance and disclosure scores are out of 10

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

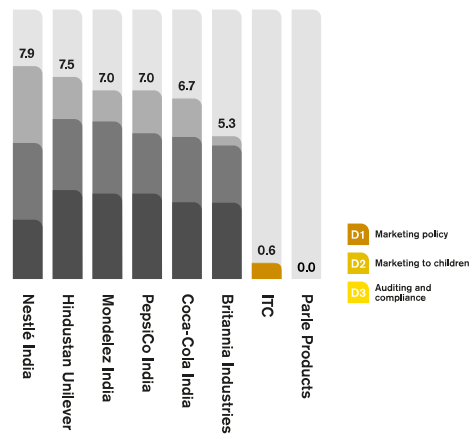
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Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

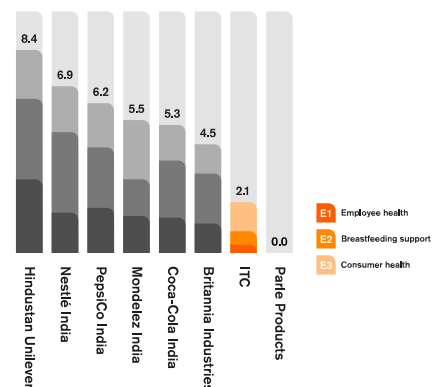
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

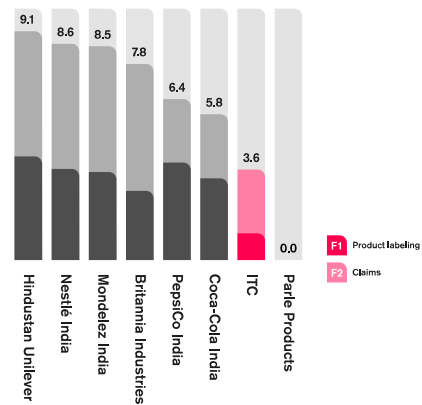
Performance

Disclosure

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

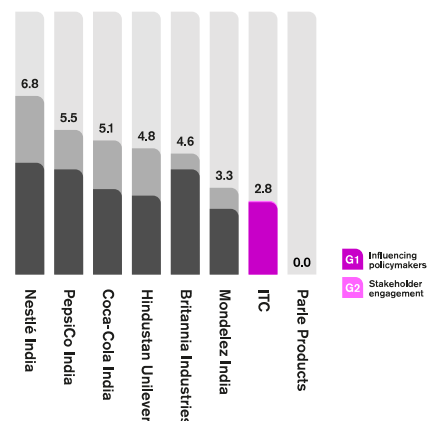
Performance

Disclosure

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Peer Comparison



Product Profile



11

Rank 11 / Score 4.4

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
1.6	8%	11%	183	4%	6%	188	90-100%

- A total of 188 products from across five categories, representing 90-100% of ITC's estimated 2018 sales, were included in the Product Profile. Of those, 183 products could be assessed using the HSR. Fifteen products (8%) were found to meet the HSR healthy threshold and the company is estimated to have derived slightly more than one-tenth (11%) of its 2018 sales from healthy products.
- The company achieves an unweighted mean HSR of 1.5 out of 5. After sales-weighting the company's mean HSR slightly improves to 1.6 out of 5, resulting in a mean healthiness score of 3.3 out of 10.
- A total of 188 products were assessed to determine their suitability to be marketed to children according to the WHO SEAR nutrient profile model. Eight products, estimated to represent 6% of 2018 retail sales, were found to meet WHO SEAR criteria and were identified in the Rice, Pasta and Noodles category and the Savoury Snacks category.

Product Category Results

Category	Confectionery	Ready Meals	Rice, Pasta and Noodles	Savoury Snacks	Sweet Biscuits, Snack Bars and Fruit Snacks
Mean HSR	1.1	1.2	2.8	1.8	1.3
% products healthy	0	0	57	7	0
% products suitable to market to children	0	0	38	0	0

- ITC's best performing category is Rice, Pasta and Noodles, with a mean HSR of 2.8 out of 5. A total of 21 products were assessed in this category and 12 (57%) were found to meet the HSR healthy threshold. Few of the company's products in the Savoury Snacks category were found to be healthy and none of the company's products in the remaining categories (Confectionery, Ready Meals, and Sweet Biscuits, Snack Bars and Fruit Snacks) were found to meet the healthy threshold.

Relative nutritional quality of ITC's products by category compared to competitors

Mean HSR	Confectionery	Ready Meals	Rice, Pasta and Noodles	Savoury Snacks	Sweet Biscuits, Snack Bars and Fruit Snacks
ITC	1.1	1.2	2.8	1.8	1.3
Ajinomoto		2.6	0.5		
Amul GCMMF	0.6				
BRF		2.8			
Britannia Industries				2.2	1.4
Campbell				2.5	
Conagra		3.3		2.5	
Ferrero	0.9				1.2
General Mills		2.6	3.7		2.4
Grupo Bimbo	1.2			2.1	1.5
Kellogg				1.7	2.3
Kraft Heinz		2.8		3.5	
Mars	1.3	3.4	3.5		
Meiji	0.9	2.9			0.8
Mondelēz	1.1			2.2	1.4
Mondelēz India	0.5				0.9
Nestlé		3.2	2.7		2.3
Nestlé India	0.7		3.0		
Parle Products	1.1			2.3	1.5
PepsiCo					2.3
PepsiCo India				1.7	
Tingyi			0.6		
Unilever		3.2	3.2		

- When compared to the other companies that sell products in India within the Confectionery category (as part of their top-selling categories), ITC ranks joint first out of five, achieving the highest mean HSR of 1.1 out of 5.

- In the Savoury Snacks and the Sweet Biscuits, Snack Bars and Fruit Snacks categories, ITC products score less well relative to those of the other companies. For both categories, the company ranks third out of four companies. In the Rice, Pasta and Noodles category, the company ranks second with a mean HSR of 2.8 out of 5.
- ITC competes with other companies in four categories and achieves a relative category score of 5.5 out of 10 based on its ranking within those categories.

Conclusion

- ITC's mean healthiness score of 3.3 and relative category score of 5.5 result in an overall Product Profile score of 4.4 out of 10, ranking the company eleventh in this assessment.
- The company should continue to improve the nutritional quality of all its products, and particularly within the Sweet Biscuits, Snack Bars and Fruit Snacks category, which do not perform well when compared to those of its competitors. The company is also encouraged to adopt strategies and relevant targets to shift its sales towards healthier products and categories.

Marico

Product Profile Categories

Breakfast Cereals; Edible Oils



Product Profile

Rank 8 / Score 2.2

Rank 6 / Score 5.6

Headquarters

India

Retail sales (INR – millions)

49055

Number of employees

1665

Company Profile

Rank 8 **Score 2.2**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Marico is assessed for the first time in the India Index 2020. ATNI welcomes Marico's interest in the Index methodology and participation in the Index stakeholder meetings.
- Among the three companies assessed for the 2020 India Index that predominantly sell products in the Edible Oil category, Marico ranks the highest. Although Marico is estimated to have derived 90-100% of its sales from the Edible Oils product category, it is expanding its product portfolio and also sells products in the Breakfast Cereals category.
- Enhancing nutrition is a commitment in the company's corporate sustainability policy. The company discloses that it intends to meet changing consumer needs with strategies that incorporate elements of nutrition and active lifestyles. Marico's recent acquisition of the Revofit mobile app that addresses elements of health and fitness, including nutrition tracking, plans and recipes, illustrates a novel approach in this regard.
- Marico's focus on improving the nutritional quality of its products is further illustrated by its commitment to reduce the salt content of their Saffola Masala Oats products by 15% by 2020. This target is part of a pledge the company made to the Food Safety and Standards Authority of India (FSSAI) in July 2018.
- Marico has a health and wellness program for its employees which includes nutrition consultations, health check-ups and various fitness activities, such as yoga. Marico also educates consumers in relation to nutrition and cardiac health. The company has developed the 'Fit Foodie Meter' in consultation with the Indian Dietetic Association, a tool which assigns a health score to every recipe presented on the website, based on nutritional composition.

Priority areas for improvement

- Marico ranks eighth overall in the India Index with a score of 2.2 out of 10.
- Marico ranks sixth in the Product Profile with a score of 5.6 out of 10. It is estimated to have derived 35% of its 2018 sales from products that achieve a Health Star Rating (HSR) of 3.5 or more out of 5 – i.e. the 'healthy' threshold. Marico's products in the Breakfast Cereals category have the highest mean HSR of (3.7) within its portfolio. The company could improve its result by expanding sales in this category and by introducing reformulated and new healthy products.
- The company could adopt and disclose a nutrition policy that specifies how its commercial strategy could help address the priorities set out the National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat – free from malnutrition, across the life cycle), and POSHAN Abhiyaan. To address micronutrient deficiency challenges in India, Marico should consider voluntarily fortifying all relevant products as per FSSAI's Food Safety and Standards (Fortification of Foods) Regulation, 2018.
- Marico should also consider adopting and publishing a policy to improve the affordability and physical accessibility of healthy products, addressing how best to reach low-income, rural or urban populations that lack regular access to nutritious food.
- As a company that predominantly sells products in the Edible Oils category, Marico could substantially increase their score in Category D – Marketing – by making commitments to market its products responsibly to all consumers and not to market any products to children (its products are unlikely to be marketed to children).
- Marico could improve its labeling practices by ensuring nutrition information is provided on all products according to the Codex Alimentarius guidelines, and in compliance with India's local regulations. It is also encouraged to implement an interpretive front-of-pack labeling system as soon as possible, that aligns with other companies or industry associations and is developed in partnership with the Government and other relevant stakeholders.
- Marico could further increase public disclosure about its nutrition-related commitments, policies and practices in India and is encouraged to further engage with ATNI to allow for a more complete assessment of these aspects.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

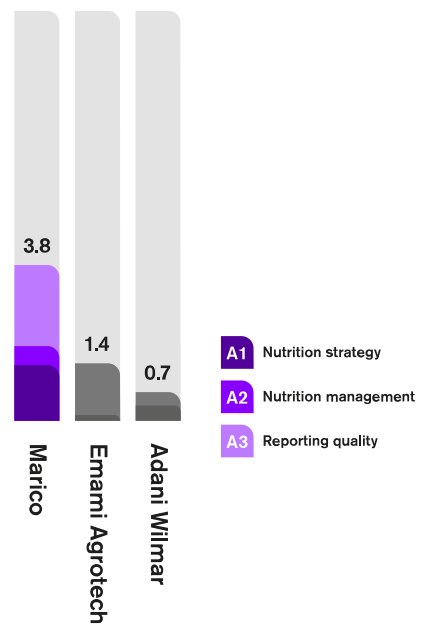
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

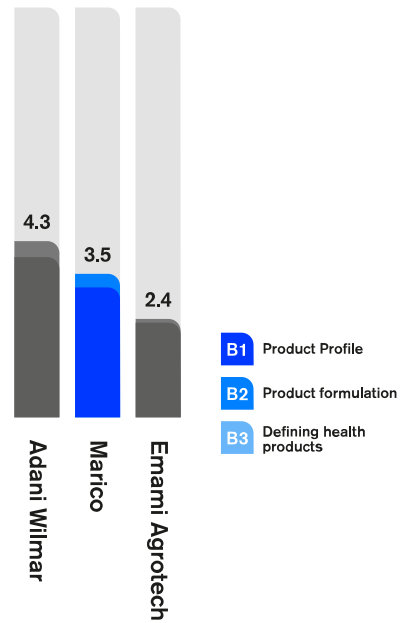
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

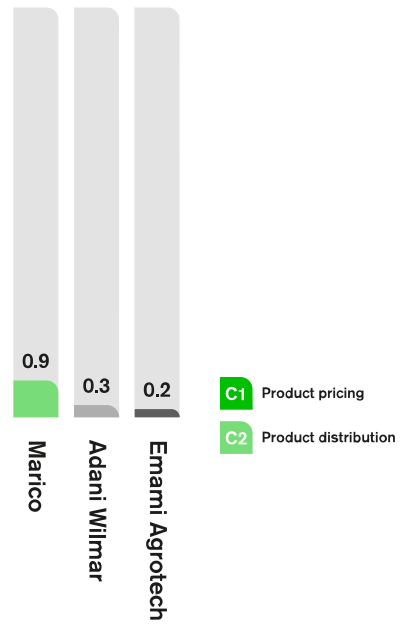
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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

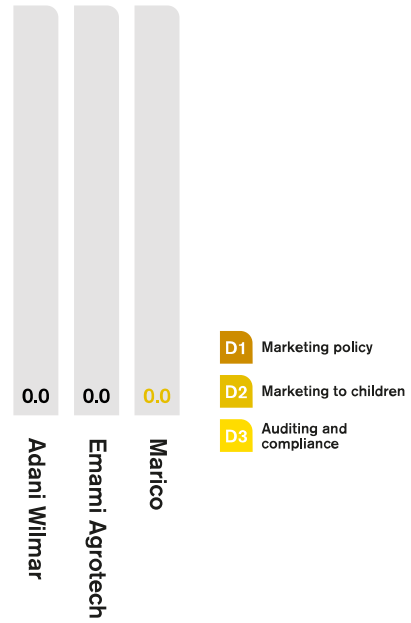
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

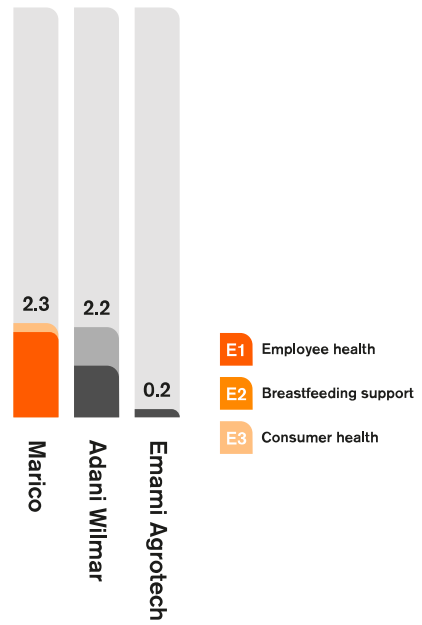
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Commitment Performance Disclosure

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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

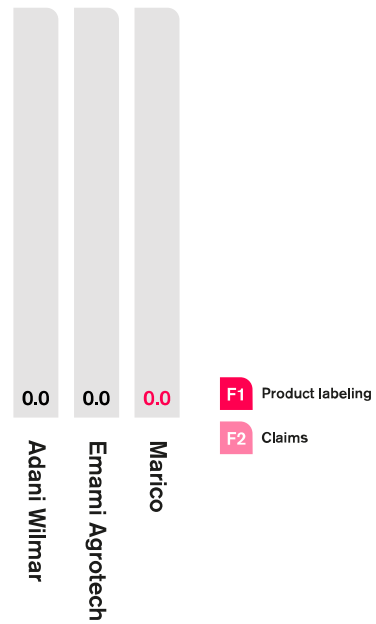
Performance

Disclosure

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

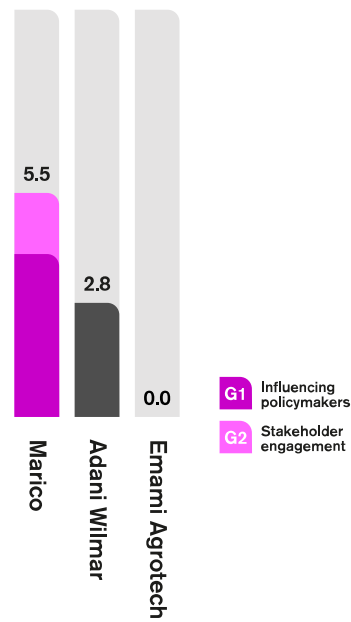
Performance

Disclosure

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Peer Comparison



Product Profile



6

Rank 6 / Score 5.6

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
2.9	61%	35%	41	44%	76%	41	90-100%

- A total of 41 products from two categories (Breakfast Cereals and Edible Oils), representing 90-100% of Marico's estimated 2018 sales, were included in the Product Profile. Twenty-five products (61%) were found to meet the HSR healthy threshold and the company is estimated to have derived approximately one third (35%) of its 2018 sales from these healthy products.
- The company achieves a mean HSR of 3.5 out of 5. After sales-weighting the company's mean HSR decreases to 2.9 out of 5, resulting in a mean healthiness score of 5.9 out of 10.
- A total of 41 products were assessed to determine their suitability to be marketed to children according to the World Health Organization (WHO) South-East Asia Region (SEAR) nutrient profile model. Eighteen products, estimated to represent 76% of the 2018 sales, were found to meet the WHO SEAR criteria.

Product Category Results

Category	Breakfast Cereals	Edible Oils
Mean HSR	3.7	2.9
% products healthy	69	33
% products suitable to market to children	34	78

- Marico performs best in the Breakfast Cereals category, achieving a mean HSR of 3.7 out of 5. Twenty-two of the 32 products assessed in this category (69%) were found to meet the HSR healthy threshold. Marico's Edible Oil category products achieve a mean HSR of 2.9 out of 5.

Relative nutritional quality of Marico's products by category compared to competitors

Mean HSR	Breakfast Cereals	Edible Oils
Marico	3.7	2.9
Adani Wilmar		3.1
Conagra	3.7	4.3
Emami Agrotech		2.8
General Mills	3.1	
Kellogg	3.2	
Mother Dairy		3.8
Nestlé	3.1	
PepsiCo	3.9	
PepsiCo India	4	
Unilever	3.8	

- Marico is one of two companies that sells products in the Breakfast Cereals category (as part of their top-selling categories) in India. Marico ranks second, with a mean HSR of 3.5 out of 5. The company ranks third out of four companies that sell Edible Oils, with a mean HSR of 2.9.
- Competing with other companies in both product categories assessed, Marico achieves a relative category score of 5.2 out of 10 based on its ranking within these categories.

Conclusion

- Marico's mean healthiness score of 5.9 and relative category score of 5.2 result in an overall Product Profile score of 5.6 out of 10, which means the company ranks sixth out of 16.
- Marico's relative category results suggest that the company has scope to improve the nutritional quality of its products. The company is encouraged to assess the opportunities to perform better compared to its peers in the same categories, and to continue its focus on delivering more healthy products.

Mondelēz India

Product Profile Categories

Concentrates; Confectionery; Other
Hot Drinks; Sweet Biscuits, Snack
Bars and Fruit Snacks



Product Profile

↓ Rank 6 / Score 4

Rank 16 / Score 1.6

Rank 4 (2016)

Headquarters

U.S.

Retail sales (INR – millions)

97288

Number of employees

5000

Company Profile

Rank 6 **Score 4**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Mondelez India's growth strategy considers aspects of nutrition and health. Since the previous India Index in 2016, the company has introduced healthier options of its Bournvita biscuits, and has developed micronutrient-fortified products. In line with the Food Safety and Standards Authority of India (FSSAI) Eat Right Movement, the company has an approach to reformulate existing products and to introduce new products with no added sugar or reduced sugar levels, such as its recently released Cadbury Dairy Milk chocolate product with 30% less sugar. It also focuses on portion control by offering many of its chocolate products in calorie-limited single serving portions.
- The company's Nutrition Profiling System (NPS), known as Better Choice, is used to guide product innovation and reformulation. Mondelez India continues to invest in product development as evidenced by its newly inaugurated global Technical Center in Thane, Maharashtra in 2019. To further strengthen its performance, the company could make its NPS publicly available and benchmark it against internationally recognized systems such as the Health Star Rating (HSR).
- The company is committed to providing nutrition information on product labels, including for saturated fat, sodium and total sugars, and stating the number of portions or servings per package. Mondelez India reports that calorie information has been placed on the front-of-pack for all products since 2016.
- Mondelez India has a comprehensive policy on marketing to children. It is one of two companies in the Index that commit to not advertise any products directly to children under 12, and is the only company that commits not to advertise in primary and secondary schools in India.
- The company's corporate social responsibility program, Shubh Aarambh, applies an evidence-based approach to nutrition/health education. The program is implemented by non-governmental organizations and focuses on children and mothers that are at risk or experiencing high levels of malnutrition. The program excludes product or brand-level branding and helps to disseminate elements of FSSAI's Safe and Nutritious Food Program.

Priority areas for improvement

- Mondelez India ranks sixth overall in the India Index 2020 with a score of 4.0 out of 10.
- The company ranks sixteenth in the Product Profile with a score of 1.6 out of 10. This outcome can be partially explained by the predominance of its Confectionery product-related sales. The Product Profile estimates that 1% of the 2018 total sales were derived from healthy products. Further, Mondelez India does not perform well when compared to its peers in the same product categories for product healthiness. The company is encouraged to continue to accelerate its efforts to improve the overall nutrition quality of its product portfolio, also relative to its competitors within the same product categories, and to focus on selling more of its healthier options.
- Mondelez India should consider addressing its nutrition strategies in a formal commercial policy and is encouraged to publish India-specific annual reports. By disclosing more India-specific information, the company could help stakeholders assess progress, particularly in relation to supporting the Government's strategies to combat all forms of malnutrition in India.
- Despite having global nutrition-related commitments, for example, to grow well-being brands at a faster rate, the company does not provide India-specific evidence that healthy products have contributed positively to its financial performance. The company should adopt SMART – Specific, Measurable, Achievable, Relevant and Time-bound – targets and make progress reports publicly available, particular in terms of sugar reduction as most of its Indian portfolio consists of Confectionery products.
- Mondelez India can further improve its responsible marketing to children by expanding its policy to address marketing activities that go beyond advertising, for example influencer marketing. The company is also encouraged to explore options to include children above the age of 12 in the commitment.
- In addition, the company is encouraged to provide nutrition information for all products on its website so Indian consumers can easily access this data. The company is also encouraged to implement an interpretive front-of-pack labeling system as soon as possible that aligns with other companies or industry associations, and is developed in partnership with the Government and other stakeholders.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

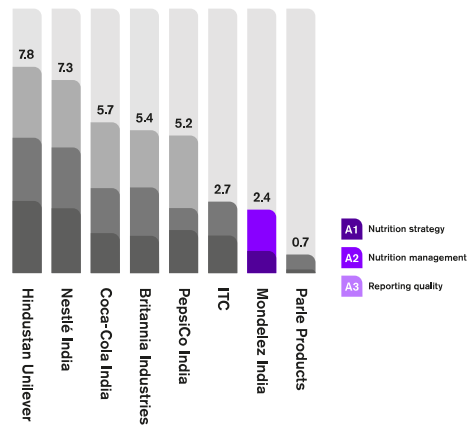
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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

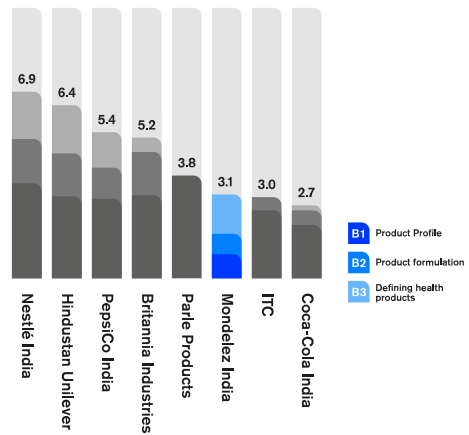
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

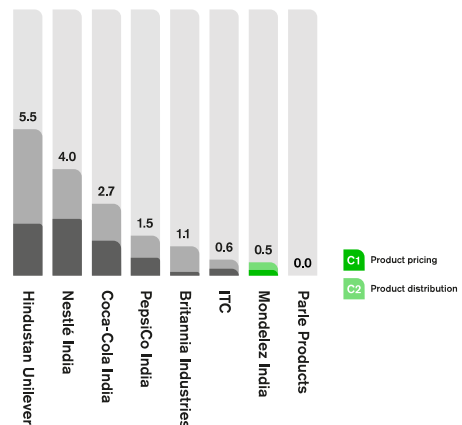
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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

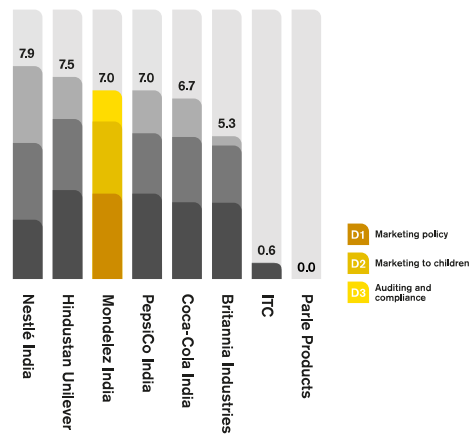
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Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

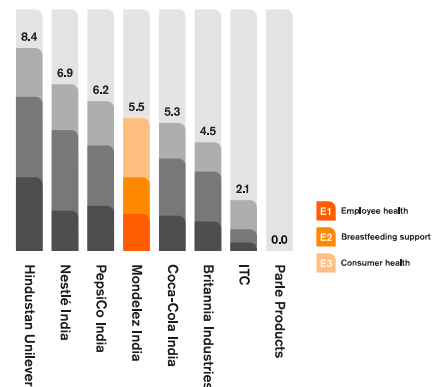
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



F1 Product labeling

F2 Claims

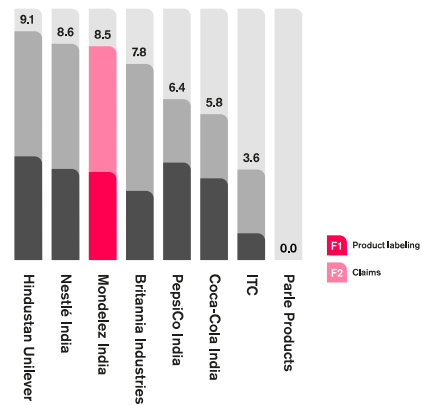
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

For this category performance indicators were not included. The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

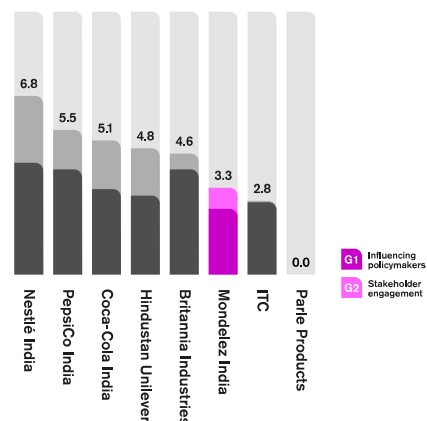
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment **Performance** **Disclosure**

The circle on the left represents the company result for this Index category, showing the rank out of 16 and the score below it. The colored segments represent the respective criteria contributions to the overall category score. The above circles indicate how the company performs on the three types of indicators within this category.

Companies are grouped into three different industry segments in this Index based on the type of products they predominantly sell (i.e. contributing 80% or more to their total food and beverage sales) – dairy, edible oil or mixed portfolio. The graph on the right shows how the company's result within this Index category compares to that of its peers within the same industry segment.

Peer Comparison



Product Profile



16

Rank 16 / Score 1.6

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
0.5	1%	1%	101	0%	0%	101	90-100%

- A total of 101 products from across four categories, representing 90-100% of Mondelez India's estimated 2018 sales, were included in the Product Profile. Only 1% of the company's products were found to meet the HSR healthy threshold and the company was estimated to derive 1% of its 2018 sales from these healthy products.
- The company achieves an unweighted mean HSR of 0.6 out of 5. After sales-weighting, the company's mean HSR drops to 0.5 out of 5, resulting in a mean healthiness score of 1.1 out of 10.
- A total of 101 products were assessed to determine their suitability to be marketed to children according to the World Health Organization (WHO) South-East Asia Region (SEAR) nutrient profile model. None of the company's products were found to meet the criteria.

Product Category Results

Category	Concentrates	Confectionery	Other Hot Drinks	Sweet Biscuits, Snack Bars and Fruit Snacks
Mean HSR	0.5	0.5	0.8	0.9
% products healthy	0	0	8	0
% products suitable to market to children	0	0	0	0

- Mondelez India's mean HSR is highest for products in the Sweet Biscuits, Snack Bars and Fruit Snacks category with a score of 0.9 out of 5. The company's products in the Concentrates and Confectionery categories achieve the lowest HSR of 0.5 out of 5.
- One out of 13 products in the Other Hot Drinks category was found to meet the HSR healthy threshold.

Relative nutritional quality of Mondelez India's products by category compared to competitors

Mean HSR	Concentrates	Confectionery	Other Hot Drinks	Sweet Biscuits, Snack Bars and Fruit Snacks
Mondelez India	0.5	0.5	0.8	0.9
Ajinomoto	0.5			
Amul GCMMF		0.6		
Britannia Industries				1.4
Coca-Cola	1.5			
Conagra			0.5	
Ferrero		0.9		1.2
FrieslandCampina			1.5	
General Mills				2.4
Grupo Bimbo		1.2		1.5
Hindustan Unilever	1.5			
ITC		1.1		1.3
Kellogg				2.3
Kraft Heinz	1.1			
Mars		1.3		
Meiji		0.9		0.8
Mondelez	0.5	1.1	0.7	1.4
Nestlé			2.7	2.3
Nestlé India		0.7		
Parle Products		1.1		1.5
PepsiCo	1.5			2.3
Suntory	1.5			
Unilever			1.6	

- When compared to the other companies that sell products in the Confectionery category (as part of their top-selling categories) in India, Mondelez India's Confectionery products achieve the lowest mean HSR (0.5 out of 5). The company therefore ranks fifth out of five in this category. In the Concentrates category, the company ranks second out of two with a score of 0.5 out of 5. In the Sweet Biscuits, Snack Bars and Fruit Snacks category the company ranks fourth out of five.
- Competing with other companies in three categories, Mondelez India achieves a relative category score of 2.0 out of 10 based on its ranking within those categories.

Conclusion

- Mondelez India's mean healthiness score of 1.1 and relative category score of 2.0 result in an overall Product Profile score of 1.6 out of 10, which means the company ranks sixteenth.
- The company is encouraged to continue with its product innovation and product reformulation strategies towards the marketing of healthy products. Mondelez India should adopt India-specific goals and targets to accelerate the company's sales of healthier options.

Mother Dairy

Product Profile Categories

Dairy; Edible Oils; Ice Cream and Frozen Desserts; Processed Fruit and Vegetables



Product Profile

Rank 7 / Score 3

Rank 1 / Score 7.5

Rank 7 (2016)

Headquarters

India

Retail sales (INR – millions)

155287

Number of employees

3269

Company Profile

Rank 7 **Score 3**

Commitment **Performance** **Disclosure**

(%) Figure in brackets is the weighting of the category. All category, commitment, performance and disclosure scores are out of 10

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type.

Main areas of strength

- Mother Dairy ranks first in the Product Profile with a score of 7.5 out of 10. It is estimated that the company derived 53% of its 2018 sales from products that achieve a Health Star Rating (HSR) of 3.5 or more out of 5, i.e. the 'healthy' threshold. This is higher than the company's 2016 healthy product sales estimate of 46%. Mother Dairy's products are relatively healthy compared to those of its peers within the same product categories, most notably in the Dairy and Edible Oils product categories.
- Among the five companies in the dairy industry segment, Mother Dairy performed best in both the overall Index and the Product Profile.
- Mother Dairy voluntarily fortifies all relevant products according to the Food Safety and Standards Authority of India (FSSAI)'s Food Safety and Standards (Fortification of Foods) Regulation, 2018. This is best practice and illustrates the company's commitment to tackle vitamin A and D deficiencies in India.
- The company has several initiatives to improve the affordability and accessibility of its healthy and fortified products. For example, it sells bulk-vended milk fortified with vitamins A and D at a stable and affordable price point in the National Capital Region and other parts of India. Mother Dairy's initiatives also aim to improve the distribution of fortified milk and the sale of affordable fruit and vegetable products.
- As part of its Safe and Nutritious Food at the Workplace Initiative, and as recommended by FSSAI, Mother Dairy has a robust employee health and wellness program called Sahi Poshan Swasth Jeevan (right nutrition, healthy life). The program addresses both nutrition and physical activity.
- The company actively engages with FSSAI's Eat Right Movement by contributing in the development of the Swasth Bharat Yatra (healthy India journey) and Eat Right Mela (Fair). Mother Dairy also aims to promote nutrition literacy among its consumers and to reduce the consumption of oil. The Zara Sa Badalav Banaye Life Behatar campaign (a little change can improve your life) is a relevant example that addresses these elements.

Priority areas for improvement

- Mother Dairy ranks seventh overall in the India Index 2020, as it did in 2016, with a score of 3.0 out of 10.
- The company is encouraged to adopt and publish a formal comprehensive nutrition strategy that clearly sets out how it addresses malnutrition in India, including issues of obesity and diet-related diseases, through its core business model. The strategy should publicly recognize the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat – free from malnutrition, across the life cycle), and POSHAN Abhiyaan.
- In 2016, Mother Dairy indicated that it was developing a Nutrient Profiling System to guide the reformulation of its products and to develop new healthy products, but the system was not finalized at the time of this assessment. The company is urged to take this important step and to define targets for reducing levels of sugar, salt and saturated fat in its products.
- Mother Dairy could complement its affordability strategy by adopting a comprehensive accessibility strategy that includes targets to distribute its healthy products more widely. Ideally, the strategy should cover all states the company is present in, with specific attention to aspirational districts, isolated rural areas, urban slums and low-income groups in India.
- Mother Dairy is advised to adopt a responsible marketing policy covering all consumer groups, with specific commitments regarding children and teenagers. It may consider signing the Food and Beverage Alliance India Pledge (FBAI) as a first step towards this aim. The company should further commit to only marketing products to children that meet the World Health Organization's (WHO) South-East Asia Region (SEAR) regional standard. The Product Profile found that 35% of its products currently meet this standard.
- The company could improve its labeling practices by ensuring nutrition information is provided on all products according to the Codex Alimentarius guidelines, and in compliance with local regulations in India. Mother Dairy is also encouraged to implement an interpretive front-of-pack labeling system as soon as possible, that aligns with other companies or industry associations, and is developed in partnership with the Government and other relevant stakeholders.

Category Analysis

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

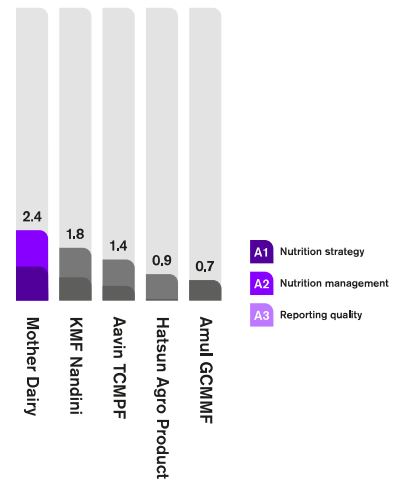
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Commitment Performance Disclosure

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Peer Comparison



- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

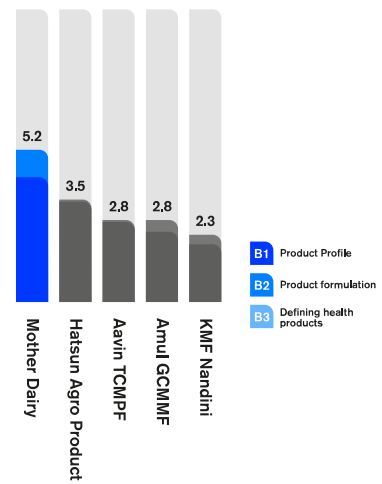
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Peer Comparison



- C1** Product pricing
- C2** Product distribution

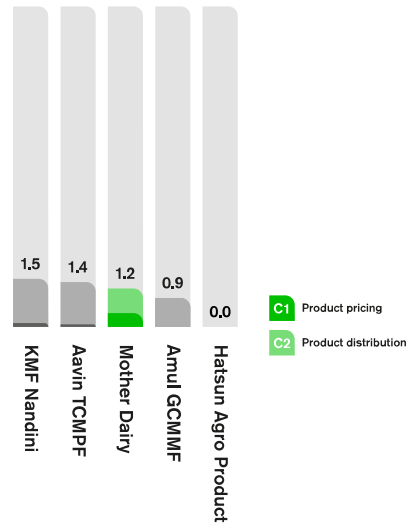
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

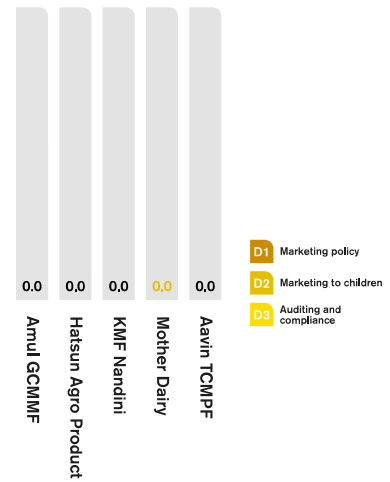
All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment Performance Disclosure

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Peer Comparison



- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

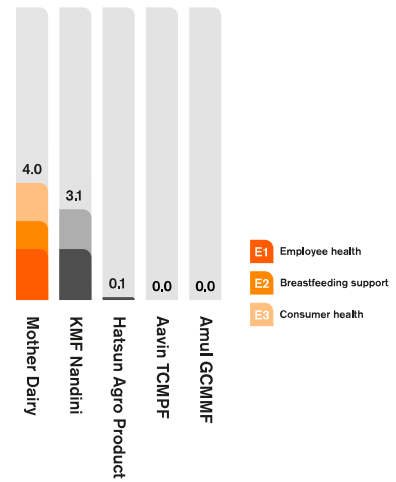
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Peer Comparison



F1 Product labeling

F2 Claims

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

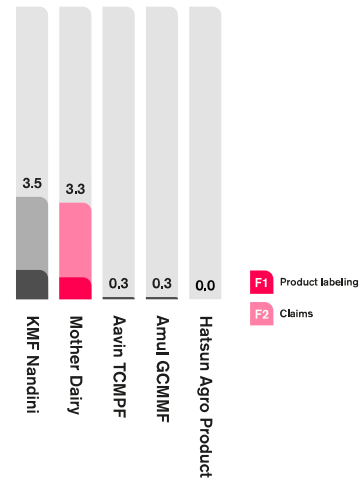
Performance

Disclosure

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Peer Comparison



G1 Influencing policymakers

G2 Stakeholder engagement

All category, criteria, commitment, performance and disclosure scores are out of 10

Commitment

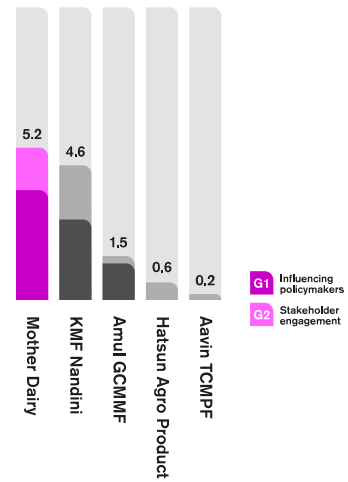
Performance

Disclosure

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Peer Comparison



Product Profile



Rank 1 / Score 7.5

Portfolio-level Results

Average HSR score products (sales-weighted)	Healthy products (HSR)			Products suitable to market to children (WHO SEAR)			Range of total India F&B sales included
	% products healthy	% sales healthy	No. products assessed	% products suitable	% sales suitable	No. products assessed	
3.0	41%	53%	99	35%	44%	106	90-100%

- A total of 106 products from across four categories, representing 90-100% of Mother Dairy's estimated 2018 retail sales, were included in the Product Profile. Of those, 99 could be assessed using the HSR. Forty-one products (41%) were found to meet the HSR healthy threshold and the company was estimated to derive over half (53%) of its 2018 sales from these healthy products.
- The company achieves an unweighted mean HSR of 2.8 out of 5. After sales-weighting the company's mean HSR slightly improves to 3.0 out of 5, resulting in a mean healthiness score of 6.1 out of 10.
- A total of 106 products were assessed to determine their suitability to be marketed to children according to the WHO SEAR nutrient profile model. Over one third (37 products), estimated to represent 44% of 2018 retail sales, were found to meet the WHO SEAR criteria. Many were identified in the Dairy and Processed Fruit and Vegetables category, whilst all products in the Edible Oils category met the criteria.

Product Category Results

Category	Dairy	Edible Oils	Ice Cream and Frozen Desserts	Processed Fruit and Vegetables
Mean HSR	3.0	3.8	2.0	4.6
% products healthy	54	67	0	100
% products suitable to market to children	39	100	0	88

- Mother Dairy performed best in the Processed Fruit and Vegetables category. Although this category represents a small proportion of the company's total sales, the seven products assessed in this category achieve a mean HSR of 4.6 out of 5. The second-best performing category for Mother Dairy is Edible Oils (3.8) followed by Dairy (3.0).

Relative nutritional quality of Mother Dairy's products by category compared to competitors

Mean HSR	Dairy	Edible Oils	Ice Cream and Frozen Desserts	Processed Fruit and Vegetables
Mother Dairy	3.0	3.8	2.0	4.6
Aavin TCMPF	2.3			
Adani Wilmar		3.1		
Amul GCMF	2.4		1.8	
Arla	3.2			
BRF	2.7			
Britannia Industries	2.2			
Coca-Cola	3.6			
Coca-Cola India	3.5			
Conagra		4.3		
Danone	3.5			
Emami Agrotech		2.8		
Ferrero	0.7			
FrieslandCampina	3.4			
General Mills	3.5		1.8	
Hatsun Agro Product	2.7		2.2	
Hindustan Unilever			2.1	
KMF Nandini	2.2		1.4	
Keurig Dr Pepper				1
Kraft Heinz	2.7			4.2
Lactalis	3.1			
Marico		2.9		
Mars	2.8			
Meiji	3.2		2.2	
Mengniu	3		2.3	
Mondelēz	2.4			
Nestlé	2.4			
Nestlé India	3.0			
PepsiCo	3.1			
Suntory	3			
Tingyi	2.7			
Yili	3.1		2.1	

- When compared to the three other companies that sell products in the Edible Oils category (as part of their top-selling categories) in India, Mother Dairy ranks first with a mean HSR of 3.8 out of 5. The company ranks joint second out of eight companies in the Dairy category with a mean HSR of 3.0 out of 5, and ranks third out of five for its Ice Cream and Frozen Desserts products with a mean HSR of 2.0 out of 5.
- Competing with other companies in three categories, Mother Dairy achieves a relative category score of 8.8 out of 10 based on its ranking within those categories.

Conclusion

- Mother Dairy ranks first in the Product Profile. The company's mean healthiness score of 6.1 and relative category score of 8.8 result in an overall Product Profile score of 7.5 out of 10.
- The portfolio and category-level results suggest that Mother Dairy has scope to further improve the healthiness of its products, mostly in the Ice Cream and Frozen Desserts category and possibly in the Dairy category. Mother Dairy is encouraged to continue its efforts to do so and to further shift its sales towards its healthy products and product categories.

India Spotlight Index 2020

KMF Nandini

Product Profile Categories

Dairy; Ice Cream and Frozen Desserts



Product Profile

Rank 10 / Score 1.9

Rank 14 / Score 3.5

Headquarters

India

Retail sales (INR – millions)

14522

Number of employees

4970

Company Profile

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