KENYA MARKET ASSESSMENT 2025

Methodology

June 2025

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Foreign, Commonwealth & Development Office

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ABBREVIATIONS

ATNi	Access to Nutrition initiative
CEO	Chief Executive Officer
EMI	Euromonitor International
ESG	Environmental, Social, Governance
F&B	Food and Beverages
FAO	Food and Agriculture Organization
FEMR	Food Environment Mapping Report
FOP	Front-of-Pack
FOPNL	Front-of-Pack Nutrition Labelling
FVNL	Fruits, Vegetables, Nuts, and Legumes
HSR	Health Star Rating System
iTFA	Industrially produced Trans Fatty Acids
KES	Kenyan Shilling
KPI	Key Performance Indicators
KNPM	Kenyan Nutrient Profile Model
LSFF	Large-Scale Food Fortification
NCD	Non-communicable disease
NPM	Nutrient Profile Model
SOP	Standard Operating Procedure
TFA	Trans-Fatty Acids
TGI	The George Institute
USD	US Dollars
WFNA	Workforce Nutrition Alliance
WHO	World Health Organization

TABLE OF CONTENTS

1 INTRODUCTION

This document sets out the rationale, process, and methodology for the first Kenya Market Assessment consisting of two elements: the Corporate Profile and the Product Profile.

PURPOSE AND SCOPE

The Kenya Market Assessment assesses 30 of the largest food and beverage (F&B) manufacturers in Kenya – representing approximately 57% of the Kenyan F&B market – on the nutritional quality of their portfolios in Kenya, referred to as the 'Product Profile.' In addition, 12 companies (representing approximately 44% of the Kenyan F&B market) were assessed on their policies, commercial practices, and transparency, beyond regulatory requirements, on a range of nutrition-related topics and their impact on consumers' diets, referred to as the 'Corporate Profile.' For further information on selected companies, see Annex A and Annex B.

This forms part of the ATNi (Access to Nutrition initiative) East Africa Market Assessment project, which also includes a similar assessment of the largest F&B manufacturers in Tanzania and a food environment report for both countries. Through this project, ATNi seeks to challenge the food industry, investors, and policymakers to shape healthier food systems. Our goal is to translate data into actionable insights that will drive partnerships, innovation, and market change, ensuring more people have access to nutritious and affordable food.

RATIONALE FOR THE KENYA MARKET ASSESSMENT

In recent decades, Kenya has undergone a nutrition transition. Multiple factors including economic development, urbanization, globalization and the growth of modern retail, including supermarket and fast-food outlets, have led to increased availability and consumption of processed, energy-dense foods (high in fat, salt and sugar). Notably, in the last decade, at least 8.1% of Kenyan consumers' total calories now come from 'ultra-processed' packaged foods.[1]

In Kenya, these trends contribute to a complex nutrition landscape characterized by the coexistence of multiple forms of malnutrition. Currently, an estimated 27.8% of the Kenyan population is undernourished, while 10.8% of adults are living with obesity, and micronutrient deficiencies continue to be prevalent amongst women and children.[2] Malnutrition poses a substantial risk for children under five, with 18.4% of children in Kenya having stunting, and 4.9% wasting.[3] There is growing evidence that the consumption of packaged foods and beverages high in sugar, sodium, and saturated fat, and often at the expense of foods with higher fibre and micronutrient content, is associated with adverse health outcomes.

The F&B industry has a critical role to play in increasing the availability of nutritious and affordable food and shaping healthier food environments. In order to align business with the goals of the food systems transformation agenda, transparency and accountability of company performance is key. For the private sector to play its part, we need consensus on what is expected of companies, in addition to insights into actual performance. Further transparency helps governments, policymakers, investors, civil society, and consumers to hold these companies to account.

AIM AND OBJECTIVES

The Kenya Market Assessment 2025 provides insights and data on Kenyan food manufacturers' nutrition-related commitments, policies, and disclosure, as well as performance metrics, including the healthiness of and presence of micronutrients within their portfolios.

ATNi's purpose is to develop and deliver tools that:

- Track the relative contribution of the F&B industry in addressing the global nutrition challenges of overweight and obesity, undernutrition, micronutrient deficiencies, and all diet-related diseases;
- Are used by food systems stakeholders to hold companies to account for delivering on commitments to tackle these challenges;
- Provide specific recommendations for companies on how they can improve, highlight positive and negative developments, and identify their best practices on nutrition-related topics that other companies can emulate.

The ultimate aim of ATNi's indexes and company assessments is to encourage companies and the wider sector to take robust action to improve the diets of adults and children around the world. For the Kenya Market Assessment, achieving this involves multiple objectives:

- The Government of Kenya uses this information to support the development of policies and regulation where necessary, and advocate for nutritious food production at the national level;
- Companies use this information to improve the healthiness of their packaged foods portfolios,including fortified foods;
- Companies use this information to improve their nutrition policies, practices, and disclosure;
- Companies use this information to improve the quality assurance and quality control procedures for their fortified products, and consider product formulations with micronutrients to address deficiencies in Kenya;
- Investors and shareholders of the companies assessed use this information to engage with companies to improve their practices;

LIMITATIONS

- The assessment uses the same framework to assess a range of companies with very different features, most notably with regards to differences between multinational and Kenya-headquartered companies. The companies included in this assessment also vary considerably in terms of portfolio types, size, market presence, and ownership structure. Some indicators will naturally have greater or lesser applicability to certain companies than others. ATNi has sought to address this by including the option to make certain indicators 'Not applicable' for certain companies as well as ask for specific evidence for policy implementation in Kenya.
- A substantial part of the assessment analyzes companies' commitments and self-reported performance. Without independent verification, it was not feasible for ATNi to perform independent, on-the-ground assessments of companies' practices across all topics. It is assumed that all publicly reported and privately disclosed data is accurate, and for many indicators ATNi also requires companies to provide evidence to substantiate their statements. Further, due to resource constraints, ATNi was not able to include further independent performance assessment such as on levels of processing, marketing to children or product affordability, which could be included in future.

- The true performance of non-engaging companies, or companies with limited engagement, may not be fully captured, as in this case, only publicly available information could be used to conduct the assessment. The results of the assessment therefore may not provide a full representation of the companies' nutrition-related activities. Time constraints may also limit the amount of evidence that companies can share.
- The research does not assess other corporate issues of policy and practices of F&B manufacturers which might affect public health or sustainability more broadly, including 1) environmental sustainability; 2) corporate tax abuse; 3) corporate wealth and income distribution; and 4) country-specific food lobbying practices
- This is the first edition of the East Africa Market Assessment conducted by ATNi, and as such, it is not currently possible to analyze improvement over time. The assessment acts as a baseline from companies' which progress can be tracked.
- Product Profile: For a full explanation of the limitations for the Product Profile assessment, please refer to the full Product Profile report.[4]

ABOUT ATNi

ATNi is a global foundation that actively challenges the food industry, investors, and policymakers to shape healthier food systems. Its mission is to transform markets so that, by 2030, at least half of companies' F&B sales are derived from healthy products.

ATNi analyzes and translates data into actionable insights, driving partnerships and innovations for market transformation so that all people have access to nutritious and sustainable food. With its tools, partnerships, and policy work, the organization aims to shine a light on nutrition-related corporate practice, policy, and food products, and have its data and analyses used by responsible investors, policymakers, civil society organizations, and industry leadership.

As of November 2024, ATNi's work is supported by over 88 institutional investors that manage over USD 21 trillion assets under management. They use ATNi's research in their investment research and engagements with companies in which they are shareholders, to encourage improved performance on nutrition to contribute to long-term shareholder value. More information can be found in ATNi's Investor Expectations on Nutrition, Diets, and Health.[5]

To preserve its independence, ATNi does not accept funding from companies it assesses or the wider F&B industry. It is overseen by an independent unpaid board and is funded, among others, by the Gates Foundation and the UK Foreign, Commonwealth and Development Office. More information about ATNi's governance and operating policies is available online.[6]

2 RESEARCH APPROACH

Corporate profile: The Corporate Profile methodology uses the 2024 ATNi Global Index methodology as a basis with significant adaptions to the Kenyan context, as well as a reduction in the number of indicators from 46 to 23. This process was informed by one-on-one consultations with relevant stakeholders and experts (see Annex C), insights from the Kenya Food Environment Mapping Report (2024), literature reviews, and the latest guidance from authoritative public health bodies. Lessons from previous ATNi index iterations were drawn upon where relevant. See Section A for further information.

Product Profile: To assess the healthiness of the 30 companies' portfolios, four nutrient profiling models (NPM) were used:

- The Health Star Rating (HSR), to assess the healthiness of F&B manufacturers' product portfolios to allow comparability with similar assessments in other geographic contexts;
- The modified HSR Model with micronutrients (mHSR + micronutrients), which accounts for levels of 6 micronutrients relevant for public health (developed by ATNi in collaboration with The George Institute (TGI);
- The World Health Organization (WHO) AFRO model, which was developed to assess eligibility of food and non-alcoholic beverage products to be marketed to children in the African region;
- The recently developed Kenyan Nutrient Profiling Model (KNPM), developed for front of pack labelling, which has specific relevance for the Kenyan diet.

See Section B for further information.

RESEARCH PROCESS

For the Corporate Profile, companies are provided access to the survey in an online data gathering platform and are invited to submit a response and evidence for each indicator. Information provided for each indicator can be either publicly available or shared confidentially. This is reviewed by ATNi researchers to make a preliminary assessment, after which companies have a second opportunity to provide additional information and address any clarification questions. Engagement in the assessment is voluntary. For non-engaging companies, the researchers check for information available on the companies' public domains.

For the Product Profile, ATNi prepares the company Product Profile sheets using information collected during previous Product Profile assessments and complements this with product nutrient information from data gathering platforms such as Innova Market insights. Companies are requested to review this information.

The Product Profile analysis is conducted by TGI. Companies have the opportunity to review data and make additions or corrections about their product range, and input any missing nutritional data. Products were categorized according to Euromonitor International (EMI) categories, and scores for HSR, mHSR + micronutrients, WHO AFRO NPM and KNPM were sales-weighted using EMI subset sales estimates.

For this assessment, the Corporate Profile and Product Profile components are unscored.

3 SECTION A: CORPORATE PROFILE

The Corporate Profile methodology assesses companies' nutrition-related policies, practices, and disclosures related to their commercial activities in promoting good nutrition for all – including preventing and tackling overweight, obesity, and diet-related diseases; undernutrition; and micronutrient deficiencies. These are assessed across the following topics:

- Developing clear and cohesive strategies to address nutrition through their commercial operations, report on their progress, and formalize this through robust governance mechanisms;
- Improving the nutritional quality of their product portfolios;
- Improving their pricing of healthy products;
- Marketing their products responsibly, especially to children;
- Supporting their employees to achieve a healthy diet and support breastfeeding mothers;
- Labelling their products effectively to help consumers choose healthy options.

METHODOLOGY DEVELOPMENT

ATNi's Global Index methodology 2024 was used as a basis for development of the framework for the Kenya Corporate Profile assessment. The Global Index is ATNi's flagship publication and is continuously updated based on literature reviews, stakeholder consultations, and the latest guidance from authoritative public health bodies, and was rigorously reviewed by ATNi's Expert Group over the past five editions. The most recent iteration (2024) includes six thematic categories - Governance, Products, Affordability, Marketing, Workforce and Labelling - which assess companies' nutrition-related performance, commitments, and disclosures and refers to voluntary guidelines for industry's best practices regarding nutrition.

The framework was substantially revised to increase its relevance to the Kenyan nutrition context and appropriateness for the companies selected. ATNi's Kenya Food Environment Mapping Report was used to inform the development of the methodology, ensuring it reflects the specific context of Kenya's food environment—including market structure, regulatory and policy environment for manufacturers, consumer consumption patterns, and the F&B industry's role in providing nutritious options.

Finally, the methodology was presented to the Kenya healthy diets working group and various other important nutrition stakeholders including government, academia, industry associations, CSOs and NGOs for feedback.

This is the first iteration of the Kenya Corporate Profile assessment, which was developed to gain a baseline understanding of Kenyan companies' publicly available nutrition information. The survey for this assessment has therefore been shortened from 46 indicators in the Global Index methodology to a total of 23 unscored indicators (**see Annex A for more information**).

Table 1. Summary list of Corporate Profile categories

Thematic Area	Category	Number of Indicators
Product Healthiness	**Portfolio Improvement:** Macronutrients and Food Components	6
	Portfolio Improvement: Micronutrients and Fortification	3
	Reporting on Healthiness	2
Influencing Consumers	**Affordable Nutrition**	2
	Responsible Marketing	3
	Responsible Labelling	2
Corporate Governance	**Nutrition Governance**	3
	Workforce Nutrition	2

Company Selection

The twelve F&B companies were selected for inclusion in the Corporate Profile assessment using EMI's retail sales estimates for the year 2022. Other inclusion criteria such as local business ownership, product portfolio diversity, availability of a company website, and portfolio relevance to Kenyan diet were also considered.

The selection was supported by information on market share sourced via desk research and stakeholder consultations. ATNi has consistently used this approach to select companies for inclusion in its indexes over the previous ten years.

Assessment Approach

ATNi begins by sending a letter to the Chief Executive Officer (CEO) of the selected companies and conducting an introductory meeting to introduce the companies to ATNi and the project. Companies are informed that engagement in the assessment is voluntary, and they will be assessed on publicly available information if they choose not to engage.

For the Corporate Profile assessment, ATNi uses an online assessment platform called Probench to collect company inputs. ATNi's assessment process involves two rounds of company engagement. In the first, companies are provided access to the survey on Probench and are invited to submit a response and evidence for each indicator. This is reviewed by ATNi researchers to make a preliminary assessment, after which companies have a second opportunity to provide additional information and address any clarification questions.

> **Assurance of non-disclosure/confidentiality**
>
> ATNi has a strict data protection policy. The platform 'Probench' ATNi uses to collect data for the Corporate Profile assessment is protected, ensuring that companies' submitted information is safe and protected within the platform. Companies receive individual accounts for their assessment which only staff who have log in details can access. In addition, ATNi offers companies the option of a non-disclosure agreement for both the purpose of submitting data for the Product Profile and Corporate Profile assessment.

Companies are assessed both on publicly available information, as well as internal information that they choose to provide during engagement. Companies are only assessed on areas where they go beyond existing regulatory requirements. ATNi does not assess compliance with regulation or the law. No on-the-ground data collection or verification checks are involved.

Data Analysis and Reporting

Once the Corporate Profile assessment process is completed, each assessment is peer reviewed by another member of the research team to ensure that assessments are consistent, accurate, and unbiased. After this, the information is used to develop eight report chapters and individual company result cards, which including what was found and recommendations for the company. Prior to publication, companies are provided the opportunity to review written information, for the specific purposes of confirming accuracy and that information is suitable for publication and not confidential.

Statements in the report and company result cards which are about the lack of information/evidence in the public domain are carefully worded to avoid implying that the company does not have a specific policy, strategy, or target. Rather, the statements indicate that while these policies, strategies or targets may exist internally, they are not published publicly in a report, on a public website or on an online platform. These could not be reviewed during the research period, nor were they shared with ATNi during that research period.

Disclosure Level

To encourage companies to be transparent about their commitments, policies, and activities, enable greater scrutiny by stakeholders, and enhance accountability, ATNi applies a 'disclosure level' to certain indicators. These indicators are identified by the 'page' symbol (shown on the left).

The disclosure level measures how transparent the company is about commitments/policies and activities, i.e. the extent to which the information scored in the indicator is available on the company's public domain (i.e. own website(s) and reports).

Fully
Partially
No
Not applicable

Notes on use:

- 'Fully' is selected when all necessary information is on the public domain.
- If some information is publicly available but key details are based on internal documentation provided by the company during engagement, 'Partially' is selected.
- If information used to assess the indicator is publicly available on the websites/reports of third-party organizations (such as industry associations or initiatives), 'Partially' is selected. If the third-

party source is an online news site/magazine etc., ‘No’ is selected. If information is only shared with ATNi and is not available in the public domain, ‘No’ is selected.

- If a multinational company provides evidence on their global policies and activities, but without stating how this applies to Kenya specifically, ‘Partially’ is selected.
- ‘Not applicable’ is selected if the company does not receive a score for the relevant indicator.

PORTFOLIO IMPROVEMENT: MACRONUTRIENTS AND FOOD COMPONENTS

No.	Indicator Question	Answers
1.	Is there a target in place to reduce levels of salt/sodium across its applicable portfolio, and is it specific, measurable, and timebound? (Check all that apply)	**a.1** Target to increase alignment with WHO global sodium benchmarks, for all relevant product categories
		a.2 Target to increase alignment with WHO global sodium benchmarks, for some relevant product categories
		a.3 Target not aligned with WHO global sodium benchmarks, for all relevant product categories
		a.4 Target not aligned with WHO global sodium benchmarks, for some relevant product categories
		b. The target is specific and measurable
		c. The target is timebound
		d. No target/no information
		e. Not applicable

Scoring Guidance

Only one **answer 'a'** option can be selected.

Answer 'a' targets can be % of products, % of sales, or relative amounts of sodium. Examples targets:

- By 2028, 80% of products meet the WHO sodium benchmarks;
- Increase the proportion of products meeting the WHO sodium benchmarks by 60% by 2026;
- Reduce sodium content by an average of 15% across all product categories by 2027.
- To be credited with answer options **'a.1' or 'a.2'**, the same product sub-categories defined in the WHO sodium benchmarks must be used.

To be credited for **answer 'b'**, 'specific and measurable', the target should involve either:

(1) specific nutrition criteria or thresholds (per g/ml/kcal, or per serving (where serving sizes are publicly available)) for certain product groups/categories, or specifies a portfolio (mean) target value), (i.e. If the company commits to meeting an absolute measure (e.g., the WHO sodium benchmarks), then this can be credited); or
(2) relative reduction criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).
(3) Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.

<table>
<tr><td></td><td colspan="2">To be credited for answer 'c', timebound', a baseline and target year must be set e.g., an X% reduction in salt by 2025 (from 2020 levels).

For dairy products, a salt/sodium target is only relevant for products with added salt.

'e. Not applicable' can be selected if the company's portfolio does not typically contain salt/sodium (e.g. non-dairy beverages). This results in this indicator being removed from the total score for this category.</td></tr>
<tr><td></td><td colspan="2">Rationale

Kenya's National Dietary Guidelines recognize that diets high in sodium are associated with an increased risk of non-communicable diseases (NCD) such as hypertension, cardiovascular disease and stroke.[7] As part of its efforts to drive progress in reducing sodium intake in the global population, the WHO has established global benchmarks for sodium levels in foods across different food categories.[8]The WHO recommends a daily consumption of <5g of salt (i.e. <2g of sodium) for adults. Further, WHO Member States including Kenya have agreed to strive for a reduced intake of salt at the global population level by a relative 30% by 2025. However, average sodium intake in Kenya in 2022 was estimated to be double the WHO-recommended amount. Industry is encouraged where it is possible to limit use of salt as an ingredient and improve accessibility and affordability of low salt products.

To make both the company's portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</td></tr>
<tr><td rowspan="7">2.</td><td rowspan="6">Has the company eliminated (or reduced in line with the WHO recommendation) industrially produced trans fats (iTFA) from its applicable portfolio (applicable to all relevant product categories)?</td><td>a. Yes, AND provides information about its processes to prevent the presence of iTFA in relevant products</td></tr>
<tr><td>b. Yes, without providing information about its processes to prevent the presence of iTFA in relevant products</td></tr>
<tr><td>c. No, but the company has a time-bound target in place to eliminate (or limit in line with the WHO recommendation) for all relevant product categories</td></tr>
<tr><td>d. No, but the company has a time-bound target in place to eliminate (or limit to the WHO recommendation) for some relevant product categories</td></tr>
<tr><td>e. No statement or target/no information</td></tr>
<tr><td>f. Not applicable</td></tr>
<tr><td colspan="2">Scoring Guidance

Product categories with a high risk of containing iTFA include baked goods, confectionery, dairy, ice-cream/frozen desserts, ready meals, savoury snacks, sweet biscuits, snack bars, fruit snacks, sweet spreads and additives e.g. flavorings and emulsifiers. To be credited with answer 'a' or 'b,' the company should have a clear public or internal statement that iTFA have been eliminated from</td></tr>
</table>

its full product portfolio or limited to <2g iTFA per 100g of fats and oils (as per the WHO recommended threshold). Alternative terms to iTFA/trans fats such as 'partially hydrogenated oils' (PHOs) and 'partially hydrogenated cooking oils' are accepted.

To be credited with **answer 'a,'** the company should also have a statement, policy, or evidence of the measures it has in place to control for iTFA and prevent it from re-entering its portfolio. This should specifically mention products sold in Kenya, or if relevant cover all markets in which products are sold. This can be, for example, a supplier specification (showing monitoring of purchasing ingredients not containing iTFA, PHOs, etc.), or Standard Operating Procedure (SOP) document(s).

'f. Not applicable' can be selected if the company's portfolio does not contain products from categories with a risk of iTFA ingredients e.g. beverages such as juices, carbonated sodas or food products such as flour, canned meat, fish, fruits, etc.,) or where trans-fatty acids (TFA) is most likely coming from ruminant sources e.g., dairy and meat. This results in this indicator being removed from the total score for this category.

Rationale

Intake of TFA is associated with increased risk of heart attacks and death from heart disease. TFA are semi-solid to solid fats which occur in two forms: iTFA and naturally occurring TFA (ruminant). iTFA can form at low levels during oil refining processes, and therefore can be produced during product manufacture or be present in sourced ingredients (supply side). A study found that limiting their intake could save 2,000 lives and prevent 17,000 cases of heart disease over the next 10 years and could lead to a net saving of 40 million USD (~4.1 billion KES) to the Kenyan healthcare system. Therefore, companies should have a statement, policy, or evidence of measures in place to control for iTFA, such as supplier specification (showing monitoring of purchasing ingredients not containing iTFA, PHOs etc.), or SOP document(s).

In 2018, WHO launched the REPLACE initiative, calling on countries and industry to eliminate iTFA globally by 2023.[9,10] Kenya is noted on WHO's TFA Country Score Card as having a national policy commitment to eliminate TFA in the food supply, and consistent with this, Kenya's National Dietary Guidelines recommend that consumers avoid processed foods containing TFA.[7,11] In 2019, 11 members of the International Food and Beverage Alliance signed a commitment stating their intention to voluntarily limit iTFA to below 2g per 100g fats and oils in their products worldwide. ATNi's interim assessment of companies' progress toward their commitment between 2021-2022, covering eight iTFA-associated product categories across fourteen markets found that progress is uneven across food categories, companies, and markets. Relatively high TFA levels were observed in countries with no known measures or with limited complementary measures in place to monitor or control TFA in the supply chain.

3.	Has the company set a target to reduce levels of saturated fats across its applicable portfolio, and is it specific, measurable, and timebound? (Check all that apply)	**a.1** Yes, for all relevant product categories
		a.2 Yes, for some but not all relevant product categories
		b. Specific and measurable
		c. Timebound
		d. No/no information

<table>
<tr><td></td><td></td><td>e. Not applicable</td></tr>
<tr><td></td><td colspan="2">Scoring Guidance

Only one answer 'a' option can be selected. Targets can be either in terms of % of products, % of sales, or relative amounts of saturated fats.

To be credited for answer 'b,' 'specific and measurable', the target should involve either:
(1) specific nutrition criteria or limits (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value, i.e. If the company commits to meeting an absolute measure, then this can be credited; or
(2) relative reduction criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).
(3) Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.

To be credited for answer 'c,' 'timebound', a baseline and target year must be set: e.g., an X% reduction in saturated fats by 2025 (from 2020 levels).

'e. Not applicable' can be selected if the company's portfolio does not typically contain saturated fats (e.g., beverages such as carbonated sodas, juices, canned foods like beans, lentils or pulses, wholegrains or fruits, nuts, and vegetables). This results in this indicator being removed from the total score for this category.</td></tr>
<tr><td></td><td colspan="2">Rationale

Diets high in saturated fat are associated with an increased risk of NCDs such as diabetes, hypertension, and cardiovascular disease. To reduce the risk of unhealthy weight gain, WHO suggests that adults limit total fat intake to 30% of total energy intake or less.[12] Fat consumed should be primarily unsaturated fatty acids, with no more than 10% of total energy intake coming from saturated fatty acids. The WHO suggests further reducing saturated fatty acid intake to less than 10% of total energy intake (a further reduction to <5% has additional health benefits). Consistent with Kenya's National Dietary Guidelines, average saturated fat intake in Kenya was estimated to be less than the WHO-recommended amount in 2022.[7] Nonetheless, to ensure that Kenyan diets continue to comply with these thresholds as the dietary transition unfolds, WHO recommends replacing saturated fatty acids in the diet with polyunsaturated fatty acids, monounsaturated fatty acids from plant sources, or carbohydrates from foods containing naturally occurring dietary fiber, such as whole grains, vegetables, fruits and pulses.

To make the company's portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</td></tr>
<tr><td rowspan="3">4.</td><td rowspan="3">Has the company set a target to reduce levels of free/total sugars (or added sugars) across its applicable portfolio,</td><td>a.1 Yes, for free/total sugars, for all relevant product categories</td></tr>
<tr><td>a.2 Yes, for free/total sugars, for some but not all relevant product categories</td></tr>
<tr><td>a.3 Yes, for added sugars, for all relevant product categories</td></tr>
</table>

	and is it specific, measurable, and timebound? (Check all that apply)	**a.4** Yes, for added sugars, for some but not all relevant product categories
		b. Specific and measurable
		c. Timebound
		d. No/no information
		e. Not applicable

Scoring Guidance

Only one **answer 'a'** option can be selected.

According to the WHO, 'Free sugars' refer to all sugars added to foods and beverages by the manufacturer as well as naturally occurring in honey, syrups, fruit juices and fruit juice concentrate, while 'total sugar' also includes intrinsic naturally occurring sugars (e.g. part of the cell structure of fruits and vegetables).[13] The term 'Added sugar' typically excludes those naturally occurring in honey, syrups, fruit juices and fruit juice concentrate.

If the company's target relates to 'sugar' and does not specify which definition of sugar it uses, it will be assumed to mean 'added sugar' ('**a.3'/'a.4'**).

To be credited for **answer 'b,'** 'specific and measurable', the target should involve either:

(1) specific nutrition criteria or limits (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value), i.e. If the company commits to meeting an absolute measure, then this can be credited; or
(2) relative reduction criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).
(3) Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.

To be credited for **answer 'c,'** 'timebound', a baseline and target year must be set: e.g., an X% reduction in sugar by 2025 (from 2020 levels).

Rationale

Diets high in sugar are associated with unhealthy weight gain, tooth decay and an increased risk of NCDs such as diabetes, hypertension, and cardiovascular disease. As such, Kenya's National Dietary Guidelines recommend that consumers limit their intake of sugar.[7]

The WHO and its Regional Office for Africa urge countries to reduce sugar consumption among adults and children. WHO guidelines released in 2015, recommend a daily free sugar intake of <10% of total energy intake.[13] However, the average consumer's intake of sugar in Kenya was estimated to far exceed this threshold in 2022.

Industry is encouraged where it is possible to limit use of 'free sugars', which includes sugars naturally occurring in honey, syrups, fruit juices and fruit juices in concentrate (which contributes to negative health outcomes in the same way as 'added sugar') as an ingredient and reformulate products to reduce levels of free sugars in companies' portfolios.

To both make the company's portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.

5.	Does the company provide quantitative evidence of making progress on sodium, saturated fat, and/or free/total sugar reduction across its applicable portfolio within the last 3 years?	**a.** Yes, for all relevant product categories
		b. Yes, for some but not all relevant product categories
		c. Yes, for specific products only
		d. No/no information

Scoring Guidance

To be credited with **answer 'a'** the company should report quantitatively on (or share evidence of) saturated fat, sugar, and/or sodium reduction either at the portfolio level, or at the category-level for all relevant categories. If evidence is provided for some, but not all relevant product categories, **answer 'b'** is selected.

Reporting/evidence can either be year-on-year or relative to a baseline year but must show progress to be credited. Examples can include:

- X% reduction in free sugar levels across the category/portfolio;
- Y% of products meeting maximum sodium thresholds;
- Z% of products which have achieved X% reduction in saturated fat levels.

If the company only provides examples of specific products for which it has reduced sugar, saturated fat, and/or sodium levels, **answer 'c'** is credited, unless it/they can be shown to constitute more than 20% of the company's sales.

The reporting of illustrative statistics (e.g. "1 million tons of sugar removed…") will not be credited.

Reporting progress should be per nutrient, rather than a combined statistic.

Rationale

Kenya's National Dietary Guidelines recognize that diets high in sugar, saturated fat, and sodium are associated with an increased risk of NCDs, including diabetes, hypertension, cardiovascular disease, and stroke.[7] Consistent with WHO recommendations, the Guidelines urge consumers to reduce sugar, saturated fat, and sodium consumption. The WHO recommends a daily free sugar intake of <10% of total energy intake, limit total fat intake to 30% of total energy intake or less, and less than <5g of salt (i.e., <2g of sodium) for adults. Kenyan consumers' intake of these nutrients of concern were estimated to be higher than the suggested amount for all but total fat in 2022, showing the need to further reduce their consumption through promoting healthy diets.

		It is important that companies systematically track and publicly report on their progress in reducing levels saturated fat, sugar, and salt across their portfolios. Doing so helps drive results within the company and enhances accountability, both internally and externally. Quantitative measurement and reporting are important as it presents a more comprehensive and credible picture of the company's overall progress: while reductions at the product level are important, tracking/reporting at the category/portfolio level shows the relative impact of product-level reductions. For sugar, it is also important that companies measure in terms of 'free sugars', as per WHO guidelines, since this definition is more comprehensive.	
6.		Has the company set a target to increase the use of wholegrains, fruits, vegetables, nuts, and/or legumes (FVNL) in its portfolio, and is it specific, measurable, and timebound? (Check all that apply)	**a.** Yes, specifically for unprocessed (or minimally processed) FVNL and/or whole grain products (containing >25% wholegrains) **b.** Specific and measurable **c.** Timebound **d.** No/no information found **e.** Not applicable

Scoring Guidance

The target only needs to address at least one part of 'FVNL' and or 'Wholegrains' to be selected. Targets could be in terms of the number of products in its portfolio meeting an FVNL and or Wholegrains definition, sales value or volume of such products, or average levels of FVNL and or Wholegrains across product categories/portfolio.

Fruit, vegetables, nuts and legumes

The company must clearly define 'FVNL' levels/portions. This could also include pickling and other forms of preservation, pureeing, and concentration. FVNL definitions should exclude a constituent, extract or isolate of a food e.g. peanut oil, fruit pectin and de-ionized juice.

Wholegrains

A target cannot be credited unless the company can confirm that the definition of 'whole grains' it uses stipulates that the three elements of the kernel (i.e. bran, germ and endosperm) must be present in their original proportions. This means that refined grains are excluded.

Answer 'a': The company's target must specifically relate to either:

(1) Products that can be defined as 'Whole grain products', meaning it contains at least 50% whole grain ingredients based on dry weight (as per the Whole Grain Initiative definition);[14]

(2) Products that contain a minimum of 25% minimally processed whole grains (i.e. have not undergone reconstitution or extrusion).

To be credited for **answer 'b,'** 'specific and measurable', the target should involve either:

	(1) specific nutrition criteria or minimums (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value), i.e. If the company commits to meeting an absolute measure, then this can be credited; or (2) relative increase criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported). Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification. To be credited for **answer 'c,'** 'timebound', a baseline and target year must be set: e.g., an X% increase in products containing a meaningful portion of whole grains by 2025 (from 2020 levels). **'e. Not applicable'** can be selected if the company's portfolio is not suited to typically contain whole grains (e.g., carbonated drinks, dairy). This results in this indicator being removed from the total score for this category.
	Rationale The Kenyan National Dietary Guidelines recognize wholegrains, fruits, vegetables, nuts, and legumes as part of a healthy diet, and the Kenya Demographic and Health Survey 2022 shows that they are an important component of consumers' diets.[7,15] 'Whole grains' refers to ingredients such as maize, millet, oats, wheat, and brown rice, containing the naturally-occurring components of the kernel (i.e. bran, germ and endosperm) – these elements must be present in their original proportions to be considered 'whole grain.' 'Whole grains' refers to ingredients such as maize, millet, oats, wheat, and brown rice, containing the naturally-occurring components of the kernel (i.e. bran, germ and endosperm) – these elements must be present in their original proportions to be considered 'whole grain'. Fruits, vegetables and legumes are essential components of a healthy diet due to their vitamins, minerals, dietary fibre and phytonutrient content, while also being low in energy relative to many other foods. Higher consumption of FVNL is associated with reduced risk of developing cardiovascular diseases and cancer. Nuts are also important, given their high protein, fiber, unsaturated fats, and micronutrient content. Likewise, whole grains are an important source of dietary fibre, protein, as well as micronutrients and phytochemicals. Diets high in whole grains improve digestive health, can be associated with maintaining a healthy weight, and are associated with a reduced risk of NCDs such as type-2 diabetes, hypertension, and cardiovascular disease and increased overall health. The WHO advises that carbohydrate intake should come primarily from whole grains, vegetables, fruits and pulses, recommending a daily intake of 25g of naturally occurring dietary fibre, and at least 400g (5 servings) of vegetables and fruit per day for adults.[16] In Kenya, cereals and grains are consumed frequently and were one of the most important sources of carbohydrate, fibre, protein and total fat intake in 2022. Industry is encouraged where possible to increase wholegrains as an ingredient, reformulate products and improve accessibility and affordability of products contributing toward positive nutrition. The Kenyan Dietary Guidelines note that whole grains that are consumed in an unprocessed or minimally processed state contain more nutrients and fibre than refined grains.[7] The WHO also acknowledges the level of processing when consuming whole grains and FVNL: "there is evidence to suggest that the naturally occurring structure of intact whole grains contributes to its observed health effects, minimal processing of whole grains beyond that necessary to ensure edibility is preferred" and "fresh foods, or foods that are minimally processed or modified beyond the treatment necessary to ensure edibility, without added fat, sugars or salt, are preferred."[16] During

	the milling process, constituent parts (bran, germ and endosperm) may be separated and recombined later in the product development process (known as recombination or reconstitution). Industry is therefore encouraged where possible to increase the use of FNVL as an ingredient in both new product formulations and reformulation of existing products.

PORTFOLIO IMPROVEMENT: MICRONUTRIENTS AND FORTIFICATION

<table>
<tr><th>No.</th><th>Indicator Question</th><th>Answers</th></tr>
<tr><td rowspan="7">1.</td><td rowspan="5">If the company fortifies products, does it explicitly commit to follow the following principles?

(Check all that apply)</td><td>a.1 Not to fortify or enrich products that are unhealthy, according to the thresholds of an (inter)nationally recognized NPM</td></tr>
<tr><td>a.2 Not to fortify or enrich products that are unhealthy, according to the company's own thresholds</td></tr>
<tr><td>a.3 Other restrictions relating to nutrition, without specific nutrition standards</td></tr>
<tr><td>b. No/no information</td></tr>
<tr><td>c. Not applicable</td></tr>
<tr><td colspan="2">Scoring Guidance

Only one answer 'a' option can be selected.
'a.1'/'a.2': To be credited, the company should clearly state in either its external reporting or in an internal policy or process document that it commits to not fortify or enrich products that are defined as 'unhealthy' (i.e., meeting maximum thresholds for fat, salt, and sugar, etc.), according to a formal nutrition standard, based on either an (inter)nationally recognized NPM (see B3) or its own established nutrition criteria.
'a.3': Examples of 'other restrictions' include the formal exclusion of certain product categories from fortification (e.g. confectionary).
For answer options 'a.1,' 'a.2,' and 'a.3,' the use of fortified staples in products can be exempted from the company's policy/commitment. I.e. the use of fortified staples in products not meeting healthiness criteria is permitted.
Answer 'c': In the case companies do not sell fortified products, this indicator is not applicable and therefore not scored.</td></tr>
<tr><td colspan="2">Rationale

Information about whether F&B manufacturers are using processed foods as vehicles for fortification is limited in Kenya. ATNi encourages companies to only fortify foods in accordance with relevant guidance and select products or categories with underlying nutritional quality or defined as healthy i.e., low in fat, salt, sugar. Fortifying products that contain high levels of nutrients of concern can result in a "health halo effect" that leads consumers to misunderstand and overestimate their nutritional quality and healthfulness, leading to higher consumption of such products, and thereby greater risk of experiencing adverse health effects.[17]

CODEX CAC/GL 9-1987: GENERAL PRINCIPLES FOR THE ADDITION OF ESSENTIAL NUTRIENTS TO FOODS and WHO/FAO Guidelines on Food Fortification with Micronutrients provide concrete guidance on the appropriate selection and levels of micronutrients to use in fortification.[18]</td></tr>
<tr><td></td><td></td><td>a. Fortification by adding micronutrient premix</td></tr>
</table>

2.	If the company sells micronutrient-fortified products, what method does the company use?	**b.** Using fortified staples as ingredients in product formulation **c.** Other **d.** Company does not sell fortified products/no information **e.** Not applicable
	Scoring Guidance Evidence of methods used to fortify or enrich foods can be in the form of supplier specifications or purchasing orders identifying that fortified, biofortified staples, micronutrient sachets or premix has been ordered. To be credited for **answer 'c,'** companies can supply evidence of other methods used to fortify their products, including, for example, using micronutrient sachets (selling foods with an additional sachet of vitamins and minerals to "sprinkle" on finished foods)."	
	Rationale The consumption of processed packaged foods is rising globally, yet deficiencies in micronutrients remain a public burden in most economies. Large-scale food fortification (LSFF) programs, which use commonly consumed industrially produced products such as salt, oils, and cereal flours as vehicles to increase the supply of micronutrients, are widely recognized as a cost-effective public health intervention to reduce micronutrient deficiencies, such as those of iodine, vitamins A and D, folate, and iron, among others. In Kenya, iron, iodine, zinc and vitamin A are some of the main micronutrients where deficiency remains to be of health concern. The Kenya government has set mandatory measures to control for iodine deficiency disorders through mandatory fortification of staple foods like salt (with iodine), maize and wheat flour (with vitamins A, B1, B2, B3, B6, B12, folic acid, iron and zinc; salt with iodine); and edible fats and oils (with vitamin A), vegetable oils and fats (with vitamin A) , through the Food Drugs and Chemical Substances Act.[19] Companies can choose to use fortified staples produced through these programs as ingredients in their products, which can in turn help to address key micronutrient deficiencies.	
3.	If fortified staples are used as ingredients in the company's products, does the company have any quality control or assurance methods in place to determine whether the levels of micronutrient(s) are sufficient in the fortified staples used? Please describe the processes and provide supporting evidence.	**a.** Yes, if procuring fortified staples business-to-business **b.** Yes, if the company fortifies staples itself **c.** No, the company relies on quality assurance tests by government at the supplier level **d.** No/no information **e.** Not applicable
	Scoring Guidance	

	Quality assurance refers to activities to ensure that the production of fortified staples contain adequate micronutrient levels, are of high quality, and are safe to consume. The focus is on the manufacturing process (including fortification). Quality control activities are concentrated on the finished product. They verify that fortified foods contain adequate micronutrient levels, are of high quality, and are safe to consume before marketing them to consumers. Companies should be able to show proof of method(s) in place to check compliance with internal or external fortification standards e.g., by sampling products and record keeping compliance For background information see the WHO Guidelines on Food Fortification with Micronutrients, page 186-191.[20]
	Rationale LSFF programs for staple products, whether mandated through regulation or through voluntary standards, have been found to frequently experience low levels of compliance and limited enforcement in many markets.[21,22] As major procurers of staple foods, F&B manufacturers can serve as an important lever in improving the overall quality of fortified products available to consumers on the market. This can be done by driving improved compliance or implementing quality control procedures for fortification practices e.g., ordering adequately fortified staples or premix and testing quality. Kenya Bureau of Standards has issued labelling standards, which stipulate that vitamin or mineral content must be ≥5% of the nutrient reference value per 100g/ml and be expressed in metric units and/ or as a % of the nutrient reference value or per 100g/ml or per package if a single serve" in order to be eligible for the Fortification Mark of Quality. This indicator seeks to assess whether the company takes measures to ensure its accountability for the quality of its fortified food products throughout stages of the supply chain. For background see Kenya's National Food Fortification Strategic Plan, and regulatory frameworks ensure the quality of fortified foods.[23,24]

REPORTING ON HEALTHINESS

No.	Indicator Question	Answers
1.	Does the company use nutrition criteria to distinguish between healthier and less healthy products in their portfolio in Kenya, and what form does the criteria take?	**a.** An internationally recognized/government endorsed NPM*
		b. The company's own NPM
		c. Other nutrition criteria
		d. No reporting on products meeting 'healthier' definition / no information

Scoring Guidance

If the company uses an NPM only for internal use (i.e. reformulation) and does not use it for external reporting, this is not considered relevant for this indicator. For this indicator, the primary metric the company uses to report on the percentage of products/sales is considered, i.e. the metric which appears most prominently in its annual/responsibility reports and websites, and on reporting frameworks (e.g. SASB: FB-PF-260a.1).

If the company has measured its portfolio's healthiness using an internationally recognized/government endorsed NPM specifically for the purposes of benchmarking only and reports on this, this is not considered for this indicator unless the company has adopted this definition of 'healthier' as its primary reporting metric.

Answer 'a': To be credited, the company must use an internationally recognized/government endorsed NPM that has a clear threshold for defining 'healthier.' It must use the same product categorizations, thresholds, cut-off points, and algorithm as the original model. The model must be used as originally intended, i.e. strictly following its application guidelines, without notable exceptions. If adaptations are made, it does not qualify for **answer 'a.'**

Answer 'b': To be credited, the company shows evidence of using its own NPM.

Answer 'c': Option c is selected if the company uses criteria other than an NPM.

*A full list of government endorsed NPMs can be found in a 2023 scientific review.[25]

Rationale

In order to enable stakeholders to better hold the company accountable for its impact on consumers' diets and motivate further improvements in the healthiness of its portfolio, it is important that the company publicly discloses the proportion of its products (and, ideally, sales) that meet a robust definition of 'healthier.'

Companies are advised to make use of an (inter)nationally recognized/government endorsed NPM, such as the KNPM, to define 'healthier' products, given that these models are based on independent scientific evidence related to public health, undergo a thorough and extended peer-review process, and include comprehensive documentation of the governance, food-category criteria, and nutrient thresholds in the public domain.

2.	Does the company have targets for, and report on its sales of 'healthier' products for its Kenya market?	**a.1** Yes, targets for 'healthier' sales relative to overall sales
		a.2 Yes, targets for total sales of 'healthier' products only
		b.1 Yes, reporting on 'healthier' sales relative to overall sales
		b.2 Yes, reporting on total sales of 'healthier' products only
		c. Reported on public domain
		d. Reported annually
		e. No/no information
	Scoring Guidance Only one **answer 'a'** option can be selected. The company can only be credited for this indicator if it is clear how it defines 'healthier' in this case. This must be a formal definition with nutrient criteria (including, at minimum, upper thresholds for nutrients of concern), rather than specific product lines branded arbitrarily as 'healthier'. For additional points (**answer 'b'**), the company must use the thresholds of an internationally recognized/government-endorsed NPM,* or be able to show that its definition is stricter, or within a 10% deviation. Moreover, it must be clear that the NPM is used as it was intended in its design, i.e. only applied to relevant product categories. If it is applied to categories beyond the scope of the NPM in question, this answer option will not be selected. Note that this indicator assesses reporting on *sales*, rather than the number of products classified as 'healthier' in the company's portfolio. Sales can be in terms of 'value' or 'volumes'. *A full list of government endorsed NPMs can be found in a 2023 scientific review.[25]	
	Rationale Currently, information about the healthiness of processed products is lacking in Kenya. It is important for transparency that the company publicly discloses what proportion of its total sales is derived from sales of products meeting its 'healthier' definition, in order to enable stakeholders to better hold the company accountable for its impact on consumers' diets.	

AFFORDABLE NUTRITION

No.	Indicator Question	Answers
1.	Does the company have a strategy to ensure the affordability of 'healthier' products in its portfolio?	**a.** Yes, and with clear criteria for which products are 'healthier'
		b. Yes, but without clear criteria for which products are 'healthier'
		c. No nutrition criteria/no information
	Scoring Guidance This indicator specifically concerns the classification of 'healthier' products that are part of the company's 'affordable nutrition' strategy/approach. This could be a specific set of criteria developed specifically for its 'affordable nutrition' strategy, or it could be the same definition of 'healthier' used for other purposes (such as product (re)formulation and/or reporting, as assessed in 'Reporting on Healthiness'). If the latter, it must be clear that this definition is used for products participating in the 'affordable nutrition' strategy. Similarly, non-commercial approaches (i.e. product donations, philanthropic programs) are considered out of scope for this assessment. The strategy must be commercial: any consumer must be able to purchase the product.	
	Rationale Processed foods and beverages constitute an ever-increasing proportion of lower income consumers' diets both globally and in Kenya specifically. To improve lower-income consumers' diets, it is important that they have access to nutritious products at affordable prices, especially since food represents the largest share of lower-income consumers' expenditure. It is important that products included in the company's affordability strategy/approach are nutritious, to ensure optimum public health impact. Companies should therefore ensure that products in their affordable nutrition strategy/approach meet a formal definition of 'healthier,' ideally one that is internationally recognized and/or government endorsed (such as the KNPM), to ensure a positive impact on lower income consumers' diets.	
2.	Can the company provide quantitative evidence demonstrating that their healthier products are affordable?	**a.** Yes, clear quantitative evidence
		b. Qualitative information only
		c. No/no information
	Scoring Guidance Companies can show evidence in a range of ways, such as through household penetration data by socio-economic class, or pricing data for their healthier products, ideally compared to clearly defined affordable pricing thresholds.	
	Rationale	

	The Food and Agriculture Organization (FAO) estimated in 2021 that 74% of Kenyans could not afford a healthy diet. However, information about the affordability of packaged, processed food is lacking in Kenya, particularly concerning the healthiness of these products. Companies can demonstrate this through providing data showing household penetration of their healthier products in lower-socio-economic-classes, or lower-income regions, or through sharing information on how they determine an affordable price-point for lower-income consumers, and evidence of which healthier products meet this threshold.

RESPONSIBLE MARKETING

No.	Indicator Question	Answers
1.	Does the company have mechanisms in place to restrict the marketing of F&B products to children? (Check all that apply)	**a.** A responsible marketing policy which includes reference to children and teenagers.
		b1. No marketing to children or use of an internationally recognized nutrient profiling model to restrict the marketing of unhealthy products to children teenagers
		b2. Only products meeting the company's own or industry-affiliated standards for marketing to children and/or teenagers.
		c. Audience thresholds and/or time-based restrictions to limit children and teenagers' exposure to marketing of unhealthy products
		d. No information
	Scoring Guidance **Answer 'a':** If the company shows evidence of having a responsible marketing policy which includes specific reference to children and teenagers, **answer 'a'** can be selected. **Answer 'b.1':** To be credited, the company must use an internationally recognized/government endorsed NPM that has a clear threshold for defining 'healthier.' It must use the same product categorizations, thresholds, cut-off points, and algorithm as the original model. The model must be used as originally intended, i.e. strictly following its application guidelines, without notable exceptions. If adaptations are made, it does not qualify for answer b.1. **Answer 'b.2':** To be credited, the company shows evidence of using its own or industry-affiliated NPM. **Answer 'c'** can be selected if the company has audience thresholds and/or time-based restrictions in its marketing policy, which specifically refer to restrictions to limit children and teenager's exposure to marketing of unhealthy products.	
	Rationale There is a wealth of evidence that the marketing of products high in fat, sugar and salt adversely affects children's eating and drinking behaviour, preferences, requests, nutrition knowledge, and food intake, thereby contributing to rising rates of obesity and diet-related NCDs.[26] In order to limit the negative impact of F&B marketing, companies are encouraged to refrain from marketing any of their products that are high in saturated fatty acids, trans-fatty acids, free sugars and/or salt, according to a robust NPM. Consequently, the WHO has developed a series of Regional NPMs, including for the African Region, to identify foods whose marketing should be restricted in order to protect children from the harmful impacts of the marketing of unhealthy foods and beverages.[27] These are considered the gold standard for defining which products can	

and cannot be marketed to children. Many companies and industry initiatives have developed their own nutrition criteria for determining which products can be marketed to children. However, numerous studies have found that, in nearly all cases, the thresholds and criteria used to determine which products are sufficiently healthy to be marketed to children are significantly less strict than those of the WHO regional models.[28,29]

To restrict marketing of foods & beverages to children via measured media, governments such as Chile, Canada, and the UK have set thresholds for programmes where children make up more than >15% to >35% of the audience.

The WHO recommends that companies use a government endorsed nutrient profiling model to identify foods suitable to be marketed to children. Additionally, the WHO developed the NPM for the WHO African Region to determine which products are suitable to be marketed to children based on their nutritional content/contribution to a healthy diet.

For certain media types, such as TV and radio, it is possible to measure the demographics of the audience that tune-in to certain channels/programs. Where children make up a disproportionate part of the audience of a channel or program, this can be considered to be 'child-directed', and companies are recommended to refrain from advertising unhealthy products. The lower the percentage at which a channel can be considered as 'child-directed,' the more comprehensive the policy is considered: the current industry best practice is 25%, whereas Chile's law considers it to be 20%. In addition, WHO guidance from 2023 indicates that measures that rely on gauging the percentage of children in the audience, or definitions of child programming, are insufficient on their own.[30] Therefore, time-based restrictions are increasingly being implemented in government policies in addition to audience thresholds to limit children's exposure to F&B marketing across certain media channels, including television, radio, and cinema. Companies are therefore encouraged to adopt this into their policies.

2.	What age range does the company use in their responsible marketing policy to restrict marketing of F&B to children?	**a.** Below the age of 18
		b. Below the age of 16
		c. Below the age of 12/13
		d. No / No information

Scoring Guidance

To be credited for this indicator, companies should publish an age threshold to define 'children' according to an age threshold in their responsible marketing to children's policies, or explicitly and publicly reference their commitment to an industry pledge that includes an age threshold for children.

If the company uses different age thresholds for different media/techniques or other commitments, then either the lower answer option is selected, or intermediary answer option (if applicable).

Rationale

The Convention on the Rights of the Child defines children as those under the age of 18 years. Adolescents are often not included within the scope of the marketing restrictions due to the

<table>
<tr><td></td><td colspan="2">assumption that they have more advanced cognitive ability than younger children. However, evidence shows that adolescents' neurological, hormonal and social developmental factors make them particularly susceptible to advertising of products high in fat, sugar and salt. In addition, they have more purchasing power than younger children as they often have money with which to purchase food items. Further, the WHO notes that age thresholds that do not take adolescents into account can lead to companies advertising to older children (i.e., 12 – 18 years) to a greater extent due to 'migration'. Consequently, both the WHO and UNICEF recommend that restrictions on the marketing of unhealthy products should include children up to the age of 18.[26,31] The Kenya Information and Communications (Broadcasting) Regulations (2009), Consumer Protection Act (2012), and Advertising Standards Body of Kenya's Code of Advertising Practice and Direct Marketing (2003) all define a child as any person under the age of 18.</td></tr>
<tr><td rowspan="5">3.</td><td rowspan="4">If the companies' mechanisms to ensure the responsible marketing of F&B products to children include restrictions for media channels and techniques, which of the listed apply?

Please read Scoring Guidance carefully.</td><td>a. Specifically marketing channels and techniques beyond national guidelines</td></tr>
<tr><td>b. Marketing channels and techniques outlined in national guidelines</td></tr>
<tr><td>c. General commitment to market responsibly across all marketing channels</td></tr>
<tr><td>d. No responsible marketing to children policy/no commitments/no information</td></tr>
<tr><td colspan="2">Scoring Guidance

Key channels and techniques include:
TV/Radio
Print media
Outdoor advertising
Cinema
Mobile/SMS
Third party websites/digital media
On pack
Social media
In primary and/or secondary schools
Licensed or brand equity characters
Celebrities and/or influencers
Toys, gifts, competitions and premiums
The Advertising Standards Body of Kenya's Code of Advertising Practice and Direct Marketing (2003) applies to media channels such as TV, radio, print media, outdoor advertisements, cinema, telephone, non-broadcast electronic media (digital media), and toys/gifts.

Research from Kenya, corroborated by international standards from WHO, shows that common media channels and techniques used by F&B companies to appeal to children include TV, radio, outdoor advertisements, print media, cartoon characters, word of mouth and on-pack advertising.</td></tr>
</table>

	Rationale The WHO attributes the impact of marketing to children to exposure (communication channels, times, and frequency in which children see and experience marketing) and power (the message content). The WHO recommends that restrictions on marketing of unhealthy foods to children "be sufficiently comprehensive to minimize the risk of migration of marketing to other media, to other spaces within the same medium or to other age groups". Children are exposed to a wide range of marketing techniques and channels beyond traditional broadcast media in Kenya. In addition, the changing digital landscape amplifies existing marketing strategies, enabling more engaging, immersive, integrated and personalized marketing techniques. A company's policy that is less than comprehensive in scope means that there is a risk that child-directed marketing may migrate to those channels/techniques not explicitly covered, allowing the company to market to children without breaching its policy. Given the vast array of different marketing techniques available and its ever-evolving landscape (especially in the digital sphere), it is essential that companies' policies cover all marketing channels, are as explicit as possible about which specific marketing channels are covered and are continually updated in line with wider developments in marketing practices. The answers are adapted from the WHO's 'A framework for implementing the set of recommendations on the marketing of foods and non-alcoholic beverages to children' (2012) and the more recent WHO guidance from 2023, the Advertising Standards Body of Kenya's Code of Advertising Practice and Direct Marketing (2003), a literature review of the food environment in Kenya, and analysis of past ATNi Global assessment findings.[26,30]

RESPONSIBLE LABELLING

<table>
<tr><th>No</th><th>Indicator Question</th><th>Answers</th></tr>
<tr><td rowspan="4">1.</td><td rowspan="4">Does the company commit to adopting the proposed Kenyan front-of-pack nutrition label (FOPNL), across its applicable portfolio, when it is formally enacted?

Please provide supporting evidence.</td><td>a. Yes, for all applicable products</td></tr>
<tr><td>b. Yes, for part of its applicable portfolio</td></tr>
<tr><td>c. No / no information.</td></tr>
<tr><td>d. Not applicable</td></tr>
<tr><td></td><td colspan="2">Scoring Guidance

To be credited, the company should ideally have a written statement stating their position on the pending proposed FOPNL. Ideally this would be written in a publicly available form, such as on the company's website, and/or in a public document such as a company labelling policy/annual report.</td></tr>
<tr><td></td><td colspan="2">Rationale

The WHO considers FOP labelling "an important policy implementation tool to promote healthy diets through facilitating the consumers' understanding of the nutritional values of the food and making healthier food choices and drive reformulation by the food industry."[32] It is therefore a key measure to address obesity and diet related NCDs. In response, at least 38 countries have developed or endorsed FOP labelling schemes, most of which are voluntary. These have taken a variety of different forms and are underpinned by different nutrient profiling models that have been endorsed by these countries' respective governments; there is currently a lack of international endorsement of a standardized system.
Then Kenyan Ministry of Health have made a commitment for the development and implementation of a Front of Pack interpretative label, which is expected to be based on their KNPM.

To ensure the maximum effectiveness of the FOPNL, is important that the company applies the label comprehensively across its products. This ensures consumers can make informed decisions when choosing which products to purchase. Additionally according to the WHO, there is evidence of companies voluntary FOPNL being applied selectively to avoid products that contain excessive amounts of nutrients of concern.[33]</td></tr>
<tr><td rowspan="3">2.</td><td rowspan="3">If the company places nutrition and/or health claims on its products, does it commit:

(Check all that apply)</td><td>a. To only place claims on products meeting the nutrition criteria of an internationally recognized/government endorsed NPM* (or equivalent)</td></tr>
<tr><td>b. To only place claims on products meeting the nutrition criteria of its own internal NPM</td></tr>
<tr><td>c. To only place claims on products according to other nutrition criteria</td></tr>
</table>

		d. No/no information
		e. Not applicable (the company commits to not use any health or nutrition claims at all
	Scoring Guidance Evidence can include a public commitment, or internal documentation which clearly states that this is company-wide policy. *A full list of government endorsed NPMs can be found in a 2023 scientific review.[25]	
	Rationale Nutrition claims are claims made on nutritional properties of food, and health claims suggest or imply a relationship between a food or a constituent of that food and health. Health and nutrition claims are often used on product packaging and in marketing communications. It is important that such claims are accurate, evidence based, and do not mislead consumers. The use of health and nutrition claims is highly regulated in many high- or middle-income countries, including Kenya. The Kenya Bureau of Standards enforces food labelling regulations that require health claims to be truthful and substantiated by scientific evidence, aligning with international Codex Alimentarius standards. Two main standards apply - 'EAS 804: Claims on Foods – General Requirements' and 'EAS 805: Use of Nutrition and Health Claims – Requirements'. Nutrition and health claims are used to influence purchasing behaviours and food preferences.[34] When claims are used on products with high levels of nutrients of concern, this can result in a "health halo effect" that leads consumers to misunderstand and overestimate their nutritional quality and healthfulness, leading to higher consumption of such products, and thereby greater risk of adverse health effects.[17] It is therefore important that companies have policies in place to not place nutrition or health claims on products without first determining the healthiness of the product by using a government endorsed NPM.	

NUTRITION GOVERNANCE

<table>
<tr><th>No.</th><th>Indicator Question</th><th>Answers</th></tr>
<tr><td rowspan="5">1.</td><td rowspan="3">Does the company formally set out a clear strategy/plan to contribute to healthier diets and address malnutrition in Kenya through its commercial operations (i.e. “nutrition strategy”)?</td><td>a. Company has nutrition strategy in place, which specifically refers to its Kenyan market</td></tr>
<tr><td>b. Company articulates commitment to grow through a focus on nutrition and health, or has a strategy that is not Kenya-specific</td></tr>
<tr><td>c. No/no information</td></tr>
<tr><td colspan="2">Scoring Guidance

To score options ‘a’ or ‘b’, the company must demonstrate that it is aware of how public health challenges are influenced by nutrition, and how the company ensures it is making a positive contribution to public health.

To be considered as a ‘nutrition strategy’ (answer ‘a’), the company must clearly set out: (1) in one place (e.g. document, report page, webpage), (2) including Kenya-specific approaches how it plans to improve diets/address malnutrition through its commercial activities, and that these (3) encompass a significant proportion of its portfolio (rather than a narrow selection of specific product ranges).

Selecting answer ‘a,’ the company’s strategy should involve core responsibilities such as responsible marketing to children and labelling commitments, and ideally also consider either/both:
how ‘healthier’ products reach consumers at a proportionately greater rate than less healthy products (for example, through relative pricing, distribution models, marketing spending on healthier products relative to general portfolio), or
how the company ensures that a wide range of its ‘healthier’ products reach low-income consumers and/or other at-risk populations (for example, through affordable pricing and/or accessibility strategies).
Meanwhile if a company acknowledges its role in addressing public health challenges without clearly describing how the company aims to address these challenges through its business, answer ‘b’ is selected. Answer ‘b’ is also applicable if the company’s nutrition strategy is not Kenya-specific.

Note: Non-commercial activities (e.g. philanthropy, initiatives only available for specific consumers, etc.), including efforts to address food insecurity via non-commercial channels, are not taken into consideration.</td></tr>
<tr><td colspan="2">Rationale

Increasing rates of malnutrition continues to challenge efforts to achieve the Sustainable Development Goals. An estimated 27.8% of the Kenyan population is undernourished, while 10.8% of adults are living with obesity, and micronutrient deficiencies continue to be prevalent amongst women and children. F&B manufacturers have an increasingly urgent responsibility and</td></tr>
</table>

	opportunity to contribute to healthier diets and address malnutrition through their commercial operations. This means being willing to decouple their financial performance from products and strategies that risk exacerbating poor nutritional outcomes, and instead striving to achieve commercial growth through a focus on nutrition and being part of the solution. Since they have the potential to impact the diets of consumers through many different aspects of their commercial operations, not only from the healthiness of the products they sell, but also from how these are marketed, priced, distributed, and labelled, for example, it is important that these companies develop a clear strategy or plan to harness these approaches to contribute to healthier diets, particularly as Kenyan diets shift from fresh foods and minimally-processed staples towards including more processed products. This should be done in an integrated manner, for which targets can be developed, formal accountability assigned within the company, and key performance indicators (KPIs) and/or milestones defined to drive and sustain progress. As there is little information in the public domain on how the F&B industry is addressing malnutrition in Kenya, companies' strategies should be outlined and presented cohesively in a publicly available document/page, both to signal to external stakeholders the company's plans, enabling scrutiny and accountability, and to show that the planned activities are deliberate and intentional, rather than ad hoc and incidental.	
2.	Can the company provide evidence of making progress on implementing its nutrition strategy, specifically in Kenya?	**a.** Quantitative metrics of progress on the strategy **b.** Primarily qualitative or specific examples of actions taken. **c.** No reporting/no information
	Scoring Guidance Only reporting against key elements (i.e. approaches, pillars, workstreams, KPIs, etc.) described in the company's nutrition strategy (as assessed in Indicator 1) are taken into consideration for this indicator. To be credited with answer **answer 'a,'** the company should show evidence of quantitively reporting on metrics in their nutrition strategy. These metrics must reasonably seek to provide an authentic indication of the company's progress on its objective: for example, quantitatively reporting efforts relating to very specific products only, or the reporting of illustrative statistics (e.g. "100 tons of sugar removed…") will only be considered for **answer 'b.'** If the company only provides evidence that is non-Kenya specific, **answer 'b'** is selected. 'Qualitative' examples include lists or case studies of specific product launches/reformulations in the past year, examples of specific marketing campaigns for specific healthy products, etc. Only reporting on the company's own public domain (e.g. website or reports) is considered for this indicator.	
	Rationale It is important that companies can demonstrate evidence of progress made against each element of their nutrition strategies: doing so publicly enhances the credibility of their efforts, enabling	

<table>
<tr><td></td><td colspan="2">stakeholders to hold them accountable if progress is slow and ensuring that companies are meeting their goals.

Ideally, the company tracks progress systematically and quantifiably. A key aspect of a robust strategy is developing quantitative metrics or KPIs for each element (where this is feasible) to measure progress/success. This helps to drive results and enhances internal accountability. When reported publicly, this further enhances the credibility of its efforts in the eyes of external stakeholders, as it reduces the risk of a company cherry-picking specific or qualitative examples to report on while also carrying out activities that run counter to these.</td></tr>
<tr><td rowspan="7">3.</td><td rowspan="5">Is accountability for the company’s nutrition strategy assigned to the highest levels of the company, and is successful implementation incentivized?

(Check all that apply)</td><td>a. Evidence of regular Kenya-market-level (or equivalent) board or senior management review of nutrition strategy</td></tr>
<tr><td>b.1 Formal accountability assigned to the CEO (or equivalent)</td></tr>
<tr><td>b.2 Formal accountability assigned one level below CEO (e.g. other C-Suite Executive)</td></tr>
<tr><td>c. Executive remuneration linked to performance on nutrition-related objectives</td></tr>
<tr><td>d. No strategy/information</td></tr>
<tr><td colspan="2">Scoring Guidance

Evidence for answer ‘a’ could include an explicit statement in its reporting that its nutrition strategy is specifically reviewed by the Board of Directors or Senior Management, or through evidence such as a Board meeting agenda/minutes showing this to be the case.

For answer options ‘b1’ and ‘b2,’ the ‘accountable person’ is the individual who has ‘ownership’ of the strategy and is responsible for its success and failure. For example, if the company has set high-level nutrition-related targets and/or has set KPIs (e.g. on growing sales of ‘healthy’ products, this person is held responsible for achieving this goal and driving progress. Without targets/KPIs, it must be clear from external reporting or internal documentation where responsibility lies, and how success is measured.

For answer ‘c,’ remuneration arrangements could include bonuses, stock options, or other incentives. The company must show that it has clear targets or KPIs/metrics on which performance is measured, and they are applied to the individual credited in option b.</td></tr>
<tr><td colspan="2">Rationale

The level at which responsibility for the nutrition strategy resides within the company's management has significant impact: to exert sufficient influence, drive accountability, and ensure alignment with the business strategy, the lead should be a senior executive. The CEO also plays a critical role in setting the tone at the top and emphasizing the importance of the nutrition strategy. Assigning direct responsibility for the successful implementation of the strategy to the CEO not only further demonstrates this commitment, but also increases the chance of sustained success of the strategy, since senior personnel have greater ability to prioritize the strategy, coordinate different business units, and allocate necessary resources for the strategy.</td></tr>
</table>

	In order to make accountability for the nutrition strategy more concrete, the responsible people's compensation should be linked to success in the nutrition strategy, meaning that they are directly incentivized to act in the best interests of the nutrition strategy and prioritize its objectives. Governance starts with the Board of Directors, since the Board holds the ultimate decision rights on such issues and the company's strategic direction. Boards play a central role in aligning Environmental, Social, and Governance (ESG) initiatives with the strategic direction of the company, ensuring it is focused on material topics (both risks and opportunities), establishing targets and accountability, and assessing the company's performance at a company-wide level. While ESG implementation will be devolved to individual business units, Boards play a central role in establishing a clear strategic direction, focusing on the long-term, and developing a plan to avoid fragmentation and duplication. Regularly discussing and reviewing the nutrition strategy at Board-level is a clear indication that the company considers it a priority.

WORKFORCE NUTRITION

Category specific adjustor:

Availability level (drop-down menu):

a. Yes, provided to all office and production workers
b. Yes, provided only to office workers
c. No/no information

No.	Indicator Question	Answers
1.	Does the company have a workforce nutrition program for employees that includes the following elements?	**a.** Healthy food at work
		b. Nutrition education
		c. Regular nutrition-focused health checks
		d. Support for breastfeeding mothers in the workplace (which goes beyond existing regulations)
		e. Measurable targets/KPIs for all elements in place
		f. Measurable targets/KPIs for only some elements in place
		g. No/ no information

Scoring Guidance

The Employment Act (2007) speaks of employees to be 'properly fed' by the employer. To receive **answer 'a,'** the company should be able to demonstrate evidence of providing healthy food, ideally based on clear nutritional criteria, as well as evidence of what form it provides the food in.

To receive **answer 'b,'** the company should be able to show evidence of 'nutrition education' programs in line with the he Workforce Nutrition Alliance (WFNA) definition as programs/interventions aiming "to change the nutrition and/or lifestyle behaviours of employees through increasing employees' knowledge of beneficial health habits. Nutrition education may act on several levels, including: (1) changing attitudes towards a specific food behaviour; (2) addressing normative beliefs (i.e. the perceived norm); (3) modifying beliefs about self-control and the ability to change. Interventions often work through groups with methods such cooperative menu planning, dissemination of educational materials, interactive information sessions and workshops; an alternative approach is one-to-one counselling."

To receive **answer 'c,'** the company should be able to show evidence of 'Nutrition-focused health checks' in line with the WFNA definition: "periodic one-to-one meetings with a health or nutrition professional to assess, and usually discuss, the employee's nutritional health. Health checks provide personalized data for each employee, giving them a better understanding of their nutritional risk factors. These might include cholesterol and/or blood-pressure screenings,

	or weight monitoring and classification (for example using Body Mass Index to assess whether an employee is underweight, overweight, or obese)." The company should show evidence of making nutrition-focused health checks available, either at subsidized rates or free-of-charge to its employees, with a clear goal and objective- see for example the WFNA self-assessment scorecard, page 9).[35] According to the 2017 Kenya Health Act (S.71(1)), employers are required to provide private lactation rooms for breast milk expression, which should have refrigeration facilities. Employers are required to provide reasonable break time for breastfeeding mothers to express milk of up to one hour per 8 hour working period. **Answer 'd'** is selected if the company can show evidence of going beyond any such existing regulations. For instance, the Breastfeeding Mothers Bill (2019) (under consideration) sets out more detailed standards for lactation rooms & extending rights for breastfeeding break (max 40 mins every 4 hours).
	Rationale Workplace settings, as contained environments which can be modified with relative ease, and which involve consistent interaction with a substantial and recurrent audience, are recognized by the WHO to be a promising platform for implementing nutrition interventions at scale. There is considerable evidence that providing healthy food at the workplace can lead to positive health outcomes for the employees (see the WFNA Healthy Food at Work and WFNA Nutrition Education evidence briefs, for example). The Employment Act (2007) says employees should be 'properly fed' by the employer, either by provision of proper quality food (Section 33(1) or food rations (Section 73(1)).[26,36] It is important that companies can demonstrate what activities they have in place to ensure employees are fed, ideally including consideration of the healthiness of meals provided. The business case for investing in workforce nutrition programs is clear, as the benefits associated with providing healthier food at work can include: improved employee health and wellbeing, increased productivity, reduced absenteeism, and increased employee morale, engagement, and retention. Studies have estimated financial returns of 6:1 on investment for companies on workforce nutrition programs. Evidence suggests that nutrition health checks can help prevent NCDs like diabetes and heart disease. Studies conducted in offices and factory settings found promising results especially when health-checks were coupled with counselling. Benefits to the company of providing nutrition focused health checks to its employees can include: increasing employees' awareness and understanding about their own nutritional health status; increasing employees' healthy behaviour and willingness to improve their nutritional behaviours; preventing NCDs in the workforce and improving health employee health and wellbeing; increasing employee retention and attracting prospective employees; demonstrating to employees their value to the company by providing access to healthcare during paid work time. Aggregated data from the health checks can be used to monitor results of the company wider workforce nutrition program, provided that strict confidentiality procedures are followed (see, for example, WFNA Nutrition Related Health Checks Guidebook, page 9.[37]

2.	Does the company provide paid maternity leave and paternity/second caregiver leave for employees on all	**a.1.** Paid maternity leave: 26 weeks or more (WHO recommendation)
		a.2. Paid maternity leave: Between 14 and 26 weeks

	contract types (e.g. permanent contractor, contractor, part-time employment) and does the company offer leave beyond minimum legal requirements?	**a.3.** Paid maternity leave: 14 weeks (International Labour Organisation recommendation)
		a.4. Paid maternity leave of 12 weeks, in line with local regulation
		b.1. Paid paternity/second caregiver leave of greater than 2 weeks
		b.2. Paid paternity/ second caregiver leave of 2 weeks, in line with regulation.
		c. No/no information
	Scoring Guidance Only one **answer 'a'** option and one **'b' option** can be selected. Only paid leave is assessed in this indicator: leave that is unpaid or paid less than two-thirds of the usual salary will not be credited. However, if a paid parental leave period is offered in addition to paid maternity leave, the latter will be scored first and revised upward depending on the length of additional parental leave offered, with an appropriate **answer 'b'** selected.	
	Rationale Kenya's Employment Act, S.29 (2007) and Employment Rules, S.9 (2014) stipulates a minimum of three months (approximately 12 weeks) paid maternity leave (full pay) (S.29). Section 29 also stipulates paternity leave for two weeks at full pay. The WHO recommends that mothers breastfeed exclusively (no other liquids or foods) for the first six months after birth; this not only has significant nutritional and health benefits for the child, but also for the mother.[38] Time, resources, and protective policies are critical to support breastfeeding mothers: consequently, returning to work has been found to be one of the greatest barriers to breastfeeding. Offering paid maternity leave is therefore critical, enabling mothers and babies to recover from birth, bond with their babies, and breastfeed in the critical early weeks and months of life. A wealth of evidence from countries at all income levels has found that longer periods of maternal leave reduce infant mortality rates.[39] The International Labour Organisation stipulates that 14 weeks should be the minimum time period for paid maternity leave to be offered (Article 4(1), C183 - Maternity Protection Convention, 2000 (No. 183)), and that the amount of pay should not be less than two-thirds of the original salary. However, to optimally support mothers to breastfeed exclusively for the first six months, the WHO recommends paid leave of 26 weeks or more. There is also evidence raising the possibility that paternity leave may indirectly affect children's health. Studies have found that fathers who take paternity leave are more involved in childcare and other unpaid labour at home, which may support mothers' breastfeeding and reduce the likelihood of post-partum depression, which in turn benefits infant health.[39] There is currently no international standard for paternity leave. As of 2023, the United Nations and WHO offers all	

	their employees 16 weeks of paid parental leave, including fathers/second caregivers, increasing from 8 weeks of paternity leave.[40] Companies are encouraged to establish a policy that goes beyond legal minimum requirements and define a minimum arrangement across the markets they operate in (allowing for longer paid leave where legally required).

4 SECTION B: PRODUCT PROFILE

The overall goal of the Kenya Product Profile assessment is to provide stakeholders, including companies, governments, investors, nutrition experts, and others, with a better understanding of the nutritional quality of packaged food and non-alcoholic beverage products sold by Kenya's largest manufacturers.. This Product Profile is the first publicly available objective assessment of the nutritional quality of packaged F&B portfolios from the largest manufacturers in Kenya. It evaluates the relative 'healthiness' of products using four distinct nutrient profiling models (NPMs):the Health Star Rating Model (HSR), the WHO regional model (AFRO model), the ATNi modified Health Star Rating Model with micronutrients (mHSR + micronutrients) and the Kenyan Nutrient Profile Model 2024 (KNPM) which has been approved for application for this assessment by the Kenyan Ministry of Health. The full details of the methodology, findings, and limitations of the Product Profile study are available in the ATNi - The George Institute for Global Health (TGI) Product Profile report.[4]

Company Selection

30 F&B companies were selected for inclusion in the Product Profile assessment. Companies were selected based on country retail sales of food and non-alcoholic beverages according to sales estimates from Euromonitor International Passport data for financial year 2022. Additional considerations were made for portfolio relevance, applicable product categories, and national scope.

Eligibility of Food and Beverage Products

F&B products eligible for inclusion are defined as *'all packaged foods and non-alcoholic beverages manufactured by the included companies.'* A food or beverage is considered a unique item based upon the brand name and description, irrespective of serving size and packaging (i.e. a specific brand of soda sold in 330mL cans will be the same food item as the same specific brand of soda sold in 600mL bottles). The following products are excluded from analyses:

- Unprocessed meat, poultry, fish and raw agricultural commodities such as plain cereals (on the basis that such foods are not generally required to carry a nutrient declaration)
- Plain tea and coffee (on the basis that these make an inherently low nutritional contribution and are thereby not required to display a nutrient declaration)
- Some (not all) condiments such as herbs, salt, pepper, vinegars and spices (those that do not have nutrition information)
- Infant formulas, medical nutrition supplements and baby food and baby beverages (excluded because these products are not consumed by the general population and the selected models are not appropriate for their evaluation).

Product Identification

ATNi identified all relevant F&B categories for each company and prepared product lists. Three sources were used to create a product list for each manufacturer comprising nutritional information as well as sales estimates:

- Product label data from 'Innova Market Insights' (a global market insights provider)
- Product label data from companies' own websites when available
- Companies reviewed datasets and provided additional information on nutritional information and sales estimates

Data Review

In October and November 2024, the 30 companies were given the opportunity to review their product lists and sales information The companies could make corrections or additions to information about their product range as well as the nutritional information, including micronutrient data. Depending on the requirements under the different model algorithms, companies were asked to specifically review such product data and/or provide further details.

Imputation of Essential Missing Data

For many products the available nutritional information was insufficient to apply the selected NPMs. This is partly due to differences in legislation around what nutrients are required to be displayed on the label (for example, added sugar is not mandatory in Kenya). Therefore, it was necessary to impute missing data which was done as follows:

1. **Food Composition Tables:** Food composition tables were utilized to fill in some of the macro and micronutrient data in the datasets. The Kenya Food Composition Table was referenced. This table was primarily used for single-ingredient products, such as honey, butter, ghee, fresh milk, milk powder and yogurt (including those with artificial flavours), as well as for products with extra ingredients that do not significantly alter the nutrient composition. Examples include peanut butter, carbonated drinks, tomato paste, tomato ketchup, chili sauce, and simple or plain biscuits.

   It is important to highlight that these products in the dataset were initially compared with their corresponding items in the food composition tables to ensure minimal or no variation in the current data before utilizing the food composition tables to address any missing information. However, the Kenya Food Composition Table does not include data for iodine or trans fats.

2. **Online Retail Supermarkets:** Nutrition information was supplemented using data from online retail supermarkets in Kenya where available.

3. **Online Nutrition Food Databases:** For products available in the global market (e.g., items from Mars, Ferrero), nutritional data was sourced from online databases such as Cronometer and the US Department of Agriculture.

4. **Proxy Values:** For products that do not require certain nutrients to be displayed on pack, proxy values for those nutrients (most commonly saturated fat, total sugar, sodium, fibre and FVNL content) and micronutrients was used. These proxy values were developed by TGI using the average value of the products with available data from an extensive product database.

The presence of added sugars and sweeteners was determined from the ingredient lists.

Product Categorization

Table 2. Euromonitor subsets

Foods	Beverages
Baked Goods Breakfast Cereals Confectionery Dairy Butter and Spreads Edible Oils Ice Cream Meat and Seafood Substitutes Plant-Based Dairy Processed Fruit and Vegetables Processed Meat and Seafood Ready Meals Rice, Pasta and Noodles Sauces, Dips and Condiments Savoury Snacks Soup Sweet Biscuits, Snack Bars and Fruit Snacks Sweet Spreads	Bottled Water Carbonates Concentrates Energy Drinks Instant Tea and Coffee Mixes Juice Other Hot Drinks RTD Coffee RTD Tea Sports Drinks

Sales Data

2022 sales data estimates at the EMI subset level were used for the analysis. Companies were invited to provide updated sales data or percentage breakdowns to inform the sales-weighted outcomes for the four nutrient profile models.

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6 ANNEX

ANNEX A: CORPORATE PROFILE COMPANY SELECTION

Selection of companies

ATNi selected 12 companies (3 global and 9 national) to be assessed in the Corporate Profile.

These companies, listed alphabetically by the global business owner's name, will be referred to consistently throughout the report.

Company Name	Headquarters	Market Share Range (All categories)[a]
Bidco Africa Ltd	Kenya	5–10%
Brookside Dairy Ltd	Kenya	5–10%
Capwell	Kenya	0–5%
The Coca-Cola Company	United States	5–10%
Excel Chemicals Ltd	Kenya	0–5%
Flora Food Group[b]	Netherlands	0–5%
Highlands Mineral Water Co Ltd	Kenya	0–5%
Kapa Oil Refineries Ltd Kenya	Kenya	0–5%
Kevian Kenya Ltd	Kenya	0–5%
Mini Bakeries (NRB) Ltd	Kenya	0–5%
Nestlé SA	Switzerland	0–5%
New Kenya Co-operative Creameries Ltd	Kenya	10–15%

[a] EMI estimates exclude some food categories such as flour. As such, estimates for some companies may not be reflective of their full portfolio.

[b] Formerly known as Upfield

ANNEX B: PRODUCT PROFILE COMPANY SELECTION

ATNi requested TGI to include the products of 30 Kenyan F&B manufacturers (11 companies assessed in the Corporate Profile, plus 19 additional companies active on the Kenyan market in various product categories). [c] These companies will be referred to throughout the report.

Company GBO	Headquarters	Market Share (All ATNi applicable categories)	Market Share (All categories)
Bidco Africa Ltd + Suntory	Kenya	5-10%	5-10%
Britannia Industries Ltd	India	0-5%	0-5%
Broadways Bakery Ltd	Kenya	0-5%	0-5%
Brookside Dairy Ltd	Kenya	5-10%	5-10%
Capwell Industries Ltd	Kenya	0-5%	0-5%
Coca-Cola Co, The	United States	5-10%	5-10%
Deepa Industries Ltd	Kenya	0-5%	0-5%
Excel Chemicals Ltd	Kenya	0-5%	0-5%
Ferrero & related parties	Italy	0-5%	0-5%
Flora Food Group	Netherlands	0-5%	0-5%
Fresh Del Monte Produce Inc	United States	0-5%	0-5%
Githunguri Dairy Ltd	Kenya	0-5%	0-5%
Highlands Mineral Water Co Ltd	Kenya	0-5%	0-5%
Indofood Sukses Makmur Tbk PT	Indonesia	0-5%	0-5%
Jetlak Foods Ltd	Kenya	0-5%	0-5%
Kapa Oil Refineries Ltd Kenya	Kenya	0-5%	0-5%
Kevian Kenya Ltd	Kenya	0-5%	0-5%
Kraft Heinz Co	United States	0-5%	0-5%
Lotte Group	South Korea	0-5%	0-5%
Manji Foods Industries Ltd	Kenya	0-5%	0-5%
Mars Inc	United States	0-5%	0-5%
Menengai Oil Refineries Ltd	Kenya	0-5%	0-5%
Mondelez International Inc	United States	0-5%	0-5%
Nestlé SA	Switzerland	0-5%	0-5%
New Kenya Co-operative Creameries Ltd	Kenya	10-15%	10-15%
PepsiCo Inc	United States	0-5%	0-5%
Post Holdings Inc	United States	0-5%	0-5%
Promasidor (South Africa) (Pty) Ltd	South Africa	0-5%	0-5%
Pwani Oil Products Ltd	Kenya	0-5%	0-5%
Royal FrieslandCampina NV	Netherlands	0-5%	0-5%

[c] Companies with >50% of products missing all nutrient values were excluded. This led to one company assessed in the Corporate Profile (Mini Bakeries) being removed from the Product Profile assessment.

ANNEX C: LOCAL ADVISORY EXPERT GROUP

This Kenya Corporate Profile methodology and company selection is also developed and reviewed in collaboration with the project's advisory group committee consisting of:

1. Mr. Zachariah Muriuki, Nutrition officer, Ministry of Health
2. Dr. Gershim Asiki, Senior research scientist, African Population & Health Research Centre
3. Prof Catherine Kunyanga, Professor of Food Science and Technology, University of Nairobi
4. Mr. Peter Mutua, Food Standards Manager, Kenya Bureau of Standards
5. Professor Juliana Kiio, School of Applied Human Sciences, Kenyatta University. Also supporting this work as a senior nutrition advisor (consultant).
6. Vivian Maduekeh, Managing Partner, Food Health Systems Advisory

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