

EAST AFRICAPACKAGED FOOD & BEVERAGE MARKET ASSESSMENTS



KENYA REPORT 2025

TABLE OF CONTENTS

ACKNOWLEDGEMENTS / DISCLAIMER	4
EXECUTIVE SUMMARY	5
KEY FINDINGS	7
CONTEXT	12
METHODOLOGY	15
SECTION 1 - PRODUCT HEALTHINESS	18
PRODUCT PROFILE	19
PORTFOLIO IMPROVEMENT: MACRONUTRIENTS AND FOOD COMPONENTS	32
PORTFOLIO IMPROVEMENT: MICRONUTRIENTS AND FORTIFICATION	23
REPORTING ON HEALTHINESS	41
SECTION 2 - INFLUENCING CONSUMERS	43
AFFORDABLE NUTRITION	44
RESPONSIBLE MARKETING	46
RESPONSIBLE LABELLING	50
SECTION 3 - CORPORATE GOVERNANCE	52
NUTRITION GOVERNANCE	53
WORKFORCE NUTRITION	55
CONCLUSION AND KEY RECOMMENDATIONS	58
REFERENCES	61

ABBREVIATIONS

ATNI	ACCESS TO NUTRITION INITIATIVE
ВМІ	BODY MASS INDEX
ВОР	BACK-OF-PACK
CODEX	CODEX ALIMENTARIUS (INTERNATIONAL FOOD STANDARDS BODY)
ESG	ENVIRONMENTAL, SOCIAL, GOVERNANCE
F&B	FOOD AND BEVERAGE
FAO	FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS
FOP	FRONT-OF-PACK
HSR	HEALTH STAR RATING
KEBS	KENYA BUREAU OF STANDARDS
KNAP	KENYA NUTRITIONAL ACTION PLAN
KNPM	KENYA NUTRIENT PROFILE MODEL
MHSR+	MODIFIED HEALTH STAR RATING PLUS MICRONUTRIENTS
MSME	MICRO-, SMALL-, AND MEDIUM-SIZED NATIONAL ENTERPRISES
NCDS	NON-COMMUNICABLE DISEASES
NPM	NUTRIENT PROFILE MODEL
PPP	POPULARLY POSITIONED PRODUCTS
SSB	SUGAR-SWEETENED BEVERAGE
UNICEF	UNITED NATIONS CHILDREN'S FUND
WHO	WORLD HEALTH ORGANIZATION
WHO AF	RO WORLD HEALTH ORGANIZATION REGIONAL OFFICE FOR AFRICA

ACKNOWLEDGEMENTS

ATNi's Kenya Report 2025 would not have been possible without the generous support of several donors, in particular the Gates Foundation, the Foreign, Commonwealth and Development Office, and the Waterloo Foundation.

ATNi's Kenya Report 2025 was produced by many ATNi staff: Aurélie Reynier, Babs Ates, Bo-Jane Woods, Daniela Hernández Morales, Eaindra Aye, Efi Chatzinikolaou, Elena Schmider, Freddie von Kaufmann, Greg Garrett, Gulden Timur, Hammed Jimoh, Irene Santoro, Katherine Pittore, Lucy Cosenza, Mark Wijne, Veronica Maxey, Will Sharp; and ATNi consultants: Carly Brown, Elizabeth Dunford, Dr.Juliana Kiio, Kaitlyn Elavaza, Obey Assery Nkya, Philip Eisenhart, and Tumaini Charles.

The ATNi team drew on the expertise and advice of the ATNi East Africa Advisory Group; Dr. Germana Leyna, Gershim Asiki, Festo Kavishe, Professor Catherine Kunyanga, Peter Mutua, Stephanie Kaaya, Vivian Maduekeh, Zachariah Muriuki, and in-country stakeholders, whose close engagement throughout the ATNi development process has been a source of invaluable guidance. We would also like to acknowledge The George Institute for Global Health for their input on the Product Profile assessment. The views expressed in this report, however, do not necessarily reflect the views of the group's members or their institutions.

DISCLAIMER

The information in this report is provided "as is", without any express or implied warranties or representations. The user of the information agrees that any use of the information is at their own risk. All implied warranties with respect to the information are expressly excluded and disclaimed, to the maximum extent permitted by applicable law.

Euromonitor International intelligence is used under license. Euromonitor International's annual industry editions are subject to change year on year and while every attempt has been made to ensure accuracy and reliability, Euromonitor International cannot be held responsible for omissions or errors of historic figures or analyses and should not be relied upon in making, or refraining from making, any investment or legal decision.

Without limiting any of the foregoing and to the maximum extent permitted by applicable law, in no event shall the Access to Nutrition Foundation nor any of its affiliates or contributors to or included in ATNi's Kenya Report 2025 have any liability regarding any information contained in this report for any direct, indirect, special, punitive, consequential (including lost profits), or any other damages, even if notified of the possibility of such damages.

EXECUTIVE SUMMARY

PREFACE

Kenya is experiencing an increase in the proliferation of modern food retail outlets, the consumption of unhealthy processed foods, the prevalence of obesity and overweight, and ongoing micronutrient deficiencies in the country. As a result, Kenya's food industry stands at a pivotal crossroads. Embracing nutrition is no longer an option but essential.

This first-ever independent assessment of Kenya's food and beverage (F&B) manufacturing sector analyzes the healthiness of products offered by 30 of the largest producers of packaged F&B. Together, these companies represent approximately 57% of the formal packaged F&B market in Kenya. Amongst the 746 F&B products analyzed, only 33% meet defined 'healthy' thresholds—while the remaining 67% do not.

This report provides important data and analysis to support a range of stakeholders: policymakers to shape markets and design policies that improve food environments; responsible investors to allocate capital wisely within the food sector; the food industry to reformulate products to improve health outcomes; and civil society and consumers to ensure their voice is leveraged for the improvement of products they consume.

CONTEXT

Kenya is undergoing a rapid nutrition transition. While fresh and minimally processed staple foods remain central to Kenyan diets, the consumption of (ultra-) processed packaged foods—including products high in fats, salt, and sugar—such as sugary beverages, is rapidly increasing. For example, the sales of (ultra-) processed, packaged foods grew by 16% between 2017-2023. This shift is driven by urbanisation, a growing middle class, and expanding formal and informal retail markets.

These dietary changes are contributing to rising rates of overweight, obesity, and diet-related non-communicable diseases (NCDs). Adult obesity has tripled since 2000, and NCDs now account for 39% of all deaths in Kenya, over 50% of hospital admissions, and 11% of health expenditure. In 2022, 45% of women of reproductive age and 19% of men were overweight or obese. At the same time, undernutrition and micronutrient deficiencies persist—especially amongst low-income populations—with 79% of Kenyans unable to afford a healthy diet.

Improving food and nutrition security in Kenya requires coordinated, multisectoral efforts that promote access to affordable, safe, and nutritious foods while mitigating the negative impacts of a rapidly changing food system.

The Government of Kenya has implemented several regulatory and policy measures. The fortification of staple foods—including edible oils, wheat and maize flour, and salt—is mandatory. Furthermore, in a recent public statement, the government has committed itself to prioritising healthy diets, including implementing mandatory front-of-pack (FOP) nutrition warning labels based on the recently released Kenya Nutrient Profile Model (KNPM).

 Ultra-processed foods from the Food Systems Dashboard are defined as foods made of mostly industrial ingredients and additives with minimal amounts of unprocessed foods, mainly used to increase palatability and shelf-life. The F&B industry plays a critical role in shaping food environments, with large multinationals and micro-, small- and medium-sized enterprises driving the availability and marketing of both nutritious and unhealthy products. Monitoring the nutritional quality of products on the market and strengthening accountability and regulatory oversight of the industry is essential to ensure progress towards national nutrition goals.

PURPOSE AND SCOPE

To support national policymaking processes, ATNi (Access to Nutrition initiative) conducted the first independent assessment of the healthiness of products offered by 30 of the largest producers of packaged foods and beverages operating in Kenya. Together, these companies represent an estimated 57% of the formal packaged F&B market in the country.

30
COMPANIES INCLUDED
IN THE KENYA PRODUCT
PROFILE



of the total sales of packaged foods in Kenya in 2022

This assessment provides insight into the relative 'healthiness' of products sold on the Kenyan market, having analyzed 746 packaged F&B products. Four nutrient profile models (NPMs) were used: the Health Star Rating (HSR); the modified HSR+ micronutrients (mHSR+) to include inherent or added micronutrients; the World Health Organization Africa Regional Office's (WHO AFRO) model to determine whether products are eligible to be marketed to children; and the recently adopted KNPM.

In addition, the Kenya Corporate Profile methodology evaluated the nutrition-related policies and practices for 12 of the largest companies in terms of estimated sales (Bidco, Brookside, Capwell, Coca-Cola, Excel Chemicals, Flora, Highlands, Kapa Oil, Kevian, Mini Bakeries, Nestlé, New KCC) to better understand the

food industry's potential impact on food environments and healthy food choices.

The ATNi Global Index 2024 methodology served as the foundation for developing the framework for the Kenya Corporate Profile assessment. The framework was substantially revised to reflect the Kenyan nutrition context, and to ensure applicability for the selected companies. The revision process was informed by one-on-one consultations with relevant stakeholders and experts; insights from the Kenya Food Environment Mapping Report (2025) that included a comprehensive overview of existing government regulations and policies relevant for the food environment; additional literature reviews; and the latest guidance from authoritative public health bodies. Lessons from previous ATNi Index iterations were incorporated where relevant.

The assessment methodology comprises 22 indicators, evaluating companies across three themes and eight categories:

- Product healthiness (product profile, portfolio improvement, reporting on healthiness, and micronutrients and fortification);
- 2. Influencing consumers (labelling, marketing and affordability);
- 3. Corporate governance (nutrition governance and workforce nutrition).

The purpose of these assessments is to provide independent data to inform the food policy debates in Kenya, help companies understand how they compare to their peers, and guide investors on the performance of the companies they own or support in relation to nutrition and health. The report also provides tailored recommendations to government, industry and investors.

KEY FINDINGS

The level of engagement varied across the evaluated companies, which included both Kenya-headquartered and global-headquartered manufacturers. Four companies-three global (Coca-Cola, Flora Food Group, and Nestle), and one Kenya-headquartered (Kapa Oil)-engaged in the data collection process for the assessment of the company's nutrition-related policies and practices (Corporate Profile assessment). ATNi's research found that while nutrition and health are increasingly appearing on the agenda of the 12 largest F&B companies in Kenya, the companies still have considerable progress to make to show how they contribute to food and nutrition security in Kenya. Global-headquartered companies may have stronger global policies and commitments, but they could improve transparency regarding how their global practices are implemented in Kenya. Meanwhile, for Kenya-headquartered companies, no published information on nutrition strategies and activities they may have in place was found. Kenya-Headquartered companies are therefore encouraged to improve both their transparency and reporting in this area.

Product Healthiness

Product Profile: The overall healthiness of the 30 Kenyan companies' portfolios is low, with substantial variation between companies. Results from the HSR calculation showed that just 33% of products met the 'healthy' cut-off of 3.5 out of 5.0 stars, 1 which increased to 38% when results were weighted by company sales—a considerable shift.

When micronutrient data were included using the mHSR+ model, these figures rose to 36% and 42% with sales weighting. Lower results under the WHO AFRO model (14%; 23% sales-weighted) and KNPM (10%; 15% sales-weighted) reflect the more stringent criteria applied by WHO for eligibility to market F&B products to children, and by the KNPM.

When comparing the mean HSR of the 11 largest global-headquartered companies included in the Kenya Product Profile (1.4 stars out of 5, n=223) with their overall mean in the ATNi Global Index 2024 (1.7, n=21.617), it is evident that eight out of these 11 companies have a lower average HSR score in Kenya than their global average.

Portfolio Improvement: Macronutrients and Food

Components: Only two globally head-quartered companies—Flora FG and Nestlé—were found to have published global targets to address nutrients of concern. Kenya-headquartered companies had not published reformulation strategies or targets, although Kapa Oil shared evidence of product testing for nutrient content in 2020.

Portfolio Improvement: Micronutrients and

Fortification: Seven of the 12 largest companies assessed were found to be fortifying their products. Bidco and Kapa Oil were found to fortify edible oil with vitamins A and D, and Capwell was found to fortify maize and wheat flour, in line with Kenyan regulations. Only Flora FG was found to have a public global commitment to only fortify 'healthy' products based on their own criteria and to fortify in line with Codex Alimentarius and WHO/Food and Agriculture Organization of the United Nations (FAO) guidelines.

Product profile: ATNi's assessment found that 140 products (19% of the total 746 products considered) across 24 companies were fortified, including 120 (11%) that were voluntarily fortified. Only 32% of fortified products assessed by HSR were found to meet the 'healthier' threshold

Reporting on Healthiness: Only Flora FG and Nestlé were found to have published information on using a NPM to assess product healthiness, though not specifically for Kenya. Kenya-headquartered companies had not published information on whether they used an NPM or planned to adopt the KNPM once available for this purpose.

COMPARISON OF THE HEALTHINESS OF PRODUCTS IN KENYA ACROSS DIFFERENT MODELS

33%
of products analyzed using the Health Star Rating met the healthy threshold of 3.5 stars out of 5

14%
of products passed the KNPM model to children under the WHO AFRO model

* A total of 746 products included in the analysis * A total of 916 products included in the analysis * A total of 840 products included in the analysis

Influencing Consumers

Responsible Labelling: Back-of-pack (BOP) labelling is regulated in Kenya and is therefore not evaluated in this assessment, which aims to evaluate companies' labelling commitments beyond regulatory compliance. No company was found to explicitly commit to FOP labelling or placing health and nutrition claims only on products meeting specific nutrition criteria (e.g. passing an NPM), meaning that companies may be using health and nutrition claims on products of low nutritional quality in Kenya. However, the Kenyan Ministry of Health (MoH) has recently released a government-endorsed NPM, the KNPM, which provides criteria for a FOP warning label and is designed to inform other food policies.

Product profile: ATNi's product profile assessment found that 90% of products analyzed with the KNPM did not pass the model and would require an FOP warning label as proposed in the KNPM.

Responsible Marketing: Three globally-headquartered companies—Coca-Cola, Flora FG, and Nestlé—were found to have published global commitments for responsible marketing to children. However, none reported on the implementation of these policies in Kenya. Kenya-headquartered companies included in the assessment had not published commitments to restrict marketing of all—or 'less healthy'—products to children.

Product profile: ATNi's Product Profile report assessed the eligibility of 30 companies' products to be marketed to children applying the WHO AFRO model and found that just 14% of products were eligible.

Affordable Nutrition: Three Kenya-headquartered companies—Bidco, New KCC, and Capwell—were found to market their products as affordable and healthy or nutritious on their websites but had not published a nutrition strategy outlining specific criteria for defining affordability or healthiness. Kapa Oil shared evidence of tracking product prices relative to competitors in Kenyan supermarkets. Flora FG measured affordability by tracking household penetration of its products amongst lower socioeconomic groups in Kenya.

Corporate Governance

Nutrition Governance: Three Kenya-headquartered companies—Brookside, Capwell, and Kevian—referenced their role in providing access to nutritious or healthy foods on their websites. Other companies, such as Bidco, were found to market some of their products as healthy. Three global-headquartered companies—Coca-Cola, Flora FG, and Nestlé—publish global nutrition strategies, though none reported comprehensively on the implementation of all aspects of their strategy in the Kenyan market.

Workforce Nutrition: Five of the 12 companies assessed—Coca-Cola, Flora FG, Kapa Oil, Kevian and Nestlé—shared information on the practices they have in place for at least one of the workforce nutrition pillars: healthy food at work, nutrition-focused health checks, nutrition education, and breastfeeding support (including parental leave). Certain elements of these pillars are regulated in Kenya, including parental leave and the right for employees to be properly fed.

CONCLUSION

This assessment highlights the limited but emerging efforts of F&B companies in Kenya to improve the nutritional quality of their products and influence healthier consumer choices. While some global headquartered companies show progress in setting nutrition-related targets and commitments at corporate level, information on their implementation in the Kenyan market is largely undocumented. Kenyaheadquartered companies, meanwhile, had not yet published information on the nutrition strategies and activities they may have in place.

The overall healthiness of packaged food products was found to be low, with most products failing to meet established NPM thresholds. Although some companies have taken steps to fortify products or promote affordability, these efforts were not consistently linked to clear nutrition criteria or supported by robust monitoring systems. Reformulation strategies, where present, were rarely backed by public targets or evidence of local application.

Information on consumer-facing practices—such as responsible labelling and marketing—was also found to be limited. No company was found to apply NPMs to guide their health claims. Responsible marketing of F&B products to children remains relatively unregulated in Kenya, and little attention is paid by industry to this topic.

Overall, few companies align with international standards or reporting on the implementation of their responsible marketing commitments in Kenya. In terms of governance, only a handful of companies were found to have published nutrition strategies, but none demonstrated comprehensive implementation in Kenya. Reporting on workforce nutrition policies was minimal, with little evidence of practices exceeding legal requirements or addressing broader employee health needs in the workplace in Kenya.

To create a healthier food environment in Kenya, stronger regulatory enforcement, greater corporate transparency, and more ambitious industry action are needed. This assessment provides a foundation for policymakers, companies, investors and civil society to collaborate in ensuring that nutritious, affordable, and safe food becomes the standard–not the exception–for all Kenyans.

RECOMMENDATIONS

Manufacturers

1 Assess Product Healthiness, Marketing to Children, and Affordability in Line with National Commitments

F&B companies operating in Kenya should assess their product portfolios using the KNPM and align their practices with national nutrition goals. This includes:

- Identifying which products qualify as 'healthier' under the KNPM and, for global companies, ensuring these products are equally available in the Kenyan market.
- Avoiding the marketing of 'less healthy' products to children by applying the WHO AFRO NPM standards.
- Measuring the affordability and accessibility of healthier options, particularly for low-income and vulnerable populations.

2 Set Clear Targets for Healthier, Affordable Products and Responsible Marketing

Companies should adopt and publicly disclose measurable targets to:

- Increase the availability and sales of healthier, affordable, and fortified products, especially those aligned with national fortification mandates.
- Assign executive-level accountability for nutrition, such as CEO oversight or regular board reviews.
- Fully align marketing practices with WHO and UNICEF standards, defining children as under 18 and restricting marketing of unhealthy products across all media platforms.

3 Improve Transparency on Nutrition Policies, Progress, and Quality Controls

To build trust and accountability, companies should:

- Publicly report on nutrition-related policies, including progress on reformulation, sales of healthier products, and responsible marketing and labelling.
- Disclose fortification practices and ensure that fortified products meet health standards through robust quality control systems.
- Include standardized micronutrient content on BOP labels, in line with Kenya's regulatory requirements.

Government and Policymakers

The Government of Kenya has demonstrated strong leadership on nutrition through revising the **Kenya National Action Plan (KNAP) 2023-2027** and developing the KNPM. To accelerate progress:

- Mandate the use of the KNPM and the recommended FOP nutrition warning labelling to drive healthier offerings by food companies and help consumers make informed choices.
- Enact and enforce regulations to protect children from exposure to unhealthy food and beverage marketing, in line with WHO and UNICEF recommendations.
- Consider other fiscal policy measures that make healthy and sustainable products the easiest and affordable options, thereby supporting a healthy food environment, including taxing unhealthy food or reducing taxes on healthy foods, and implementing public procurement criteria.
- Integrate workplace nutrition interventions into national health strategies to support employee well-being and productivity.
- Consider adopting Environmental, Social, and Governance (ESG) guidance which includes nutrition metrics for public food companies listed on the Nairobi Stock Exchange.

Investors

- Investors should **prioritize investment in companies that demonstrate transparency** in
 their nutrition-related policies; responsible
 marketing practices; and workforce nutrition
 initiatives. They should support investees that
 align with national and international nutrition
 standards (such as Codex Alimentarius and
 WHO/FAO guidelines) and back businesses that
 offer healthier product portfolios and actively
 contribute to Kenya's public health goals.
- Investors can leverage tools, such as <u>ATNi's</u>
 <u>Investor Expectations on Nutrition, Diets, and</u>

 <u>Health</u>, to evaluate company actions on nutrition and guide them towards progress on nutrition and health.
- Investors should help drive progress by demanding that multi-national companies operating in the region apply the same or better nutrition and health standards in emerging and frontier markets as they do in more mature markets.
- Investors should leverage their influence by integrating nutrition into their own reporting standards.

CONTEXT

KENYA'S FOOD AND BEVERAGE INDUSTRY

The F&B sector in Kenya is a significant component of the country's manufacturing and agribusiness landscape, contributing to national food security, employment, and economic growth. In 2025, Kenya's food market–including fresh and processed food sectors–generated an estimated USD 54.62 billion in revenue, and is expected to grow by 9.8% by 2030.¹ The sales of ultra-processed packaged foods grew by 16% over a period of 5 years from 2017 to 2023.¹

The sector comprises a wide range of actors, from small-scale enterprises to large global-headquartered corporations engaged in food processing, packaging, distribution, and retail. Large global-headquartered corporations dominate segments such as dairy, beverages, and milling, while micro-, small-, and medium-sized national enterprises (MSMEs) make up the majority of actors involved in value-added processing and retail. Informal markets also play a central role in food distribution, often operating outside formal regulatory oversight.²

Rapid urbanization, a growing middle class, and shifting dietary preferences are driving demand for processed packaged food in Kenya. However, significant disparities remain in access to nutritious, affordable, and safe food—particularly in rural and low-income urban communities. These demographic and consumption trends shape market behaviour and influence the operational strategies of the F&B industry operating in Kenya.

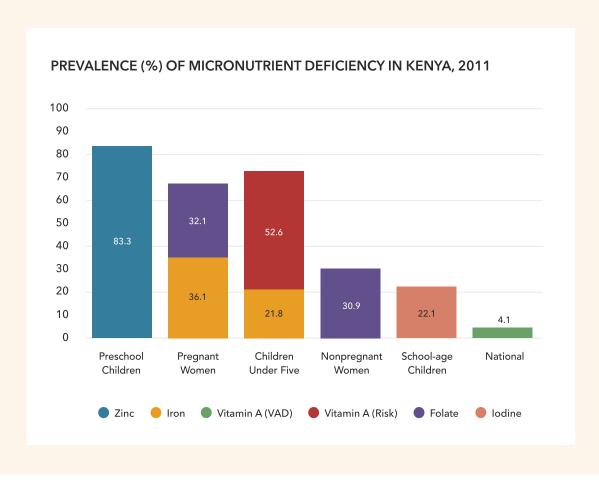
THE TRIPLE BURDEN OF MALNUTRITION

Like many other countries, Kenya faces the triple burden of malnutrition, characterized by the coexistence of undernutrition (stunting, wasting, and underweight), micronutrient deficiencies, and overweight, obesity and diet-related NCDs.

- **Undernutrition:** The prevalence of undernutrition among children has decreased in Kenya. In 2000, 38.5% of children under five were stunted, 7.4% were affected by wasting, and 7.4% were overweight. By 2022, Kenya had succeeded in reversing some of these trends: 18.4% of children under five were stunted, 4.5% were affected by wasting, and 3.8% were overweight.³
- Micronutrient deficiency: The Kenya National Micronutrient Survey (2011) indicates that women and young children are most at risk of experiencing various forms of micronutrient deficiencies, including iron, vitamins A and B12, folate, iodine, and zinc (see Figure 1B). Kenya has made progress in reducing the prevalence of anaemia among women of reproductive age (15-49 years), from 39.89% in 2000 to 28.7% in 2019.4

CONTEXT 12





Overweight, obesity, and diet-related disease:

The prevalence of obesity among adults (18 years and older) rose from 4.2% in 2000 to 12.4% in 2022. NCDs pose a critical public health challenge in Kenya, accounting for 39% of all deaths, contributing to more than half of hospital admissions, and absorbing 11% of national healthcare expenditure.⁵

Trends in the increasing prevalence of overweight, obesity, and diet-related disease in Kenya are partly driven by a nutrition transition—from fresh and minimally processed staple foods to processed and packaged products.

As in many low- and middle-income countries, Kenya is experiencing rapid growth in retail food outlets selling commercial pre-packaged foods and beverages. Studies show that formal retail outlets in Kenya primarily stock processed packaged foods.^{6,7} Additionally, the sales and unregulated marketing of products typically considered 'unhealthy'-including highly processed packaged foods—are influencing dietary behaviours.⁸ This shift in the food environment is altering dietary patterns across all age groups in Kenya.

13

REGULATORY AND POLICY ENVIRONMENT

The F&B industry in Kenya operates under a regulatory framework under the responsibility of several government institutions. Key regulatory bodies include the Kenya Bureau of Standards (KEBS), the Ministry of Health, the Ministry of Agriculture and Livestock Development, and the Kenya Food and Drugs Authority. These institutions are responsible for food safety, labelling, marketing, nutritional standards, and product quality across the country.

To tackle the rising rates of obesity and diet-related disease–partly driven by changing dietary patterns—the 'Kenya National Guidelines for Healthy Diets and Physical Activity' advocate for dietary diversity and a reduced intake of nutrients of concern, such as salt, sugar, and fats. The government is currently reviewing the 'Kenya Nutrition Action Plan' (KNAP) and has publicly committed to introducing policies to improve the national food environment.

There is an urgent need to increase investments in strengthening and integrating nutrition into primary health care and community interventions in Kenya to combat malnutrition.¹² Furthermore, the F&B industry's contribution to nutrition must be properly regulated to enhance its potential in improving nutritional outcomes and preventing malnutrition.

As the Government of Kenya enacts food policies such—as FOP nutrition labelling and marketing restrictions on unhealthy food products—there is a need to integrate accountability frameworks to guide the F&B industry in adhering to these measures to improve food and nutrition security in Kenya.

CONTEXT 14

METHODOLOGY

PURPOSE AND SCOPE OF THE MARKET ASSESSMENT

The Kenya Market Assessment includes two components with different sample sizes of companies included in each component.

- The Product Profile assessment evaluates the portfolio healthiness of 30 of the largest F&B manufacturers in Kenya, representing approximately 57% of the national F&B market.
- In addition, the Corporate Profile assesses 12 companies (representing approximately 44%) are assessed on their policies, practices and transparency across a range of nutrition-related topics.

This work forms part of the ATNi East Africa Market Assessment project, which also includes a similar evaluation of the largest F&B manufacturers in Tanzania and companion reports for both countries titled 'Mapping Kenya's/Tanzania's Packaged Food Environment: Insights into policy, industry, and consumer landscapes' (hereafter referred to as the Food Environment Mapping Report or FEMR). Through this project, ATNi aims to challenge the food industry, investors, and policymakers to shape healthier food systems. ATNi's goal is to translate data into actionable insights that will drive policy, partnerships, innovation, and market change—ensuring more people have access to healthy, sustainable diets.

METHODOLOGY DEVELOPMENT

The 2024 ATNi Global Index methodology served as the foundation for developing the framework for the Kenya Corporate Profile assessment. The framework was substantially revised to reflect the Kenyan nutrition context and to ensure its relevance for the companies selected. This process was informed by one-on-one consultations with relevant stakeholders and experts; insights from the Kenya Food Environment Mapping

Report (2025); additional literature reviews; and latest guidance from authoritative public health bodies. Lessons from previous ATNi Index iterations were incorporated where relevant.

Company selection criteria included market share, national presence, data availability, and product relevance to diets in Kenya. Market share selection criteria was based on national retail sales of food and non-alcoholic beverages, using sales estimates from Euromonitor International (EMI) Passport data for the financial year 2022.

For the Kenya Product Profile assessment, ATNi applied the Health Star Rating (HSR) nutrient profile model (NPM) to assess the healthiness of F&B manufacturers' product portfolios with direct relevance for people's diets. ATNi also applied the modified HSR + micronutrients (mHSR+), model that accounts for levels of six micronutrients relevant to public health, the World Health Organization's Africa Regional Office (WHO AFRO), and the Kenya Nutrient Profile Model (KNPM).

RESEARCH PROCESS

For the Corporate Profile, the 12 companies are provided with access to a survey in an online data gathering platform and are invited to submit responses and evidence for the indicators across eight categories (see Table 1). Information submitted for each indicator may be either publicly available or shared confidentially. ATNi researchers review the submissions to make a preliminary assessment, after which companies are offered a second opportunity to provide additional information and respond to any clarification questions. Engagement in the assessment is voluntary but there is no opt-out. For companies that decide not to engage, researchers rely on information available on the companies' public domains (website, online platform, annual reports etc).

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.

For the Product Profile, ATNi prepares the company product profile sheets with nutrient information for all relevant products in the company' portfolio using information collected from previous assessments where relevant, supplemented with product nutrient information from Innova Market Insights as well as from company websites if available. Companies are invited to review and verify this information.

The product profile analysis using various NPMs is conducted by The George Institute of Global Health Products^b are categorized according to EMI product categories, and scores for HSR, mHSR+, WHO AFRO NPM and KNPM are also sales-weighted using EMI sales estimates.

For the full methodology approach, see the published full Kenya Methodology Document. See Table 2 for a full overview of companies selected for this assessment.

TABLE 1 SUMMARY LIST OF CORPORATE PROFILE CATEGORIES

Thematic Area	Category	Number of Indicators
	Portfolio improvement: Macronutrients and food components	6
Product Healthiness	Portfolio improvement: Micronutrients and fortification	3
	Reporting on healthiness	2
	Affordable nutrition	2
Influencing Consumers	Responsible marketing	3
Consumers	Responsible labelling	2
Corporate	Nutrition governance	3
Governance	Workforce nutrition	2

b. The George Institute for Global Health (TGI) is an independent medical research institute headquartered in Australia with offices in China, India and the United Kingdom. The George Institute conducts research on non-communicable disease, including heart and kidney disease, stroke, diabetes, and injury.

TABLE 2

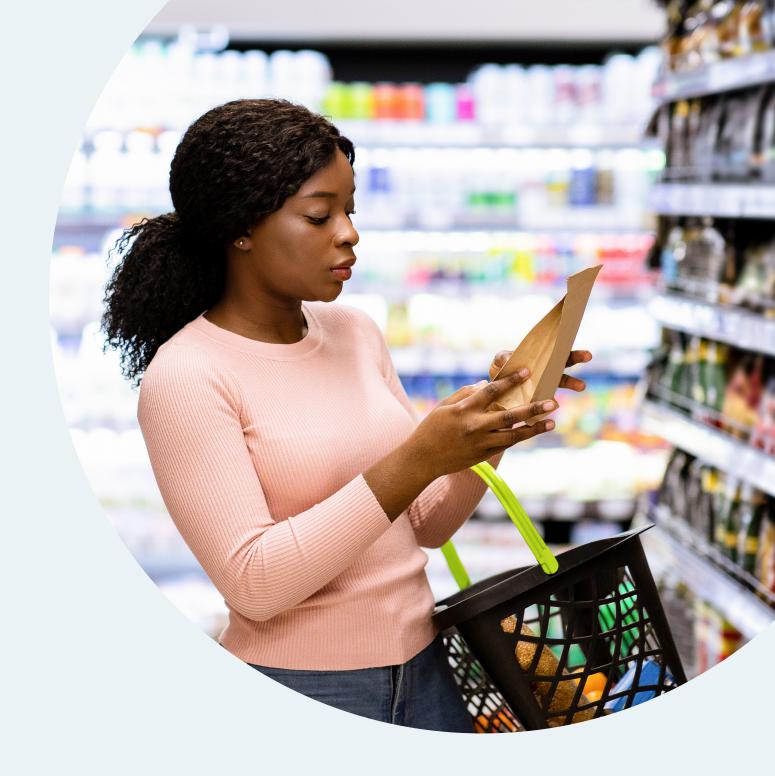
COMPANY SELECTION FOR KENYA MARKET ASSESSMENT

Company	Company short name	Headquarters	Percentage market share in Kenya	Selected for Corporate Profile	Selected for Product Profile
Bidco Africa Ltd	Bidco	Kenya	5-10%	Yes	Yes
Britannia Allied Industries	Britannia	India	0-5%	-	Yes
Broadways Bakery Ltd	Broadways	Kenya	0-5%	-	Yes
Brookside Dairy Ltd	Brookside	Kenya	5-10%	Yes	Yes
Capwell Industries	Capwell	Kenya	0-5%	Yes	Yes
The Coca-Cola Company	Coca-Cola	United States	5-10%	Yes	Yes
Deepa Industries Ltd	Deepa	Kenya	0-5%	-	Yes
Excel Chemicals Ltd	Excel Chemicals	Kenya	0-5%	Yes	Yes
Ferrero	Ferrero	Italy	0-5%	-	Yes
Flora Food Group*	Flora FG	Netherlands	0-5%	Yes	Yes
Fresh Del Monte Produce Inc	Fresh Del Monte	Kenya	0-5%	-	Yes
Githunguri Dairy Ltd	Githunguri	Kenya	0-5%	-	Yes
Highlands Mineral Water Co Ltd	Highlands	Kenya	0-5%	Yes	Yes
Indofood Sukses Makmur Tbk PT	Indofood	Indonesia	0-5%	-	Yes
Jetlak Foods Ltd	Jetlak	Kenya	0-5%	-	Yes
Kapa Oil Refineries Ltd Kenya	Kapa Oil	Kenya	0-5%	Yes	Yes
Kevian Kenya Ltd	Kevian	Kenya	0-5%	Yes	Yes
Kraft Heinz	Kraft Heinz	United States	0-5%	-	Yes
Lotte Group	Lotte	South Korea	0-5%	-	Yes
Manji Foods Industries Ltd	Manji Foods	Kenya	0-5%	-	Yes
Mars Inc	Mars	United States	0-5%	-	Yes
Menengai Oil Refineries Ltd	Menengai	Kenya	0-5%	-	Yes
Mini Bakeries (NRB) Ltd	Mini Bakeries	Kenya	0-5%	Yes	-
Mondelez International Inc	Mondelez	United States	0-5%	-	Yes
Nestlé SA	Nestlé	Kenya	0-5%	Yes	Yes
New Kenya Co-operative Creameries Ltd	New KCC	Kenya	10-15%	Yes	Yes
PepsiCo Inc	PepsiCo	United States	0-5%	-	Yes
Promasidor (South Africa) (Pty) Ltd	Promisador	South Africa	0-5%	-	Yes
Pwani Oil Products Ltd	Pwani	Kenya	0-5%	-	Yes
Royal Friesland-Campina	Freisland-Campina	Netherlands	0-5%	-	Yes
Post Holdings (Weetabix East Africa Ltd)	Weetabix	United States	0-5%	-	Yes

^{*} Number of products with micronutrient data available out of total products (and proportion of total products in the category)



17



SECTION 1 PRODUCT HEALTHINESS



CATEGORY

PRODUCT PROFILE



(30 COMPANIES)

CATEGORY CONTEXT

Product profiling is a key tool for evaluating the nutritional quality of F&B companies' product portfolios. It enables stakeholders – including institutional investors, governments and consumers – to compare the healthiness of portfolios across companies and over time.

This Product Profile presents 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 across 30 companies** using four distinct nutrient profile models (NPMs):

- 1. The Australasian Health Star Rating (HSR) model
- A modified HSR plus micronutrients (mHSR+) model
- The World Health Organization's Africa Regional Office (WHO AFRO) nutrient profile model
- 4. The Kenya Nutrient Profile Model (KNPM)

c. The threshold of 3.5 or above (≥3.5 HSR) is based on research commissioned by the New South Wales Ministry of Health in Australia, which concluded that "healthy core foods with a HSR of ≥3.5 can be confidently promoted in public settings as healthier choices." Reference: Dunford, E., Cobcroft, M., Thomas, M., Wu, J.H. (2015). Technical Report: Alignment of the NSW Healthy Food Provision Policy with the Health Star Rating System. Available at: http:// www.health.nsw.gov.au/heal/ Publications/health-star-rating-system.pdf.

BOX 1

DESCRIPTION OF THE DIFFERENT NUTRIENT PROFILE MODELS

Nutrient profiling is the science of classifying or ranking foods based on their nutritional composition for the purpose of preventing disease and promoting health. Different models are used depending on the policy objective or purpose.

The **HSR** is a FOP interpretive nutrition labelling system designed to help consumers make healthier choices. It scores products from 0.5 (least healthy) to 5 stars (most healthy), based on nutrients to limit (energy, sodium, total sugar and saturated fat) and positive food components (fruit/vegetable content, protein, fibre) on the basis of nutritional composition per 100g or 100mL across one of six categories. Products scoring 3.5 stars or higher are considered 'healthier'. ^{13,c} ATNi uses the HSR in its Global Index and Country Spotlight Indexes to enable cross-company comparisons.

The **mHSR+** was developed by The George Institute in collaboration with ATNi. The HSR+ model builds on the original HSR by incorporating six key micronutrients: iron, vitamin A, vitamin B12, vitamin D, folic acid, and iodine. This enables better differentiation of products based on their micronutrient content.

The **WHO AFRO model** is designed for use by Member States of WHO African Region. It supports policies aimed at restricting food marketing to children. The model categorizes products into 25 categories and applies nutrient thresholds per 100g/mL. Products must meet all thresholds to be eligible for marketing. Results are binary: either 'marketing permitted' or 'marketing not permitted'.

The **KNPM** was developed to underpin FOP labelling requirements in Kenya. It sets thresholds for total fat, saturated fat, total sugars, and sodium across 21 categories of processed foods. Products are assessed per 100g/mL.

DATA COLLECTION

For this analysis, nutrient information was analyzed^{3,d} for 746 packaged F&B products^e sold by 30 of Kenya's largest F&B companies. Collectively, these companies accounted for an estimated 57% of all packaged F&B sales in Kenya in 2022.^f

Product composition data was sourced from Innova Market Insights and shared with the companies for verification. To enable meaningful comparisons, EMI Marketing Insights F&B categories and sub-category definitions were used to create subsets of products large enough for nutritional analysis. Sales-weighting was applied using data from EMI. Of the 30 companies, 14 provided (partial) additional feedback or confirmed the use of their data – including product identification and nutrition label information – for this analysis.

Where nutrition information was incomplete, proxy values were used to estimate missing data and enable scoring. The largest product sub-categories represented in the dataset were Dairy (n=135), Confectionery (n=109), and Juice (n=102). These factors should be considered when interpreting the results. Further details on the methodology, findings, and limitations of the Product Profile study are available in the full ATNi/The George Institute for Global Health (TGI) Product Profile report. The results are also accessible via ATNi's interactive dashboard.

Table 3 provides an overview of the companies included in the Kenya Product Profile assessment. It details per company the number of products analyzed under the HSR model, along with the product categories, example brands and the estimated proportion (range) of retail sales by the company in Kenya that is represented by this research. The categories are ordered based on sales estimates.

- d. Using the HSR Model
- e. Because of missing nutrient data for some products the number of products assessed per NPM differ.
- f. ATNi estimates derived from EMI. EMI is an independent, privately owned global market research firm conducting in-country research in 100 countries worldwide analysing 26 consumer industries including; Hot Drinks, Packaged Food and Soft Drinks. EMI produces historic and forecast cross-comparable market data and strategic reports to narrate the current and future drivers shaping each one.



TABLE 3

PERCENTAGE RANGES OF KENYA SALES AND PRODUCT CATEGORIES INCLUDED IN THE HSR ANALYSIS FOR THE PRODUCT PROFILE

Company	No. products assessed for HSR	Categories included	Examples of brands included	% Kenya 2022 retail sales values represented
Bidco	63	Edible Oils (10) Butter and Spreads (9) Juice (27) Rice, Pasta and Noodles (8) Carbonates (7) Bottled Water (1) Energy Drinks (1)	Bidco, Planet, Juo, Jooz Boost, Ribena	95-100%
Britannia	20	Sweet Biscuits (17) Juice (1)* Savoury Snacks (3)	Britania, Bikwi, Splash	95-100%
Broadways	5	Baked Goods (5)	Broadways	95-100%
Brookside	103	Dairy (75) Butter and spreads (6) Ice Cream (20) Plant-based Dairy (2) Juice (5)	Brookside, Tuzo, Delamere, Daima, Creambell	95-100%
Capwell	29	Rice, Pasta and Noodles (7) Processed Fruit and Vegetables (9) Sweet Biscuits (4) Dairy (3) Breakfast Cereals (1) Flour (5)	Pearl, Ranee, Treatos, Soko	95-100%
Coca-Cola 27		Carbonates (15) Bottled Water (4) Juice (8)	Coca-Cola, Fanta, Schweppes, Sprite, Minute Maid, Dasani, Keringet	80- 85%
Deepa 65		Savoury Snacks (61) Sweet biscuits (4)	Tropical Heat	85- 90%
Del Monte 18		Juice (18)	DelMonte, Just Juicy	95- 100%
Excel Chemicals 20		Bottled Water (1) Other Hot Drinks (2)* Juice (6) Concentrates (8) Confectionery (3) Energy Drinks (2)* Sports Drinks (2)	Excel, Champ, GoFrut, Quencher, Reload	95-100%
Ferrero	Sweet Biscuits (6) Ferrero Rocher, Raffaello,		Kinder, Keebler, Royal	95-100%
Flora FG 6		Butter and Spreads (4) Sweet Spreads (2)	Blue Band, Flora	95-100%
FrieslandCampina	7	Dairy (7)	Peak	95-100%
Githunguri	24	Dairy (20) Butter and Spreads (3) Bottled Water (1)	Fresha, Maziwa, Yuppi, Zito	95-100%
Highlands	Bottled Water (1) Carbonates (12)		Club, Bazuu, Rio	95-100%

Table continues on the next page.



TABLE 3 (CONTINUED)

PERCENTAGE RANGES OF KENYA SALES AND PRODUCT CATEGORIES INCLUDED IN THE HSR ANALYSIS FOR THE PRODUCT PROFILE

Company	No. products assessed for HSR	Categories included	Examples of brands included	% Kenya 2022 retail sales values represented
Indofood	12	Rice, Pasta and Noodles (12)	Indomie	95-100%
Jetlak	33	Bottled Water (1) Concentrates (5)* Juice (20) Plant-based Dairy (9) Sweet Spreads (3)	Waba, Savanah, Frosti, Fruitville, Nuziwa, Nuteez	95-100%
Kapa Oil	17	Butter and Spreads (11) Edible Oils (5) Rice, Pasta and Noodles (1)	Kapa, Rina, Rinsun, Alpa, Prestige, Nala	95-100%
Kevian	17	Juice (9), Bottled Water (1) Energy Drinks (4) Carbonates (2) Sauces, Dips and Condiments (1) Asian Speciality Drinks (1)*	Kevian, Mt Kenyan, Afia, Sunny, Acacia, Pick n Peel,	95-100%
Kraft Heinz	10	Sauces, Dips and Condiments (10)	Heinz	95-100%
Lotte	27	Confectionery (27)	Lotte, E Wedel	95-100%
Manji Foods	5	Sweet Biscuits (4) Baked Goods (1) Savoury Snacks (4)*	Manji	90- 95%
Mars	25	Ice Cream (2) Confectionery (23)	M&M, Galaxy, Snickers, Bounty, Twix, Wringley's, Skittles	95-100%
Menengai	6	Edible Oils (1) Butter and Spreads (2) Rice, Pasta and Noodles (3)	Mamas own, Top Fry, Karibu, Somo	95-100%
Mondelēz	45	Confectionery (34) Other Hot Drinks (6) Sweet Biscuits (5) Cadbury, Oreo, Bournvita, Stimerol		95-100%
Nestlé	26	Other Hot Drinks (2) Instant Coffee Mixes (1) Sauces, Dips and Condiments (1) Dairy (4) Confectionery (17) Ice Cream (1)	Kit Kat, Milkybar, Smarties, Nido, Milo, Maggi	75 - 80%
New KCC	26	Dairy (24) Butter and Spreads (2)	KCC, Gold Crown, Safariland	95 -100%
PepsiCo	27	Carbonates (4) Juice (13) Breakfast Cereals (10) Pepsi, 7UP, Bokomo, Ceres, Mirinda		80 - 85%
Promasidor	10	Dairy (2) Savoury Snacks (4) Meat and Seafood Substitutes (3) Other Hot Drinks (1) RTD Coffee (2)* Miksi, Sossi, Twisco, Wo		95 -100%
Pwani	7	Edible Oils (5) Butter and Spreads (2) Fresh Fri, Salit, Fry Mate, Popco, Mpishi Poa		95 -100%
Weetabix	35	Breakfast Cereals (29) Sweet Biscuits (6)	1 95 -1	
Total	746			

^{*} Categories only included in the WHO AFRO analysis



FINDINGS

Aggregate industry level results across all NPMs

At the industry level, the overall healthiness of company portfolios is low, with substantial variation observed between companies, as shown in Table 4.

TABLE 4

PROPORTION OF INDIVIDUAL PRODUCTS AND SALES CONSIDERED 'HEALTHIER' ACROSS THE FOUR NPMS

NPM	No. of products assessed	Healthy thres- hold	% individual products	% sales
HSR	746	HSR % ≥3.5	33%	38%
mHSR + micronutrients	746	HSR % ≥3.5	36%	42%
WHO AFRO	916	% eligible	14%	23%
KNPM	840	% passing	10%	15%

Of all products analyzed, 33% met the original **HSR** 'healthy' cut-off of 3.5 out of 5.0 stars⁴, increasing to 38% when results were weighted by company sales. Just over half (50.3%) of all products on the market scored 1.5 stars or below. Eight out of the 30 companies had 50% or more of their products meeting the HSR healthier threshold.

When including micronutrient data, using the **mHSR+**, the mean HSR rose by 3%. Five companies increased their rankings under mHSR+ compared to HSR and 15 companies improved their overall healthiness score, of which four substantially. This is an indication of a positive contribution of micronutrients and appropriate fortification to product healthiness. It should be noted that none of the products had data for all six micronutrients included in the model so for the purposes of generating an mHSR+ result, proxy values were used which can result in an underestimation of the real differences between companies.

The lower results observed under the **WHO AFRO** model–14%, 23% sales weighted–reflect the more stringent criteria applied by WHO for eligibility to market to children.^{5,g} Even fewer products passed the **KNPM**, with only 10% of individual products passing the model, and 15% sales-weighted. Using the WHO AFRO model, for only three companies more than 50% of their products were found eligible for marketing to children.^e Similarly, only three companies had 50% or more of their products meeting the KNPM criteria.

Comparison with Global Benchmarks

The average healthiness of packaged foods sold by the 30 largest companies operating in Kenya is comparable to other regions in the world. The proportion of 'healthier' products when using HSR in Kenya–33% –is consistent with ATNi's previous findings, as can be seen in Table 5 below.

The sales-weighted mean HSR in Kenya was 2.3 – identical to the Global Index 2024. However, the product sample in Kenya (746 products) is significantly smaller than that of the Global Index (52,414 products), which may limit comparability. Comparing regional findings, ATNi's Product Profile assessment in Tanzania, found a lower proportion of 'healthier' products at 25%, though the sales-weighted mean HSR was comparable.

g. This assessment did not investigate whether these products are in practice marketed to children and teens by the companies in scope. Instead, it provides an extra indication of the healthiness of the company's portfolios by checking whether the products, in theory, would be eligible to be marketed to children using WHO AFRO criteria

TABLE 5 PRODUCT PROFILE (HSR) RESULTS ACROSS OTHER ATNI INDEXES

	US Index 2022	India Index 2023	Global Index 2024	Tanzania Market Assessment 2025	Kenya Market Assessment 2025
No. companies assessed	11	20	30	21	30
Combined market share of companies assessed	30-35%	35-40%	20-25%	45-50%	55-60%
No. products analyzed with HSR	11,041	1,901	52,414	483	746
Mean HSR	2.3	1.9	2.3	1.9	2.1
Sales-weighted mean HSR	2.2	2.0	2.3	2.2	2.3
% individual 'healthier' products	31%	17%	31%	24%	33%
% sales from 'healthier' products	29%	24%	34%	37%	38%

When comparing 11 global-headquartered companies included in this Kenya Product Profile^{6,h} with their overall HSR results from the Global Index 2024 (see Table 6), it is evident that eight of the 11 companies have a lower average HSR in Kenya than their global average. The remaining 19 companies in this assessment have a combined mean HSR of 2.4, which is higher than the combined mean of 1.4 for the global-headquartered companies that were also assessed in ATNi's 2024 Global Index.

While differences in sample sizes between the datasets should be taken into account, this finding raises important questions about the consistency of product healthiness across markets. It underscores the need for global-headquartered companies to assess whether they are making their healthier products equally available in all regions, including Kenya.

TABLE 6

PRODUCT PROFILE (HSR) RESULTS

OF GLOBAL-HEADQUARTERED

COMPANIES: KENYA VS GLOBALLY

Company	Mean HSR in Kenya	Mean HSR globally
Coca-Cola	1.9 (n=27)	2.2 (n=1170)
Ferrero	0.8 (n=11)	0.9 (n=2743)
Flora FG	2.4 (n=6)	2.0 (n=202)
Friesland Campina	3.7 (n=7)	3.5 (n=358)
Indofood	1.2 (n=12)	1.8 (n=582)
Kraft Heinz	1.8 (n=10)	2.3 (n=2763)
Lotte	0.7 (n=27)	1.4 (n=1964)
Mars	1.5 (n=25)	1.4 (n=2999)
Mondelēz	1.0 (n=45)	1.3 (n=1945)
Nestlé	0.8 (n=26)	1.9 (n=4378)
PepsiCo	1.9 (n=27)	2.3 (n=2513)
Total mean HSR of global- headquartered companies in Kenya	1.4 (n=223)	1.7 (n=21.617)
Total mean HSR for all 30	2.1	2.3
companies in analysis*	(n=746)	(n=52.414)

* Both for this Kenya 2025 Product Profile as well as the Global Index 2024 Product profile, 30 companies were assessed, but they are not the same companies - 11 overlap

The results for the Kenya Product Profile have been considered here, as these results have been updated since the last Global Index 2024.

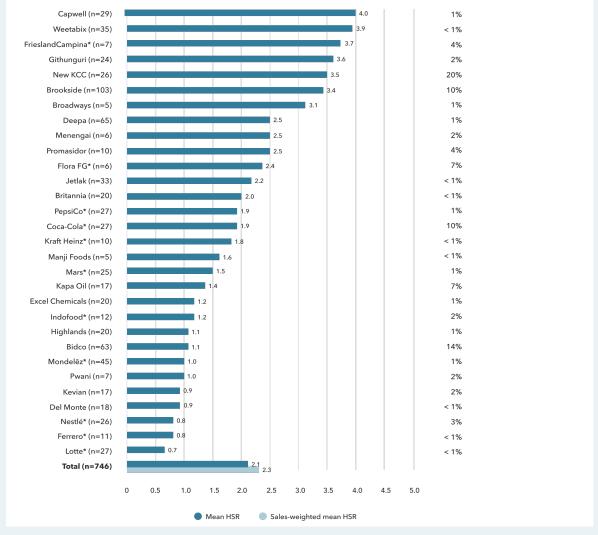
How do companies compare in terms of healthiness?

Based on the HSR, the mean healthiness of products from all 30 companies assessed in Kenya was 2.1 out of 5 stars, increasing slightly to 2.3 stars when weighted by sales. This indicates that healthier products accounted for a slightly larger share of total sales. Only five out of the 30 companies achieved a mean HSR of 3.5 or higher, which is considered the 'healthier' threshold (see Figure 2 below).

Differences in mean healthiness between companies primarily reflect differences in product mix, but this is also an indication of differences in the healthiness of products within the same categories. For example, Lotte and Ferrero, which primarily produce confectionery, had low average HSRs of 0.7 and 0.8, respectively. In contrast, FrieslandCampina (dairy), Weetabix (breakfast cereals), and Capwell (mixed portfolio including rice, pasta, and noodles) had significantly higher mean HSRs of 3.7, 3.9, and 4.0, respectively.

For more detailed results per model, see the full <u>Product Profile report here.</u> Detailed results for each company, including performance across product categories, are available in the company scorecards and on the <u>ATNi dashboard</u>.





* Also assessed in ATNi's Global Index 2024



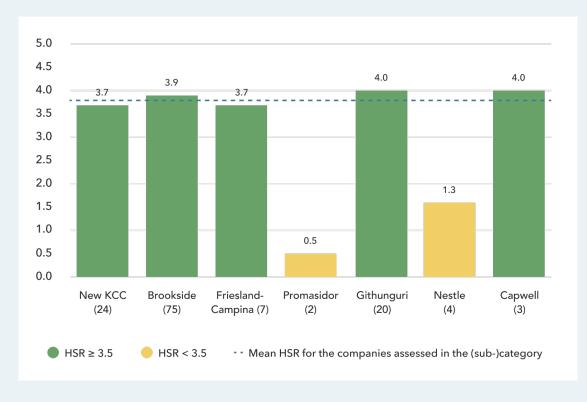
How do product categories compare in terms of healthiness?

There was considerable variation in mean HSR values among companies, even within the same product categories. Overall, food products had a higher mean HSR of 2.5, compared to beverages, which averaged just 1.1. Five categories—Flour, Processed Fruit and Vegetables, Meat and Seafood Substitutes, Plantbased Dairy and Bottled Water—had 100% of products with an HSR of 3.5 or higher. In contrast, none of the products in the Ice Cream, Concentrates, Energy Drinks, Instant Coffee Mixes, and Sports Drinks categories reached the HSR 'healthier' threshold. For more detailed results by category, see the full Product Profile report available here.

Of all the products assessed, most were concentrated in the Dairy category (135 products, including milk, yoghurt, and cheese), Beverages (183 products), and a combined group of "Discretionary/ Indulgent" food categories (246 products) which includes Confectionery, Ice Cream, Savoury snacks and Sweet Biscuits.

Within the Dairy category, five out of the seven companies reached the healthier threshold of 3.5 out of 5 stars. In this category, the average HSR was 3.8 stars, although significant differences were observed between companies. Mean HSRs in this category ranged from 0.5 for Promasidor (2 products) to 4.0 for Capwell (3 products) and Githunguri (20 products) out of 5 stars (see Figure 3).





 Companies with only one product in a category are not shown here, see the <u>full Product Profile report here</u> In the "Discretionary/Indulgent Food" category groups (Confectionery, Ice cream, Savoury Snacks and Sweet Biscuits), the mean HSR ranged from 0.6 for Nestlé (18 products), to 3.0 out of 5 stars for Excel Chemicals (3 products) and Weetabix (6 products) (see Figure 4).

Within the Beverage portfolio type, Carbonates and Juice were the largest sub-groups. For Carbonates, the mean HSR ranged from 0.5 for Kevian (3 products) to 1.6 for Coca Cola (15 products) out of 5 stars (see Figure 5).

FIGURE 4
COMPARISON OF MEAN HSR BY COMPANY WITHIN THE DISCRETIONARY/
INDULGENT FOOD CATEGORY

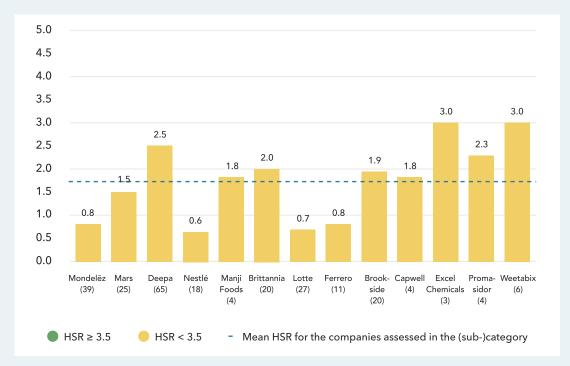
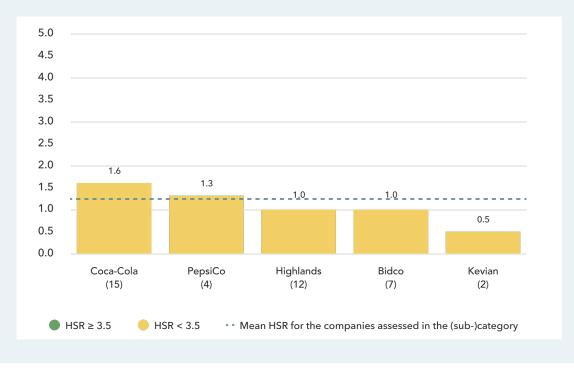
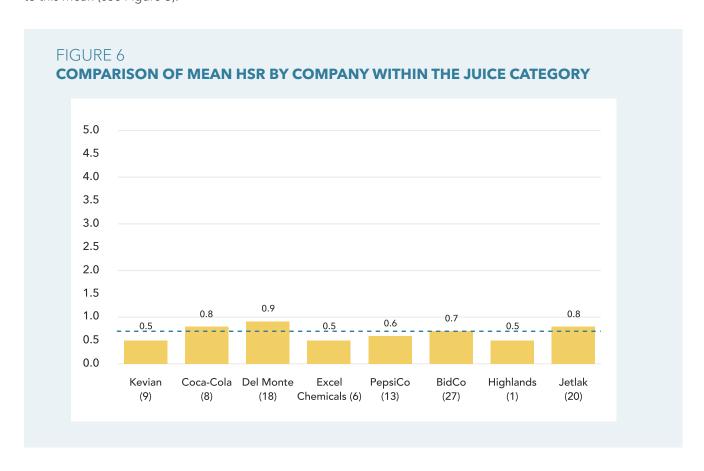


FIGURE 5

COMPARISON OF MEAN HSR BY COMPANY WITHIN THE CARBONATES CATEGORY



For Juice, the mean HSR in this sub-category was 0.7 out of 5 stars, with all eight companies scoring close to this mean (see Figure 6).



BOX 2

SUGAR-SWEETENED BEVERAGES

In Kenya, there's a growing interest from the government in implementing taxes on sugar-sweetened beverages (SSBs) to address diet-related non-communicable diseases (NCDs) like obesity and diabetes. When looking at the Carbonates sold by the five manufacturers highlighted in Table 7, the main differences between the companies is in the offerings of diet- and zero-sugar carbonates by Coca Cola (Diet Coke and Coca Cola Zero Sugar) and PepsiCo (Diet Pepsi and Pepsi Max). When comparing the mean sugar levels of the SSBs, excluding the diet varieties, the sugar mean is highest for Kevian and PepsiCo, as can be seen in table below. When excluding the diet varieties, Highlands (n=12) and Bidco (n=7) have the highest mean HSR of 1.0 out of 5 stars.

TABLE 7

LEVELS OF SUGAR IN SUGAR-SWEETENED BEVERAGES PRODUCED BY DIFFERENT COMPANIES IN KENYA

Company	Excluding diet- and zero-sugar drinks			Including	diet- and zero-su	gar drinks
	Number	Mean sugar	Mean HSR	No	Mean sugar	Mean HSR
Bidco	7	9.7	1.0	7	9.7	1.0
Coca-Cola	11	8.2	0.9	15	6.0	1.6
Highlands	12	7.8	1.0	12	7.8	1.0
Kevian	2	14.6	0.5	2	14.6	0.5
PepsiCo	3	11.5	0.5	4	8.6	1.3
Total	35	9.0	0.9	40	7.9	1.2

CONCLUSION

The overall healthiness of the 30 Kenyan companies' portfolios is low, with substantial variation between companies. Only five out of the 30 companies achieved a mean HSR of 3.5 or higher, which is considered the 'healthier' threshold.

Overall, these results align with ATNi's global findings. The sales-weighted mean HSR in Kenya was 2.3 – identical to the Global Index 2024. However, when comparing 11 global-headquartered companies included in this Kenya Product Profile with their global HSR results from the Global Index 2024, eight of the 11 companies have a lower average HSR in Kenya than their global average. This underscores the need for global-headquartered companies to assess whether they are making their healthier products equally available across all regions, including Kenya.

Only 14% of products were eligible for marketing to children under the WHO AFRO criteria, increasing to 23% after sales-weighting. The low proportion of products eligible for marketing to children is indicative of the unhealthy nature of most products offered by Kenya's largest F&B manufacturers. The KNPM criteria are even more stringent: only 10% of products overall passing, representing 15% of total sales. These findings highlight the need for a strong policy environment to improve the nutritional quality of the food supply.

Across the different NPMs used in this assessment, the overall results improved after weighting by sales. This illustrates the opportunity for companies to increase the proportion of sales deriving from healthy foods and decrease their reliance on sales of less healthy foods. This can be achieved not only by accelerating product (re)formulation, but also by redirecting marketing strategies to healthier products and brands, and by incorporating nutrition considerations into merger and acquisition strategies.

There was also considerable variation in healthiness scores between companies within the same product category. This suggests that healthier product formulations are possible. Companies with lower average 'healthiness' scores in a specific category are encouraged to step up their reformulation efforts and/ or develop new, healthier products.

INDUSTRY RECOMMENDATIONS

A healthy diet plays a crucial role in protecting consumers from chronic NCDs. To support this, consumers should have access to a diverse range of foods while limiting their intake of salt, sugars, and industrially produced trans-fats.^j
F&B companies can contribute to healthier diets for Kenyan consumers, by taking a comprehensive, portfolio-wide approach to nutrition. Specifically, companies should aim to:

- 1. Increase revenue from healthier products: Derive a significant proportion of revenue from products classified as 'healthier'—using a government-endorsed nutrient profile model such as the KNPM or the HSR system (with a rating of 3.5 or higher)—and set measurable targets to grow this share.
- 2. Improve sales-weighted nutritional quality:
 Achieve a high average sales-weighted nutritional score across the product portfolio, based on models such as the KNPM or HSR
- 3. Reduce products requiring warning labels:

 Ensure a high proportion of products are exempt from FOP warning labels under the KNPM criteria, and set SMART (Specific, Measurable, Achievable, Relevant, Time-bound) targets to increase this percentage.
- 4. Support responsible marketing to children: Maintain a high proportion of products eligible for marketing to children, according to the WHO AFRO nutrient profile model.
- 5. Demonstrate continuous improvement: Show measurable improvements in the healthiness of the product portfolio over time, and aim to lead on nutritional quality within specific product categories relative to industry peers.
- j. Ministry of Health. National Guidelines for Healthy Diets and Physical Activity [Internet]. Nairobi: Government of Kenya; 2017 p. 1-100. Available from: https://www.nutritionhealth.or.ke/ wpcontent/uploads/Downloads/National%20Guidelines%20 for%20Healthy%20Diets%20and%20Physical%20Activity% 202017.pdf



POLICY RECOMMENDATIONS

The Kenyan government has committed to advancing a policy environment that supports healthy diets, with particular emphasis on FOP nutrition labelling and restricting the marketing of food to children. The findings of this Product Profile assessment highlight the urgent need to introduce and enforce effective, mandatory food environment policies—especially those related to clear labelling and the restriction of marketing unhealthy products to children.



CATEGORY

PORTFOLIO
IMPROVEMENT:

MACRONUTRIENTS AND FOOD COMPONENTS

CATEGORY CONTEXT

Improving the healthiness of F&B companies' product portfolios—and limiting the negative effect of the increased consumption of unhealthy foods and diets—is crucial to addressing public health challenges in Kenya. Rising rates of NCDs, such as hypertension, diabetes, and cardiovascular diseases, are increasingly linked to dietary factors and greater consumption of packaged processed foods, particularly those that are high in fats, sugar and salt.¹⁴

TABLE 8 POLICY LANDSCAPE

ALC: UNIT	
National Policy or Regulation	Summary
National Guidelines for Healthy Diets and Physical Activity 2017	Outlines principles for healthy eating across all life stages, including nutrients and foods to consume and avoid. ⁹
KNPM	The KNPM is designed to align with WHO guidelines to classify foods based on nutritional quality. ³ The model is designed to be used for FOP labelling to clearly inform consumers about high levels of nutrients of concern, and could also be used to inform other policies to (re)shape the food environment including fiscal measures, which could stimulate the (re)formulation of products to be healthier. ¹⁶
Labelling of pre-packaged foods–General requirements (2024)	Specifies labelling requirements for prepackaged foods, including nutrition information. ¹⁷
Food, Drugs and Chemical Substances Act, Cap 254	Mandates trans-fatty acid labelling in alignment with international standards, including those set by the Codex Alimentarius Commission. ¹⁸

FINDINGS

Of the 12 companies assessed in the Corporate Profile assessment, only two companies—Flora FG and Nestlé—have published global targets to address levels of some nutrients of concern. Among these, only Flora FG has set targets for all nutrients of concern (salt, sugar, saturated fats, and trans fats) and provided concrete evidence of how these global targets are being translated to the Kenyan market. While Coca-Cola reports on its progress reducing sugar in its global portfolio, the company did not show evidence of having a quantitative target globally or in Kenya.

Overall, while none of the Kenya-headquartered companies demonstrated evidence of reformulation strategies and targets, one has recognized the importance of monitoring the nutritional quality of their portfolios. Kapa Oil shared evidence with ATNi of product testing for nutrient content in 2020.

KEY INDUSTRY RECOMMENDATIONS

To ensure their products contribute to healthy diets in Kenya, F&B companies are recommended to:

- Identify products or categories that are high in applicable nutrients of concern (sodium, sugar, saturated fats and iTFAs) and publish specific, measurable, and time-bound targets for reducing levels of these nutrients across all relevant product categories sold in Kenya.
- Publicly report on annual progress against reformulation targets in the Kenya market using quantitative metrics.

POLICY RECOMMENDATIONS

While some policy measures exist to help guide F&B companies to produce and reformulate healthier products, there is further scope to help drive industry accountability and transparency. Policymakers are encouraged to use the outcomes of this research to help develop a roadmap for industry and policymakers, outlining clear measures to guide and align reformulation efforts to improve the nutritional quality of their products.



CATEGORY

PORTFOLIO
IMPROVEMENT:



MICRONUTRIENTS AND FORTIFICATION

CATEGORY CONTEXT

Micronutrient deficiencies remain a significant public health concern in Kenya, particularly among vulnerable population groups such as women of reproductive age and young children.^{4,19} Kenya has adopted mandatory food fortification of commonly consumed staples as a means of improving micronutrient intake at scale.¹⁹

However, there is reason for concern in Kenya regarding food companies fortifying packaged processed products that are considered 'unhealthy', potentially leading to adverse health outcomes. While fortification is essential for addressing micronutrient deficiencies, it is equally important for the food industry to prioritize the production and promotion of foods that are inherently rich in essential macro- and micronutrients and not fortify products with poor nutritional quality.

TABLE 9

POLICY LANDSCAPE

National Policy or Regulation	Summary
National Food Fortification Strategic Plan (2018-2022)	A framework for addressing micronutrient deficiencies through staple foods fortification, without explicitly applying to fortified non-staples or packaged processed foods, or the use of fortified staples as ingredients in packaged processed foods. ²⁰
Food, Drugs and Chemical Substances Act, Chapter 254, 2012	Mandates that salt, wheat flour, maize flour, and vegetable fats and oils should be fortified with key micronutrients in line with the Codex and WHO/FAO Guidelines. ⁴ Requires that fortified foods are labelled in line with national legislation (Labelling of prepackaged foods - KS EAS 38 and Guidelines for health and nutrition claim - KS CAC/GL 23) and Codex Guidelines. ²²
KS EAS 767: Specification for Maize Flour	Establishes mandatory fortification requirements for maize flour. ²³
KS EAS 768: Specification for Wheat Flour	Establishes mandatory fortification requirements for maize flour. ^{23,24}
KS EAS 769: Specification for Edible Fats and Oils	Establishes mandatory fortification requirements for edible fats and oils. ²³
KS EAS 35: Specification for lodized Salt	Establishes mandatory iodine fortification levels for salt. ²⁵
East African Standard RS EAS 1023:2021 Food Fortification Premix and Fortificants: Specification	Provides requirements and specifications for food fortification premixes and fortificants used in the East African region. ²⁶
Guidelines for Use of Nutrition and Health Claims (KS CAC/GL 23)	Defines various types of claims, including nutrient content claims, nutrient comparative claims, and nutrient function claims. However, it does not provide a formal definition of what constitutes a 'healthy' food product. ²⁷
Fortification Mark of Quality	The Kenya Bureau of Standards facilitates a voluntary certification process, where companies can pay KES 10,000 per product to apply the KEBS Fortification Mark of Quality. ²⁸



FINDINGS

Corporate profile

Seven out of 12 companies assessed in the Corporate Profile were found to be fortifying their products. This information was collected either on the company's website or shared by the company. Of these seven, two companies (Bidco and Kapa Oil) fortify edible oil with vitamins A and D, as mandated in Kenya, by means of adding premix. Capwell also confirmed to ATNi that it is fortifying maize and wheat flour as required by law in Kenya.

Micronutrient information was also found for other product categories that fall outside the scope of existing mandatory fortification regulations (see Table 10). For most companies, this information was found on BOP nutrition labels, meaning it was not always clear whether the micronutrients are added by means of fortification or inherent in some of the products' ingredients. Additionally, it remains unclear if companies aside from Flora FG are using mandatory fortified staples as ingredients in formulations of other packaged processed foods to enhance their nutritional quality.

TABLE 10

COMPANIES' PRODUCT CATEGORIES FOR WHICH MICRONUTRIENT INFORMATION WAS FOUND

Company	Product Categories	Data source
Bidco	Butter and spreads, energy drinks, juice and rice, pasta and noodles	Micronutrients listed on BOP label
Kapa Oil	Butter and spreads, pasta and noodles	Micronutrients listed on BOP label
Capwell	Rice	DSM ²⁹
Flora FG	Blue Band margarine, sweet spreads	Vitamin A and D premix, and use of fortified edible oil as ingredient for margarine; and micronutrients listed
Brookside	Milk and breakfast cereals	Micronutrients listed on BOP label
Kevian	Energy drinks	Micronutrients listed on BOP label
Highlands	Juice and concentrates	Micronutrients listed on BOP label

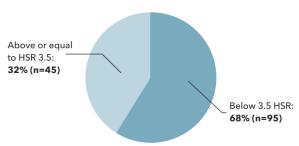


Kenya-headquartered companies included in this assessment have not published information on the fortification practices, policies, or procedures they may have in place for determining which products are suitable to be fortified and how they are fortified. Of the 12 companies assessed, only one company–Flora FG–has a public global commitment regarding the criteria is adheres to when fortifying its products with micronutrients. The company commits to:

- Implement restrictions relating to nutrition when fortifying products, not related to the formal nutrition criteria on an NPM.
- Adhere to the Codex Alimentarius CAC/GL 9-1987
 General Principles for The Addition of Essential
 Nutrients to Foods, which provides international
 guidance on the appropriate selection and levels
 of micronutrients, for use in fortification. This
 commitment is in line with Kenyan regulation.

MICRONUTRIENTS & FORTIFICATION





Proportion of fortified products classified as 'healthier using the HSR

Flora FG was the only company in the assessment to provide evidence of using external analytical testing methods to verify micronutrient levels in the fortified staples that it produces, as well as in its own products.

Two other global companies—Coca-Cola and Nestlé—also provided evidence of a similar global commitment without linking the fortification of their products with specific nutrition criteria. However, only Nestlé's policy is available in the public domain.

BOX 3

PRODUCT PROFILE

ATNi's Product Profile report assessment confirmed that companies are fortifying products beyond mandatory fortified staples. The assessment, covering 30 of the largest F&B manufacturers operating in Kenya (including those in ATNi's corporate Profile assessment), found that 24 companies had at least one product for which micronutrient data was available. Of the 983 products assessed, for 333 (32%) products, data was available for at least one micronutrient. This includes staple products that are mandatorily fortified. An additional 120 (11%) products were voluntarily fortified (excluding oil and flour^{8,k}). The greatest number of products with micronutrient information (inherent from ingredients in the product or through fortification) was found in the Dairy (n=184, 55%), Juice (n=39, 12%) and Breakfast Cereal (n=28, 8%) categories. No data were found for products in the Asian speciality drinks, Carbonates, Instant coffee mixes, Meat and seafood substitutes or Sports drinks categories. (Box continues on the next page).

k. The Kenyan government mandates the fortification of staple foods such as salt, vegetable oils and fats, wheat flour, and maize flour. Specific standards can be found under Kenya's Food, Drugs and Chemical Substances Act (CAP 254), as amended in 2015 (Legal Notice No. 157).



TABLE 11

FORTIFICATION STATUS OF PRODUCTS FOR WHICH MICRONUTRIENT DATA WAS FOUND

Category	Total no. products	No. products with micronutrient data ^{9,1}	No. fortified products ^{10,m}
Asian specialty drinks	1	0	0
Baked goods	9	4	0
Bottled water	10	2	0
Breakfast cereals	41	28	26
Butter and spreads	40	37	28
Carbonates	44	0	0
Concentrates	20	0	4
Confectionary	118	2	0
Dairy	166	147	7
Edible Oils*	22	18	21
Energy drinks	8	6	5
Flour*	6	6	6
Ice cream	38	5	0
Instant coffee mixes	1	0	0
Juice	184	39	20
Meat and seafood substitutes	3	0	0
Other hot drinks	12	6	2
Plant-based dairy	11	4	9
Processed fruit and vegetables	9	3	0
Rice, pasta and noodles	43	13	10
Packaged ready-to-drink coffee	2	2	0
Sauces, dips and condiments	16	1	0
Savoury snacks	75	1	0
Sports drinks	2	0	0
Sweet biscuits and snacks	95	6	4
Sweet spreads	7	3	1
Total	983	333	144

 $[\]mbox{\ensuremath{^{\star}}}$ Category is subject to mandatory fortification regulations in Kenya.

Note: Grey rows indicate product categories in which no products with micronutrient data were found.

- Products were included if micronutrient data were available from Innova Market Insights, visible on product images from company websites, or directly provided by the company, for at least one micronutrient. Micronutrients could be inherent in ingredients used or fortified.
- m. Products were classified as fortified if this was clearly stated, or if micronutrients were listed in the ingredients. In many cases, the specific levels of micronutrients were not available.





BOX 4

PRODUCT PROFILE HSR AND HSR+ RESULTS

Overall, a HSR score could be calculated for 746 products in the product profile assessment. Of these, 140 (19%) were classified as fortified, including staple products subject to mandatory fortification (edible oil, maize flour, and wheat flour). Table 12 below summarises the number of products classified as fortified, categorized by EMI categories along with their mean HSR and mHSR+ micronutrient scores. The highest number of fortified products were in the Dairy (n=35, 32%), Breakfast cereal (n=26, 18%), Juice (n=20, 20%) and Edible oil (n=21, 14%) categories. For some product categories, nutritional information was insufficient to calculate a HSR, and therefore scores are not reflected in the table below. Analyzing products with the HSR, 68% did not meet the 'healthier' threshold of 3.5 stars, and 57% scored 1 star or below indicating many may not be suitable for fortification. For example, in the Dairy category, 74% of fortified products scored 1.5 stars or less. The mean healthiness for products analyzed with the mHSR+ micronutrients with protein in the model was 5% higher than with the HSR model.

Comparatively, ATNi's <u>Product Profile assessment in Tanzania</u> shows a higher proportion of 'healthier' fortified products at 67%, however the total number of fortified products included in the HSR assessment was lower in Tanzania (n=40) than in Kenya (n=140).

TABLE 12

PROPORTION OF FORTIFIED PRODUCTS CLASSIFIED AS 'HEALTHIER' USING THE HSR AND HSR+

	No. fortified	HSR											
Category	products/total no. products assessed in HSR	Below 3.5 HSR:68%				Ab	oove or equal to HSR 3.5:32%			Mean HSR	Mean mHSR+		
	(%)	0.5	1.0	1.5	2.0	2.5	3.0	3.5	4.0	4.5	5.0		
Breakfast cereals	25/40 (62%)	0	0	0	0	1	3	4	7	7	3	4.0	4.7
Butter and spreads	28/39 (72%)	3	19	2	0	1	2	1	0	0	0	1.3	1.3
Concentrates	0/13 (0%)	3	0	0	0	0	0	0	0	0	0	0.5	0.5
Dairy	35/174 (20%)	5	19	2	0	1	2	1	5	0	0	1.6	1.8
Edible Oils	20/21 (95%)	0	13	0	2	0	2	2	0	1	0	1.7	1.7
Energy drinks	5/6 (83%)	4	0	0	1	0	0	0	0	0	0	0.8	0.9
Flour*	5/5 (100%)	0	0	0	0	0	0	2	3	0	0	3.8	4.6
Juice	20/102 (20%)	20	0	0	0	0	0	0	0	0	0	0.5	0.5
Other hot drinks	2/9 (81%)	1	0	1	0	0	0	0	0	0	0	1.0	1.0
Plant-based dairy	9/11 (81%)	0	0	0	0	0	0	0	3	6	0	4.3	4.3
Rice, pasta and noodles	11/31 (35%)	7	1	2	0	0	0	1	0	0	0	1.0	1.0
Sweet biscuits, snack bars and fruit snacks	4/46 (7%)	2	2	0	0	0	0	0	0	0	0	0.8	0.8
Sweet spreads	1/5 (20%)	1	0	0	0	0	0	0	0	0	0	0.5	0.5
Total	140/463 (30%)	43	35	5	3	2	7	10	18	14	3	2.0	2.2
% of total	19%	31%	25%	3.5%	2%	1.4%	5%	7%	13%	10%	2%	-	-

^{*}Table represents the number of products identified as fortified based on information shared by companies, Innova Market Insights or public sources. Products were classified as fortified, if a micronutrient was listed in the ingredients.

^{*}Product nutrient information was missing for HSR analysis in the following categories: Meat and seafood substitutes, baked goods, bottled water, confectionery, Ice cream, Instant coffee mixes (powder), Meat and seafood substitutes, Processed fruit and vegetables, Sauces, dips and condiment, Savoury snacks, Sports drinks.





BOX 5

PRODUCT PROFILE KNPM RESULTS

Table 13 presents the number of fortified products that passed the KNPM. Of the 116 out of 840 fortified products included in the KNPM assessment, 84% did not pass the model and would require an FOP warning label.

TABLE 13

PROPORTION OF FORTIFIED PRODUCTS CLASSIFIED AS 'HEALTHIER' USING KNPM

Carrier	No. fortified products/total no.	KNPM		
Category	products assessed in KNPM (%)	Did not pass	Passed	
Asian specialty drinks	0/1(0%)	0	-	
Baked goods	0/6 (0%)	0	-	
Bottled water	0/10 (0%)	-	0	
Breakfast cereals	25/40 (63%)	22	3	
Butter and Spreads	28/39 (72%)	21	7	
Carbonates	0/44 (0%)	0	0	
Concentrates	0/20 (0%)	4	-	
Confectionary	0/117 (0%)	0	0	
Dairy	7/138 (5%)	7	0	
Energy drinks	5/8 (63%)	5	0	
Ice cream	0/24 (0%)	0	-	
Instant coffee mixes (powder)	0/1 (0%)	0	-	
Juice	20/184 (11%)	20	0	
Meat and seafood substitutes	0/3 (0%)	0	-	
Other hot drinks	2/12 (18%%)	2	0	
Plant-based dairy	9/11 (81%)	0	9	
Processed fruit and vegetables	0/4 (0%)	-	0	
Rice, pasta and noodles	11/43 (26%)	11	0	
Sauces, dips and condiments	0/12 (0%)	0	0	
Savoury snacks	0/68 (0%)	0	-	
Sports drinks	0/2 (0%)	0	0	
Sweet biscuits, snacks and fruit snacks	4/48 (8%)	4	-	
Sweet spreads	1/5 (20%)	1	0	
Total number	116/840	97	19	
Proportion of total	14%	84%	16%	

^{*}The KNPM does not include single ingredient products such as edible oil and flour categories.



KEY INDUSTRY RECOMMENDATIONS

To ensure fortified packaged F&B contribute to healthy diets and help to address micronutrient deficiencies in Kenya, F&B companies are encouraged to:

- List and disclose levels of micronutrients present in products on BOP nutrition labels, including fortified staples used as ingredients and standardize metrics.
- Develop and publish a fortification policy that explicitly commits to follow the CODEX CAC/GL 9-1987 and/or the WHO/FAO 'Guidelines on Food Fortification with Micronutrients' as per standards set out by the Kenyan government, and only fortify products that meet the nutrition criteria of an NPM or as required by law to avoid the any health 'halo' effect.
- Publish quality control or assurance methods to determine whether the levels of micronutrient(s) are adequate in the final product.

POLICY RECOMMENDATIONS

While clear policy infrastructure exists to govern the fortification of certain staple foods in Kenya, the government has an opportunity to expand this framework to regulate the fortification of packaged processed foods, including mandating the use of fortified staples as ingredients in such products.

The absence of clear policy guidance allows F&B manufacturers to fortify products that may be high in sugar, salt, and unhealthy fats, potentially leading to misleading health claims and consumer perceptions, and undermining broader nutrition goals.

Further, Kenya's regulatory framework for food fortification includes standards for labelling and health claims on food products, but these do not establish a formal definition a 'healthy' product based on formal nutrition criteria. Claims can therefore be used to suggest that a fortified product will yield certain health benefits, without considering the overall nutritional profile of the product.

To address these gaps, policymakers are encouraged to use the outcomes of this research to help develop a roadmap for industry and policymakers outlining specific measures to strengthen policy on the fortification of packaged processed foods.



REPORTING ON HEALTHINESS



CATEGORY CONTEXT

Nutrient profile models (NPMs) are tools used to classify F&B products based on their nutritional composition and impact on healthy diets. In Kenya, packaged processed foods are increasingly entering the market and consumers' food baskets. Many of these products are high in fats, salt and sugar, which can negatively impact the diet quality.

This nutrition transition is contributing to rising rates of obesity and diet-related disease, alongside undernutrition and micronutrient deficiencies.

Applying NPMs to assess the nutritional quality of packaged processed products, monitor progress and inform policies to improve healthy diets can help create healthier food environments and support improved public health outcomes.

TABLE 14 POLICY LANDSCAPE

National Policy or Regulation	Summary
Kenya Nutrient Profile Model (KNPM)	An NPM developed by the Kenyan Ministry of Health in consultation with public health stakeholders to guide the implementation of mandatory FOP labelling for prepackaged foods, as well as a range of other potential food policy measures. ³⁰
National Guidelines for Healthy Diets and Physical Activity 2017	Provides guidelines on foods that are part of a healthy diet. The Guidelines recommend consumers limit intake of trans fats, saturated fats, sugars, and salt, while increasing consumption of fruits, vegetables and other staple foods rich in key micronutrients such as iron, vitamin A, iodine, and zinc. ⁹

FINDINGS

Two of the twelve companies assessed (Flora FG and Nestlé) published information about using an NPM to evaluate the healthiness of their product portfolios; however, neither specify whether these models are specifically applied in the Kenyan market.

Nestlé has adopted the government-endorsed HSR NPM, and Flora FG uses its own model to report on portfolio healthiness at the global level. Nestlé has published key methodological details on how the HSR is applied to their product portfolio, but only for select countries and not including Kenya.

Flora FG shared the methodology, products and nutrients of concern, as well as targets and rationale for achieving healthier products within their global portfolio, although these disclosures are not specific to Kenya.

Kenya-headquartered companies have not published information on whether they use an NPM to evaluate the nutritional quality of their products, nor whether they intend to adopt the KNPM for similar purposes when it is made available.

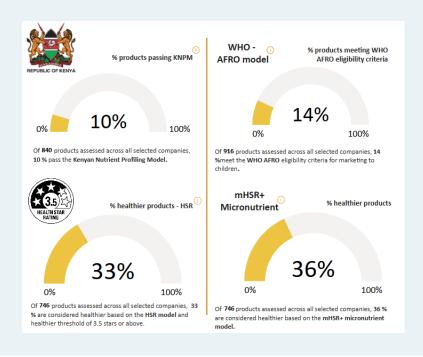


BOX 6 PRODUCT PROFILE

ATNi's Product Profile report assessment also benchmarked the healthiness of 30 companies' portfolios against different NPMs, including the KNPM and HSR, as shown in Figure 7 below and ATNi's country dashboard. F&B companies are encouraged to adopt these government-endorsed NPMs and the relevant reporting guidelines to report on the proportion of products and sales coming from 'healthy' products.

FIGURE 7

PROPORTION OF SALES DERIVED FROM 'HEALTHY' PRODUCTS IN THE KENYAN MARKET



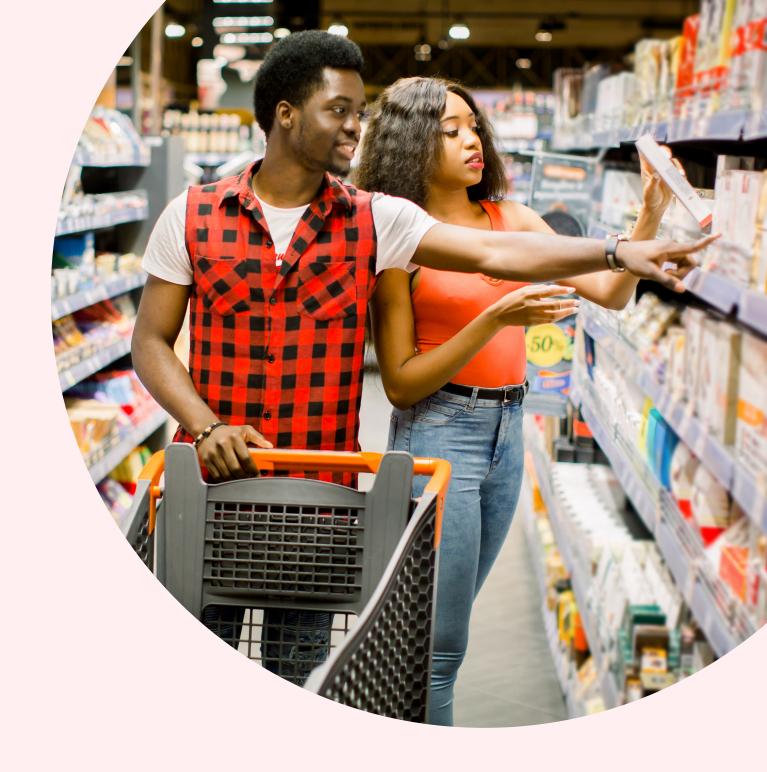
KEY INDUSTRY RECOMMENDATIONS

To ensure transparency on the impact of companies' product portfolios on healthy diets and public health goals in Kenya, F&B companies are encouraged to:

- Measure and publicly report the percentage of sales in Kenya derived from products classified as 'healthier' according to the formal nutrition criteria of an NPM, such as the KNPM.
- Publish information on how the NPM is applied to the company's portfolio in Kenya, specifying which product categories are included and how the products are categorized.

POLICY RECOMMENDATIONS

The Kenyan government has developed the KNPM for FOP labelling purposes and other food environment policies and could also consider asking companies to apply the model to report on the healthiness of their packaged processed foods sold in Kenya. Policymakers are encouraged to use the outcomes of this research to help develop a roadmap for industry and policymakers outlining measures to define and report on product healthiness and proportion of sales from 'healthy' products.



SECTION 2 INFLUENCING CONSUMERS



AFFORDABLE NUTRITION



CATEGORY CONTEXT

According to the 2024 'State of Food Security and Nutrition in the World' report, in 2022, 79% of Kenyans were unable to afford a healthy diet, with wealthier households being more likely to meet dietary recommendations.^{31,32} Convenient, affordable and shelf-stable packaged processed products are playing an increasing role in consumers' diets in Kenya.³³

To mitigate the possible negative impact of those packaged processed products high in fats, salt and sugar on public health, it is imperative that 'healthier' varieties are priced affordably for all consumers. Access and availability of affordable, nutritious food is particularly key for low-income consumers, who spend a higher proportion of their budgets on food.

TABLE 15 POLICY LANDSCAPE

National Policy or Regulation	Summary
Value Added Tax Act, 2012	Exempts animal produce, and fresh and minimally processed staple foods from VAT to ensure that they remain affordable for the population. 34,35
Kenya Finance Act, 2024	Doubled excise duty on the manufacturing and importation of sugar confectionary to 85.82 Kenya shillings per kilogram and increased this to 257.55/kg for imported chocolate products. ³⁵ Additionally, Kenya's Ministry of Finance introduced a flat rate of 6.41 Kenya shillings per litre excise tax on non-alcoholic beverages (with or without sugar and sweeteners), in attempt to reduce the consumption of sugary drinks and tackle rising obesity rates and diet-related health issues. ³⁶
Import taxes	Imported food crops-cereals, legumes, pulses, and roots and tubers-are subject to a levy of 1-2%. ³⁷ In addition, imported fresh and packaged processed goods are subject to the East African Community Common External Tariff rates. ³⁸

FINDINGS

Of the 12 companies assessed, three Kenyaheadquartered companies—Bidco, New KCC, and Capwell—market their products as both affordable and healthy or nutritious, but have not published a nutrition strategy describing criteria or targets for products to be considered affordable, healthy or nutritious. Kapa Oil states that its products are affordable on its website, without linking this specifically with healthiness.

Two companies were found to quantitatively track the affordability of their products without incorporating nutrition criteria into their analysis. Kapa Oil shared evidence with ATNi that it tracks the pricing of its products sold in different Kenyan supermarkets relative to competitors. Flora FG measured affordability by tracking the "percentage of people from lower socioeconomic groups reached with our products" using household penetration data from Kenya.

Nestlé was found to have a policy addressing the affordability of its 'healthy' products—Popularly Positioned Products (PPP)—in emerging markets, including Kenya. The PPP applies to products in specific categories that:

- 1. Meet the criteria of the Nestlé NPM; and
- 2. Are affordable to low-income consumers who have a daily budget of USD 2 to 4.

Nestlé provided *qualitative* examples of affordable 'healthy' products. However, none of the companies assessed shared *quantitative* evidence of tracking the price differential between their 'healthy' and 'less healthy' products. Such data is crucial to ensure that healthier choices are at least as affordable—and ideally more affordable—than less healthy alternatives for low-income consumers.

INDUSTRY RECOMMENDATIONS

To ensure that 'healthier' F&B options are as affordable to consumers than 'less healthy' options in Kenya, F&B companies are encouraged to:

- Adopt and publish a strategy to ensure that the company offers 'healthier' products that are priced affordably for low-income consumers in Kenya.
 - Align the definition of 'healthier' or 'nutritious' products with the the criteria of an NPM, such as the KNPM.
 - Use a formal, Kenya-specific classification of 'low-income consumers' to guide the strategy.

Measure and report on the price differential between 'healthier' products relative to products that do not meet formal nutrition criteria in Kenya, and work on improving the differential between them

POLICY RECOMMENDATIONS

Some fiscal mechanisms exist at the national level to regulate the price of staple foods and packaged processed foods in Kenya, but these are not specifically linked to nutrition outcomes. Policymakers are encouraged to use the outcomes of this research to help develop a roadmap for industry and policymakers outlining measures to incentivize the affordability and consumption of 'healthier' foods relative to 'less healthy' foods.



RESPONSIBLE MARKETING



CATEGORY CONTEXT

Evidence has shown that marketing of 'less healthy' F&B to all sorts of consumer groups-including using channels and techniques that appeal to children and at locations where children typically gather-is a common industry practice. This type of marketing will influence consumer preferences, purchasing requests, and consumption patterns of children and adults.^{39,40}

Public health organizations in Kenya recognize that the marketing of unhealthy products is a key contributor to overweight in the country. 41,42

FINDINGS

Of the 12 companies assessed, three global-headquartered companies (Coca-Cola, Flora FG and Nestlé) have published policies for responsible marketing to children (see Table 17). These policies outline the companies' global commitments. However, no information was found in the public domain regarding how these commitments apply specifically in the Kenyan market. It is therefore unclear to what extent these policies are implemented in Kenya.

TABLE 16 POLICY LANDSCAPE

National Policy or Regulation	Summary
National Strategic Plan for the Prevention and Control of Non-Communicable Diseases 2021/22- 2025/26	Aims to address unhealthy diets and the rising prevalence of overweight, obesity and NCDs, including through regulating the marketing of unhealthy F&B to children. ⁴²
Food, Drugs and Chemical Substances Act	Prohibits misleading advertising and unsubstantiated claims. ⁴³
Consumer Protection Act	Safeguards consumers from deceptive marketing and ensures they receive accurate product information. ⁴⁴
Competition Act	Addresses anti-competitive practices and prevents misleading marketing strategies that could harm consumers or unfairly disadvantage competitors. ⁴⁵
Kenya Information and Communications (Broadcasting) Act (2009)	Outlines appropriate marketing practices across broadcast media, including for children under the age of 18–mandating a watershed period between 5:00 am and 10:00pm on which only family-friendly and child-appropriate content may be shown. 46



TABLE 17

COMPANIES' GLOBAL POLICIES FOR RESPONSIBLE MARKETING TO CHILDREN

Company	Age threshold	Nutrition Criteria	Audience threshold	Media channels and techniques listed
Coca- Cola	13	No products marketed to children	30%	14
Flora FG	12	No products marketed to children	35%	13
Nestlé	16 and 13*	Only products meeting EU Pledge nutrition criteria	25%	21

^{*} Nestlé uses the age threshold of 16 to restrict marketing to children on measured media and 13 across other media channels and marketing techniques.

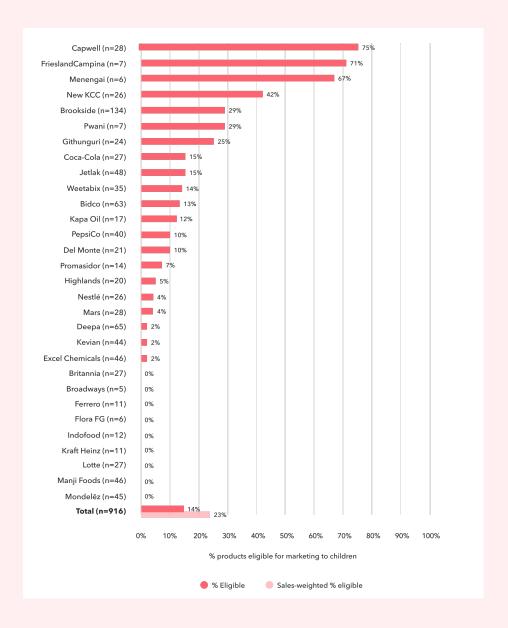
During the research, ATNi did not conduct an independent assessment of the marketing practices of companies. However, during the time of the assessment, some examples were found of companies marketing products to children on their social media accounts, including Instagram and Facebook. Some examples include companies using photos and videos of children and cartoon characters that appeal to children in their posts.

Kenya-headquartered companies in this assessment have not published information on commitments for responsible marketing to children. However, recent studies, including those published in 2024, have shown that F&B companies in Kenya disproportionately market their 'less healthy' products across a range of online platforms and other marketing channels. These include schools, TV, outdoor advertising, radio, print media, posters, and various digital channels (see ATNi's 'Packaged Food Environment Mapping Report' for the Kenyan market). This underscores the importance for companies publishing a responsible marketing policy, outlining how the company avoids direct marketing of 'less healthy' products to children.



ATNi's Product Profile report assessed the healthiness of 30 companies' portfolios against the WHO AFRO NPM. This model is designed to determine which products are suitable to be marketed to children under 18, and found that only 14% of companies products–23% of their sales—met the model's criteria (see Figure 8). The low number of products eligible for marketing to children is indicative of the unhealthy nature of most of the products offered by Kenya's largest F&B manufacturers and should be considered in marketing policies by the companies.

PROPORTION OF PRODUCTS MEETING WHO AFRO ELIGIBILITY CRITERIA FOR MARKETING TO CHILDREN IN KENYA





INDUSTRY RECOMMENDATIONS

To avoid marketing 'less healthy' foods to all consumers including children in Kenya, F&B companies are encouraged to:

- Commit to adhere to the ICC Framework for Responsible Food and Beverage Marketing Communications.
- Adopt and publish a responsible marketing policy to ensure that the company does not market any products—or 'less healthy' products—to children up to 18 years of age in Kenya.
- Explicitly apply the responsible marketing policy to a comprehensive range of media channels and techniques identified by the WHO and United Nations Children's Fund (UNICEF) Guidelines.
- Commission an independent third-party audit of the company's responsible marketing commitments in Kenya, covering a wide range of media channels and marketing techniques, and publish the results.

POLICY RECOMMENDATIONS

The National Strategic Plan for the Prevention and Control of Non-Communicable Diseases 2021/22-2025/26 identifies the marketing of 'unhealthy' F&B to children as a key factor contributing to rising levels of obesity and NCDs in Kenya.

Policymakers are encouraged to make use of this research to develop a roadmap for industry and policymakers, outlining policy measures to restrict marketing of 'unhealthy' products to children under 18.



RESPONSIBLE LABELLING



CATEGORY CONTEXT

Nutrition labelling is an important tool that supports consumer nutrition awareness and informed product choices. ⁴⁷ Evidence shows that BOP and FOP nutrition labelling can help guide consumers in understanding the nutritional content and quality of food products. Labelling schemes and standards can also contribute to healthier diets by incentivising F&B manufacturers to improve the overall quality—particularly nutritional—of their products. ⁴⁷⁻⁴⁹

FINDINGS

BOP labelling is already regulated in the Kenyan market, and is therefore not assessed in this chapter, which aims to evaluate companies' labelling commitments beyond compliance with regulation.

The Kenyan government has developed a FOP nutrition labelling scheme based on the KNPM nutrition criteria. No company was found to have published a position on or commitment to adopt the proposed Kenyan FOP nutrition label across its applicable portfolio, once formally enacted.

Only three companies—Coca-Cola, Flora FG, and Nestlé—were found to have a commitment to follow the 'Codex Alimentarius Guidelines for Use of Nutrition and Health Claims'. While Nestlé referenced the use of nutrition criteria in its commitment, it is unclear which criteria are being applied. No company was found to explicitly commit to only placing claims on products meeting the nutrition criteria of a NPM.

TABLE 18 POLICY LANDSCAPE

National Policy or Regulation	Summary
Kenya Bureau of Standards Act (Cap 496)	Outlines food labelling standards to ensure consumer protection and product quality. ⁵⁰
Labelling of Prepackaged Foods - Specification [KS EAS 38:2014	Provides detailed specifications for how prepackaged foods should be labelled, including by food category. 50,51 Labels must include essential information such as the product name, list of ingredients, net weight or volume, and the manufacturer or distributor's contact details. Nutritional information—such as calorie content and levels of key nutrients—must also be included, along with expiration dates to inform consumers of shelf life. Labels are also required to state the country of origin and disclose allergens to safeguard individuals with specific sensitivities. Health and safety warnings, including storage instructions, must be clearly stated.
Food, Drugs and Chemical Substances Act Cap 254 (Amendment) 2015	Mandates the declaration of the level of trans-fatty acids in all food products containing edible fats and oils. ²² The labelling standards are aligned with international benchmarks, including those set by the Codex Alimentarius Commission, to facilitate global trade and ensure that Kenyan practices meet global standards.
KNPM FOP Labelling Scheme	The Kenyan government has developed the KNPM for FOP labelling and includes a proposed warning label. ¹⁶

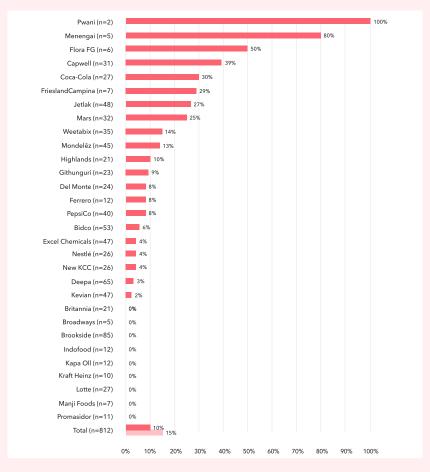


BOX 8

PRODUCT PROFILE

<u>ATNi's Product Profile</u> assessment assessed companies' portfolios against the criteria of the KNPM and found that only 10% of products meet the criteria of the KNPM, and therefore would be exempt from carrying the proposed FOP warning labels (see Figure 9).

FIGURE 9
PROPORTION OF PRODUCTS PASSING THE CRITERIA OF THE KNPM



INDUSTRY RECOMMENDATIONS

To ensure that F&B companies accurately contribute to consumers' awareness on healthy food choices in Kenya, companies are encouraged to:

- Support and implement policy measures to improve consumers' awareness on healthy food choices, including the proposed governmentendorsed FOP label.
- Commit to refrain from using nutrition or health claims on products that are not considered 'healthier' according to the formal nutrition criteria of an NPM, such as the KNPM.

POLICY RECOMMENDATIONS

Government promotion and monitoring of the uptake of the forthcoming FOP nutrition labelling scheme among Kenyan F&B companies will be essential once it is enacted. Policymakers are encouraged to use the findings of this research to develop a roadmap for industry and policymakers, including policy measures that incorporate the KNPM nutrition criteria into requirements for nutrition and health claims.





SECTION 3 CORPORATE GOVERNANCE



NUTRITION GOVERNANCE



CATEGORY CONTEXT

There is increasing global awareness among policymakers, investors, and civil society about the influence of F&B manufacturers in shaping consumers' diets, and the impact that this has on public health. This is also the case in Kenya, where diets are shifting from fresh and minimally processed foods to include more packaged processed foods, as well as foods high in fat, salt, and sugar.

F&B manufacturers influence consumers' diets not only through the healthiness of the products they sell, but also through how these are marketed, priced, distributed, and labelled. It is therefore important that companies develop clear strategies to ensure their actions across these various aspects are aligned with public health goal, as defined by public health and food authorities in Kenya.

TABLE 19 POLICY LANDSCAPE

National Policy or Regulation	Summary		
Kenya Nutrition Action Plan (KNAP) 2023-2027	The KNAP currently under development will outline an five-year multisectoral approach to combat malnutrition in all its forms in Kenya. ⁵²		
National Strategic Plan for the Prevention and Control of Non- Communicable Diseases 2021/22 - 2025/26	Outlines a framework for engaging the private sector to reduce noncommunicable disease, including through shaping healthy environments and responsible marketing. ⁵³		
Kenya Nutrient Profile Model (KNPM)	Aims to set clear criteria for defining 'healthy'. The government plans to use it as the basis for interpretative FOP labelling. The model could also inform other policies to (re-)shape the food environment–including fiscal measures, public procurement, and marketing restrictions. ⁵⁴		

FINDINGS

Reporting on F&B companies' nutrition-related policies and practices in Kenya was found to be very limited among the 12 companies assessed. While Kenyaheadquartered companies have not yet published information on strategic approaches to improving diets, shaping healthy diets does appear to be on their agendas.

Three companies—Brookside, Capwell and Kevian—refer to their role in providing access to nutritious or healthy foods on their websites, and others—such as Bidco—market some their products as healthy (see Table 20). These companies have the opportunity to formalize and elaborate on this role by developing a comprehensive nutrition strategy.

TABLE 20

KENYAN COMPANIES REFERENCING NUTRITION AND HEALTH

Company	Statement on company website	
Bidco	The company historically positioned some of its products as contributing to healthier lifestyles, including: • "Launch of SunGold Lite to boost healthier lifestyle among Kenyans." • "Fortified with vitamins A, D, and E, [Kimbo] has made more Kenyans healthy and live longer."	
Brookside	The company's home page states "We bring wholesome nutrition to you and your family" ⁵⁷	
Capwell	Capwell's purpose statement is "enriching lives through nutrition," and its vision is to "bring fulfilment to our consumers by providing nutritious, safe and convenient foods."58	
New KCC	The company's mission statement is "To nourish and refresh consumers with innovative, quality and affordable dairy products." ⁵⁹	

Additionally, while the three global-headquartered companies included in the assessment–Coca-Cola, Flora FG and Nestlé–have global nutrition strategies in place, none publicly report on how these are implemented in Kenya. Common features of their global nutrition strategies, include:

- Ensuring affordability, particularly through selling in small pack sizes
- Reformulating or adding new 'healthier' products to their portfolio
- Fortifying with micronutrients
- Implementing responsible marketing and labelling policies

All three companies did share evidence with ATNi of implementing specific elements of their global strategies in Kenya. Flora FG provided quantitative evidence of making progress toward its saturated fat target through its global 'Nutritional Benchmarking Programmen in Kenya. Coca-Cola shared qualitative examples offering reduced- and zero-sugar options in the market; products in various pack sizes; and nutritional information on packaging across multiple product types. Some online evidence was found of Nestlé providing an affordable fortified dairy drink in Kenya in small pack sizes. However, comprehensive, quantitative reporting on the implementation of each aspect of their strategies in Kenya was not found.

While these global-headquartered companies also have accountability assigned at the senior management level for their global strategies, it is unclear whether those accountable also review or are responsible for ensuring progress on implementation specifically in Kenya. No information on such nutrition governance and accountability frameworks was found in the public domain for the Kenya-headquartered companies.

n. The company provided evidence of displaying nutritional information tables on the caps of returnable glass bottles. However, it is unclear whether energy information is also displayed on FOP for glass bottles, in line with the company's approach for other packaging types in other markets.

KEY INDUSTRY RECOMMENDATIONS

To ensure that companies' commercial operations contribute to public health goals in Kenya, F&B companies are encouraged to:

- Develop and publish a clear commercial strategy to contribute to healthier and more nutritious diets and publicly report on its implementation in Kenya.
- Set a specific, measurable, and timebound target to increase sales of products that meet a government-endorsed NPM such as the KNPM, showing annual progress on meeting set targets.
- Have the Board of Directors (or regional equivalent) review progress against the nutrition strategy on at least an annual basis.
- Assign formal accountability for the implementation and success of the nutrition strategy ideally to the CEO, or another senior-level executive in Kenya. Link executive (or regional equivalent) remuneration to at least one of the nutrition strategy's targets or metrics.

POLICY RECOMMENDATIONS

The Kenyan government has committed to advancing policies that support healthy diets, including FOP nutrition labelling and marketing to children.⁵ The government is encouraged to use the outcomes of this research to help build a roadmap for industry and policymakers outlining measures to mitigate the potential negative impact of packaged processed foods and beverages on healthy diets.



WORKFORCE NUTRITION



CATEGORY CONTEXT

WHO recognizes the workplace as a pivotal setting for promoting health and addressing malnutrition. ⁶⁰ Given that 58% of the global population will spend at least a third of their adult lives at work, workforce nutrition programmes are key agents to improve public health. ^{60,61} The benefits to businesses are clear, with studies estimating returns on investment for workforce nutrition programmes to be as high as 6:1. ⁶² As a result, such programmes are gaining increasing traction in the private sector, particularly those focusing on direct employees. ⁶³

Kenya is currently facing a triple burden of malnutrition, which—along with diet-related non-communicable disease—negatively affects its workforce through decreased productivity and increased absenteeism. 64,65 The resulting loss of workforce productivity is estimated to cost Kenya approximately USD 38.3 billion in GDP between 2010 and 2030.66 Improving workforce health can enhance companies' financial performance and contribute to broader economic wellbeing over the long term. 67

FINDINGS

Five of the 12 companies assessed—Coca-Cola, Flora FG, Kapa Oil, Kevian and Nestlé—shared information on the practices they have in place for at least one of the four workforce nutrition pillars (see examples in Table 22).

TABLE 21 POLICY LANDSCAPE

National Policy or Regulation	Summary
Kenya Nutrition Action Plan (KNAP) 2018	Provides a national strategic framework for promoting healthy diets through community initiatives, nutrition education, health screenings to prevent diet-related disease, and supporting optimal breastfeeding in the workplace. ⁵²
Employment Act	Codifies the rights of employees to be properly fed, circumstances under which employers can provide food rations, and the duration of paid maternity (12 weeks) and paternity leave (two weeks). Specifies that female employees have the right to resume the positions they held prior to leave or to different suitable job terms. ⁶⁸
Health Act	Stipulates the right to maternity care. Specifies that all employers establish lactation stations in the workplace with refrigerators and other necessary equipment and that employees are entitled to a one-hour break for every eight hours worked. ⁶⁹
The Breastfeeding Bill (2019/2024)	Requires employers to provide private and hygienic lactation stations for mothers to express milk, refrigerators to store milk during working hours, and appropriate programmes to support child development. Entitles individuals to 40-minute breastfeeding breaks every four hours worked and to flexible working arrangements. ⁷⁰

TABLE 22

EXAMPLES OF COMPANIES' WORKFORCE NUTRITION ACTIVITIES

Company	Healthy food at work	Nutrition Education	Nutrition-focused health checks
Coca-Cola	Daily food options in the company canteen*	Provides employees access to an online app with wellbeing tips and habit tracking features	Nutritional assessment (blood sugar, body mass index (BMI), blood pressure) provided to office employees through an annual wellness day
Flora FG	Daily food options in the company canteen	Online workshops and healthy talks available to office employees	-
Kapa Oil	-	-	Provides regular nutrition- focused health checks for office employees
Kevian	Provides refreshments and meals to office workers*	-	-
Nestlé	'Healthy' meals (including free and subsidized fruit) provided in canteens*	Healthy Lives programme provides office workers with online modules on nutrition education	My Health Numbers programme provides office workers with a health risk assessment including biometric tests (BMI, blood pressure, cholesterol and glucose levels)

^{*} It is unclear whether all food options provided in the canteen are free or subsidized for employees

Note: Breastfeeding support is not included in this table, as none of the companies have initiatives in place that exceed local regulations.

None of the companies were found to have policies and/or practices that extended beyond Kenyan regulations which mandate private lactation rooms for breast milk expression, refrigeration facilities and reasonable break time for breastfeeding mothers to express milk of up to one hour per 8 hour working period. Although the Breastfeeding Bill (2019/2024) addresses flexible working arrangements, it has not yet been enacted into regulation and none of the companies reported that they offered this to their workers in Kenya. Additionally, three companies were found to have parental leave policies that exceed the minimum duration specified by Kenyan labour regulations-12 weeks of paid maternity leave and two weeks of paid paternity leave-for at least one caregiver:

 Nestlé has a gender-neutral global policy which provides paid parental leave of 18 weeks to primary caregivers, and four weeks to secondary caregivers, for all employees with full-time contracts.

- Flora FG's global policy for parental leave provides Kenyan employees with 17 weeks of paid maternity leave and 12 weeks of paid paternity.
- Coca-Cola's parental leave policy provides 12 weeks of paid maternity leave and four weeks of paid paternity leave in Kenya.

Kapa Oil has published a parental leave policy that aligns with Kenyan regulations.

Due to a lack of disclosure, it remains unclear whether the remaining Kenya-headquartered companies have workforce nutrition programmes that go beyond existing legal requirements or how Kenyan regulations are implemented in practice.

INDUSTRY RECOMMENDATIONS

To ensure that F&B companies invest in employees' nutritional health in Kenya, companies are encouraged to:

- Develop a comprehensive workforce nutrition program for all employees in Kenya (including at manufacturing sites, and where possible, in supply and distribution chains), which includes:
 - 1) Healthy food at work;
 - 2) Nutrition education;
 - 3) Nutrition-focused health checks;
 - 4) Breastfeeding support and parental leave.
- Set and publicly report against outcome-focused targets or key performance indicators (KPIs) to measure progress on implementing the program in Kenya.

POLICY RECOMMENDATIONS

Kenya has regulations in place mandating certain aspects of workforce nutrition programmes, including healthy food at work and breastfeeding support. Policymakers are encouraged to make use of this research to help build a roadmap for industry and policymakers of policy measures to expand current regulatory landscape to cover all elements of workforce nutrition programmes.



CONCLUSION

This assessment highlights the limited but emerging efforts of F&B companies in Kenya to improve the nutritional quality of their products and influence healthier consumer choices. While some global headquartered companies show progress in setting nutrition-related targets and commitments at corporate level, information on their implementation in the Kenyan market is largely undocumented. Kenyaheadquartered companies, meanwhile, had not yet published information on the nutrition strategies and activities they may have in place.

The overall healthiness of packaged food products was found to be low, with most products failing to meet established NPM thresholds. Although some companies have taken steps to fortify products or promote affordability, these efforts were not consistently linked to clear nutrition criteria or supported by robust monitoring systems. Reformulation strategies, where present, were rarely backed by public targets or evidence of local application.

Information on consumer-facing practices—such as responsible labelling and marketing—was also found to be limited. No company was found to apply NPMs to guide their health claims. Responsible marketing of F&B products to children remains relatively unregulated in Kenya, and little attention is paid by industry to this topic.

Overall, few companies align with international standards or reporting on the implementation of their responsible marketing commitments in Kenya. In terms of governance, only a handful of companies were found to have published nutrition strategies, but none demonstrated comprehensive implementation in Kenya. Reporting on workforce nutrition policies was minimal, with little evidence of practices exceeding legal requirements or addressing broader employee health needs in the workplace in Kenya.

To create a healthier food environment in Kenya, stronger regulatory enforcement, greater corporate transparency, and more ambitious industry action are needed. This assessment provides a foundation for policymakers, companies, investors and civil society to collaborate in ensuring that nutritious, affordable, and safe food becomes the standard–not the exception–for all Kenyans.

RECOMMENDATIONS

Manufacturers

Assess Product Healthiness, Marketing to Children, and Affordability in Line with National Commitments

F&B companies operating in Kenya should assess their product portfolios using the KNPM and align their practices with national nutrition goals. This includes:

- Identifying which products qualify as 'healthier' under the KNPM and, for global companies, ensuring these products are equally available in the Kenyan market.
- Avoiding the marketing of 'less healthy' products to children by applying the WHO AFRO NPM standards.
- Measuring the affordability and accessibility of healthier options, particularly for low-income and vulnerable populations.

2 Set Clear Targets for Healthier, Affordable Products and Responsible Marketing

Companies should adopt and publicly disclose measurable targets to:

- Increase the availability and sales of healthier, affordable, and fortified products, especially those aligned with national fortification mandates.
- Assign executive-level accountability for nutrition, such as CEO oversight or regular board reviews.
- Fully align marketing practices with WHO and UNICEF standards, defining children as under 18 and restricting marketing of unhealthy products across all media platforms.

Improve Transparency on Nutrition Policies, Progress, and Quality Controls

To build trust and accountability, companies should:

- Publicly report on nutrition-related policies, including progress on reformulation, sales of healthier products, and responsible marketing and labelling.
- Disclose fortification practices and ensure that fortified products meet health standards through robust quality control systems.
- Include standardized micronutrient content on BOP labels, in line with Kenya's regulatory requirements.

Government and Policymakers

The Government of Kenya has demonstrated strong leadership on nutrition through revising the **Kenya National Action Plan (KNAP) 2023-2027** and developing the KNPM. To accelerate progress:

- Mandate the use of the KNPM and the recommended FOP nutrition warning labelling to drive healthier offerings by food companies and help consumers make informed choices.
- Enact and enforce regulations to protect children from exposure to unhealthy food and beverage marketing, in line with WHO and UNICEF recommendations.
- Consider other fiscal policy measures that make healthy and sustainable products the easiest and affordable options, thereby supporting a healthy food environment, including taxing unhealthy food or reducing taxes on healthy foods, and implementing public procurement criteria.
- Integrate workplace nutrition interventions into national health strategies to support employee well-being and productivity.
- Consider adopting ESG guidance which includes nutrition metrics for public food companies listed on the Nairobi Stock Exchange.

Investors

- Investors should **prioritize investment in companies that demonstrate transparency** in
 their nutrition-related policies; responsible
 marketing practices; and workforce nutrition
 initiatives. They should support investees that
 align with national and international nutrition
 standards (such as Codex Alimentarius and
 WHO/FAO guidelines) and back businesses that
 offer healthier product portfolios and actively
 contribute to Kenya's public health goals.
- Investors can leverage tools, such as <u>ATNi's</u>
 <u>Investor Expectations on Nutrition, Diets, and</u>

 <u>Health</u>, to evaluate company actions on nutrition and guide them towards progress on nutrition and health.
- Investors should help drive progress by demanding that multi-national companies operating in the region apply the same or better nutrition and health standards in emerging and frontier markets as they do in more mature markets.
- Investors should leverage their influence by integrating nutrition into their own reporting standards.

CONCLUSION

REFERENCES

- Statista. Food Kenya | Statista Market Forecast [Internet]. Statista. 2025
 [cited 2025 Mar 21]. Available from: https://www.statista.com/outlook/cmo/food/kenya
- Kuboka M, Grace D, Artursson K, Lindahl J, Carlsson G, Mutua F. Food safety in informal public markets in Kenya: perceptions of stakeholders in the food chain. Front Sustain Food Syst [Internet]. 2024 Jun 19 [cited 2025 Mar 7];8. Available from: https://www.frontiersin.org/journals/ sustainable-food-systems/articles/10.3389/fsufs.2024.1411318/full
- FAO, IFAD, UNICEF, WFP, WHO. The State of Food Security and Nutrition in the World 2024 [Internet]. Rome: FAO; IFAD; UNICEF; WFP; WHO; 2024 [cited 2025 May 15]. Available from: https://openknowledge.fao. org/handle/20.500.14283/cd1254en
- Ministry of Health. The Kenya National Micronutrient Survey 2011
 [Internet]. 2011. Available from: https://www.gainhealth.org/sites/default/files/publications/documents/kenya-national-micronutrient-survey-report-2011.pdf
- Ministry of Health Reiterates Kenya's Commitment to Spearheading Regional Nutrition Policy Reforms | Ministry of Health [Internet]. 2025 [cited 2025 Apr 29]. Available from: https://www.health.go.ke/ministry-health-reiterates-kenyas-commitment-spearheading-regional-nutrition-policy-reforms
- Demmler KM, Ecker O, Qaim M. Supermarket Shopping and Nutritional Outcomes: A Panel Data Analysis for Urban Kenya. World Development. 2018 Feb 1:102:292-303.
- Karugu CH, Agyemang C, Wanjohi MN, Ojiambo V, Mugo S, Sanya RE, et al. The promotion of ultra-processed foods in modern retail food outlets in rural and urban areas in Kenya. Public Health Nutr. 2024 Oct 24;27(1):e240.
- Kimenju SC, Rischke R, Klasen S, Qaim M. Do supermarkets contribute to the obesity pandemic in developing countries? Public Health Nutr. 2015 Dec;18(17):3224-33.
- Ministry of Health. National Guidelines for Healthy Diets and Physical Activity [Internet]. Nairobi: Government of Kenya; 2017 p. 1–100.
 Available from: https://www.nutritionhealth.or.ke/wp-content/uploads/ Downloads/National%20Guidelines%20for%20Healthy%20Diets%20 and%20Physical%20Activity%202017.pdf
- Ministry of Health. Kenya's Multisectoral Approach to Nutrition: Key Stakeholders Meet to Validate KNAP 2023-2027 [Internet]. 2024 [cited 2025 Jun 20]. Available from: https://www.health.go.ke/kenyasmultisectoral-approach-nutrition-key-stakeholders-meet-validateknap-2023-2027
- Ministry of Health. Ministry of Health Reiterates Kenya's Commitment to Spearheading Regional Nutrition Policy Reforms [Internet]. 2025 [cited 2025 Jun 20]. Available from: https://www.health.go.ke/ministry-health-reiterates-kenyas-commitment-spearheading-regional-nutrition-policy-reforms
- Maina L, Oghera W. A MALNOURISHED NATION? EMBRACING EMERGING TRENDS IN MALNUTRITION: A case forincreased investment [Internet]. 2022. Available from: https://www.health.go.ke/sites/default/

- $\label{lem:compressed} files/2023-06/NHA\%20POLICY\%20BRIEF\%20NUTRITION_compressed.$ pdf
- Dunford E, Cobcroft M, Thomas M, Wu JH. Technical Report: Alignment of NSW Healthy Food Provision Policy with the Health Star Rating System [Internet]. NSW Ministry of Health; 2015. Available from: https://www.health.nsw.gov.au/heal/Publications/health-star-rating-system.pdf
- Kenya Ministry of Health. Kenya National NCD Strategic Plan (NSP) 2021/22-2025/26 [Internet]. 2021. Available from: http://guidelines. health.go.ke/#/category/37/382/meta
- 15. Ouma SD. Kenya's Journey to Better Nutrition: Empowering Healthy Choices with an Evidence- Based Nutrient Profile Model and Front-of-Pack Warning Labels [Internet]. Health Business. 2024 [cited 2025 Mar 25]. Available from: https://healthbusiness.co.ke/7584/kenyas-journey-tobetter-nutrition-empowering-healthy-choices-with-an-evidence-basednutrient-profile-model-and-front-of-pack-warning-labels/
- 16. Global Nutrition Report. NAF Tracker Develomenent and Implementation of Kenya Nutrient Profile Model and Front of Pack Nutrition Labelling [Internet]. [cited 2025 Mar 25]. Available from: https://globalnutritionreport.org/resources/naf/tracker/goal/develomenent-and-implementation-of-kenya-nutrient-/
- East African Community 2024. Labelling of pre-packaged foods

 General requirements (DEAS 38: 2024) [Internet]. 2024. Available from:
 https://www.kebs.org/wp-content/uploads/2025/02/DEAS-38-2024

 Labelling-and-pre-packaged-foods-Requirements.pdf
- ECOLEX. Food, Drugs and Chemical Substances Act (Cap. 254).
 [Internet]. [cited 2025 Mar 20]. Available from: https://www.ecolex.org/details/legislation/food-drugs-and-chemical-substances-act-cap-254-lex-faoc106440/
- Allen L. Guidelines on food fortification with micronutrients. Geneva,
 Rome: World Health Organization; Food and Agriculture Organization of the United Nations; 2006.
- Ministry of Health. Kenya National Food Fortification Strategic Plan:
 2018-2022 [Internet]. Republic of Kenya Ministry of Health; 2018.
 Available from: https://www.nutritionhealth.or.ke/wp-content/uploads/
 Downloads/Food%20Fortification%20Strategic%20Plan%20Final%20
 Press%20Signed%20-%20Aug%202018.pdf
- CODEX. CAC/GL 9-1987 General Principles for the Addition of Essential Nutrients to Foods. 1987.
- KENYA GOVERNMENT INSPECTOR. Food, Drugs, and Chemical Substances Act [Internet]. 2015 p. 4. Available from: https:// infotradekenya.go.ke/media/FOOD%20and%20drugs%20regulations. pdf
- Ministry of Health Division of Family Wellness, Nutrition, & Dietetics.
 Overview of Food Fortification Program [Internet]. Food Fortification.
 2022 [cited 2025 Mar 26]. Available from: https://nutritionhealth.or.ke/programmes/micronutrient-deficiency-control/food-fortification/
- East African Community. East African Standard: Fortified wheat flour—Specification [Internet]. EAS 767: 2019 2019. Available from: https://www.kebs.org/wp-content/uploads/2025/01/EAS-767-2019-Amendment-01-2024.pdf



REFERENCES 61

- KEBS. Fortified edible salt specification [Internet]. 2021 [cited 2025 Jun 19]. Available from: https://webstore.kebs.org/index.php?route=product/ product&product_id=15935
- East African Community. Food fortification premix and fortificants

 Specification [Internet]. 2021. Available from: https://www.kebs.org/
 wp-content/uploads/2025/01/EAS-1023-2021-Amendment-01-2024.pdf
- 27. Smith C (KCII). GUIDELINES FOR USE OF NUTRITION AND HEALTH CLAIMS.
- Kenya Bureau of Standards. Marks of Quality [Internet]. Kenya Bureau of Standards. Standards for Quality life. 2025 [cited 2025 Mar 26]. Available from: https://kebs.org/marks-of-quality/
- DSM. On the ground in Kenya: teaming up with WFP against malnutrition [Internet]. 2024 [cited 2025 Jun 19]. Available from: https://our-company. dsm-firmenich.com/en/our-company/news/our-stories/2024/on-the-ground-in-kenya-teaming-up-with-wfp-against-malnutrition.html
- WHO. Nutrient profiling Report of a WHO/IASO technical meeting London, United Kingdom 4-6 October 2010 [Internet]. 2011 [cited 2023 Jan 4]. Available from: https://iris.who.int/bitstream/hand le/10665/336447/9789241502207-eng.pdf
- FAO, IFAD, UNICEF, WFP, WHO. The State of Food Security and Nutrition in the World 2024 [Internet]. FAO; IFAD; UNICEF; WFP; WHO; 2024 [cited 2025 Apr 1]. Available from: https://openknowledge.fao.org/ handle/20.500.14283/cd1254en
- Kisia L, Wambiya E, Osindo J, Mohamed S. The Cost of Eating Healthy in Kenya [Internet]. APHRC, IDRC; 2021. Available from: https://aphrc.org/ wp-content/uploads/2021/09/Policy-Brief-COEH.pdf
- 33. Growth in retail value (total sales) of packaged food sales, 5 years Map Food Systems Dashboard [Internet]. [cited 2025 May 15]. Available from: https://www.foodsystemsdashboard.org/indicators/food-environments/product-properties/growth-in-retail-value-of-packaged-food-sales-5-years-2012-2017/map
- Republic of Kenya. The Tax Laws (Amandement) Act 2024 [Internet].
 No.215 2024. Available from: https://www.kenyalaw.org/kl/fileadmin/pdfdownloads/Acts/2024/TheTaxLaws_Amendment_Act_No.12of2024.pdf
- 35. Ministerie van Landbouw N en V. [Finance] VAT and Agriculture in Kenya: Recent law changes Kenia Agroberichten Buitenland [Internet]. Ministerie van Landbouw, Visserij, Voedselzekerheid en Natuur; 2018 [cited 2025 Mar 28]. Available from: https://www.agroberichtenbuitenland.nl/landeninformatie/kenia/achtergrond/latest-developments/vat-and-agriculture-in-kenya-recent-law-changes
- 36. The Finance Act, 2018 [Internet]. No. 10 of 2018 2018. Available from: https://www.kra.go.ke/images/publications/Finance-Act-2018.pdf
- African Agriculture and Food Systems. Kenya Introduces New Levy on Food Crop Imports and Exports - Kilimo Kwanza [Internet]. 2024 [cited 2025 Mar 25]. Available from: https://kilimokwanza.org/kenya-introduces-new-levy-on-food-crop-imports-and-exports/
- East African Community. Common External Tariff 2022 Version [Internet].
 2022. Available from: https://www.kra.go.ke/images/publications/
 EAC-CET-2022-VERSION-30TH-JUNE-Fn.pdf
- $39. \hspace{0.5cm} \text{World Health Organization. Policies to protect children } \hspace{0.1cm} \text{from the harmful} \\$

- impact of food marketing: WHO guideline [Internet]. Geneva; 2023.

 Available from: https://iris.who.int/bitstream/hand

 le/10665/370113/9789240075412-eng.pdf?sequence=1
- Ministry of Health, KELIN, IDLO. Marketing of foods and non-alcoholic beverages to children in Kenya: Policy Brief [Internet]. 2021. Available from: https://www.kelinkenya.org/wp-content/uploads/2022/04/ Marketing-of-foods-and-non-alcoholic-beverages-to-children-in-Kenya.
- Strengthening Multi-sector Interventions in the Reduction of Overweight and Obesity in Kenya - KIPPRA [Internet]. [cited 2025 Mar 20]. Available from: https://kippra.or.ke/strengthening-multi-sector-interventions-in-the-reduction-of-overweight-and-obesity-in-kenya/
- Ministry of Health. National Non-Communicable Diseases Strategic Plan 2021/22-2025/6 [Internet]. Nairobi; 2021. Available from: https://www. iccp-portal.org/system/files/plans/Kenya-Non-Communicable-Disease-NCD-Strategic-Plan-2021-2025.pdf
- Kenya Law. CAP. 254 Act Title: FOOD, DRUGS AND CHEMICAL SUBSTANCES [Internet]. 2022 [cited 2025 Mar 20]. Available from: http://kenyalaw.org;8181/exist/kenyalex/actview.xql?actid=CAP.%20254
- The Consumer Protection Act, 2012 [Internet]. No.46 2012. Available from: http://parliament.go.ke/sites/default/files/2017-05/ ConsumerProtectionActNo46of2012.pdf
- Competition Act [Internet]. No.12 2010. Available from: https://www.cak. go.ke/sites/default/files/Competition_Act_No._2012_of_2010.pdf
- Kenya Information and Communications (Broadcasting) Act, 2009
 [Internet]. 2009. Available from: https://eregulations.invest.go.ke/media/ (Broadcasting)%20Regulations,%202009.pdf
- World Health Organization. Nutrition Labelling: Policy Brief [Internet].
 2022. Available from: https://iris.who.int/bitstream/hand
 le/10665/355295/9789240051324-eng.pdf?sequence=1
- 48. Afroza U, Abrar AK, Nowar A, Sobhan SMM, Ide N, Choudhury SR. Global overview of government-endorsed nutrition labeling policies of packaged foods: a document review. Front Public Health [Internet]. 2024 Nov 8 [cited 2025 Mar 27];12. Available from: https://www.frontiersin.org/journals/public-health/articles/10.3389/fpubh.2024.1426639/full
- 49. WHO. Guiding principles and framework manual for front-of-pack labelling for promoting healthy diets [Internet]. Geneva; 2019. Available from: https://cdn.who.int/media/docs/default-source/healthy-diet/guidingprinciples-labelling-promoting-healthydiet. pdf?sfvrsn=65e3a8c1_7&download=true
- Kenya Bureau of Standards. Standard Code of Practice: Laws of Kenya [Internet]. 2019. Available from: http://www.kenyalaw.org:8181/exist/ kenyalex/actview.xql?actid=CAP.%20496
- Kenya Bureau of Standards. Food and Agriculture-Kenya Bureau of Standards Web Store [Internet]. 2015 [cited 2025 Mar 25]. Available from: https://webstore.kebs.org/index.php?route=product/ category&path=1 1&limit=100
- Ministry of Health. Kenya National Nutrition Action Plan 2018-2022
 [Internet]. Republic of Kenya Ministry of Health; 2018 Dec p. 1-44.
 Available from: https://scalingupnutrition.org/sites/default/files/2023-02/Kenya-National-Nutrition-Action-Plan-2018-22.pdf



- Ministry of Health. National Strategic Plan for the Prevention and Control
 of Non-Communicable Diseases 2021/22 2025/26 [Internet]. Nairobi;
 2021. Available from: https://www.iccp-portal.org/sites/default/files/
 plans/Kenya-Non-Communicable-Disease-NCD-StrategicPlan-2021-2025.pdf
- 54. Global Nutrition Report. NAF Commitment Tracker: Develomenent and Implementation of Kenya Nutrient Profile Model and Front of Pack Nutrition Labelling [Internet]. 2025 [cited 2025 Jun 13]. Available from: https://globalnutritionreport.org/resources/naf/tracker/goal/ develomenent-and-implementation-of-kenya-nutrient-/
- 55. Bidco. BIDCO INNOVATES TO HELP LOCAL AGRIBUSINESS FLOURISH [Internet]. 2014. Available from: https://www.bidcoafrica.com/front/downloads/press/Bidco%20Innovates%20with%20Renewed%20 Sunflower%20Oil%20-%20SunGold%20Lite%20Press%20Release%20(3).
- Bidco. Bidco Today [Internet]. 2014. Available from: https://www. bidcoafrica.com/front/downloads/newsletters/BidcoToday_Vol_1_Apri_ June_14.pdf
- 57. Brookside. Brands [Internet]. 2020 [cited 2025 May 28]. Available from: https://www.brookside.co.ke/
- Capwell Industries Limited. The Home of Wholesome Brands [Internet].
 2025 [cited 2025 May 28]. Available from: https://capwell.co.ke/about-us/
- New KCC. Who We Are [Internet]. New KCC. 2025 [cited 2025 May 28].
 Available from: https://www.newkcc.co.ke/who-we-are/
- Innstrand S, Christensen M. The Workplace as a setting: Health Promotion in the Workplace: Siw Tone Innstrand. European Journal of Public Health. 2015 Oct 1;25(suppl_3):ckv169.067.
- GAIN. The evidence for workforce nutrition programmes [Internet]. 2019
 [cited 2024 Oct 22]. Available from: https://www.gainhealth.org/sites/default/files/publications/documents/evidence-for-workforce-nutrition-programmes-overview-2019.pdf
- Global Alliance for Improved Nutrition. The evidence for workforce nutrition programs [Internet]. 2019. Available from: https://www. gainhealth.org/sites/default/files/publications/documents/evidence-for-workforce-nutrition-programmes-overview-2019.pdf
- 63. Workforce Nutrition Alliance [Internet]. 2022 [cited 2025 Jun 13].

 Available from: https://workforcenutrition.org/
- Kenya [Internet]. GAIN. [cited 2025 Mar 17]. Available from: https://www. gainhealth.org/impact/countries/kenya
- Wellesley L, Eis J, Marijs C, Vexler C, Waites F, Benton TG. The Business
 Case for Investment in Nutrition [Internet]. London: Chatham House;
 2020 [cited 2025 May 1]. Available from: https://www.chathamhouse.org/sites/default/files/07-08-business-case-investment-nutrition-wellesley-et-al.pdf
- Hilberink A, Mansharamani S, Kastia A, Opiyo C, Murundo S, Gacheru J, et al. EXISTING WORKFORCE NUTRITION-RELATED POLICIES IN KENYA AND OPPORTUNITIES FOR IMPROVEMENT. GAIN: 2023 Mar.
- Nihus Dhillon C, Ortenzi F. Assessing the Impact of Workforce Nutrition Programmes on Nutrition, Health and Business Outcomes: A Review of the Global Evidence and Future Research Agenda. International Journal of Environmental Research and Public Health [Internet]. 2023 May 5;20(9).

- Available from: https://pubmed.ncbi.nlm.nih.gov/37174251/
- The Republic of Kenya. The Employment Act (2007) [Internet]. 2007.
 Available from: https://www.labourmarket.go.ke/media/resources/
 The_Employment_Act_2007.pdf
- Kenya Law. Act Title: Public Health Act [Internet]. 2017. Available from: http://kenyalaw.org:8181/exist/kenyalex/actview.xql?actid=CAP.%20242
- Republic of Kenya. Breastfeeding Mothers Bill [Internet]. 2024. Available from: https://kenyalaw.org/kl/fileadmin/pdfdownloads/bills/2024/ TheBreastfeedingMothersBill_2024.pdf



REFERENCES 63