

Insights into Policy, Industry, and Consumer Landscapes



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# **ABBREVIATIONS**

AGRA	Alliance for a Green Revolution in Africa
AFA	Agricultural and Food Authority
ATNi	Access to Nutrition initiative
APHRC	African Population Health Research Centre
СМА	Cereal Millers Association
DLG	Diamond Lalji Group
FAO	Food and Agriculture Organization
FOP	Front-of-pack (labelling)
FPRO	Food Production Solutions Association
GAIN	Global Alliance for Improved Nutrition
GDP	Gross Domestic Product
IFPRI	International Food Policy Research Institute
KAM	Kenya Association of Manufacturers
KEPSA	Kenya Private Sector Alliance
KES	Kenyan Shillings
KNAP	Kenya Nutrition Action Plan
KNBS	Kenya National Bureau of Statistics
KDHS	Kenya Demographic and Health Survey
KNPM	Kenya NPM
MMM	Mombasa Maize Millers
МоН	Ministry of Health
N4G	Nutrition for Growth
NCD	Non-Communicable Disease
NCD-RisC	NCD Risk Factor Collaboration
NCPB	National Cereals and Produce Board
NGO	Non-governmental organization
NRV	Nutrient Reference Value
ООН	Out-of-home
SSB	Sugar-sweetened beverage
UHT	Ultra-high-temperature processing
UN	United Nations
	otouritations
UNDP	United Nations Development Program
UNDP UNICEF	
	United Nations Development Program
UNICEF	United Nations Development Program United Nations Children's Fund
UNICEF UPF	United Nations Development Program United Nations Children's Fund Ultra-processed Foods



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# **EXECUTIVE SUMMARY**

Across the African continent a significant shift is occurring in the food environment. Economic growth, urbanization, and increased globalization have led to rapid changes in dietary patterns.

This report consolidates information on the packaged processed food market in Kenya and its impact on the food environment. Adopting a private sector lens, the report explores the **food and beverage industry's role in the ongoing nutrition transition in the country**.

This report delves into consumption patterns, market structure (including supply and distribution chains), policy developments, food industry practices, and food fortification. The research framework was built on pre-existing food environment mapping frameworks, including for example 'The Healthy Food Environment Policy Index' (Food-EPI), 'High Level Panel of Experts' report on Nutrition and food systems', Informas Food Retail, and USAID/Turner frameworks.<sup>1-4</sup>

Between August 2024 and May 2025, ATNi conducted desk research and identified key peer-reviewed publications, studies, and reports on the packaged food market environment in Kenya. This research found:

- Substantial data on the availability, consumption, and regulation of staple foods (including mandatory fortified varieties) and fruits and vegetables in Kenya. There are fewer studies focused on the production, distribution, sale, and consumption of packaged processed foods and their effects on diets in Kenya.
- Limited data on micronutrient-fortified packaged processed products beyond those covered by mandatory regulation.
- There is no widely accepted definition of "healthy" packaged processed products in the current literature. Existing studies and reports often group products under umbrella terms such as "ultra-processed foods", "convenience foods", or "discretionary foods," synonymizing these with generally less healthy foods.
- Recent policy developments in Kenya, including the finalization of the Kenya Nutrient Profiling Model (KNPM), which can be used for mandatory front-ofpack labelling or regulations around marketing foods to children, guiding consumers towards healthier options. In March 2025, at the Nutrition for Growth Summit in Paris, the Kenyan government registered three policy commitments to strengthen the food environment: mandatory front-of-pack labelling, restriction of marketing less healthy foods to children, and fiscal policies to promote healthy diets.<sup>5</sup>



#### In summary:

Policymakers, companies, research institutions and other nutrition stakeholders are encouraged to refer to the latest 'Kenya Nutrition Action Plan' (KNAP) which underscores the importance of data, governance, financing, and accountability in ensuring effective implementation and measurable impact.

#### Policymakers are advised to:

- Provide clear labelling guidelines linked to nutritional criteria;
- Restrict the marketing of less healthy foods to children;
- Promote public procurement of healthy food products;
- Develop policies on food fortification and product reformulation aligned with national nutrition standards.

#### Research institutions are encouraged to:

- Work to standardize definitions related to "healthy" packaged foods;
- Investigate consumption patterns and retail dynamics;
- Assess how fortification is applied in both healthy and less healthy products.

#### Food and beverage companies are urged to:

- Adopt nutrition criteria aligned with Kenyan public health standards, including the newly introduced KNPM, and national guidelines for healthy diets;
- Commit to responsible marketing and labelling practices;
- Refrain from fortifying less healthy products
- Ensure that healthier options are accessible and affordable, particularly for lowincome consumers.

More detailed recommendations can be found here.

In June 2025, ATNi and its partners will publish a report presenting the findings from an assessment of the healthiness of more than 700 packaged food and beverage products sold by 30 of the largest food and beverage companies operating in Kenya. These companies represent an estimated 55-60% of all commercial packaged food and beverage sales in the country. The analysis uses four nutrient profiling models, including the proposed KNPM, Health Star Rating (HSR) system, WHO Model for the Africa Region, and the HSR + Micronutrients, a model specifically designed to assess micronutrient quality and fortification. For 12 of the largest food and beverage manufacturers in Kenya this analysis is complemented with an additional evaluation of corporate nutrition policies, commitments, and disclosure.



# **BACKGROUND**

Kenya is experiencing a nutrition transition. As in the case in many emerging markets, diets in Kenya are increasingly incorporating packaged and processed products alongside traditional staple foods.<sup>6,7</sup> In the last decade, at least 8.1% of Kenyan consumers' total calorie intake has come from **"ultra-processed" packaged foods**.<sup>8</sup> In particular, the growing market for "less healthy" packaged processed foods and beverages has raised concerns about their impact on public health.

The triple burden of malnutrition – undernutrition, micronutrient deficiencies, and overweight/obesity – is a major concern on Kenya's public health agenda. The prevalence of undernourishment has decreased since 2000, standing at around 27.8% between 2020 and 2022. The most recent national estimates of micronutrient deficiencies in the Kenyan population from 2011 found that on average, women –including pregnant women– and young children were most at risk of experiencing micronutrient deficiencies, including for iron, Vitamins A and B12, folate, iodine and zinc. 10

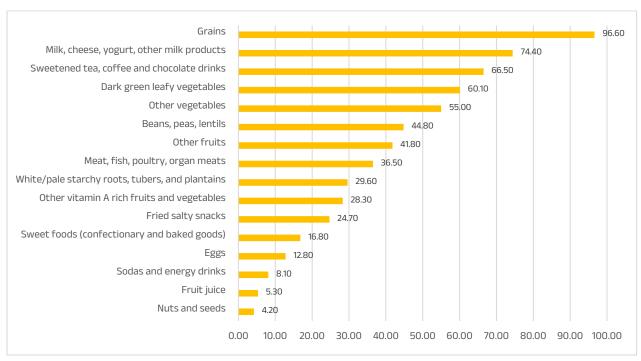
Simultaneously, rates of overweight and obesity are increasing, particularly among adult women. According to the latest Kenya Demographic Health Survey (KDHS) 2022, the prevalence of overweight and obesity among women (20-49 years) has risen from 38% in 2014 to 45% in 2022, while 19% of adult men (in the same age bracket) were found to be overweight or obese. Notably, affluent and educated women in Kenya are twice as likely to be overweight or obese compared to their less affluent or less educated counterparts. Similarly, a 2024 study by NCD Risk Factor Collaboration (NCD-RisC) found that 19.3% of adult women in Kenya were obese – three times the rate observed in men. 11

The shifting landscape of malnutrition in Kenya can be partially attributed to changing dietary patterns. The 'National Dietary Guidelines for Healthy Diets and Physical Activity' recommend consuming a diverse diet and limiting intake of nutrients of concern – such as salt, sugar and fats – in an effort to address rising rates of malnutrition in the country. However, economic development and urbanization, which have led to increased incomes, have contributed to a rapid expansion in the number of supermarkets and greater availability of processed packaged foods. The increased availability and consumption of less healthy processed packaged foods – such as fried salty snacks, sweet foods and beverages – is increasingly a concern for public health. For example, the KDHS 2022, which included an analysis of dietary diversity based on recall interviews, found that while



49% of women of reproductive age achieved minimum dietary diversity, 70% reported consuming sweet beverages and 35% consumed 'unhealthy' foods.<sup>7ab</sup>

Table 1. Percentage of Kenyan women aged 15-49 consuming different food and liquids, 2022



Source: Kenya Demographic and Health Survey 2022<sup>7</sup>



<sup>&</sup>lt;sup>a</sup> Sweet beverages include fruit juice and fruit drinks, sodas drinks such as Coca-Cola, Fanta, Sprite, and energy drinks such as Red Bull, tea with sugar, coffee with sugar, Milo, cocoa, and other sweetened liquids.

<sup>&</sup>lt;sup>b</sup> Unhealthy foods include sweet foods such as cakes, sweet biscuits, candies, chocolates, ice cream, or ice lollies; and fried and salty foods such as crisps, chips, ngumu, mandaazi, samosa, bhajias, or Indomie.

# DESK REVIEW APPROACH AND METHODOLOGY

This desk review focused on actors involved in the packaged food and fortification value chains in Kenya. Several methods were used to produce this report.

Firstly, eleven food environment and food systems analysis frameworks were reviewed to identify relevant elements for assessing food environments through a private sector lens. From these, the four most comprehensive frameworks that had already been tested in the East African context were selected to guide the research. A core set of guiding themes for the research was derived from these models:

- 1. Consumption, affordability, and accessibility: consumption patterns of fresh, packaged, and processed food; consumer demand, consumption trends, and the affordability and accessibility of food products.
- 2. Market structure and direct influencers: value chain actors (producers, processors, manufacturers, retailers, out-of-home (OOH), food delivery services), food product offerings, market share by actor type, and economic & political influencers that shape the food market such as investors, shareholders and government entities.
- **3. Food policy and regulation:** regulation and standards relating to food quality and safety, trade laws, subsidies, imports/exports, food prices, labelling, marketing, food composition, and social safety net programmes.
- **4. Food industry practices:** product offerings, marketing and promotion, labelling, product healthiness, composition, and levels of processing.

A literature review was conducted to identify existing tools, peer-reviewed publications, studies, and reports related to Kenya's packaged food environment. The search term "East Africa food environment", as well as other key search words derived from the aforementioned food environment mapping frameworks were used to gather information. In total, 200 sources were reviewed. In addition to academic journal articles and database searches, additional sources were identified from grey literature, technical reports, conference proceedings, professional organizations' bulletins, and websites of stakeholders in the packaged food environment.

In addition to these sources, market databases such as Euromonitor were used to gather data on the market structure of the food and beverage industry in Kenya, including key companies and their market shares.

A comprehensive list of definitions and search terms used to guide the research and search terms can be found in the accompanying document (published separately). One critical aspect to highlight is the terminology surrounding food processing, which is central to the interpretation of literature reviewed for this report, and the subject of ongoing global debate.



In this report, the term "processed packaged food" refers to foods manufactured by food and beverage companies, sold through formal retail channels, and subjected to varying degrees of processing. We define "packaged processed food" as any food that has undergone changes to its natural state, encompassing minimally, moderately, highly, and ultra-processed foods.<sup>15</sup>

Much of the literature reviewed for this report uses the term "processed food" inconsistently without clearly distinguishing between different levels of processing. This results in limited understanding of the role that different types of packaged processed foods—from minimally processed staple foods to ultra-processed foods and beverages—play in Kenyan consumers' diets.

To streamline the analysis, this report explores and distinguishes the literature on both minimally processed staple foods and packaged processed foods (UPF), and noting where the literature explicitly uses the term 'UPF'. For further discussion of terminology, refer to the ATNi report on UPF terminology.<sup>16</sup>

#### Limitations

**Scope:** This desk research aimed to map a specific and underexplored segment of Kenya's food environment: the processed packaged food environment. Due to this factor, the scope of this report is focused on the built food environment and excludes natural food environment. The analysis encompasses factors that influence informal and formal markets through which consumers may purchase processed packaged foods (see Figure 1).<sup>15</sup> For example, although Kenya's agricultural sector produces a large proportion of the food in consumers' diets, this is considered part of the cultivated natural food environment, and is therefore outside the scope of this report. However, staple foods<sup>c</sup> such as minimally processed grains, flour, and milk that are pre-packaged and sold through formal and informal retail channels are included within the scope of this report, as they fall under the category of processed packaged foods.



<sup>&</sup>lt;sup>c</sup> Staple foods are defined by the FAO as "foods that are eaten regularly and in such quantities that they constitute a dominant portion of a diet and supply a major proportion of energy and nutrient needs." In Kenya, examples of staple foods include cereals and grains, rice, wheat and maize flour (see Consumption section).

Figure 1. Food environment typology





**Terminology:** the term "packaged food environment" is used throughout this report to refer to a subset of the built food environment that encompasses the supply, demand, and enabling conditions for the sale and consumption of processed packaged foods. ATNi recognizes that this terminology has not been widely adopted in the existing literature to date.

**Available literature:** while there is substantial research on processed staple foods in Kenya, studies focusing on non-staple packaged processed foods and beverages remain limited. Moreover, much of the existing literature on Kenya's packaged food environment is dated and may not reflect the current situation in Kenya. This underscores a significant research gap that ATNi initiatives seek to address.

**Sources:** in addition to peer-reviewed journal articles and academic databases, this report draws on grey literature, technical reports, conference proceedings, bulletins from professional organizations, and websites of stakeholders in the packaged food environment. ATNi recognizes that these sources may not undergo rigorous academic review; however, they are critical for capturing most recent developments in Kenya's evolving food environment.

ATNi acknowledges these limitations and advises readers to interpret findings within the context of these boundaries. In particular, the exclusion of key components of the broader food environment may limit the generalizability of conclusions presented from this analysis.



# **RESULTS**

The results are outlined in two sections: 1) the processed packaged food environment; and 2) the fortified packaged food environment. Each section addresses all four assessed elements of the food environment: market structure and direct influencers; consumption, affordability, and accessibility; food policy and regulation; and product offering.

#### PROCESSED FOOD ENVIRONMENT

## Consumption, Affordability, and Accessibility

## Consumption

Robust nationwide data on the consumption of processed packaged foods and beverages in Kenya is currently limited.<sup>17</sup> However, available data on Kenyan consumers' diets indicates a growing trend in the consumption of these products. Recent national data and regional studies indicate that Kenyan diets are increasingly characterized by higher intake of processed foods high in fat, salt, and sugar—alongside traditional staples—reflecting dietary transitions observed across Sub-Saharan Africa. (see Table 2).<sup>18,19</sup>

A rapid consumption survey conducted in Nairobi identified maize - the primary ingredient in uji and ugali - as a staple food among low-income urban households. However, households are increasingly diversifying from maize to other staples such as rice, wheat, plantain, and potato, with 88%, 56%, 22%, and 3% households consuming these foods respectively.<sup>20, 21</sup>

Nevertheless, consumption of ultra-processed foods remains relatively low in Kenya. In 2023, the estimated annual per capita consumption was USD 36.8-90.1% lower than the global average and 41.0% lower than the East African regional average – representing approximately 3.7% of total food sales in the country. However, consumption has grown steadily by 23% between 2017 and  $2023.^{23}$ 



Table 2. Foods commonly consumed in Kenyan households.

Category	Product examples
Cereals, grains and bread	Rice, maize grain, green maize, maize flour, popcorn, wheat grain, wheat flour, millet grain and flour, cassava flour, sorghum grain and flour, porridge flour, soya and other grain flour, barley and other cereals, breakfast cereal/oats, pasta, cakes, Biscuits, bread, wheat buns /scones, Pasta (spaghetti, macaroni, noodles)
Pulses	Beans, green grams, dolichos, peas, groundnuts, macadamia, cashew nuts, cowpeas, chicken peas, canned foods
Meat and fish/seafood	Canned beef/sausages, ham/Salami, tinned meat soups, meat paste for hamburger, other meats products, fish, fish fillet, prawns /other sea foods, tinned fish, omena
Milk, cheese and eggs	Milk, condensed/powder milk, milk sour, yoghurt, cheese, eggs
Oils and fats	Butter, ghee, margarine, cooking fat, cooking oil, lard, peanut butter, other oils and fats
Fruits	Tinned/packaged fruits
Vegetables	Tinned/packaged vegetable
Roots and tubers	Packaged potatoes, sweet potatoes and other roots and tubers
Sugar, jam, honey, chocolate and other confectionery	Sugar, sugar cane, jaggery, sugar-icing, jam, honey, marmalade, honey, chocolate bar, sweets, chewing gum, other sugar/confectionary
Food products, spices and miscellaneous	Common salt, magadi, tomato/chilli sauce, food seasoning, pilau masala, ginger-tangawizi, mustard, pickles, vinegar, crisps, baking powder, yeast, other food n.e.c /spices
Coffee, tea and cocoa. Mineral water, soft drink, fruit and vegetable juices	Soya drink, other coffee, tea and cocoa, squashes, sodas, energy/health drinks, fruit juice, other drinks

Source: The Kenya Poverty Report,  $2023^{22}$ 

A 2012 study conducted in three towns in Central Kenya found that ultra-processed packaged products accounted for 8.1% of total caloric intake and 10.2% of total food expenditure.<sup>8</sup> These figures are comparatively low relative to other countries examined in the study.<sup>26</sup> Figure 2 below shows that breads and scones contributed by far the largest share of calories from ultra-processed foods, followed by chocolates, sweets and biscuits, margarine and sugary drinks.<sup>8</sup>



Figure 2. Percentage total calories from ultra-processed foods in Central Kenyan households.

Food Type	Percent (%)
Breads and scones	62
Chocolates/sweets/biscuits	11
Margarine	7
Sugary drinks (juices and soda)	7
Chips/crisps	3
Yogurt with sugar/flavored	2
Sausages	1
Breakfast cereals	1
Instant noodles	1
Others	6

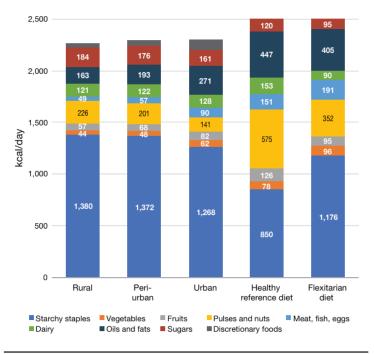
A 2019 meta-analysis of surveys found that 40% of the Kenyan and Ghanaian adults sampled consumed SSBs.<sup>26</sup> A 2019 survey found that over half of urban households in Kenya had consumed processed packaged foods within the previous 24 hours.<sup>27</sup>

The OOH food sector is becoming a significant source of food in Kenya, constituting 10% of food spending in urban areas, 5% in peri-urban areas, and 3% in rural areas. Although recent data is limited, a 2002 study in Nairobi found that 13% of schoolchildren and 36% of adult men derived their total daily energy intake from foods prepared outside the home, primarily by street vendors and kiosks (see section on Retailers). The World Health Organization (WHO) has expressed concern about the rapid growth of this largely unregulated market, as available evidence suggests that foods in the OOH sector are often higher in energy, saturated fats, sugar and salt, and are sold in larger portion sizes compared to their formal retail equivalents. Further research is needed to develop an accurate and current understanding of how OOH food consumption influences healthy dietary patterns in Kenya.

The nutrition transition towards increased consumption of processed packaged foods has also been shown to negatively affect the overall healthiness of the average diet in Kenya. In 2021, approximately 80% of households met four or fewer of the nine healthy diet recommendations outlined by the WHO and Food and Agriculture Organization (FAO), with comparatively healthier eating patterns observed in western Kenya compared to other regions. A recent study comparing the current Kenyan diet to the EAT-Lancet's Healthy Reference Diet (see Figure 3) found that Kenyan consumers tend to eat large amounts of starchy staples, and relatively low amounts of vegetables, fruits, pulses, nuts, and both animal and plant-based proteins. In addition, the intake of added sugars was found to exceed the EAT-Lancet recommendations.



Figure 3. Calories consumed per major food group in Kenya compared to EAT-Lancet dietary recommendations.



Source: Authors' estimates using 2015/16 KIHBS data.

Note: Consumption estimates refer only to foods consumed at home. Starchy staples include cereals, starchy roots/tubers, and plantains. Discretionary foods include snacks, sweets, and beverages and are considered as non-required foods according to the EAT—acnet Commission. AE = adult equivalent.

Source: Ecker et.al, 2023<sup>31</sup>

# **Affordability**

A 2020 study found that approximately 10m Kenyans lack access to sufficient and nutritious foods, with barriers linked primarily to low incomes and high food prices.<sup>32</sup> A 2022 study estimated the cost of a 'healthy' food basket for a family of four in Kenya – which includes starches, meat, fish, eggs, dairy, fats/oils, fruits, vegetables, and legumes and meets 95-97% of the daily energy needs of an adult woman – at 33,800 KES or 270 USD.<sup>33</sup> In 2021, the FAO reported that 79% of Kenyans could not afford a healthy diet.<sup>34</sup> Further, research by APHRC identified a positive correlation between higher household food expenditures and adherence to dietary recommendations.<sup>30</sup>

Changes in food prices have been shown to impact the consumption of different food groups in varying ways. For example, price increases for meat, fish, seafood, milk, cheese, and eggs significantly reduced demand for these products, while price hikes for oils, fats, fruits, vegetables, roots, tubers, salt, bread, cereals, coffee, and tea did not result in reductions in consumption.<sup>30</sup> A review of Nairobi's food system found that ready-to-eat foods such as fries and chapati were relatively inexpensive compared to fruits, certain vegetables, eggs and fish.<sup>35</sup> However, literature that explicitly compares the cost of processed packaged foods to fresh foods in Kenya remains limited.



## Accessibility

Economic development in Kenya has led to rapid urbanization. In 2023, 30% of the population lived in urban areas in 2023, compared to just 17% in 1990.<sup>7</sup> Urban households now purchase 98% of their food rather than growing it themselves, making them highly dependent on their food retail environments.<sup>19,36</sup> A similar trend is emerging in rural areas, where the proportion of food acquired through purchase increased from 30% in 2009 to 78% in 2022.<sup>19,36</sup> This rural-to-urban migration has driven dietary shifts towards more convenient foods sold through retail outlets like rice, bread, and packaged processed items including SSBs.<sup>36,37</sup>

As explored in the section on Retailers, informal retailers tend to offer more fresh produce and cater to consumers on lower incomes, while processed packaged foods are more commonly available in formal retail outlets, which are more generally more accessible to affluent consumers. <sup>38,39</sup> For lower-income consumers in Nairobi, reliance on this informal food sector is driven by convenience, as these vendors operate close to where people live and work, especially benefiting those who cannot easily access open-air markets or supermarkets. <sup>35,40</sup>

Informal vendors also tend to offer more flexible purchasing options, such as credit, barter, and smaller quantities, and often price products more affordably than formal retailers. However, in the case of minimally-processed staples, unit prices can sometimes be higher due to smaller package sizes.<sup>35,40-42</sup>

#### **Market Structure and Direct Influencers**

In 2025, Kenya's food market – including both formal and informal retail channels and spanning fresh and processed food sectors – generated an estimated USD 53.21bn in revenue, in addition to USD 5.52bn in non-alcoholic beverage sales. The market is expected to grow by 9.8% by 2030.<sup>24,25</sup> The agricultural sector alone contributes over 33% to the national Gross Domestic Product (GDP), with cereal production and processing playing a particularly significant role in the economy (see Figure 4).<sup>43,44</sup> In addition to cereals, Kenya's food sector also includes key industries such as milling, dairy, beverage, and fruit and vegetable processing.<sup>45</sup>



Figure 4. Contribution of the agrifood system to Kenya's economy, 2019

	GDP		
	Value (\$ billions)	Share of total	
Total economy	92.0	100	
Agrifood system	31.1	33.8	
Primary agriculture (A)	20.9	22.7	
Off-farm agrifood system	10.2	11.1	
Agro-processing (B)	4.7	5.1	
Trade and transport (C)	3.6	3.9	
Food services (D)	8.0	0.9	
Input supply (E)	1.1	1.2	
Non-agrifood system	60.9	66.2	

Source: Diao, X., 202344

Kenya is one of the largest importers of food products in East Africa, spending 25.9bn KES on food imports in 2024. The majority of these imports consisted of maize, unmilled wheat and wheat flour, rice, and sugar. <sup>46</sup> To support its national food processing sector, Kenya has also historically imported ingredients from countries such as the UK, South Africa, Malaysia, Indonesia, New Zealand, Singapore, Ireland, India and US (see Table 3). <sup>47</sup>

Table 3. Food processing ingredients imported into the Kenyan market

Stabilizers	Non-dairy creamer
Yoghurt cultures	Malt extract
Casings for meat and meat products	Food grade packaging material
Emulsifiers	White maize
Food flavourings and colouring	Soy protein concentrates and soy food-based ingredients
Vitamins and minerals	Protein concentrates
Dicalcium phosphate	Vitamin and mineral premixes

Source: US Department of Agriculture, GAIN, 2007<sup>47</sup>

#### Retailers

According to Euromonitor, the value of formal food retail sales in Kenya was approximately USD 8bn in 2023, accounting for about 15% of total food sales.<sup>24,41</sup> The vast majority of food retail transactions continues to occur through 'informal' (also referred to as 'traditional') retail channels, such as open-air markets, wet markets, kiosks, roadside vendors (kibandas), and small neighbourhood stores (dukas).<sup>42</sup> However, the formal food

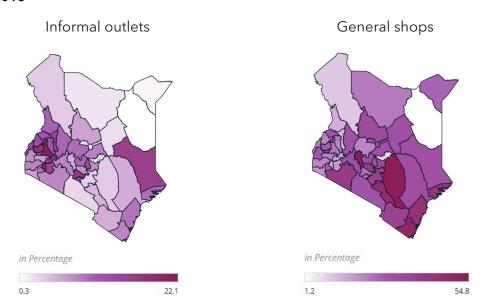


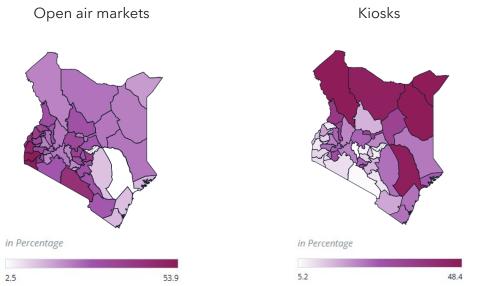
retail sector is projected to grow at compound annual growth rate (CAGR) of 10% between 2022 and 2027, with a growing variety of supermarkets and formal retail stores emerging in urban areas.<sup>41</sup>

#### Informal retailers

The informal food retail market plays a significant role in shaping dietary patterns across all regions of Kenya (see Figure 5).<sup>23</sup> For example, a 2024 study found that 59% of consumers surveyed at open-air markets in urban areas across Kenya relied on such markets for all or most of their food purchases.<sup>48</sup>

Figure 5. Share of food purchases made by consumers in different informal outlets by region, 2015-2016





Source: GAIN, The Columbia Climate School, and Cornell University College of Agriculture and Life Sciences, 2025



The literature indicates that the majority of foods sold by informal retailers in Kenya are unprocessed, including fresh fruit and vegetables, dairy, meat and fish, and other unbranded whole foods. <sup>39,51-</sup> In Nairobi, fruits and vegetables account for over 40% of products sold by informal vendors, with 25% of informal vendors selling fresh fruits, 16% selling fresh leafy vegetables, and 18% selling other types of fresh vegetable. <sup>40,52</sup> Among the processed foods sold, most consist of traditional foods, such as lala, mutura, dried fish products, and cooked foods.

Fresh produce is typically more available and affordable in informal retail settings than in supermarkets.<sup>41</sup> The predominance of sales of fresh fruit and vegetables and other unprocessed foods in informal markets positions these channels as important contributors to nutritious diets in Kenya, particularly for low- and middle-income households that typically rely heavily on them for daily food needs.<sup>53,40,49,42,49</sup>

A 2024 study found that urban consumers who shopped exclusively at traditional markets had significantly better diet quality than those who purchased food from a more diverse range of food sources, including formal retail.<sup>48</sup> Shopping at traditional markets was associated with higher consumption of pulses, vitamin A-rich vegetables, citrus fruits, and unprocessed meat, and with lower consumption of baked grain-based sweets, fast food, and instant noodles.<sup>48</sup>

However, a 2019 study of informal vendors in Kibera, an informal settlement in Nairobi, revealed that while 44% of surveyed vendors posed minimal obesogenic risk – primarily selling nutrient-rich, minimally-processed foods – more than one-third of vendors sold nutrient-poor, highly-processed foods such as sweets and confectionary (primarily kiosks), SSBs, and fried starches.<sup>51</sup>

#### — Formal retailers

The 2015-2016 'Integrated Household Budget Survey' indicated that only 7.4% of consumer food purchases in Kenya were made through formal retailers such as supermarkets.<sup>22</sup>

A 2018 study noted that processed packaged foods are mostly sold through formal retail outlets such as supermarkets.<sup>39</sup> A more recent study investigating the types of food available in modern retail outlets in Kenya found that the largest proportion of products sold in supermarkets were either minimally processed (50%) or ultra-processed (40%), with ultra-processed foods disproportionately featured in advertisements (see Figure 6).<sup>54</sup>

The study also identified a slightly higher availability of processed packaged products in retail outlets located in poorer neighbourhoods (40.9%) compared to wealthier neighbourhoods (39.1%). A 2025 study found that 53% of food purchases were of ultraprocessed products, 35% were unprocessed or minimally processed, and 10.5% were processed culinary ingredients. 55



70% 60% 60% 50% culinary ingredients foods 50% Percentage of food products Unprocessed/ 40% 40% minimally processed 32% 30% Processed foods Ultraprocessed 20% foods 10% 8% 10% Foods items available for sale Food items advertised

Figure 6. Types of food products sold and advertised in supermarkets in Kenya

Source: Karugu, 2024

A 2025 study indicated that there are currently over 20 supermarket chains with over 300 stores operating in the country, with food products (both packaged and fresh) representing 60% of their total sales. <sup>55</sup> Kenya's formal food retail market is highly fragmented. The largest retail chain, Naivas, accounts for less than 10% of formal food retail sales (according to Euromonitor), despite operating over one-third of all physical supermarket outlets in Kenya. The next three largest retailers – QuickMart, Carrefour, and Chandarana FoodPlus – each account for less than 5% of food retail sales. <sup>41</sup> Over the past decade, several of Kenya's major supermarket chains have closed due to inflation, competition from small neighbourhood stores (dukas), and the economic impact of the COVID-19 pandemic. These include Uchumi, Tuskys, Nakumatt, Shoprite, Game Stores (owned by Walmart), and Choppies. <sup>56,57</sup> For example, between 2020 and 2021, the total number of supermarket outlets in Kenya declined from 334 to 189. <sup>58</sup> The current four largest retailers have capitalized on these market gaps, collectively opening 72 locations since 2020. Carrefour more than doubled its store count during this period, increasing from 9 to 22 locations. <sup>58</sup>



Table 4. Top grocery retailers in Kenya

Coi	mpany	Share
1.	Naivas	5-10%
2.	Carrefour	0-5%
3.	Chandarana Food Plus	0-5%
4.	Eastmatt Supermarket	0-5%
5.	Quick Mart	0-5%
6.	Tuskys	0-5%
7.	Game	0-5%
8.	Others	>86%

Source: EMI, 2023

Note: data includes grocery retail items such as food, beverages, and/or tobacco

## Out-of-home food consumption

In addition to selling fresh, minimally-processed products, informal vendors in Kenya are also key sources for ready-to-eat cooked meals, such as githeri, and snacks, such as smokies (smoked sausages), chips, and bhajia. <sup>52</sup> These items are often purchased by workers as convenient lunches, and have also increasingly become a substitute for home-cooked meals in Nairobi. <sup>52</sup> A survey of two informal settlements in Nairobi (Kibera and Mukuru) found that approximately 16% and 12% of informal vendors, respectively, sold ready-to-eat meals, while 10% and 5% sold ready-to-eat snacks. <sup>50</sup>

In the formal sector, OOH food outlets and e-commerce platforms are growing in number and gaining popularity, especially amongst urban consumers.<sup>59</sup> Prominent OOH chains in Kenya include Steers, Nandos, KFC, Cold Stone Creamery, Subway, Pizza Hut, Planet Yoghurt, Domino's Pizza, Burger King, Teriyaki, McDonald's and Hardee's; Online food delivery services such as Glovo, Copia, and Uber Eats are also increasingly used. <sup>60-63</sup>

#### Food Processing and Manufacturing

Kenya's food processing sector expanded by 0.5% and contributed 4.2% to GDP in 2023. The domestic food processing and manufacturing sector was valued at approximately USD 3.2bn in the same year. The industry encompasses dairy and meat processing, grain milling firms, edible fats and oils processing, beverages, fruits and vegetable processing, and fish processing. Key drivers of recent growth include increased output in dairy processing (16.4%), prepared and preserved fruits and vegetables (11.6%), meat and meat products (10.1%) and bakery goods (8.8%). According to the Kenya Revenue Authority, the sector includes 1,232 businesses across large, small- and medium-scale enterprises, though only 187 were registered with the Kenyan Association of Manufacturers as of 2021.



#### Packaged processed food processors

**Maize:** Maize is a dietary staple in Kenya, with annual per capita consumption estimated at 60-100kg. 66,67 It is also the country's most widely grown crop, cultivated by 96% of farmers. Approximately 70% of maize is produced by small-scale farmers, who primarily grow it for household consumption and sell any surplus to urban markets. Due to domestic demand exceeding production – particularly during years of poor harvest – Kenya imports between 5 and 20% of its maize supply. 70

Maize is primarily processed via dry milling to make maize meal, flour, and maize grits.<sup>68</sup> The National Cereals and Produce Board (NCPB) estimates that Kenya has the capacity to mill approximately 1.77m tonnes of maize per year, representing 41-59% of the country's production based on figures from 2010 to 2023.<sup>66,68</sup> The Cereal Millers Association (CMA) estimates that 19 medium- and large-scale millers account for 85-90% of the national milling capacity, with small-scale 'posho' millers processing the remainder.<sup>68</sup> Large-scale millers include Mombasa Maize Millers (MMM), Diamond Lalji Group (DLG), Pembe Flour Mills, and Unga Group Limited.

The majority of maize is consumed in minimally processed form (typically as ugali) and is purchased through informal channels such as open-air markets, kiosks, farm stores, or directly from posho mills.<sup>67,68</sup> In addition, maize serves as a key ingredient in various processed products available in supermarkets, including popcorn, cornflakes, corn chips, tortillas, biscuits, and maize flour.<sup>68</sup>

**Wheat:** Wheat is the second largest consumed cereal crop in Kenya, with the country importing between 65 and 75% of its annual wheat supply.<sup>66,70</sup> Kenya's domestic wheat milling capacity stands at approximately 5,000 tonnes per day, excluding informal operations, for which limited data is available. Each year, around 64-70% of the total wheat supply is processed into flour.<sup>70</sup> Kenya has 20 large-scale millers, primarily concentrated in the central and southwestern regions of the country.<sup>70,71</sup> The six largest millers account for 69% of the total market share, with MMM leading at 22%, followed by Grain Industries Limited at 15%.<sup>72</sup>

Wheat flour in Kenya is predominantly used to produce leavened bread, pastries, cakes, and flatbreads such as chapatis. Demand for wheat-based products is expected to rise, partly driven by the growth of e-commerce platforms, which are making consumer-oriented products like pizza more accessible. This shift may come at the expense of traditional maize-based meals.<sup>70</sup>

**Dairy:** Milk is among the most widely consumed food products in Kenya, with per capita consumption estimated at 86.1 litres per year. <sup>66</sup> In 2023, Kenya produced approximately 5.76bn litres of milk, 80% of which came from smallholder farmers, while the remaining 20% was produced by medium and large-scale enterprises. <sup>73</sup>

The informal dairy sector accounts for about 80% of milk consumed and operates outside of quality regulations and the Kenya Dairy Board's oversight. Milk from the informal sector



consists mostly of raw, unpasteurized milk, and is sold directly to consumers through milk bars, informal milk traders, street vendors, and small-scale milk processors.<sup>73</sup>

Kenya's formal dairy processing sector comprises 32 active processors, the largest of which include Brookside, New Kenya Cooperative Creameries (New KCC – a government-owned entity), and Githunguri Dairy Farmers Cooperative Society. Additionally, 186 small-scale processors have a combined processing capacity of approximately 3.75m litres per day, equivalent to about 24% of total annual domestic milk production.<sup>73</sup> Kenya's dairy processing sector is moving towards greater consolidation and formalization, characterized by larger commercial entities, cooperatives, and milk processors.<sup>73</sup>

These processors pasteurize, package, and distribute a range of dairy products–such as pasteurized fresh milk, long-life (UHT) milk, yogurt, cheese, and butter–primarily to urban centres and retail outlets. However, the sector's current processing capacity is insufficient to meet domestic demand, necessitating significant imports of dairy products.<sup>73</sup>

**Sugar:** Kenya currently produces approximately 750,000 tonnes of sugar domestically. As of 2023, there were 17 operational processing mills in the country, 13 of which are privately owned and collectively account for 80% of total domestic production.<sup>74</sup> Notable producers include West Kenya Sugar Company (with a market share of 29.6%), Butali Sugar Mills (16.1%), and Sukari Industries Ltd (14.3%).<sup>75</sup>

Sugar demand in Kenya is projected to grow by 4% annually, reaching 1.22 million tonnes, driven by rising disposable incomes and expansion in the bakery and hospitality sectors. According to Kenya's 2023 Economic Survey, baked goods and confectionary are among the fastest-growing segments of the food processing industry, with sales increasing by 6% and 5% respectively in 2022. Kenya currently imports 48% of its sugar supply in order to meet this growing demand. However, the government is investing in improving productivity within the domestic sugar sector to reduce dependency on imports. Alarman and the sugar sector to reduce dependency on imports.

**Edible Oils:** Kenya's demand for edible oils significantly exceeds domestic production, with annual consumption estimated at 900,000 tonnes, compared to only 80,000 tonnes produced locally. As a result, the country is heavily reliant on imports, which account for 91% of total supply and are valued at approximately USD 1.24bn (KES 160bn) annually – making edible oils Kenya's second-largest import expenditure after petroleum. In October 2023, the Kenyan government announced an investment of USD 7.6m (KES 981 million) to increase domestic edible oil production to 240,000 tonnes. This initiative includes a targeted expansion of sunflower oil production through a 316% increase in farmland allocated to oilseed cultivation.

#### Packaged processed food and beverage manufacturers

Sales of packaged foods have increased by 47% since 2019, reaching a total retail value of USD 5.1bn in 2023.<sup>60</sup> Common packaged processed foods and beverages available in the market in Kenya include bread, yoghurt, sweet and savoury snacks, cookies and



biscuits, carbonated SSB, juices, and pastries.<sup>80,81</sup> Euromonitor International has mapped the key food and beverage manufacturers operating in Kenya across these and other product categories (see Table 5).

Table 5. Top 10 manufactures across different food and beverage categories

Snacks	Soft drinks	Dairy	Processed fruits and vegetables	Processed meat and seafood	Staple foods	Edible Oils	Breakfast cereals
Glacier Products	Coca-Cola East & Central Africa Division	New Kenya Co- operative Creameries	Premier Foods	Farmer's Choice	Sawake Kenya	Bidco Africa	Weetabix East Africa
Cadbury Kenya	Aquamist	Brookside Dairy	Trufoods	Quality Meat Packers	Mini Bakeries	Kapa Oil Refineries	Proctor & Allan
Deepa Industries	Coca-Cola Beverages Africa	RH Devani	Kenya Orchards	Meatons Kenya	Aryuv Agencies	Menengai Oil Refineries	Nestlé Foods Kenya
Mars	Kevian Kenya	Upfield Holdings BV*	Kraft Heinz	-	Capwell Industries	Pwani Oil Products	Kellanova
Propack Kenya	Highlands Mineral Water	Bidco Africa	American Garden Products	-	Farmer's Choice	United Millers Association	Kenya Oatmeal
Manij Foods Insustries	Excel Chemicals	Promasidor Kenya	Attiance SVL	-	Broadways Bakery	Areej Vegetable Oils & Derivatives	Morning Harvest
Razco	Grange Park	Branded Fine Foods	Aryuv Agencies	-	Mjengo	Pietro Coricelli	Mornflake Oats
Kenafric Industries	Sameer Agriculture & Livestock	Sameer Agriculture & Livestock	Njoro Canning Factory	-	Pastificio Lucio Garofalo SpA	SALOV	Simba
Britania Foods	Seven-Up Bottling Co (SBC) Kenya	Kapa Oil Refineries	Natco Foods	-	Festive Bread	-	Manji Foods Industries
Procter & Gamble Co,The	Jetlak Foods	Pearl Dairy Farms	Rhodes Food Group	-	Akiyda 2000	-	Mass Food

<sup>\*</sup> In 2024, Upfield changed its name to Flora Food Group

Note: Companies highlighted in orange represent those that are included in ATNi's Kenya Market Assessment 2025.

Source: EMI 2023



## Industry associations

Prominent industry associations representing the packaged processed food industry in Kenya include:<sup>d</sup>

- **Kenya Private Sector Alliance (KEPSA):** Represents over 500 companies in Kenya across different sectors, acting as an umbrella organization for private sector engagement with regulatory bodies and external organizations such as the East Africa Business Council.<sup>82</sup>
- **Kenya Association of Manufacturers (KAM):** Established in 1959, KAM represents the value-added manufacturing sector in Kenya, including industries related to sugar and sweeteners, grain processing, fresh produce, tea and coffee, and agricultural inputs.<sup>83</sup>
- Food Production Solutions Association (FPRO): Represents the food production industry in Kenya, including manufacturers of baked goods, beverages, meats, dairy, processed foods.<sup>84</sup>
- **CMA:** Created in 2007, the CMA represents over 50 grain millers in Kenya, spanning wheat, maize, rice, pulses and other cereals, aggregators, traders, and importers.<sup>85</sup>
- Retail Trade Association of Kenya: Established in 2012, the Retail Trade
  Association of Kenya advocates for 1,000 retailers in dialogues with the
  government and parliament.<sup>86</sup>

## Investors in the Food and Beverage Industry

The Kenya Investment Authority is a national agency responsible for attracting international investment into Kenyan industries. In 2020, the Kenya Investment Authority identified strategic investment opportunities aligned with the government's 'National Economic Transformation Agenda' many of which relate directly to the food and beverage sector.<sup>87</sup> These include:

#### • Retail:

o Opening more supermarkets, hypermarkets and luxury outlets.

### • Manufacturing/ Agro-processing:

- o Developing a fishing port and fish processing industry.
- o Producing industrial sugar, establishing new sugar processing facilities, and investing in stevia production and processing.



<sup>&</sup>lt;sup>d</sup> This list does not include industry associations representing the agricultural or fresh produce sectors, such as the Agriculture Sector Network, Fresh Produce Exporters Association of Kenya and Fresh Produce Consortium Kenya.

- Adding value to traditional tea and coffee, including flavoured tea production; converting coffee husks into charcoal or furniture; coffee roasting, blending and packaging (e.g. instant coffee).
- o Producing fruit concentrates and frozen vegetable products (e.g. French beans); and investing in cold storage facilities.
- Setting up large-scale meat and poultry production and processing facilities, including a large-scale canning factory; abattoirs and cold storage for meat and fish products.

#### • Exports:

 Supporting export-oriented businesses involved in food processing, fresh produce, and the packaging of shelf-ready products.

Information on shareholders of the top food & beverage manufacturers in Kenya is difficult to find, as many of the top food & beverage companies appear to be privately-owned.

## **Food Policy and Regulation**

The Republic of Kenya operates under a two-tier system of governance, comprising national and county governments that are distinct yet interdependent, and conduct their mutual relations on the basis of consultation and cooperation. The devolved units are divided into 47 semi-autonomous counties, each with its own County Executive (elected County Governor, Deputy governor and County Executive Committee Members) and County Assembly.<sup>88</sup>

County governments are responsible for functions assigned to them in the Fourth Schedule of the Constitution, in conjunction with article 186 and functions transferred by the national government through mutual agreements. However, they are expected to align execution of their functions with national policy corresponding to their respective functions. The food environment is a multi-sectoral issue, necessitating strong coordination and collaboration between the two levels of government as well as other stakeholders. In this context, the national government is primarily responsible for the formulation of overarching policies in areas such as health, agriculture, international trade, consumer protection, and standards for social security.

The section below outlines the existing policy, institutional, legal, and regulatory frameworks that shape the food environment in Kenya.



# Food Quality and Food Safety

Table 6. Policies and regulations on food quality and food safety

Policy/Regulation	Description
Constitution of Kenya	Guarantees the right to adequate food of acceptable quality under Article 43(1)(c). This right is reinforced by Article 46 on consumer protection, which states in Article 46(1)(a) that consumers have the right to goods and services of reasonable quality. Additionally, Article 35(1)(b) guarantees the right of access to information, enabling consumers to obtain critical data on the nutrient content of food products. <sup>89-91</sup>
National Food and Nutrition Security Policy	A national framework that addresses food safety as part of broader food security and nutrition goals. The Policy recognizes multiple regulatory ministries (including the Ministry of Health (MoH); the Ministry of Agriculture, Livestock, Fisheries and Cooperatives), agencies (the Kenya Bureau of Standards (KEBS) and the Kenya Plant Health Inspectorate Service), and Acts of Parliament as responsible for food safety and quality. The Policy acknowledges the importance of food processing in reducing foodborne illnesses by controlling contamination and extending shelf life, and hence promotes the adoption of safe food processing techniques.
Food, Drugs and Chemical Substances Act (Cap 254)	Regulates the manufacturing, distributing, labelling and sale of food, ensuring safety and quality standards are met. 93
National Cereals and Produce Board Act (Cap 338)	Regulates grading, quality control, and licensing for cereals and produce. <sup>94</sup>
Public Health Act (Cap. 242).	Provides a framework for regulating food hygiene and food safety. It regulates food production, storage and sale for public safety.
The Standards Act, (Cap 496)	Establishes KEBs and confers it with the mandate to develop and enforce standards on commodities including food products.
National Food Safety Policy	National and County Governments are in discussions to create a cohesive and comprehensive policy framework to improve coordination and effectiveness of food safety mechanisms across the country. <sup>95</sup>
Consumer Protection Act, 2012 (No. 46 of 2012)	Safeguard the rights of consumers in their dealings with businesses and service providers.
Government body	Description
Kenya Bureau of Standards (KEBS)	Develops standards and guidelines specific for many different food products, which provide detailed specifications for manufacturers on minimum product requirements, including acceptable levels of certain nutrients. However, these documents are not freely available for download. <sup>96</sup>

## Trade law

Except for the National Cereals and Produce Board Act. (Cap 338), Kenya's existing trade policies do not specify individual food categories. Instead, they are primarily focused on food safety, public health, and consumer protection.



Table 7. Trade policies and regulations on foods and beverages

Regulation/Agreements	Description
National Cereals and Produce Board Act (Cap 338)	Provides a legal framework for managing the trade and marketing of cereals and other produce. It includes provisions for the grading, storage, and marketing of cereals to ensure quality and fair pricing. It also provides mechanisms for controlling sales and exports; and mandates the licensing and registration of businesses involved in the cereals trade. The Act also covers the inspection and certification of produce to ensure compliance with quality benchmarks, as well as the regulation of storage and handling practices to prevent spoilage. Responsibilities to enforce the Act lies with designated government bodies, including the Ministry of Agriculture, who hold power to issue fines or legal action for non-compliance.
African Community and the African Continental Free Trade Area	Offer benefits such as reduced tariffs or easier market access within the African and East African regions. <sup>98</sup>
Government body	Description
Kenya Bureau of Standards (KEBS)	Ensures the standardization of industrial and trade products by providing facilities for testing and examining commodities for compliance to national standards.

# Taxes and subsidies

Food taxes and subsidies are used to manage food consumption, affordability and support Kenyan industry and agriculture.

Table 8. Taxes and subsidies on foods and beverages

Policy/Tax	Description
Tax exemption	Essential foodstuffs such as maize flour, rice, and bread are typically zero-rated or exempt from value-added tax (VAT) to keep prices low.
Subsidies	Subsidies are provided for agricultural inputs such as fertilizers and seeds to boost production, and have been implemented for maize flour and occasional programmes to subsidize sugar and fuel. <sup>94</sup>
Value-added tax	Most processed foods and beverages are subject to the standard VAT rate of 16%, including canned and preserved foods, ready-to-eat meals, processed meats like sausages, bacon, and ham, and processed dairy products such as cheese, butter, and yogurt. <sup>99</sup>
Excise taxes	The 2024 Finance Bill doubled excise duty on the manufacturing and importation of sugar confectionary at 85.82 Kenya shillings per kilogram and increased this to 257.55/kg for imported chocolate products. <sup>100</sup> Additionally, Kenya's Ministry of Finance introduced a flat rate of 6.41 Kenya shillings per litre excise tax on non-alcoholic beverages (with or without sugar and sweeteners), in attempt to reduce the consumption of sugary drinks and tackle rising obesity rates and diet-related health issues. <sup>101</sup>
Import and export tax	<ul> <li>The East African Community Common External Tariff, 2022 stipulates tariffs of food products, including: 102</li> <li>Fresh produce: Meat products (35%), seafood (25%), sugar-sweetened milk products (25%), eggs (25%), vegetables (25-35%), fruits and nuts (25-35%), coffee, tea and spices (25-35%), cereals (25%), oil seeds (10%), edible fats and oils (10-35%).</li> <li>Packaged processed products: Processed meat (35%), processed seafood (25%), sugary syrups (10%), molasses (35%), confectionary (35%), cocoa products (10-35%), pasta (25%), baked goods (35%), preserved fruits, vegetables and nuts (35%), juice (35%), ice cream (35%), bottled water and SSBs (35%).</li> <li>Kenya also introduced a levy on imported agricultural products in 2024, including cereals (2% on imports; 0.3% on exports), legumes/pulses (2% on imports; 0.3% on exports) and roots and tubers (1% on imports; 0.3% on exports). 103</li> </ul>

Government body	Description
Kenya Revenue Authority	Responsible for collecting revenues generated by taxes in Kenya. <sup>104</sup>

### Imports and exports

Regulations regarding the import of agricultural products in Kenya are outlined in various industry-specific Acts. Food imports and exports are overseen by relevant Boards, such as the Sugar Board and Dairy Board, and Directors (i.e., Director of Veterinary Services, and are enforced by port officers stationed at international airports, seaports, dry ports, Inland Container Depots, and One Stop Border Posts. Pospite monitoring efforts by the Eastern Africa Grain Council (EAGC), limited trade data is collected and porous borders and political factors can disrupt the consistency of food supply tracking.

Table 9. Policies and regulations on the import and export of foods and beverages

Policy/Regulation	Description	
Crops (Food Crops) Act, 2019	Regulates the standards and manner through which crops are imported into Kenya. <sup>105</sup>	
Food, Drugs and Chemical Substances Act, 2015	Prohibits the import of foods that do not meet the hygiene and labelling standards specified in the Act. 93	
Meat Control Act (Cap 356)	Regulates slaughter of animals, meat and meat products intended for human consumption, sanitation of slaughterhouses and places where such meat is processed; and to regulates import and export of meat and meat products. It grants power to the Cabinet Secretary (responsible for veterinary services) in consultation with the Cabinet Secretary responsible for health to make regulations to among other things, control imports and exports of meat and meat products.	
Meat Control (Importation of Meat and Meat Products) Regulations, 2001	Specifies that meat products cannot be imported into Kenya without a permit. 106	
Draft Sugar (Imports and Exports) Regulations, 2025 made pursuant to Section 61 of the Sugar Act No. 11 of 2024	Outlines that anyone importing sugar into the country must apply for a license and permit from the Kenya Sugar Board. 107	
Dairy Industry (Imports) Regulations, 2012 made pursuant to Section 19 of Dairy Industry Act (Cap 336)	Specifies the types of milk products that may be imported into Kenya, and the manner in which they are imported. <sup>108</sup>	

## Food prices

Current policies regulating food prices in Kenya primarily focus on agricultural produce, highlighting a policy gap in the regulation of prices for packaged processed foods.



Table 10. Policies and regulations on food prices

Policy/Regulation	Description	
Agricultural and Food Authority Act (No. 13 of 2013)	Includes provisions for managing and stabilizing the prices of essential food commodities, particularly staples such as maize and sugar. The Act establishes floor prices, regulates market practices, and allows for government intervention during periods of significant price volatility to maintain market stability. In practice, the Kenyan government has occasionally implemented price controls or offered consumption and production subsidies for key staples, setting maximum prices during shortages or crises to curb food inflation and protect consumers. To	
Kenya's National Food and Nutrition Security Policy	Aims to ensure food security and stabilize food prices through the promotion of sustainable agricultural practices and improvements in market efficiency. A In addition, the Kenyan government aims to reduce post-harvest losses (which currently sit at 20-30% of production due to poor preservation techniques and inadequate infrastructure) by half by 2025 through improved preservation facilities and pre-processing to narrow the food supply gap and stabilize food prices. However, challenges such as limited budget, outdated technologies, and insufficient training pose issues for implementation.	

# **Product Healthiness**

Table 11. Policies and regulations on the healthiness of foods and beverages

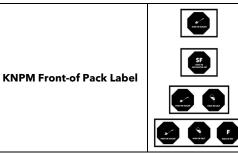
Policy/Regulation	Description	
National Guidelines for Healthy Diets and Physical Activity	Introduced in 2017 by the MoH, and outlines principles of healthy eating across all stages of life. <sup>12</sup>	
Kenya Nutrient Profiling Model (KNPM)	Kenya's MoH has developed the KNPM, using the WHO general principles for developing nutrient profile models. 111,112 The draft KNPM was finalized in 2023 and signed in 2025.	

# Labelling

Table 12. Policies and regulations on labelling of food and beverage products

Policy/Regulation	Description	
Kenya Bureau of Standards Act (Cap 496)	Outlines food labelling standards to ensure consumer protection and product quality.	
Labelling of Pre-packaged Foods - Specification [KS EAS 38:2014	Provides detailed specifications for how prepackaged foods should be labelled, broken down by individual food categories and items. 96,113 They stipulate labels must provide essential information such as the product's name, list of ingredients, net weight or volume, and the manufacturer or distributor's contact details. Additionally, nutritional information such as calorie content and levels of key nutrients must be included, along with expiration dates to inform consumers about the product's shelf life. Labels are also required to indicate the country of origin and disclose any allergens present to safeguard individuals with specific sensitivities. Health and safety warnings, including storage instructions, must be clearly stated.	
Food, Drugs and Chemical Substances Act Cap 254 (Amendment) 2015	Mandates the declaration of the level of trans-fatty acids in all food products containing edible fats and oils. <sup>114</sup> These labelling standards are aligned with international benchmarks, including those set by the Codex Alimentarius Commission, to facilitate global trade and ensure that Kenyan practices meet global standards.	





The Kenyan government is preparing to roll out the KNPM, which will guide the development of various policy interventions. Among these is a proposed mandatory FOP labelling scheme, that will use a warning label to inform consumers about food products that contain high amounts salt, sugar, total fats, and saturated fats as defined by the KNPM. This will be led by the MoH. 111,115,116

### Marketing

While there is no single regulation specifically governing the marketing of food products, a combination of laws and guidelines seeks to ensure that marketing practices remain transparent, fair, and protect consumer rights. While these mandatory and voluntary frameworks promote responsible marketing, the language used is often open to interpretation.<sup>117</sup>

Table 13. Policies and regulations on marketing food and beverage products

Policy/Regulation	Description	
Food, Drugs, and Chemical Substances Act	Prohibits misleading advertising and unsubstantiated claims.	
Consumer Protection Act	Safeguards consumers from deceptive marketing and ensures they receive accurate product information. <sup>118</sup>	
Competition Act	Addresses anti-competitive practices and prevents misleading marketing strategies that could harm consumers or unfairly disadvantage competitors. <sup>114</sup>	
Kenya Information and Communications (Broadcasting) Regulations (2009), pursuant to the Kenya Communications Act	Outlines appropriate marketing practices across broadcast media, including for children under the age of 18 - mandating a watershed period between 5:00am to 22:00pm on which only family-friendly and child appropriate content may be shown. <sup>119</sup>	
Government body	Description	
AFA	Oversees fair marketing practices for certain food commodities	
Non-Statutory body	Description	
Advertising Standards Body of Kenya	Implements the (2003) Code of Advertising Practice specifies voluntary responsible marketing practices that are somewhat aligned with the International Chamber of Commerce's Framework for Responsible Food and Beverage Marketing Communications. <sup>117</sup>	



## Health claims

Table 14. Policies and regulations on nutrition and health claims of food and beverage products

Policy/Regulation	Description	
Food, Drugs, and Chemical Substances Act (Cap 254)	Oversees the safety and efficacy of food products, ensuring that health claims are accurate and not misleading. <sup>114</sup>	
Public Health Act (Cap 242)	Controls public health risks, including the promotion and sale of unsafe products, especially in areas like food safety or disease claims <sup>120</sup>	
Consumer Protection Act (No. 46 of 2012)	Ensures that all advertising, including health claims, is truthful and not deceptive. 121	
Kenya Nutrition Action Plan 2018-2022 (KNAP)	Promotes accurate nutritional claims. 122	
Government body	Description	
Kenya Bureau of Standards (KEBS)	Enforces food labelling regulations that require health claims to be truthful and substantiated by scientific evidence, aligning with international Codex Alimentarius standards. This includes two main East African standards: 'EAS 804: Claims on Foods – General Requirements' and 'EAS 805: Use of Nutrition and Health Claims – Requirements'.	

# Social safety net programmes

Table 15. Policies and programmes on social safety nets

Policy/Regulation	Description	
Kenya Regulation National Social Protection Policy 2011	Aims to reduce poverty and inequality through an integrated approach that combines social safety nets, social security, and essential services. <sup>123</sup> It covers a broad range of protections, including cash transfer programmes and food aid for low-income households, pension schemes for the elderly, and improved access to healthcare and education, particularly for marginalized communities. The policy outlines the roles of various government agencies, local authorities, and partners in implementation, with an emphasis on the importance of coordination, monitoring, and evaluation to enhance effectiveness. It also stresses the need for sustainable funding through a mix of government budgets and international support. By supporting household purchasing power, the policy helps vulnerable populations access sufficient food and reduces food insecurity.	
National School Meals and Nutrition Strategy 2017-2022	Developed by the Ministry of Education, Ministry of Health, and the Ministry of Agriculture, Livestock and Fisheries. 124 The Strategy emphasizes that nutrition is a key component of school meals, stating "The school meal and nutrition initiatives should increase nutritional intake and meet and promote healthy food consumption habits. As such, all institutions should adapt the laid-down nutrition standards and requirements in food storage, meal preparation and service." The African Union Development Agency, in partnership with the Kenyan government, also established Guidelines for the Design and Implementation of Home-Grown School Feeding Programmes in Africa, which emphasize that the nutritional standards applied to the general population should also apply to school meals 125 The Guidelines recommend the use of Food-Based Dietary Guidelines as essential tools in planning. 12 In addition to providing healthy meals, the Strategy aims to ensure the regular provision of meals every school day throughout the school year; and link smallholder farmers with the demand for school meals by procuring directly from these suppliers where possible. 124	
Nairobi County School Meals Programme	In 2023, Nairobi County launched a School Meals Programme that serves approximately 400,000 children. 126 The Kenyan government has committed to match funding for Nairobi and any other counties that develop similar initiatives. 126 Kenya is currently developing a national school meals policy and bill, with stakeholders such as the APHRC participating in consultations to ensure the integration of healthy food into the policy framework.	



## **Food Industry Practices**

#### **Products**

As highlighted earlier in the Consumption section of this report, the types of foods produced and sold by industry and commonly consumed as part of the Kenyan diet include: 127

- Cereals, grains, and bread
- Pulses
- Meat and fish
- Milk, cheese, and eggs
- Oils and fats
- Fruits
- Vegetables
- Roots and tubers
- Sugar, jams, honey, chocolate, and other confectionary
- Spices, seasoning, and food ingredients
- Coffee, tea, and cocoa
- Mineral water, soft drinks, and juices

The Kenyan food industry largely focuses on the production and processing of fresh fruits, staple crops such as maize and wheat, vegetables, meats, sugar, and milk –indicative of a strong agricultural and agro-processing sector. Some larger industry players, such as Bakhresa have diversified into producing soft drinks and juices.<sup>128</sup>

#### **Product healthiness**

The Kenya Demographic and Health Survey 2022 defines 'unhealthy' food as including:

- Sweet foods such as cakes, sweet biscuits, candies, chocolates, ice cream, and ice lollies
- Fried and salty snacks such as crisps, chips, ngumu, mandazi, samosa, bhajias, and Indomie
- SSBs such as sodas, energy drinks, sweetened juices, tea or coffee with sugar, and chocolate drinks.

This is consistent with the National Dietary Guidelines, which specify that "most foods in family meals should be minimally processed" and recommend consumers to limit consumption of products with high amounts of sugar, salt, and saturated fats, and to avoid trans-fats.<sup>12</sup>



However, the categorization of certain food groups as 'unhealthy' appears not to be connected to a clear definition of "healthy" from a nutrient profiling model. Some product categories seem to be considered inherently 'less healthy' due to high levels of fats, salt and sugar. It

## **Labelling Practices**

While labelling regulations are well documented in Kenya, there is limited evidence in the public domain assessing actual labelling practices of food and beverage companies, particularly for processed packaged foods. This gap in literature suggests a need for further investigation.

However, food & beverage companies' labelling practices appear to be under greater scrutiny from consumers in recent years in Kenya. Following a legal dispute in which a consumer raised a disparity in back-of-pack labelling information between Coca-Cola's glass and plastic bottles, 129 the Kenyan High Court and Court of Appeal ruled that nutritional information on labels should enable consumers to compare products and make informed decisions, preventing deception and promoting improvements in food products. 130,131 Specifically, the ruling requires product labels to:130

- 1. Provide consumers with nutrition information about the food product (though the ruling did not specify which information should be displayed);
- 2. Enable consumers to compare the nutritional quality of products from the same food group;
- 3. Enable consumers to choose among products from different food groups based on nutritional quality;
- 4. Prevent or reduce consumer deception by providing information about the nutrient composition of the product; and
- 5. Provide incentives to improve food products by requiring manufacturers to describe fully the ingredients and nutrient value of their products.

## **Marketing Practices**

Marketing of food and beverage products has a demonstrable influence on consumer purchasing decisions in Kenya.<sup>132</sup> For example, studies in Nairobi found that the largest proportion of advertisements were for SSBs (48.1%), followed by milk, cakes and sweets, staple foods, and processed or fried foods such as chips, instant noodles, kebabs, pizza, and pilau (see Table X).<sup>35,133</sup>

<sup>e</sup> In the lead up to the implementation of the Kenya Nutrient Profile Model



Furthermore, a study that mapped 2,300 food and beverage advertisements around 500 schools across the country found that 46% of the advertisements were of "unhealthy foods" and 48% were for ultra-processed foods (according to NOVA classification system). The majority of these advertisements were for SSBs. 134

Table 16. Percentage frequency of marketing of certain food categories

Food category	Frequency advertised
Fats/oils	7.6%
Sugar-sweetened spreads	6.6%
Fresh meat/poultry	8.5%
Fresh fish/shellfish	1.9%
Milk	30.2%
Eggs	7.6%
SSB	48.1%
Processed/fried foods	11.3%
Cakes/sweets	18.9%
Condiments	6.6%
Staples	16.0%
Legumes/pulses	2.8%
Nuts/seeds	4.7%
Fruits	2.8%
Vegetables	4.7%

Note: Shaded cells indicate where percentage frequency is higher than 10%

Existing literature identifies television, outdoor advertising, radio, print media, outdoor media (such as posters), and online platforms as the most commonly used media channels for food and beverage advertising in Kenya. 35,133,135 Modern retail outlets have been found to promote processed packaged food items. 54,134



<sup>&</sup>lt;sup>f</sup> The study defines 'unhealthy' foods as sweetened baked goods, processed meat or meat alternatives, sweet snacks, savoury snacks, frozen or packaged ready-meals, and sugar-sweetened beverages.

Advertisers were found to use a variety of persuasive techniques to engage audiences, such as humour, bright colours, branded advertising, celebrity endorsements, cartoon/fantasy characters, and claims linking product consumption to positive behavioural or lifestyle outcomes. <sup>136-138,13</sup>

#### Use of Health Claims

In Kenya, the use of health and nutrition claims on food and beverage packaging must comply with regulatory requirements when employed (see Policy section). No publicly available studies on food & beverage manufacturers' practices regarding placing health claims on packaged, processed products in Kenya were identified. Additionally, information assessing whether companies place health and nutrition claims on products that can be considered 'less healthy' were not found and requires further investigation.



### FORTIFIED PACKAGED FOOD ENVIRONMENT

# Consumption, Affordability, and Accessibility

### Consumption

### Mandatory fortification of processed packaged staples

As previously noted, Kenya mandates the fortification of packaged staple foods – including wheat flour, maize flour, edible oils, and salt – yet but compliance with fortification standards have fallen short in recent decades. 140,141 The '2011 Kenya National Micronutrient Survey' found that grains were an important source of micronutrients such as iron and zinc; milk was the leading source of calcium; and vegetables were a key source of vitamin A intake in the population. The same survey found that fortified maize flour was being consumed by 87% of the population, fortified oils by 69%, and fortified wheat flour by 47%. In 2018, fortified salt reportedly reached 94.6% of the population. However, more recent data is needed on the consumption of fortified processed packaged products, as well as sociodemographic information on populations consuming fortified products in adequate amounts to alleviate micronutrient deficiencies.

Studies have investigated potential barriers to universal consumption of fortified staples in Kenya, including consumer awareness, education, preferences, and trust. One study found that fewer than one-third of respondents were familiar with the term "food fortification". The Factors associated with higher awareness of fortification included being female, aged 18-24, educated to secondary or tertiary level, belonging to a household with more than seven dependents, and being formally employed. The Consumers with these characteristics generally engage in health-promoting information, have healthier lifestyle patterns, have experience in food purchase activities, and have more of an understanding of the benefits of fortified products. Other studies suggest that awareness of fortified maize flour is low in Nairobi. The Amarch of Studies and Studies and Studies suggest that awareness of fortified maize flour is low in Nairobi.

In order to generate consumer awareness and demand for fortified foods, a 'National Social Marketing and Communication Strategy for Food Fortification' was developed in 2015 as part of Kenya's National Fortification Strategic Plan. However, a 2022 study examining consumers' awareness, preference and demand for fortified staple foods in Kenya showed that, although over 80% of respondents reported buying foods commonly used as vehicles for fortification, less than 20% purchased these items specifically for their added vitamins and minerals. This indicates that most consumer's purchasing behaviour is not driven by the presence of fortification.

When examining consumer willingness to pay for yellow (provitamin A carotenoid fortified) maize in Kenya, another study found stronger consumer preference for traditional unfortified white maize, suggesting some resistance to switching to biofortified products with unfamiliar appearance.<sup>147</sup> This is corroborated by additional studies that showed consumer preferences for unfortified varieties of flour.<sup>148</sup> Further, studies investigating determinants of consumption of fortified foods in Kenya suggested that



levels of trust in the organizations involved in voluntarily fortifying foods may also impact uptake.<sup>149</sup>

## Voluntary fortification of processed packaged products

In addition to mandated fortification programmes, Kenya also supports market-driven fortification efforts; however, data on their consumption remains limited.<sup>g</sup> In the case of sugar, available evidence indicates that factors such as consumer awareness, price, education, and preferences influence the uptake of fortified varieties.<sup>150</sup>

## **Affordability**

#### Mandatory fortification of processed packaged staples

A qualitative study on perceptions of fortified foods in Kenya found that two-thirds of respondents expressed concern that fortified foods are more expensive than their non-fortified counterparts. For 30% of respondents, price was the most important factor influencing purchasing decisions, and cost was also cited as a barrier for millers to fortify their products. 146,151-153 A 2014 study estimated the cost incurred by millers to fortify maize flour in Kenya and found that, if passed directly to consumers, it would raise the price of maize flour by 0.09 KES – translating to an increase in household expenditure of 0.03-0.07%, depending on sociodemographic group (see Figure 7). 154 This suggests that fortified staples are more expensive than non-fortified staples. To address this, Kenya's National Food Fortification Strategy includes measures such as subsidizing inputs like micronutrient premix to reduce the cost burden on consumers. 145,141



<sup>&</sup>lt;sup>9</sup> According to the WHO/FAO 'Guidelines on Food Fortification with Micronutrients', the term "market-driven fortification" is applied to situations whereby a food manufacturer takes a business-oriented initiative to add specific amounts of one or more micronutrients to processed foods. Although voluntary, this type of food fortification usually takes place within government-set regulatory limits.

<sup>&</sup>lt;sup>h</sup> Premixes are a commercially prepared, customized blend of vitamins and/or minerals where each nutrient component is prescaled and precision blended into a form that is then added to staple food vehicles as mandated by standards.

Figure 7. The increased cost of maize flour fortification from the consumer perspective.

	Kenya	Uganda	Zambia
Maize meal consumer price/kg     (Prefortification)	\$0.44	\$0.69	R: \$0.30; B: \$0.44
Maximum increase in price due to fortification—assuming the full cost is passed onto consumer	0.09	0.07	0.09
Conditional average apparent consumption:     Includes only maize meal purchasers     (grams/person/day)	82	67	242
Assuming consumption levels remain constant, fortifi as a percentage of household income of:	cation will result in	n at most an increase	d expenditure
All households apparently consuming fortified maize meal	0.03	0.002	0.2
5. Households among poorest 40% of households that purchased fortified maize meal	0.07	0.005	0.8

Source: Fiedler et.al, 2014<sup>154</sup>

In 2021, the Ministry of Agriculture, Livestock, Fisheries and Cooperatives tracked price fluctuations in staple foods, reporting a 6% increase in red sorghum prices and 3% increase in dry maize over a three-week period, while the price of wheat flour decreased by 6% during the same timeframe. The Ministry also noted that wheat flour prices stabilized at around 150 KES in October and November 2021. No clear correlation was found between a brand signalling that it is fortified and a higher price point (see Table 16). The Ministry also noted that wheat flour prices stabilized at around 150 KES in October and November 2021. No clear correlation was found between a brand signalling that it is fortified and a higher price point (see Table 16).

Table 17. Average price of wheat flour in Kenya over a three-week period in October and November, 2021

Wheat flour brand	Average price (KES)
Exe mandazi fortified wheat flour	154
Exe brown bread Flour	151,3
Exe self-raising Flour	149,7
Exe chapati fortified wheat Flour	149
Elliots self-raising flour	149
Exe Atta Mark 1 Flour	148,7
Ajab fortified Home Baking Flour	146
Ajab fortified self-raising flour	146
Dola premium all purpose	146
Dola premium atta mark 1	146
Ajab fortified mandazi flour	145,7
Elliots all-purpose Home Baking Flour	142
Exe all-purpose Home Baking Flour	141,7
Golden atta mark 1	132

Note: Highlighted cells indicate flour brands that are labelled as fortified Source: Ministry of Agriculture, Livestock, Fisheries and Cooperatives, 2021<sup>155</sup>



### Voluntary fortification of processed packaged products

Data on the pricing and affordability of fortified processed packaged foods beyond staple products in the Kenyan market is currently lacking. Further investigation is needed to determine whether food and beverage manufacturers charge a premium for fortified products.

## Accessibility

# Mandatory fortification of processed packaged staples

While the foods included in Kenya's mandatory fortification regulations were selected in part due to their widespread consumption, adequate access to fortified foods remains a challenge, as evidenced by the persistent prevalence of micronutrient deficiencies. A major barrier to access – particularly in rural areas – is that not all small-scale millers fortify their products. As such, strengthening infrastructure and capacity, and implementing fortification initiatives targeted at small- and medium-scale millers (such as building networks to improve quality, efficiency, and access to premixes), could enhance the accessibility of fortified foods. At 156,157

Availability of fortified staples also appears to vary between formal and informal market settings. One review highlighted limited access to fortified foods among rural and urban poor households in informal settings. <sup>94</sup>Additionally, urban areas may experience better access to a range of fortified products due to higher demand and more developed distribution networks. However, consultations with experts revealed that low-income rural households sometimes rely on local milling (see Annex A).

#### Voluntary fortified processed packaged products

Much of the existing literature focuses on consumers' access to fortified staple foods. Information related to consumers' access to fortified processed packaged non-staple products is limited, highlighting a significant research gap.

#### **Market Structure and Direct Influencers**

#### Retailers

Information about where consumers purchase fortified packaged foods in Kenya is currently limited. Due to the country's mandatory fortification requirements for staple foods (see 'Table 19' on pg. 42), it is assumed that most packaged wheat and maize flour, edible oils, and salt are fortified. However, given research has shown that full compliance with the fortification standards remains inconsistent, particularly among small-scale millers, and it is unclear which retail channels—including supermarkets, local shops,



or open markets-may be distributing non-fortified or substandard products to consumers..

Notably, while sugar<sup>i</sup> does not fall under mandatory fortification regulation for staple foods in Kenya, a 2014 study found a greater probability of consuming fortified sugar amongst those who shop at supermarkets compared to those that shop at local grocery stores and open markets in Kenya. This indicates that non-regulated fortified staple foods may be sold more frequently in supermarkets than in informal grocery retail outlets in Kenya.

Information about retail of fortified processed packaged foods through different grocery outlets has not been found in the existing literature. Further research is required to understand the structure of the fortified food retail value chain in Kenya.

#### Manufacturers

### Staple food producers

Fortification of packaged wheat flour, maize flour, edible oils and salt is mandatory in Kenya. In addition, the Millers for Nutrition coalition<sup>j</sup> has pledged to fortify edible oil, maize flour, wheat flour and potentially rice in Kenya, though rice fortification is not yet mandatory in the country.<sup>140,161,162</sup> Key manufacturers involved in the fortified staples supply chain include:

- **Edible oil:** Bidco Africa, Kapa Oil Refineries, Menengai Oil Refineries, Giloil Company, Palmac Oil Refiners, and Pwani Oil Products.<sup>163</sup>
- Maize and wheat flour: The CMA of Kenya lists over 50 members, including Unga, United Millers Association, MMM, Capwell Industries, Simba, Afraha Flour Mills, Bakex, and Kitui Flour Mills. 164,165
- **Salt:** Ken Salt, Krystalline, Malindi Salt Works, Kurawa Industries, and KEMU Salt Packers Production. 166

Despite mandatory regulations, not all staple food producers fortify their produce or are fortifying to meet mandatory standards. <sup>141,167</sup> For example, one study found that while all large-scale maize millers in Kenya fortify their flour, only 45% of medium-sized and 24% of small-scale millers were doing so. <sup>152</sup> The KDHS 2014 reported that 99.9% of table salt was iodized, 87% of vegetable oil was fortified, and only 37% of maize flour consumed was fortified. <sup>141</sup>



<sup>&</sup>lt;sup>j</sup> Millers for Nutrition is a coalition of food fortification stakeholders supporting capacity building initiatives amongst millers in eight countries across Africa and Asia, including Kenya.

<sup>&</sup>lt;sup>1</sup> Millers for Nutrition is a coalition of food fortification stakeholders supporting capacity building initiatives amongst millers in eight countries across Africa and Asia, including Kenya.

There is some evidence that producers of market-driven fortification initiatives by some staple food producers. For example, some milk, sugar and rice producers fortifying their products include:

- **Milk:** Evidence has been found that Brookside and Promisador fortify their milk products. 168,169
- Sugar: Mumias sugar company was found to fortify sugar with vitamin A.<sup>170</sup>
- **Rice:** Capwell launched fortified rice brands in 2024.<sup>171</sup>

## Processed packaged non-staple food manufacturers

Much of the literature on the fortification of processed packaged foods in Kenya focuses on staple foods. Information about whether processed packaged foods are being used as a vehicle for fortification in Kenya has not been found. However, some multinational food and beverage manufacturers who operate in Kenya have been found to fortify their products or use fortified ingredients in their products in other countries. For example, ATNi's Global Index 2021 found that Nestlé uses biofortified maize (vitamin A) in cereal products sold in Nigeria. ATNi's Global Index 2024 showed that 13 multinational companies have made commitments to fortify their products in line with CODEX CAC/GL 9-1987 and/or the WHO/FAO 'Guidelines on Food Fortification with Micronutrients.' While these guidelines are mandatory in Kenya, it is unclear whether all of these companies are selling products in the Kenyan market.

Further research is needed to understand whether more highly processed packaged foods are being fortified in Kenya and if so, which companies are fortifying their products and through which mechanisms.

#### **Industry Associations**

Key industry associations representing companies that fortify their products include:

- **Cereal Millers Association:** Established in 2007, the CMA represents 50 grain millers and traders, accounting for 40% of grain milling capacity for maize and 85% of the wheat milling capacity in Kenya. 85
- **Kenyan Association of Manufacturers:** represents companies from 14 food and non-food sectors, including grain milling, edible oil, salt, sugar, and dairy industries in which manufacturers are fortifying their products.<sup>174</sup>
- Edible Oil Manufacturers Association of Kenya: While a website for this association could not be found, it has been referenced in news articles from 2024.<sup>175-177</sup>

#### **Food Policy and Regulation**

The policy landscape for food fortification in Kenya, outlined below, is guided by overarching strategic action plans.



Table 18. National strategies guiding Kenya's fortification programme

Plan	Description
National Food Fortification Strategic Plan (2018 to 2022)	Provides a framework for addressing micronutrient deficiencies through the fortification of staple foods. 141The plan does not explicitly apply to fortified non-staples, processed packaged foods, or the use of fortified staples as ingredients in processed packaged foods.
Kenya Nutrition Action Plan (KNAP) 2018- 2022 and 2023-2027	KNAP is a comprehensive five-year, multisectoral strategy aimed at accelerating efforts to combat malnutrition across the country led by The Ministry of Health. The plan builds on the successes and lessons learned from the previous KNAP (2018-2022), which notably reduced stunting rates from 26% in 2014 to 18% by 2022. The 2023-2027 plan continues this momentum by involving stakeholders from various sectors, including health, agriculture, education, and international organizations such as United Nations Children's Fund (UNICEF) and WHO. It aims to further reduce malnutrition and promote good nutrition practices throughout Kenya.
Organizations	Description
Ministry of Health	Developed and coordinates the implementation of the 'National Food Fortification Strategic Plan' and the 'Kenya Nutrition Action Plan'. 178
Kenya National Food Fortification Alliance	Coordinates the fortification of all food vehicles, including but not limited to wheat and maize flour, salt, cooking oils and fats, and sugar, and provides guidance during the development and revision of fortification standards. <sup>141</sup>
Kenya Bureau of Standards	Responsible for setting and monitoring compliance with fortification standards.

# Food quality and food safety

Table 19. Policies and regulations on fortified food quality and safety

Policy/Regulation	Description
Public Health Act (Cap 242)	Provides mandates for public health inspections, food hygiene requirements, and food safety surveillance. <sup>120</sup>
Food, Drugs, and Chemical Substances Act (Cap 254)	Regulates the safety and quality of food products in Kenya to prevent contamination and ensure compliance with nutritional standards. The Act was amended in 1978 to require universal salt iodization, in 2012 to mandate the fortification of other staple foods (wheat flour, maize flour and edible fats/oils) and in 2015 to align with the East African Community standards established in 2006.
KS EAS 767: Specification for maize flour	Establishes standards for maize flour to be fortified with vitamins A, B1, B2, B3, B6, B12, folic acid, iron and zinc. <sup>178</sup>
KS EAS 768: Specification for wheat flour	Establishes mandatory fortification requirements for wheat flour with vitamins A, B1, B2, B3, B6, B12, folic acid, iron and zinc. <sup>178</sup>
KS EAS 769: Specification for edible fats and oils	Establishes standards for edible fats and oils to be fortified with vitamin A. <sup>178</sup>
KS EAS 35: Specification for iodized salt	Establishes mandatory iodine fortification levels for salt.
East African Standard RS EAS 1023:2021 'Food fortification premix and fortificants – Specification'	Provides detailed requirements and specifications for food fortification premixes and fortificants used in the East African region. <sup>179</sup>



Nairobi City County Food Safety and Fortification Act 2022	Addresses specific nutritional challenges applicable to Nairobi County's diverse and densely populated urban and peri-urban population. The bill includes provisions for monitoring and enforcement specific to the county's infrastructure, capabilities, market structure and food distribution channels.
Regulatory bodies	Description
Ministry of Health (MoH) - Division of Nutrition and Dietetics	Oversees national nutrition policies, including fortification and supplementation programmes.
Kenya Bureau of Standards (KEBS)	Responsible for setting and enforcing food safety and fortification standards in Kenya, including implementing quality control measures to verify the final micronutrient levels of fortification and compliance with standards. <sup>141</sup>

### Trade law

Table 20. Trade regulations on fortified foods

Policy/Regulation	Description
East African Community Standardization, Quality Assurance, Metrology and Testing Act, 2006	Aimed to harmonize requirements for food commodity trade for vegetable oil and fats (fortification with vitamin A), wheat and maize flour (fortification with iron, zinc, folic acid, niacin, vitamin B1 and B12 and vitamin A).
Regulatory bodies	Description
Kenya Bureau of Standards	KEBS sets and enforces standards for fortified foods, including certification and labelling requirements to ensure products meet national and international quality standards. 182

# Taxes and subsidies

Kenya has limited direct subsidies for fortified food production; however, some supportive measures are in place to promote the production and accessibility of fortified foods.

Table 21. Taxes and subsidies related to fortified foods

Policy/Tax	Description
Tax incentives	Include VAT exemptions or reduced rates for certain fortified staple foods, which help lower consumer costs and encourage production.
Customs duty relief	Reduces production costs by waiving duties on imported raw materials, such as vitamin and mineral premixes.
Public-private partnerships	Offer collaborative initiatives that may involve technical support and sometimes financial assistance.
Government subsidies and soft loans	Additional measures suggested to improve affordability and encourage the adoption of food fortification practices include government subsidies for milling equipment, and offering millers the option to purchase equipment and premixes through soft loans. <sup>94</sup>
Regulatory support	AFA provides regulatory support to help streamline production processes.94



# Imports and exports

Table 22. Policies and regulations on the import and export of fortified foods

Policy/Regulation	Description
Food, Drugs, and Chemical Substances Act (Cap 254)	Ensures that imported food products meet Kenyan safety requirements, including fortification standards. <sup>93</sup>
Fortification Mark of Quality	Applicable to all products subject to mandatory fortification by KEBS, the following foods must carry the Fortification Mark of Quality: wheat flour (zinc and iron), dry milled maize products (zinc and iron), salt (iodine), and vegetable fats and oils (vitamin A). <sup>183</sup>
KS 2571:2021 Food fortification premix and fortificants - Requirements for supply in Kenya	Establishes the minimum requirements for the import and supply of food fortification premix and fortificants within Kenya. It applies to both manufacturers and suppliers, as well as food industries (e.g., millers, edible oil refineries) that import premix and fortificants for internal use or distribution.
Regulatory Body	Description
Kenya Bureau of Standards	Oversees compliance with national standards, issuing import permits and conducting inspections. <sup>183</sup>

## Food prices

Kenya has limited direct price control mechanisms specifically for fortified foods, but price considerations are included in the Kenya National Food Fortification Strategic Plan 2018-2022.

Table 23. Policies and regulations on fortified food prices

Policy	Description
Kenya National Food Fortification Strategic Plan 2018-2022	Recommends subsidies for fortification inputs (i.e., procuring dossers, premixes, and to train staff) to ensure low-cost production of fortified foods. <sup>141</sup>
Regulatory Body	Description
Agriculture and Food Authority	Influences prices through regulatory oversight of commodity markets, but it does not typically impose direct price controls on fortified products. <sup>184</sup>
Ministry of Agriculture, Livestock, Fisheries and Cooperatives	Tracks and reports on price fluctuations of food products, including fortified wheat flour, for example. <sup>155</sup>

# Labelling and Health Claims

As with non-fortified food products, the labelling of fortified products is strictly regulated to ensure that consumers receive clear and reliable information about the nutritional benefits of fortified foods.<sup>185</sup> Those regulations and bodies specifically related to fortified products are outlined below.



Table 24. Policies and regulations on labelling fortified packaged foods

Policy	Description
Food, Drugs, and Chemical Substances Act (Cap 254)	Mandates compliance with safety and accuracy in labelling, prohibiting misleading health claims. <sup>93</sup>
Public Health Act (Cap 242)	Supports accurate labelling by ensuring safety standards for fortified foods. <sup>120</sup>
Fortification Mark of Quality	KEBS facilitates a voluntary process of certification, where companies can pay Kes. 10,000 per product to apply the KEBS Fortification Mark of Quality. <sup>186</sup>
Regulatory Body	Description
Agriculture and Food Authority (AFA)	Influences prices through regulatory oversight of commodity markets, but it does not typically impose direct price controls on fortified products. <sup>184</sup>
Kenya Bureau of Standards	Outlines labelling requirements for fortified products in line with Codex Alimentarius international standards, and issues the Fortification Mark of Quality. <sup>186</sup>

# Marketing

As with non-fortified foods, the marketing of fortified food products is regulated in Kenya to ensure accuracy and prevent misleading practices. Regulations and bodies directly related to fortified products are outlined below.

Table 25. Policies and regulations on marketing fortified packaged foods

Policy	Description
Food, Drugs, and Chemical Substances Act (Cap 254)	Ensures that all marketing claims are supported by scientific evidence and are not misleading. <sup>93</sup>
National Social Marketing and Communication Strategy for Food Fortification	A one-time effort to increase consumer awareness and demand for fortified foods. <sup>141</sup>
Regulatory Body	Description
Kenya Bureau of Standards	Sets guidelines for truthful representation of added nutrients and associated health benefits, aligning with international standards set by the Codex Alimentarius Commission.

# Social safety net programmes

Table 26. Social safety nets incorporating fortified foods

Policy	Description
National School Meals Program	Provides fortified foods through school meals to primary and secondary school children, enhancing the dietary quality and helping to address micronutrient deficiencies. <sup>187</sup>



Early Childhood Development and Education (ECDE) Centres	ECDE Centres supply children with fortified porridge in Turkana County. <sup>188</sup>
Porridge 4 Education Programme	Public-private partnership supplying schools with ready-to-eat liquid porridge fortified with 15 micronutrients including Vitamin A, C, E, Calcium, Zinc & Iron. 189

# **Food Industry Practices**

#### **Products**

In Kenya, it is mandatory to fortify certain packaged staple products, including salt (with iodine), maize and wheat flour (with vitamins A, B1, B2, B3, B6, B12, folic acid, iron and zinc), and edible fats and oils (with vitamin A) (see Policy section). H1,185 However, investigations into maize flour fortification by millers in Kenya found that not all millers were fortifying their products, or fortifying their products in line with regulatory standards. Hor instance, only 2% of 177 maize flour samples assessed met all regulatory requirements for three micronutrients that were assessed (iron, zinc and vitamin A). As a result, it remains unclear whether all staple foods under mandatory fortification regulation are meeting national standards. In response, the government has launched efforts to disseminate fortification guidelines to non-compliant millers. Additionally, the Millers for Nutrition group has committed to supporting these millers in achieving compliance. H1,192

Alongside mandatory regulations, some market-driven food fortification initiatives are apparent in Kenya. Evidence has been found that sugar is also being fortified with vitamin A, and dairy products such as milk and yoghurt are being fortified with fibre, and vitamins A and D. 149,150,193,194 Additionally, one study found that sugar, syrups, sweets and snacks are a source of minimal intake of folate, calcium, iron and zinc amongst Kenyan adults, but the study does not link this to fortification or use of ingredients that are inherently high in these micronutrients in these products. 195 It is therefore generally unclear from the existing literature whether other processed packaged foods are a routine vehicle for fortification by food & beverage manufacturers in Kenya, or whether food & beverage companies are using fortified staples as ingredients in their products. Evidence from other countries suggests that both practices are common. 196,197

#### **Product Healthiness**

Information about the overall healthiness of processed packaged foods and beverages (other than staple foods) that are fortified with vitamins and minerals has not been found in Kenya. It is mandated that the addition of vitamins and minerals to food and beverage products must follow Codex guidelines.<sup>185</sup> These guidelines do not stipulate that the underlying product must be of a high nutritional quality, but that the addition of vitamins and minerals must maintain or improve the healthiness of the product.<sup>198</sup>



## **Labelling Practices**

It is required by law that nutrient declarations are made on all pre-packaged foods for which nutrition and health claims are made, and all other pre-packaged foods with some exceptions. This includes information on vitamins or minerals for which a Nutrient Reference Value (NRV) exists and/or that are of nutritional importance in Kenya. The vitamin or mineral content must be  $\geq 5\%$  of the NRV per 100g/ml and be expressed in metric units and/ or as a % of the NRV or per 100g/ml or per package if a single serve." Products that meet this criteria are eligible for the Fortification Mark of Quality issued by KEBS, should manufacturers opt to apply for the label (see policy section).

Information on whether all food and beverage products are compliant with this regulation has not been found. One study indicated that consumers have come across fortification information on packaged product labels, but it is unclear whether these products were packaged staples or more highly processed packaged foods.<sup>142</sup>

# Use of Health Claims

Health and nutrition claims for vitamins or minerals that have a NRV must be supported by evidence (see Policy section). For example, a claim that a food is a "source of", "high in" or "very high in" a vitamin or mineral must meet a specific percentage of the NRV for that vitamin or mineral Comparative claims such as "increased iron" must be made in reference to a different version of the same or similar product. Additionally, all claims must be supported by a nutritional breakdown that explains the basis of the claim, such as "meets the criteria for a 'source' claim as above". 185

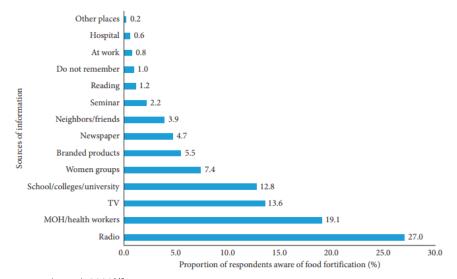
Although studies indicate that on-pack information plays a key role in shaping consumer purchasing behaviour for fortified foods, there is no available information on whether companies in Kenya are specifically making health and nutrition claims related to micronutrients – or whether such claims meet labelling requirements.<sup>142,144</sup>

#### Marketing

Generally, there is low awareness amongst consumers on health benefits of fortified foods in Kenya. A 2020 study assessing Kenyan consumers' awareness of fortified food products mapped key channels through which consumers accessed information about fortification (see Figure 8). Broadcast media such as radio and TV were the most common sources, followed by print media, product packaging, social media, word of mouth, and educational programmes. 142,144



Figure 8. Kenyan consumers' sources of information on food fortification



Source: Linda et.al, 2020<sup>142</sup>

However, information on how the food industry markets fortified processed packaged products in Kenya has not been found in the existing literature, suggesting a key research gap.



# CONCLUSION

The nutrition transition in Kenya – from traditional diets rich in fresh, minimally-processed staple foods to increased consumption of packaged processed foods and beverages, particularly less healthy varieties – is well underway. Tracking this shift is essential for shaping policies and interventions aimed at preventing overweight, obesity, and dietrelated diseases, which affected 10.8% and 21.1% of the adult population, respectively, in 2022.<sup>199,200</sup>

This report maps the existing literature on consumption patterns, market structure, policy and regulation, and food industry practice that influence both packaged, processed foods and fortified packaged processed foods in Kenya. A growing body of research addresses dietary diversity and the consumption, sale, and regulation of fresh and staple foods – such as fruits, vegetables, and fortified wheat and maize flour – which are crucial in addressing hunger, undernutrition and micronutrient deficiencies in Kenya.

However, there is a relative gap in studies focusing on the production, fortification, distribution, sale, and consumption of packaged processed foods, as well as their effects on diets in Kenya. The national public health agenda has recently expanded to include measures to prevent obesity and diet-related diseases. These include the introduction of the KNPM and proposed mandatory FOP labelling. Following this policy shift, research examining the role of processed packaged food manufacturers and distributors in shaping the food environment in Kenya has begun to emerge. APHRC has published studies on consumer responses to different varieties of FOP labelling schemes, marketing to children, and the role of supermarkets in promoting and selling ultra-processed foods.

At the March 2025 Nutrition for Growth (N4G) Summit in Paris, the Kenyan government made three policy commitments to strengthen the national food environment: (1) mandatory FOP labelling; (2) restriction on marketing 'less healthy' foods to children; and (3) fiscal policies to promote healthy diets.<sup>5</sup>

Further research is needed to support evidence-informed policymaking that fosters healthier food environments in the context of Kenya's ongoing nutrition transition. Priority research areas include the healthiness of packaged processed foods available on the market; the impact of food and beverage companies' marketing and labelling practices on consumption patterns of processed packaged foods; and whether less healthy processed packaged foods are being used as vehicles for fortification.



# RECOMMENDATIONS

The recommendations outlined below for policymakers, companies and research institutions are informed by gaps identified in this mapping exercise.

### Policymakers are encouraged to:

- Use the KNPM to inform policies that support a healthier food environment, focusing on:
  - Mandatory FOP warning labelling to inform consumers about the healthiness of packaged processed foods (as successfully implemented in several Latin-American countries);
  - Restrictions on the marketing of "less healthy" packaged processed foods to children;
  - Public procurement of appropriate food products for school feeding programmes and other public distribution channels;
  - Fiscal measures that favour the sale and consumption of "healthier" packaged processed products;
  - o Expanding labelling regulations for health and nutrition claims to specify that such claims may only appear on labels of 'healthy' products.
- Develop a policy specifically for the fortification of packaged processed foods, including:
  - o Use of fortified staple foods as ingredients in these products;
  - Identification of packaged processed products and/or product categories eligible for fortification;
  - o Determination of fortification methods (e.g. use of fortified ingredients and/or premixes), as well as minimum and maximum micronutrient levels;
  - o Labelling requirements for fortified packaged processed foods, such as limiting use of the KEBS fortification mark to "healthy" products only.
- Consider additional policy measures, such as:
  - Establishing reformulation targets to help guide and standardize industry efforts to reduce levels of nutrients of concern such as salt, fats and sugar in packaged processed products;
  - Adapting the existing watershed period for marketing to children on broadcast channels to include nutrition criteria for advertisements of food & beverage products.
  - Engaging in regional dialogue with other members of the East Africa Community to discuss alignment around a common NPM that can be used to inform other policy measures (such as front-of-pack labelling, marketing to children, health and nutrition claims, and SSB taxes).
  - Strengthen multi-stakeholder collaboration and coordination at national and sub-national levels.



### Research institutions and academia are encouraged to:

- Use the KNPM to standardize definitions for healthy packaged processed foods and beverages to enhance the clarity and comparability of research findings and support more informed decision-making for policy and industry.
- Commission research on the share of packaged processed foods in diets of Kenyans and factors affecting the consumption of packaged processed foods & beverages in Kenya, including their availability, affordability, marketing and labelling.
- Conduct research into the role of informal and formal retailers in distributing processed packaged foods to consumers.
- Investigate whether processed packaged foods (both 'healthy' and 'less healthy' according to the KNPM) are being used as vehicles of fortification in Kenya, and whether fortification-related claims are used to promote the consumption of "less healthy" products.

### Food and beverage companies are encouraged to:

- Develop and publish a clear nutrition strategy detailing how the company integrates nutrition into its commercial operations in Kenya.
- Adopt nutrition criteria aligned with the voluntary KNPM to measure and report on the healthiness of their product portfolios.
- Establish strategies to increase sales of healthier products relative to less healthy ones, using pricing, distribution, and marketing investments.
- Commit not to fortify products unless they meet nutrition criteria, such as the KNPM.
- Develop and publish a strategy to deliver more affordable healthy products that are accessible to all consumers, including low-income groups.
- Develop and publish a comprehensive responsible marketing policy that covers all media channels and audiences, including not to market 'less healthy' products for children under the age of 18.
- Adopt and publish a comprehensive nutrition labelling policy that aligns with voluntary FOP labelling standards as set out by the MoH and KEBS.



# **ANNEX A**

The focus of this report was informed by consultations with a wide range of stakeholders specializing on the topic of healthy food environments in Kenya. The report has been reviewed by ATNi's partners, APHRC and the Kenyan government's Ministry of Health.

In 2024, a multi-stakeholder workshop was convened in Nairobi to support ATNi's work in Kenya, including the development of this food environment mapping report. The workshop brought together a diverse group of nutrition experts from government, academia, civil society organizations, non-governmental organizations, and research institutes. The participating organizations included:

- Action Against Hunger
- African Population and Health Research Centre
- Alliance for a Green Revolution in Africa
- Cereal Millers Association
- Competition Authority of Kenya
- Consumer Information Network
- FAO Kenya
- Global Alliance for Improved Nutrition
- International Food Policy Research Institute
- Jomo Kenyatta University of Agriculture and Technology
- Kenya Bureau of Standards
- Kenya Consumer Organization
- Kenya National Bureau of Statistics
- Micro-Enterprises Support Programme Trust
- Ministry of Agriculture, Livestock and Fisheries
- Ministry of Health, Division of Nutrition and Dietetics
- Ministry of Trade
- Moi University
- Nutrition International
- Sanku
- Save the Children
- Scaling Up Nutrition
- TechnoServe Kenya
- UNICFF
- United Grain Millers Association
- University of Nairobi
- USAID
- World Food Programme



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