

Country Report



INDONESIA RETAIL ASSESSMENT 2025

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ABOUT ATNI

ATNi (Access to Nutrition initiative) is a global foundation headquartered in the Netherlands that actively challenges the food industry, investors, and policymakers to shape healthier food systems. Its mission is to transform markets so that, by 2030, at least half of companies' food and beverage sales are derived from healthy products. ATNi analyzes and translates data into actionable insights, driving financing, partnerships and innovations for market transformation so that all people have access to nutritious and sustainable food. ATNi is overseen by an independent board and advised by an international academic expert group that works pro bono. The organization is funded, among others, by the Gates Foundation and the UK Foreign, Commonwealth and Development Office. More information about ATNi's governance and operating policies is available online.

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ACRONYMS

ATNi Access to Nutrition initiative

BPNT Cash Food Assistance

BPOM Indonesian Food and Drug Authority
CAGR Compound Annual Growth Rate

CISDI Centre for Indonesia's Strategic Development Initiatives

F&B Food and beverage

FAO Food and Agriculture Organization of the United Nations

FOP Front-of-pack

GNI Gross National Income

HFSS High in far, sugar and salt (GGL; gula, garam, lemak)

HHI Herfindahl-Hirschman Index

HSR Health Star Rating

ITFA Industrially-produced Trans Fatty Acid

KPI Key Performance Indicator

MBDK SSB Tax

NCD Non-Communicable Disease
NNS Non-nutritive sweeteners
NPM Nutrient Profile Model
PPP Purchasing Power Parity

RAN-PG National Food and Nutrition Action Plan

SEARO South East Asia Regional Office
SKI Indonesian Health Survey

SME Small- and medium-sized enterprise

SSB Sugar-sweetened beverage
UNICEF United Nations Children's Fund

UPF Ultra-processed food

US United States

WHO World Health Organization
WPRO Western Pacific Retional Office

GLOSSARY

Key terms are outlined below; the full glossary is available in the full **methodology**.

Convenience store: Grocery retail outlets selling a wide range of groceries and typically characterized by extended opening hours, a selling area under 400m², and a range of foodservice products such as take-away or made-to-order hot foods [Euromonitor International, Passport].

Hypermarket: Similar to supermarkets but larger, with over 2,500m² of selling space. Hypermarkets also sell a range of non-grocery merchandise and are frequently located on out-of-town sites or as the anchor store in a shopping centre. In the United States, these are often referred to as 'supercenters'. Excludes cash-and-carry stores, warehouse clubs, and mass merchandisers [Euromonitor International, Passport].

Modern grocery retail: Aggregation of modern grocery channels such as supermarkets, hypermarkets, convenience stores, discounters, warehouse clubs, and food/drink/tobacco specialists, including independent outlets [Euromonitor International, Passport]. It is distinguished from traditional grocery retail, which includes small, independent shops, market stalls, and informal vendors. In this report, modern grocery retail is defined as total grocery sales minus those via small local retailers.

Operating brand: The retail brand name under which a retailer operates its physical or online stores. A single parent company may own and manage multiple operating brands. For example, Food Lion is an operating brand of Ahold Delhaize USA, and Intermarché is an operating brand of Les Mousquetaires. Sometimes referred to as 'grocery brands', 'trading brands', or 'retail banners'.

Private label: A product or brand made by a thirdparty but sold exclusively under a retailer's own proprietary brand label, with the retailer controlling all aspects. Sometimes referred to as 'own brand'.

Retail food environment: A subtype of the food environment relating to the physical and economic settings where people purchase food and beverages, such as supermarkets, convenience stores, restaurants, and vending machines. It includes the availability, affordability, quality, and marketing of food products within these outlets, which can influence consumer choices and population health.

Supermarket: Retail outlets selling groceries such as non-perishable products (e.g. rice, pasta, and sauces), fruit and vegetables, beverages, and household products. They usually have a selling space of between 400 and 2,500m². Excludes discounters, convenience stores, and small independent grocery stores [Euromonitor International, Passport].

Ultra-processed food (UPF): The term is used with some variation across reports and studies, but it is most commonly defined according to the NOVA classification. UPFs are foods made mostly from industrial ingredients and additives, with minimal or no unprocessed food content. These additives—introduced during manufacturing to enhance taste, texture, and shelf life—result in products such as sweet and savoury snacks, instant noodles, confectionery, meat substitutes, and soft drinks [Food Systems Dashboard].

SUMMARY

PURPOSE AND SCOPE

ATNi's Indonesia Retail Assessment 2025 evaluates how leading Indonesian food retailers influence access to nutritious and affordable foods. It examines what retailers state they aim to achieve through their nutrition strategies, targets, and governance, and compares this with independent assessments of how they act in practice—based on an analysis of their private-label portfolios, promotional activities, and the pricing of 'retail' food baskets.

The findings provide a picture of how retailers shape food environments and highlight opportunities to enhance their role in promoting healthier and more equitable diets. For Indonesia, the analysis focuses on three of the country's largest grocery retailers: Sumber Alfaria Trijaya (38-40% market share of modern retail; operator of Alfamart), Indomarco Prismata (31-33%; operator of Indomaret), and Lion Super Indo (1-3%).

RESEARCH METHODOLOGY

The assessment applies a harmonized methodology developed by ATNi and consistently applied across six countries representing different income settings. It integrates multiple data sources—including corporate disclosures, publicly available information, and curated

third-party datasets—to construct a robust and comparable evidence base.

The Retailer Profile qualitatively assesses the extent to which the three largest retailers—Alfamart, Indomaret, and Super Indo—address nutrition within their business practices, commercial strategies, and company policies. It evaluates whether they go beyond regulatory compliance to support healthier diets. The assessment draws primarily on publicly available information; only Super Indo took the opportunity to review the findings and provide additional evidence.

The Product Profile assesses the nutritional quality of private-label packaged foods and beverages using internationally recognized nutrient profile models (NPMs). In addition, promotional practices and affordability are analyzed through established international analytical frameworks aligned with global nutrition guidance, such as the 2019 EAT-Lancet reference diet.

By combining these elements, the integrated approach enables both context-specific insights for Indonesia and cross-country comparisons, providing a solid foundation for informing retailers, investors, and policymakers in their efforts to foster healthier food retail environments.

KEY FINDINGS

GROCERY RETAIL LANDSCAPE

Traditional retailers remain the primary source of grocery purchases in Indonesia, but modern grocery formats—especially convenience stores—are growing rapidly. This expansion is fuelled by urbanization, a growing middle class, and rising demand for convenience. The two largest players in particular—Alfamart and Indomaret—have come to dominate the modern grocery market with a combined share of over 70%, leveraging public and private investment, compact store formats, and highly flexible franchise models to expand rapidly into regional towns, rural areas, and lower-income neighbourhoods.

However, this growth coincides with rising obesity rates and greater consumption of highly processed, nutrient-poor packaged foods—especially among urban and higher-income households. As modern grocery retailers become key distribution channels for such products (alongside traditional channels), their influence on the nutritional quality of the food environment is growing.

RETAILER ASSESSMENT FINDINGS

Retailer profile: Nutrition strategies and corporate commitments

Despite their market dominance, minimal publicly available information was found on active efforts by Alfamart and Indomaret to create healthier food environments or improve consumer diets. This is particularly concerning given their rapid expansion into lower-income and rural areas. Super Indo—which has a comparatively smaller market footprint, catering primarily to urban, middle-income segments—has articulated a clearer commitment to nutrition, with some relevant initiatives in place. However, significant gaps remain, with no measurable targets to improve the healthiness of their portfolios.

Retailer Profile: Marketing policies and consumer information

Responsible marketing commitments are also largely absent: none of the retailers has published policies to restrict unhealthy food marketing to children, for example, or address in-store placement and promotions that encourage healthier choices. A notable exception is Super Indo's colour-coded labelling system for beverages, the 'Sugar Content Indicator', with thresholds aligned with national and World Health Organization (WHO) guidelines—although its overall scope is relatively limited. Overall, Indonesian retailers could do much more to leverage their influence to support healthier consumer choices.

Product Profile: Nutritional quality and levels of processing

The nutritional quality of private-label products—produced and marketed by the retailers themselves—is low in Indonesia. Among the 178 products assessed across the three retailers, the average Health Star Rating (HSR) was 2.0, with only 21% of products meeting the 'healthier' threshold (HSR ≥3.5)—well below the 41% average across the six-country assessment.

Nutri-Score and the WHO NPMs produced comparable results. Private-label portfolios showed similarly low healthiness to manufacturer brands in Indonesia across overlapping food categories (both mean HSR 1.9). This contrasts with cross-country findings, where private labels tended to perform better.

When assessed using a combined approach—identifying products high in fat, sugar, and salt (HFSS) and those with markers of ultra-processing (colours, flavours, or non-nutritive sweeteners (NNS))—almost all private-label products from the three Indonesian retailers were classified as 'unhealthy' (93–98%), exceeding the six-country average of 86%. These

findings highlight the limited availability of healthier private-label options in Indonesia and the importance of using models that consider both nutrient content and processing to provide a more comprehensive picture of product healthiness.

Promotions

Promotional practices overwhelmingly favoured less healthy products. Super Indo featured the highest share of healthy promotions (32%), while Alfamart (3%) and Indomaret (5%) displayed very few. Across all retailers, promotions were dominated by unhealthy categories, particularly sweets, ice cream, refined grains, baked goods, snacks, and sugar-sweetened beverages (SSBs).

Affordability of healthier and unhealthy food baskets

For Indonesia, pricing data were available only for Indomaret, where the healthier retail food basket was consistently more expensive than the less healthy one. However, the relative price gap between the two baskets (10.8%) was the smallest among all nine retailers assessed for affordability across the six countries. In purchasing power parity (PPP)-adjusted terms, the healthier basket cost USD 21.45 per person per day compared with USD 19.37 for the less healthy basket.

However, both baskets were highly unaffordable in the Indonesian context. As a share of daily per capita income, the healthier basket would consume 48.9% of gross national income (GNI) and nearly 100% of net income, while the less healthy basket would absorb 44.2% of GNI and about 90% of net income. This means that even modest price differences make healthier diets purchased through formal retailers financially out of reach for most households in Indonesia, highlighting severe affordability constraints—particularly for lower-income groups.

CONCLUSIONS

The Indonesia Retail Assessment underscores a widening disconnect between the growing influence of modern grocery retailers and their limited engagement with nutrition. Convenience-oriented formats operated by Alfamart and Indomaret now dominate modern grocery retail and continue expanding into lower-income and rural areas, yet their corporate strategies, product portfolios, and promotions do little to support healthier diets.

The findings indicate that private-label assortments are relatively small and dominated by highly processed products, while promotional activity heavily favours sweets, snacks, and SSBs. Super Indo demonstrates some promising practices—such as explicit nutrition commitments, a sugar-indicator labelling system, and a higher share of healthy promotions—but its reach remains relatively narrow and urban-focused.

Affordability analysis further underscores a critical barrier: both healthier and less healthy retail food baskets are largely unaffordable at Indomaret, with healthier diets requiring around a full day's net income on average.

Taken together, these findings highlight an urgent need for retailers to integrate nutrition into their core business strategies, set measurable targets to improve the healthiness and affordability of their portfolios, and rebalance promotions and marketing practices toward healthier options.

Policymakers can accelerate progress by finalizing and implementing strong nutrient-profiling and front-of-pack (FOP) labelling regulations, adopting well-designed fiscal policies, and strengthening restrictions on marketing of unhealthy foods to children. Coordinated action by retailers, government, and investors will be critical to ensure that Indonesia's rapidly expanding modern retail sector supports national nutrition and health goals.

INTRODUCTION



RETAILERS AND THE FOOD ENVIRONMENT

While traditional retailers remain the primary source of grocery purchases in Indonesia, the modern grocery retail market is rapidly expanding and becoming increasingly concentrated. To better understand its influence on public health, ATNi developed the Retail Assessment 2025, which evaluates leading food retailers in Indonesia and their commitments, policies, and practices related to nutrition and health. The assessment provides evidence to strengthen accountability and guide progress toward creating healthier food environments.

The grocery retail environment—where food is purchased for immediate or later consumption represents a major component of the physical food environment and plays a critical role in shaping dietary patterns. Food retailers influence consumer choices through their decisions on product formulation, pricing, placement, and promotion, thereby shaping the visibility, affordability, and desirability of different foods. Their strategies can therefore either support or hinder healthier diets, depending on how they prioritize and promote nutritious products.

In Indonesia, obesity rates and the consumption of highly processed, nutrient-poor packaged foods are rising—especially in urban households and among higher-income consumers. As modern grocery retailers become more prominent sources of these products (alongside traditional channels), their influence on the nutritional quality of the food environment is growing.



METHODOLOGY



ATNi's Retail Assessment 2025 comprises tailored research components applied consistently across 18 retailers in six countries: the United States (US), France, Indonesia, South Africa, the Philippines, and Kenya. As outlined in the full methodology, the assessment provides a transparent, evidence-based approach to evaluating how the modern grocery retail sector shapes food environments and nutrition outcomes.

The methodology was developed in consultation with experts in nutrition, public health, food policy, and retail, and reviewed by an independent advisory group to ensure scientific rigor and policy relevance.

Together, the research components offer an integrated view of how modern grocery retailers influence food environments through their policies, practices, and pricing strategies. The analysis includes corporate nutrition-related policies and disclosures, as well as independent assessments of retailers' promotional activities, private-label product portfolios, and the relative affordability of healthier versus less healthy retail food baskets. These are complemented by a review of national policy and regulatory frameworks to identify gaps and opportunities for stronger alignment between retail action and public health objectives.

Research was conducted between November 2024 and November 2025. This report presents the findings for Indonesia, applying the methodology to three leading retailers: Alfamart (parent company: Sumber Alfaria Trijaya), Indomaret (parent company: Indomarco Prismatama), and Super Indo (parent company: Lion Super Indo). The analysis offers valuable insights into how major retailer shape food environments, though it is limited to three national retailers and focuses primarily on private-label packaged products, excluding regional variation and the broader product offering. By using a consistent set of indicators and analytical procedures across all six countries, the assessment generates detailed country-level insights and enables meaningful cross-country comparison within a broader global perspective on food retail and nutrition.

MAPPING THE RETAIL LANDCAPE



Mapping Indonesia's grocery retail environment provides essential context for interpreting the broader findings of ATNi's Retail Assessment 2025. This section offers a descriptive overview of the size, structure, and dynamics of the modern grocery retail sector, outlining key players, ownership patterns, and the consumer and policy factors shaping food retail within the broader Indonesian food system.

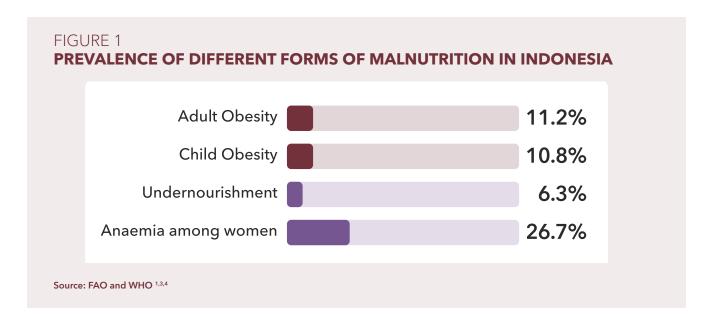
NUTRITION CONTEXT: MALNUTRITION AND DIETARY PATTERNS

The triple burden of malnutrition remains a major public health concern in Indonesia (Figure 1). Undernourishment has declined significantly from 18.3% (2004-2006) to 6.3% (2022-2024), yet challenges persist: more than one in five children under five are stunted, and one in four women (15-49 years) have anaemia.^{1,2}

Rates of obesity are rising rapidly: obesity among children and adolescents (5-19 years) more than doubled from 4.5% to 10.8% between 2012 and 2022,

and increased from 5.9% to 11.2% among adults (>18 years).^{1,3,4} The 2023 Indonesian Health Survey (SKI) found that obesity is more prevalent among women, urban residents, and higher-income groups.⁵

These outcomes reflect shifting dietary patterns, characterized by increased consumption of animal-source proteins, processed foods, and ready-made meals—especially in urban areas—alongside lower intake of vegetables, fruits, legumes, tubers, and cereals. ⁶⁻¹⁰ Barriers to healthy eating remain significant: the 2023 SKI found that 61.8% of consumers perceive limited availability and 28.6% cite unaffordability as key barriers to fruit consumption, particularly among lower-income households. ⁵





BOX 1

POLICY: BALANCED NUTRITION GUIDELINES (2014)

Indonesia's Balanced Nutrition Guidelines (*Pedoman Gizi Seimbang*) set the national framework for healthy eating and lifestyle.¹¹ Developed by the Ministry of Health and last updated in 2014, they emphasize four pillars: consuming a variety of foods, practicing clean and healthy habits, engaging in regular physical activity, and maintaining ideal body weight. The guidelines promote diverse diets rich in vegetables and fruits, limit sugar, salt, and fat, and encourage daily breakfast and adequate water intake.

Visual tools such as the Tumpeng Gizi Seimbang (nutrition pyramid) and Piring Makanku (plate model) illustrate recommended food proportions and behaviors. These guidelines underpin national nutrition policy and inform initiatives aimed at improving diets across all population groups.

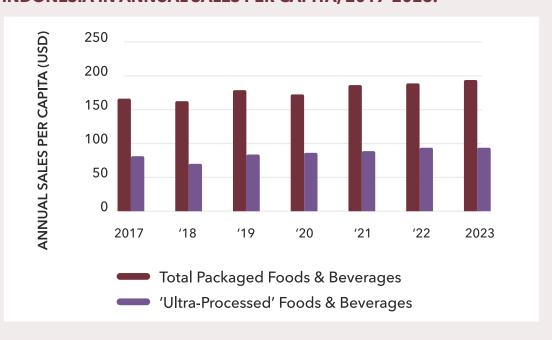
Underlying these changes are economic and demographic drivers—including rapid growth, a young and urbanizing population, and a rising middle class with greater disposable incomes—fuelling demand for diverse, convenient, and increasingly Western-style foods, many of which are highly processed and energy-dense. Agricultural trends also play a role: increased specialization in cash crops such as palm oil has improved household incomes and market access, but reduced local production diversity, limiting the availability of fruits and vegetables.

Market trends mirror these shifts. Packaged foods and beverages sales have grown at a 3.9% compound

annual growth rate (CAGR) since 2017, reaching USD 190.3 billion in 2024. Ultra-processed food (UPF)-dominated categories account for 47% of total packaged food and beverage (F&B) sales (Figure 2).^{12a} Consumption is driven by consumer perceptions that UPFs are more palatable (96.2%), easier to access (91.3%), and more affordable (79.3%).⁵

^a UPF is defined as "foods made of mostly industrial ingredients and additives, with minimal amounts of unprocessed foods. These additives are not naturally occurring in the food but are added during processing to increase palatability and shelf-life. Examples of UPFs include sweet and savory snacks, instant noodles, confectionery, meat substitutes, and soft drinks, among others."¹²

FIGURE 2 PACKAGED FOOD AND BEVERAGE SALES AND UPF CATEGORY GROWTH IN INDONESIA IN ANNUAL SALES PER CAPITA, 2017-2023. 12A





While the per capita UPF spending in Indonesia (USD 90) remains below the South East Asian average (USD 155), intake of salty snacks, instant noodles, and fast food is widespread–reported by 65% of consumers, with higher rates among urban households. 10,12 Alarmingly, a 2019 study found that among children and adolescents (6-18 years), three in four consumed instant noodles, half consumed fried snacks regularly, and soda was consumed on average twice per week. 13

BOX 2

POLICY: INDONESIAN NATIONAL FOOD AND NUTRITION ACTION PLAN (RAN-PG) (2025-2029)

Every five years, the government updates its National Food and Nutrition Action Plan (RAN-PG) to align nutrition commitments and actions across national and subnational levels. The 2025-2029 plan prioritizes climate-sensitive and climate-resilient nutrition strategies, including large-scale food fortification and reducing food loss and waste. Crucially, it aims to shift consumer demand towards healthier alternatives and reduce UPF consumption through measures such as restricting the marketing of unhealthy food. These commitments signal a growing expectation for retailers to adapt product portfolios, pricing, and promotional strategies to support national nutrition goals.



MODERN GROCERY RETAIL LANDSCAPE

The increasing prevalence of highly processed packaged foods in Indonesians' diets is closely linked to the rapid expansion of modern grocery retail. Retail dynamics shape consumer access and exposure to both healthy and less healthy products.

Market overview

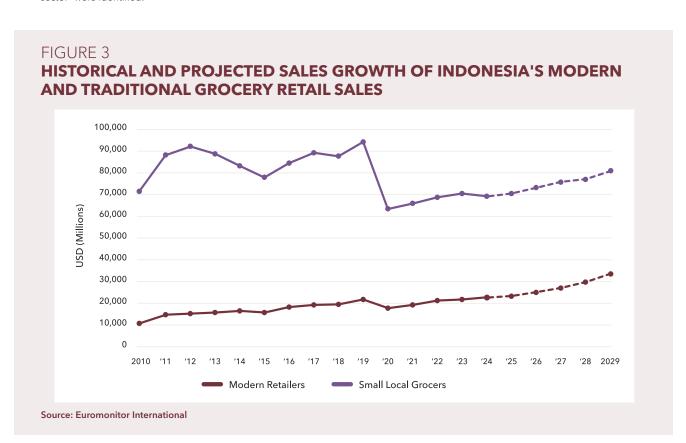
Indonesia's grocery retail sector is valued at USD 91.1 billion in 2024 (excluding e-commerce).¹⁵ Of this, an estimated 24.1% of sales takes place through modern retail formats.^b The majority (75.9%) continues to take place through traditional 'small local grocers', such as warungs (small, family-run shops), pasars (traditional wet markets), kiosks, and kaki limas (street vendors).^{c,15}

i.e. supermarkets, hypermarkets, convenience stores, discounters, warehouse clubs, and food/drink/tobacco specialists, including independent outlets [Euromonitor International, Passport].

It is plausible that the traditional grocery sector exceeds Euromonitor's estimates, given its focus on formally registered and tax-paying entities; however, no sources providing higher estimates-including those capturing the 'informal' traditional sector-were identified. The Indonesian Traditional Market Traders Association reported 12.3 million traders across 13,450 traditional markets in 2020.¹⁶ A 2015 study found that warungs accounted for the largest share of food expenditure in urban areas (31%), followed by traditional wet markets (24%), compared with 19% via modern retail outlets.¹⁷

While traditional retail dominates, modern retail is gaining an increased share of the grocery market (Figure 3), with sales growing at 7.9% CAGR between 2010 and 2019, outpacing traditional retailer sales (3.1% CAGR). ¹⁵ Convenience stores drove this surge, nearly tripling in number (+23,000 stores), while supermarkets increased by 27% (+301 stores), and hypermarkets nearly doubled (+156 stores). Over the same period, 'small local retailers' declined by more than 95,000 outlets. ¹⁵

Lockdowns during the COVID-19 pandemic disrupted growth considerably: modern grocery sales fell 11.8% between 2019 and 2020, while traditional grocery sales dropped by 35.3%. ¹⁵ The modern grocery sector is projected to return to faster growth over the next five years, with a 8.2% CAGR, compared with 3.0% for traditional retail. ¹⁵





Where consumers obtain their food: modern vs. traditional channels

Modern and traditional retail channels contribute differently to how consumers access food products. Although modern outlets represent only 24% of total grocery sales, they account for approximately 63% of sales of packaged foods, according to a 2021 analysis by Deakin University and United Nations Children's Fund (UNICEF)—including over half of sales in processed meats, cheese, and sweet spreads.^{15,18}

Traditional retailers remain the primary source for typically lower-priced, shelf-stable, and often less healthy categories such as baked goods (70%), confectionery (55%), savoury snacks (70%) and sweet biscuits, snack bars and fruit snacks (67%), across each of these categories, modern retail's share is over-represented and—with the exception of confectionery—increased between 2019 and 2021.¹⁸

Traditional markets also dominate sales of staples and fresh foods, accounting for over 95% of spending on items such as tofu, fish, poultry, and most vegetables and fruits.^{17,19}

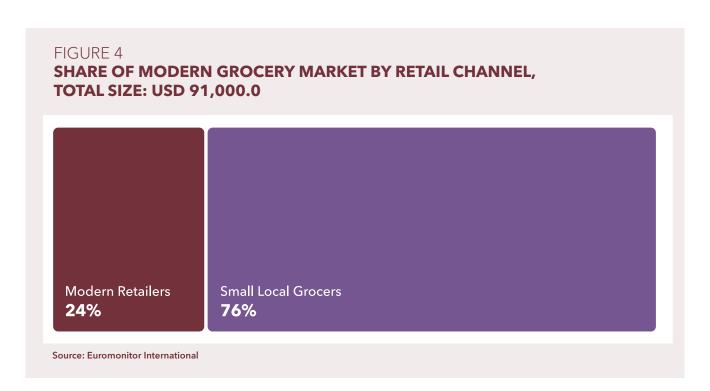
Convenience stores, in particular, offer limited fresh produce compared with supermarkets and hypermarkets, and are becoming increasingly important channels for processed beverages. 18,19

Evidence from several urban areas showed that higher food spending at modern retailers is associated with diets higher in sugar, fats, and processed foods, and fewer in fresh items.²⁰ By regularly featuring promotions such as bulk discounts and 'buy one, get one free' offers, modern retailers further encourage overconsumption.²¹

Modern retail formats

Convenience stores now dominate modern grocery retail expansion, representing 73% of modern grocery sales, followed by supermarkets (18.6%) and hypermarkets (4.6) (Figure 4).¹⁵

Persistent logistical and cold chain limitations, particularly outside Java, have favoured smaller outlets that can operate with lower inventory requirements.²² Rapid suburban expansion around Jakarta since the 1990s has created demand for accessible neighbourhood stores that cater to time-constrained consumers.²² Convenience stores' compact format, extended operating hours, and proximity to residential areas have enabled them to compete directly with traditional outlets on both accessibility and price.^{19,22} A 2024 survey found that 77% of Indonesian consumers prefer convenience stores for their convenient locations, accessibility, and affordable prices.²³⁻²⁵





Domestic chains such as Alfamart (Sumber Alfaria Trijaya) and Indomaret (Indomarco Prismatama) capitalized on these trends: as early entrants, they expanded quickly and now dominate the convenience segment.²⁶ To stay competitive, supermarket and hypermarket operators, such as Lion Super Indo and Supra Boga Lestari, are now investing in smaller store formats.¹⁹

While less prevalent, larger modern grocery formats—supermarkets (400-2,500m²) and hypermarkets (>2,500m²) are important sources of refrigerated, premium, and imported products, catering primarily to middle- and upper-income urban consumers. ¹⁹ They typically offer in-store bakeries, cafés and restaurants, and prepared meals. ¹⁹

Geographic distribution and access

The expansion of modern food retail in Indonesia began in Java's urban centres, gradually extending to other islands and progressing from cities into rural regions.²⁹

Supermarkets and hypermarkets remain concentrated in urban areas—particularly on well-connected islands such as Java—where they are typically located in malls or city centres and cater mainly to wealthier consumers. ^{19,30,31}

In contrast, convenience stores have spread more widely, reaching smaller towns and some rural communities, as well as lower-income neighbourhoods and informal settlements—typically along main roads. 31-34 In Jakarta, convenience stores are present across both affluent and disadvantaged areas, but remain 2.2 times less dense in the poorest neighbourhoods, where traditional family-run outlets continue to be prevalent. 18

BOX 3

THE GROWING ROLE OF E-COMMERCE

E-commerce remains a relatively small but rapidly expanding segment of Indonesia's grocery market. In 2024, online grocery sales were equivalent to 5.6% of total physical grocery sales—and the same share (5.6%) of modern grocery sales—reaching an estimated value of USD 1.2 billion.¹⁵ Between 2017 and 2020, the segment grew exponentially, doubling in size on average each year.¹⁵ During the COVID-19 pandemic, 55% of consumers reported increasing online grocery purchases, a trend that has persisted beyond the lifting of lockdown restrictions.¹⁸ Food staples, dairy, and cooking ingredients feature most prominently in online grocery purchases.^{27,28}

The rapid growth of Indonesia's e-commerce sector is driven by rising smartphone and internet penetration, a young and tech-savvy middle class, and concentrated demand in major urban centres such as Jakarta, Surabaya, and Bandung–supported by improved digital infrastructure and more efficient logistics. 18,27,28

CONSUMER BEHAVIOUR AND PREFERENCES

SOCIO-ECONOMIC DIMENSIONS

Modern grocery retail in Indonesia primarily serves higher socio-economic groups. According to a 2015 study:¹⁷

- The share of food spending at modern retailers rises sharply with income—from 4% among the poorest households to 33% among the wealthiest.
- In contrast, reliance on traditional retailers declines from 58% to 21% at *warung* stores, and from 26% to 15% at wet markets (*pasar*).
- The study found positive associations to shopping at modern retail with higher educational levels, larger household size, younger household heads, and ownership of a vehicle or refrigerator.¹⁷

Another 2019 study found a similar association between shopping at modern grocery retailers and higher educational attainment and stable, salaried employment.³⁵ Supermarkets and hypermarkets, in particular, typically target urban middle- and upperincome households.³¹

Consumer priorities differ by income: wealthier shoppers tend to value cleanliness, quality, and the perceived 'healthiness' of modern retailers, whereas lower-income households prioritize affordability and convenience–relying more on warung and mobile vegetable vendors (*tukang sayur*) for daily purchases. ^{19,21}

SHOPPING PATTERNS AND PREFERENCES

Convenience stores, being compact in size, cater to small, frequent purchases. They are strategically located in dense residential and office areas to ensure easy access and quick weekday shopping.^{19,22}

Supermarket shopping, in contrast, is typically a weekly activity, with some mid-week restocking. Most shoppers at modern retail outlets spend between IDR 100,000-500,000 (USD 6-30) per visit, typically staying for 1-3 hours.³⁵ Middle- and upper-income shoppers often make impulse purchases, influenced by in-store promotions and perceived product quality.²¹

In contrast, traditional retail shoppers tend to shop on a daily basis due to limited stock at these outlets and a 'buy today, eat today' approach to meal planning, driven by financial constraints.²¹

Recent data, however, indicates that the average grocery basket size at modern grocery retailers in Indonesia is increasing, while the frequency of visits is declining overall.³⁸

BOX 4

POLICY: NON-CASH FOOD ASSISTANCE (BPNT) (2017)

The BPNT is Indonesia's non-cash food assistance programme for low-income households. Recipients receive electronic vouchers to purchase eligible foods—initially rice and eggs only, and later expanded to include other nutritious food such as vegetables, chicken, and fish—at participating outlets, known as 'e-warungs'. 36,37 While these are predominantly traditional retailers, participating outlets can also include modern convenience stores. Although the programme aims to increase consumption of vitamin-rich foods, in practice many beneficiaries continue to purchase mostly carbohydrates, with animal proteins consumed only occassionally. 36

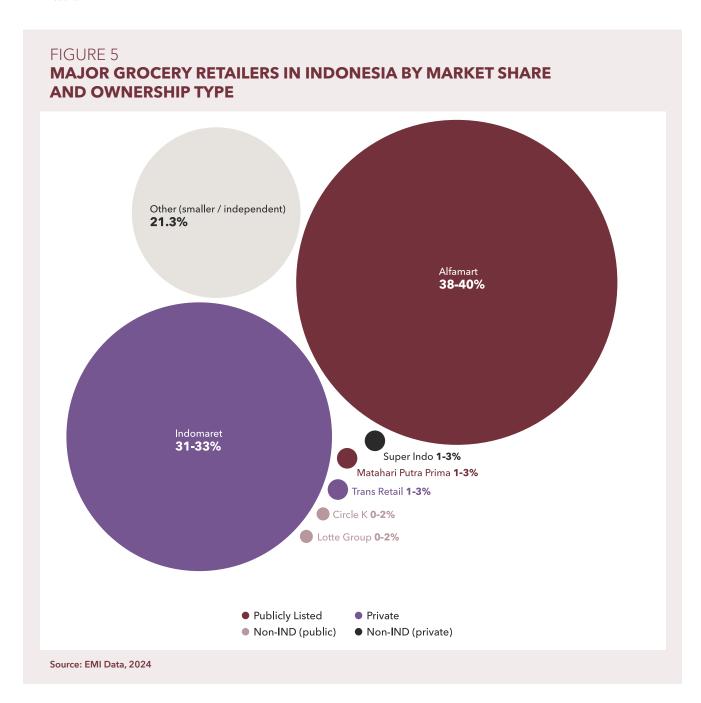


MARKET STRUCTURE & RETAILER CHARACTERISTICS

Market concentration and competition

Indonesia's modern grocery retail market has a moderate to high degree of concentration, with a Herfindahl-Hirschman Index (HHI) score of 2595.6 (out of 10,000) in 2024.^d

HHI is a measure of market concentration calculated by squaring the market share of each firm and summing the results. Two companies dominate the sector: Sumber Alfaria Trijaya, which operates Alfamart and Alfa Midi; and Indomarco Prismatama, which operates Indomaret (Figure 5). As of 2024, together they control 71.5% of the total modern grocery retail market, as well as over 90% of convenience store sales. ¹⁵ Their market dominance has increased substantially over the last decade: in 2015, they only controlled only 46% of the market. ¹⁵





Beyond these two giants, the next five retailers account for 7.2% of modern grocery sales, predominantly through supermarket and hypermarket chains, such as Lion Super Indo. Smaller chains and non-chain modern grocery stores make up the remaining 21.3% of sales.

Retailer ownership characteristics

Among the largest modern grocery retailers in Indonesia, the majority are domestically headquartered, yet ownership structures vary considerably (Figure 5), reflecting each company's historical development, capital-raising needs, and regulatory context.

Although the two largest retailers share many characteristics, Sumber Alfaria Trijaya is publicly listed while Indomarco Prismatama is privately held under the domestic conglomerate, Salim Group. As both retailers embarked on rapid expansion in the late 2000s and early 2010s, they required access to large-scale expansion capital. Indomarco Prismatama benefited from the Salim Group's internal financing and strategic support and was able to remain privately held, whereas Sumber Alfaria Trijaya opted for a public listing in 2009 to raise growth funds and strengthen governance.³⁹⁻⁴¹

Restrictions on foreign participation in modern retail have encouraged joint-venture structures, exemplified by Super Indo's partnership between Ahold Delhaize (51%) and the Salim Group (49%). Carrefour's former operations were similarly localized when CT Corp acquired its stake in 2012. While several multinational

retailers—such as Circle K, Hero Supermarket (under Dairy Farm International), and South Korea's Lotte Mart—continue to operate in Indonesia, their market shares remain limited. Dairy Farm International's closure of its Giant hypermarket and supermarket chain in 2021 further illustrates the challenges foreign retailers face in sustaining scale in the Indonesian market.

Governance and management of stores

Alfamart and Indomaret primarily operate through a franchise model (*waralaba*), in which independent entrepreneurs open or convert stores under the respective retailer's brand and follow company systems and procedures. ^{42,43} Franchisees benefit from brand recognition, marketing support, and access to business and management expertise, which helps attract local investment. ^{30,42,43} This franchise-based model enables retailers to expand rapidly with minimal upfront investment.

Supermarkets and hypermarkets are mainly operated through company-owned models rather than franchises, which enables tighter control over operations. For example, Super Indo manages nearly all of its stores directly. However, in 2015, it introduced a franchised convenience format, Super Indo Express, in which franchisees provide the store location and capital while the retailer maintains full control over daily operations, including product assortment, pricing, and promotions.⁴⁴

BOX 5

PRIVATE LABEL DEVELOPMENT IN FRANCHISE-BASED RETAIL

In franchise-based convenience chains such as Alfamart and Indomaret, the retailer centrally owns and manages both the store brand and any private-label brands. Private-label products are produced by third-party manufacturers, including large food companies such as Indofood, which also produces national brands, as well as regional small- and medium-sized enterprises (SMEs).⁴⁵ Alfamart and Indomaret frequently source SME-made private-label products on a regional basis, enabling tailored assortments across different markets.⁴⁵

Recent data on the growth and penetration of private-label grocery products in Indonesia are limited; however, several studies suggest that uptake remains relatively low. Constraints include weak marketing support and persistent consumer perceptions of inferior quality compared with established national brands–perceptions that often supersede price value. 46-48



KEY INSIGHTS INDONESIA RETAIL FOOD ENVIRONMENT

Traditional retailers remain the primary source of grocery purchases in Indonesia, but modern grocery retail formats—led by convenience stores—are expanding rapidly, driven by urbanization, a growing middle class, and rising demand for convenience.

Successful modern retailers, particularly Alfamart and Indomaret, which now dominate the modern grocery retail market, have been able to adapt to Indonesia's geographic and socioeconomic landscape; their compact formats, franchise-based models, and proximity to residential neighbourhoods have enabled them to expand rapidly, even into lower-income and rural areas.

This shift has significant nutrition implications. Obesity rates and the consumption of highly processed, nutrient-poor packaged foods are rising—especially among urban and higher-income households. Modern grocery retailers are now major distribution points for these products—alongside traditional channels—giving them increasing influence over the healthiness of Indonesia's food environment.



RETAILER PROFILES



Modern grocery retail is playing an increasingly influential role in shaping Indonesians' diets. To understand this influence, the Retailer Profile qualitatively assesses the extent to which the three largest retailers—Sumber Alfaria Trijaya (Alfamart and Alfa Midi), Indomarco Prismatama (Indomaret), and Lion Super Indo (Super Indo)—embed nutrition within their commercial practices and take steps beyond regulatory requirements to support healthier consumer diets.

This analysis draws primarily on publicly available information; although each retailer was invited to review the findings and provide additional evidence, only Super Indo took the opportunity to do so.

OVERALL FINDINGS

Based on their public disclosures, we conclude active efforts to create healthier food environments and improve consumers' diets are, overall, largely absent among Indonesia's two largest grocery retailers—

Alfamart (Sumber Alfaria Trijaya) and Indomaret (Indomarco Prismatama), as shown in Figure 6°. This is particularly concerning given their increasing market dominance—together accounting for 71.5% of the total modern grocery retail market (2024)—and continued expansion into regional towns, rural areas, and lower-income neighbourhoods.

In interpreting Figure 6, it is important to note that the green color indicates areas that are substantially addressed or in place; however, this does not imply that performance is optimal, or that no further improvement is possible.

FIGURF 6 RETAILER PROFILE FINDINGS PER NUTRITION TOPIC AREA Portfolio improvement Responsible labelling Nutrition prioritization Pricing & promotions Responsible marketing Identifying products Defining 'healthier' Marketing Targets & Affordable Product Health **Promotions** Recognition Strategy Governance reporting nutrition & loyalty positioning to children Alfamart Indomaret Super Indo* Substantially addressed / in place Partially addressed / in place No evidence found / Not in place *Provided feedback on Retailer Profile findings



Encouragingly, Super Indo has articulated a clearer commitment to nutrition and implemented several relevant initiatives. However, its efforts remain limited in scope and its market footprint is small, representing less than 2% of modern grocery retail sales and concentrated among urban, middle-income consumers.

IN-DEPTH FINDINGS

NUTRITION PRIORITIZATION & GOVERNANCE

Recognizing and addressing nutrition

Of the three retailers, only Super Indo explicitly addresses nutrition in its sustainability strategy. While Super Indo has not conducted its own materiality assessment, its co-owner Ahold Delhaize identifies 'customer health & nutrition' as a material issue in its Double Materiality assessment. And a commitment to nutrition is also central to Super Indo's purpose statement, which aspires to "make healthy food accessible and affordable, anywhere, anytime." Although not publicly disclosed, the retailer informed ATNi that its approach to nutrition is overseen by members of its (executive) 'Steering Committee and Board of Management', and that nutrition-related key performance indicators (KPIs) are part of remuneration incentives for its executive team.

In contrast, no evidence was found indicating that either Alfamart or Indomaret prioritizes or addresses

nutrition in their public disclosures or corporate strategies. Neither company identifies nutrition as a material issue in their materiality assessments, nor as an enterprise risk to the company in corporate risk registers. A limited exception is Indomarco Prismatama's 'Indomaret Fresh' line of convenience stores, which explicitly focuses on offering fresh and frozen fruits and vegetables and targets the middle-to upper-income consumers.⁵¹ The retailer aimed to establish 1,000 stores (out of 21,000 total) in 2023, but no subsequent reporting has been published.⁵¹

PORTFOLIO IMPROVEMENT

None of the three retailers assessed have public targets in place to increase the share of sales derived from 'healthier' products or disclose the proportion of sales from such products. While Super Indo previously had a target for 80% of private-label sales to be from 'nutritious products' by 2020, it has not publicly reported on progress since 2016, nor clarified how 'nutritious products' were defined, or set a new public-facing target. The retailer informed ATNi that it uses the government-endorsed 'Healthier Choice' criteria to track sales of 'healthier' products internally, although the exact purposes and reporting remain unclear.

Similarly, none of the retailers has set targets or reported on reducing specific nutrients of concern or increasing the use of positive components (such as fruit, vegetables, nuts or legumes, or wholegrains) within their private-label portfolios. For example, none has disclosed plans for eliminating industrially-produced trans fatty acids (iTFAs) from their portfolios (Box 6).

BOX 6

POLICY: VOLUNTARY REFORMULATION INITIATIVES

Indonesia currently has no mandatory reformulation standards for products high in sugar, salt, or saturated fats. However, the passing of the 'Health Omnibus Law' (No. 28/2024) empowers the central government to set maximum limits for sugar, salt and fat content in processed foods, as well as ready-to-eat products. These limits, however, are yet to be defined and implemented. 53,54

There is also no policy restricting the presence of iTFAs. A 2023 WHO Indonesia study found numerous packaged foods exceeding WHO-recommended iTFA levels.⁵⁵



PRICING AND PROMOTIONS FOR HEALTHIER PRODUCTS

While each retailer states that they strive for 'affordability' in their product offerings, only Super Indo includes an explicit commitment regarding the affordability of nutritious foods. The results of ATNi's independent pricing analysis—comparing the cost and affordability of healthier versus less healthy food baskets at Indomaret—are presented in the section on cost and affordability.

Regarding efforts to incentivize healthier purchases through promotions, Super Indo states that it offers regular promotions on fresh fruit and vegetables sourced from local partners, such as the weekly *Pilihan Segar Minggu Ini!* (Choose Fresh This Week!) promotion. ⁵⁶ However, no detailed information on the scope and frequency of these promotions—or broader affordability initiatives, was found.

Neither Alfamart nor Indomaret publish information about promotional strategies or campaigns aimed at encouraging healthier product choices. ATNi's independent analysis of the healthiness of the retailers' promotions—specifically, how frequently 'healthier' versus 'less healthy' products are promoted in weekly flyers and on e-commerce sites—is presented in the section on promotions.

RESPONSIBLE MARKETING

No information was found indicating that any of the retailers have policies or initiatives in place to address in-store product placement, shelf-space allocation, or promotional techniques designed to encourage healthier choices or increase fruit and vegetable sales.

Similarly, none of the three retailers have published commitments on responsible marketing to children, including restrictions on the advertising of unhealthy products. No policies were identified on the responsible marketing of breastmilk substitutes and complimentary foods.

BOX 7

POLICY: RESTRICTIONS ON MARKETING TO CHILDREN

The Indonesian Advertising Code of Ethics (2014; updated in 2020), enforced by the Indonesian Standards Committee and the *Dewan Periklanan Indonesia* (DPI; Indonesian Advertising Council) prohibits advertising targeted at children under 12 years of age in a way that exploits their credulity, lack of experience, or sense of loyalty, across child-targeted media channels (including social media).⁵⁷

While the Code provides general safeguards for children, it includes only limited reference to unhealthy food marketing. It specifies that advertisements for processed foods containing ingredients considered dangerous or potentially harmful to children's growth and development should not appear in media primarily directed at children, nor should they encourage excessive or inappropriate consumption. However, the Code does not define 'unhealthy' or 'nutritionally poor' foods, nor does it establish nutrient-based criteria for marketing restrictions.⁵⁸

In addition, health and nutrition claims in 'Processed Food Advertisements' are regulated by the Indonesian Food and Drug Authority (BPOM), including nutrient content claims specifically addressing child growth and development.⁵⁹

A recent UNICEF study (2025) found evidence that Indonesia's 20 largest F&B companies frequently employ techniques to target children on social media with advertisements for foods that exceed nutrient thresholds for healthiness according to the WHO South East Asia Regional Office (SEARO) Nutrient Profile Model (NPM)–highlighting the need for stronger regulation of digital marketing to children.⁶⁰



RESPONSIBLE LABELING

Only Super Indo was found to have an initiative in place to help consumers identify healthier products. In 2023, the retailer launched the 'Sugar Content Indicator', a colour-coded labelling system that highlights sugar levels on the price tags of beverage products.⁶¹ The scale uses four colours, from yellow to dark orange, with darker shades indicating higher sugar content. Thresholds are based on recommendations from the Indonesian Ministry of Health and WHO, and on the Healthier Choice nutrition criteria, calculated per 100mL.⁶¹ The labels also appear in the company's shopping app. It should be noted that this is not a government-endorsed labelling system, and no evidence was found on its impact on consumer behaviour. The possible coexistence of this scheme with other FOP labels may also create confusion among shoppers.

MISSED OPPORTUNITIES FOR NUTRITION LEADERSHIP

The findings reveal a clear disconnect between the growing influence of Indonesia's modern grocery retailers and their limited commitment to nutrition. Despite their market reach, Sumber Alfaria Trijaya (Alfamart) and Indomarco Prismatama (Indomaret) have yet to recognize nutrition as a material business issue or adopt a nutrition strategy. While Super Indo has made some positive steps, there remains significant potential for the retailer to scale up efforts to support healthier diets.

This inaction risks reinforcing unhealthy dietary patterns as these retailers continue to shape food access nationwide. Without clear nutrition strategies, measurable sales targets, or policies to improve the relative availability and affordability of healthier foods relative to less healthy products, retailers are missing a critical opportunity to demonstrate shared responsibility and support national nutrition and health goals. By embracing nutrition as a core business responsibility, retailers could play a transformative role in improving public health and reducing diet-related disease.

BOX8

POLICY: NUTRITION LABELLING AND HEALTH CLAIMS

In 2019, BPOM introduced the voluntary 'Healthier Choice' FOP label. This logo signals that a product meets specific nutritional criteria within a specific food category.

More recently, BPOM has drafted new regulation introducing a new FOP labelling scheme 'Nutri-Level', targeting HFSS processed foods.²⁶ Under this proposal:

- Products will be graded A to D, with A and B considered 'healthy'.
- Labels will display the total sugar, salt and fat content per serving.⁶²
- Grades C and D will require mandatory labelling, while A and B may remain voluntary initially.62

The government has indicated a two-year transition period for manufacturers to comply once the regulation takes effect. From the end of 2025, companies may choose to continue using their own traffic-light-style labels (such as Super Indo's Sugar Content Indicator) or voluntarily adopt Nutri-Level labels ahead of mandatory enforcement, expected around 2027, following the finalization of implementing rules.⁶³ Retailers have an opportunity to communicate transparently about their preparations for the upcoming regulation.



PRODUCT PROFILES



Retailers play a key role in shaping food environments through their private-label portfolio, which influences what consumers can access and afford. ATNi's Retailer Assessment 2025 includes a Product Profile that objectively evaluates the nutritional quality of private-label packaged foods and non-alcoholic beverages sold by the selected grocery retailers.

Applied consistently across the six countries included in the wider Retail Assessment, the Product Profile uses the same internationally recognized NPMs as ATNi's assessments of manufacturer brands. This enables cross-country comparisons and highlights opportunities for product reformulation, innovation, and diversification within national retail landscapes.

This chapter presents the results for Indonesia, focusing on the nutritional quality of the private-label portfolios of three of the largest grocery retailers: Alfamart, Indomaret, and Super Indo. The results for Indonesia—as well as for all other countries included in the assessment—can also be accessed through ATNi's interactive Dashboard.

Scope and methods

The Product Profile assesses the private-label portfolios using standardized per 100g/mL nutrient data from Innova Market Insights. All companies were invited to review and verify the dataset; however, no feedback was received. Products were screened for duplicates, implausible values, and missing key nutrients. Fresh produce, plain coffee and tea, spices, baby food, alcohol, and supplements were excluded.

Compared with other countries included in the multi-country ATNi Retailer Assessment 2025, the number of private-label packaged products available per retailer in Indonesia is relatively small. This may partly reflect differences in store format: supermarkets typically offer broader assortments than convenience stores (i.e. Alfamart and Indomaret), where private-label assortments tend to be more limited. Additional factors—such as the exclusion of certain categories, missing or incomplete nutritional information on product labels, and lower data coverage for emerging markets in the Innova Market Insights database—further reduced the number of products that could be analyzed.

Results are presented as unweighted averages, as category-specific F&B sales data for individual retailers were unavailable. Further details on data sources, categorization, proxy assumptions, and quality-control procedures are available in the <u>full methodology</u>.

BOX 9

OVERVIEW OF NUTRIENT PROFILE MODELS AND APPROACHES APPLIED

Healthiness was evaluated using five internationally recognized NPMs and approaches:

- Health Star Rating (HSR) (2020): A FOP system developed in Australia and New Zealand that assesses nutrients of concern and positive food components per 100g or 100mL across six categories. Scores are converted to a 5-star scale; products scoring ≥3.5 are classified as 'healthier'. The ≥3.5 threshold is based on work 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."⁶⁴
- Nutri-Score (2023): A European FOP labelling system that evaluates nutrients of concern and positive food
 components per 100g or 100mL across five product groups. Products are classified using a five-colour letter grade
 from A (healthiest) to E (least healthy). As no universal 'healthier' threshold exists, results are shown for products rated
 A+B and A+B+C.
- WHO SEARO NPM (2016): Developed to guide restrictions on marketing unhealthy foods to children. Includes 25 food categories, each with nutrient-based criteria and thresholds. Product must not exceed any threshold per 100g/mL basis. Results are expressed as a binary outcome i.e. 'marketing permitted' or 'marketing not permitted'.
- WHO Western Pacific Regional Office (WPRO) NPM (2016): Similar to WHO SEARO model, but with 21 food
 categories, and region-specific nutrient-based criteria and thresholds. It also uses the same binary classification
 approach as SEARO.
- HFSS and/orcolours/flavours/NNS approach (2024): Flags products that are high in nutrients of concern (HFSS; added saturated fat, sodium, and sugar) and/or that contain any of the three UPF markers, namely: colours, flavours, or nonnutritive sweeteners (NNS).⁶⁵

As no government-endorsed NPM currently exists for Indonesia, both WHO regional models were applied to support transparency and comparability. Although Indonesia falls under the WHO WPRO, the SEARO model was also included to reflect policymakers' interest.

For more detailed information on these NPMs, please see the full methodology.

TABLE 1

PRODUCT PROFILE RESULTS OF THREE RETAILERS IN INDONESIA ACROSS FIVE NUTRIENT PROFILING APPROACHES

| | Retailer | | | | | | |
|-------------------|---------------------------------|--------------------|-----|------------|-----------------------|--|--|
| NPM / Approach | Assessment criteria | Alfamart Indomaret | | Super Indo | Indonesia, overall | | |
| | Mean HSR | 2.2 | 2.4 | 1.8 | 2.0 | | |
| LICD | % healthier | 22% | 29% | 17% | 21% | | |
| HSR | Healthier products | 4 | 16 | 18 | 38 | | |
| | Total products | 18 | 55 | 105 | 178 | | |
| | % healthier (A+B) | 17% | 20% | 11% | 15% | | |
| | % healthier (A+B+C) | 39% | 40% | 24% | 30% | | |
| Nutri-Score | Healthier products (A+B) | 3 | 11 | 12 | 26 | | |
| | Healthier products (A+B+C) | 7 | 22 | 25 | 54 | | |
| | Total products | 18 | 55 | 105 | 178 | | |
| HFSS and/or | % products considered unhealthy | 93% | 96% | 98% | 97% | | |
| colours/flavours/ | Unhealthy products | 14 | 51 | 100 | 165 | | |
| NNS | Total products | 15 | 53 | 102 | 170 | | |
| | % eligible products | 9% | 7% | 14% | 12% | | |
| WHO SEARO | Eligible products | 3 | 5 | 35 | 43 | | |
| | Total products | 32 | 76 | 247 | 355 | | |
| WHO WPRO | % eligible products | 10% | 4% | 15% | 12% | | |
| | Eligible products | 3 | 3 | 32 | 38 | | |
| | Total products | 30 | 75 | 220 | 325 | | |

KEY FINDINGS

This section provides an overview of the nutritional quality of private-label portfolios for the three retailers in Indonesia (Table 1) and compares their results with global averages across all countries included in the Retail Assessment, as well as with manufacturer-branded products in Indonesia included in <u>ATNi's</u> Global Index 2024.

MEAN HEALTHINESS OF RETAILERS' PRIVATE-LABEL PORTFOLIOS USING HSR

The average HSR across the three Indonesian retailers (178 products) was low–2.0 out of 5–with some variation between retailers; a mean HSR of 2.2 for Alfamart (18 products); 2.4 for Indomaret (55 products); and 1.8 for Super Indo (105 products). Compared with the other countries included in the assessment, Indonesian retailers show a lower mean HSR than the overall mean HSR of 2.7 (18,652 product in total) across all 18 retailers assessed in the six countries (See **Dashboard**).

PROPORTION OF PRIVATE-LABEL PORTFOLIOS CONSIDERED 'HEALTHIER' USING:

HSR

Across the three Indonesian retailers, only 21% (38 out of 178 products) met the 'healthier' threshold of HSR ≥3.5—considerably lower than the overall average of 41% (7,724 out of 18,652 products) across all retailers. Indomaret had a slightly higher share of 'healthier' private-label products (29%; 16 out of 55 products) compared with Alfamart (22%; 4 out of 18 products) and Super Indo (17%; 18 out of 105 products).

Nutri-Score

Nutri-Score results reveal a similar pattern to HSR. Because Nutri-Score was not originally designed as a binary measure, both threshold approaches are presented for transparency:

- A+B threshold: 17% of Alfamart products, 20% of Indomaret products, and 11% of Super Indo products meet this definition of 'healthier'.
- A+B+C threshold: 39% (Alfamart), 40% (Indomaret), and 24% (Super Indo).

WHO models

Overall, only 12% (41 out of 355 products) were eligible for marketing to children according to the WHO SEARO model, similar to the WHO (WPRO) model (12%; 38 out of 287 products). Super Indo had slightly higher proportions: 14% (35 out of 247 products) under the WHO SEARO model and 15% (32 out of 220 products) under the WHO WPRO model compared with the two other retailers, which also had smaller product samples in this assessment.

PROPORTION OF PRIVATE-LABEL PORTFOLIOS CONSIDERED 'UNHEALTHY' USING:

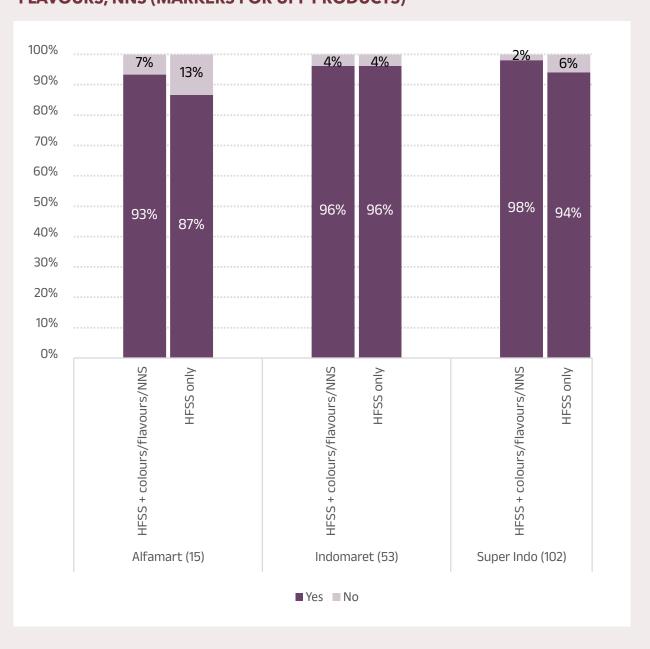
The HFSS and/or colours/flavours/ NNS approach^f

The proportion of private-label products classified as 'unhealthy' under the HFSS and/or colours/flavours/ NNS approach was very high across all Indonesian retailers: 93% for Alfamart (14 out of 15 products), 96% for Indomaret (51 out of 53 products), and 98% for Super Indo (100 products out of 102). This is higher than the overall proportion of 'highly processed' products across all retailers included in the assessment—86% (15,639 out of 18,195 products). (15,639 out of 18,195 products).

Together, these Product Profile findings highlight the importance of interpreting results across multiple models: while nutrient-based scores may improve following product reformulation, processing-based indicators persist if cosmetic additives or sweeteners remain present.

- This approach flags high levels of fat, salt, sugar, and/or products that contain 'cosmetic additives' such as colours, flavours, and non-nutritive sweeteners (markers of UPF).
- It is important to note that the analysis covers packaged food and beverages products only. Fresh fruits and vegetables were excluded. While some retailers package fresh produce resulting in barcoded products appearing in the original dataset—these were removed during data cleaning. NNS refers to non-nutritive sweeteners.

FIGURE 7 PROPORTION OF TOTAL PRODUCTS CONTAINING HFSS AND/OR COLOURS, FLAVOURS, NNS (MARKERS FOR UPF PRODUCTS)



BOX 10

REFORMULATION AND THE REMOVAL OF SYNTHETIC DYES

In other countries included in the assessment, such as the US, retailers have begun reformulating products to remove synthetic dyes amid growing awareness of their potential health impacts and their role as UPF markers. These actions reflect increasing consumer and regulatory attention to product composition and the use of cosmetic additives.

It is important to note, however, that replacing synthetic dyes with natural alternatives does not necessarily make a product healthy or healthier, nor does it change a product's classification under processing-based models such as the HFSS and/ or colours/flavours/NNS approach. This approach considers all cosmetic additives-regardless of their source (natural or synthetic)-as indicators of ultra-processing, since they modify a product's natural state without adding nutritional value. For example, low-fat yoghurts reformulated with natural colourants may score better under nutrient-based systems such as the HSR or Nutri-Score, reflecting lower energy or sugar content, yet remain classified as ultra-processed due to the continued presence of cosmetic additives and may still contain high levels of (added) sugar.

COMPARING PRODUCT CATEGORIES ACROSS RETAILERS USING HSR

The analysis covers 27 product categories, revealing significant variation in nutritional quality across the grouped categories and retailers. For example, the savoury snacks category had a relatively low mean HSR of 2.8 across the three retailers, with substantial variation between the three retailers: Alfamart (mean HSR: 2.5; 8 products), Indomaret (mean HSR: 3.1; 19 products), and Super Indo (mean HSR:1.3; 43 products). ATNi's interactive dashboard provides a more detailed comparison of category-level results across retailers and the six countries included in the overall Retail Assessment.

COMPARING PRIVATE-LABEL WITH GLOBAL MANUFACTURER PORTFOLIOS USING HSR

At an aggregate industry level, retailers' private-label portfolios in Indonesia show similar overall healthiness to those of leading manufacturers with a presence in Indonesia assessed in the Global Index 2024. The mean HSR for private-label portfolios across Alfamart, Indomaret, and Super Indo was 1.9 (161 products in total), matching the mean HSR of 1.9 (996 products in total) from 15 leading manufacturers selling packaged F&B products in Indonesia (Table 2).

This contrasts with ATNi's overall Retail Assessment findings, where private-label products generally performed better than manufacturer brands (mean HSR 2.7 vs 2.4). Evidence from other studies also suggests that private-label products often outperform branded equivalents. For example, a New Zealand study found that private-label products had a higher proportion of items with an estimated HSR ≥3.5 compared with branded packaged foods.66 Similarly, an Australian study analyzing the sodium content of 15,680 private-label and branded products sold across four major supermarkets (2011-2013) reported that private-label products generally performed better than branded equivalents on sodium levels.⁶⁷

TABLE 2

COMPARISON OF MEAN HSR BETWEEN PRIVATE-LABEL PRODUCTS AND MANUFACTURER-BRANDED PRODUCTS IN INDONESIA

| | Private-label products | | | | Manufacturer products ^h | | | |
|---------------------------------------------------|------------------------|--------------------|---------------------|-------------------|------------------------------------|-------------------------------|----------------------------|------------------------|
| Category | Mean HSR | % healthy products | Healthy products | Total products | GI - Mean HSR | GI - % healthy products | GI- Healthy products | Gi - Total products |
| Baked Goods ⁱ | 2.2 | 18% | 2 | 11 | 1.3 | 0% | 0 | 12 |
| Bottled Water | 5.0 | 100% | 6 | 6 | 5.0 | 100% | 7 | 7 |
| Concentrates | 0.5 | 0% | 0 | 1 | 0.9 | 0% | 0 | 7 |
| Confectionery | 1.8 | 0% | 0 | 12 | 1.0 | 2% | 1 | 61 |
| Dairy | 2.5 | 0% | 0 | 2 | 2.7 | 52% | 177 | 339 |
| Edible Oils | 1.6 | 25% | 1 | 4 | 1.4 | 9% | 1 | 11 |
| Juice | 1.7 | 29% | 2 | 7 | 1.4 | 6% | 2 | 31 |
| Processed Meat and Seafood | 2.5 | 50% | 6 | 12 | 3.8 | 100% | 3 | 3 |
| Rice, Pasta and Noodles | 1.6 | 0% | 0 | 7 | 1.7 | 15% | 32 | 220 |
| Sauces, Dips and Condiments | 0.9 | 0% | 0 | 11 | 1.0 | 6% | 8 | 134 |
| Savoury Snacks | 1.9 | 17% | 12 | 70 | 1.5 | 2% | 2 | 88 |
| Sweet Biscuits, Snack Bars and Fruit Snacks | 1.4 | 0% | 0 | 12 | 1.1 | 0% | 0 | 68 |
| Sweet Spreads | 1.9 | 0% | 0 | 6 | 2.2 | 40% | 6 | 15 |
| Total | 1.9 | 18% | 29 | 161 | 1.9 | 24% | 239 | 996 |

This includes 15 manufacturers featured in ATNi's Global Index 2024 (GI) that are active in Indonesia, comprising one Indonesia-based company and others for which Indonesia is among their top five markets by sales.

Such as bread, cakes, dessert mixes, pastries, dessert pies and tarts.

Fortification

Food fortification is identified by the Indonesian government as a priority intervention to address population-level micronutrient deficiencies.⁶⁸ Mandatory guidelines require the fortification of palm oil, salt, and wheat flour, with micronutrients such as vitamin A, iron, zinc, and vitamins B1, B2, and B9, as well as salt iodization. An overview of Indonesia's mandatory fortification policies is provided in Table 3.

While wheat flour must be fortified when used as an ingredient in processed foods, requirements for the use of fortified salt and palm oil as ingredients are less clear. Presidential Decree No.69 (1994) mandates iodization of all salt for human consumption, but does not specify salt used in the food industry—creating a potential barrier to universal salt iodization. Similarly, Indonesian National Standard 7709:2019 on palm oil fortification applies only to products intended for direct consumption, rather than to palm oil used as an ingredient in processed foods.

Private-label versions of these staples were limited among the three retailers assessed: only four palm oil products, two salt products, and one wheat flour product were identified. This potentially reflects the continued dominance of traditional trade channels for purchasing staples, as well as consumer preferences for well-known staple brands rather than private-label alternatives. ⁷² In addition, the absence of an online retail platform for Super Indo may have resulted in some relevant products not being captured in this mapping.

Importantly, all seven identified products were found to be fortified, demonstrating the effectiveness of mandatory regulations for ensuring the availability of fortified products in the market–even when private-label offerings are few.^j

For further information on level of coverage and the impact of mandatory fortification in Indonesia, see UNICEF Landscape Analysis of Large-Scale Food Fortification in Indonesia.⁶⁸

TABLE 3

OVERVIEW OF FORTIFICATION POLICIES IN INDONESIA

| Food category | Voluntary/ Mandatory | Specified micronutrients |
|---------------|----------------------|-----------------------------------------------|
| Palm oil | Mandatory | Vitamin A ⁶⁹ |
| Salt | Mandatory | lodine ⁷⁰ |
| Wheat Flour | Mandatory | Iron, zinc, vitamins B1, B2, B9 ⁷¹ |

PROMOTIONS



As part of ATNi's Retail Assessment 2025, an independent analysis was conducted of F&B promotions featured the flyers and e-commerce websites of the three grocery retailers assessed in Indonesia.

This research component examines how frequently products classified as 'healthy', 'unhealthy in excessive amounts', and 'unhealthy' are promoted in practice, highlighting the balance of promotional emphasis across key food categories. The categorization approach builds on the Global Diet Quality Score framework, adapted for the purposes of this assessment. Further details on the methodology and classification framework are outlined in the overarching Scope and Methodology Report; a summary of the key findings for Alfamart, Indomaret, and Super Indo is provided below.

A total of 1,546 food products were analyzed:

- three weekly flyers (PDFs) from Super Indo,
- two biweekly flyers (PDFs) from Indomaret,
- promotions listed on the Alfamart e-commerce webpage.

On average, Indomaret's flyers featured more products per issue (n = 292) compared with Super Indo (n = 193). The Alfamart promotional webpage yielded a total of 384 products.

Figure 8 summarizes the proportion of promoted foods categorized as healthy, unhealthy in excessive amounts, unhealthy, and other products. Overall, each retailer allocated a larger share of their flyer space to promotions for unhealthy products. Super Indo featured the highest proportion of healthy items (32%), while Alfamart (3%) and Indomaret (5%) displayed

substantially fewer.^k This pattern is consistent with the findings from the Retailer Profile assessment, which reported that Super Indo offers regular promotions on

Notably, a large share of Alfamart's promotions (31%) fell under the 'Other' category, comprising products that could not be clearly classified as healthy or unhealthy, such as specialized nutrition items (e.g. baby food and milk formula).

FIGURE 8 PROPORTION OF HEALTHY, **UNHEALTHY IN EXCESSIVE** AMOUNT, UNHEALTHY, AND **OTHER PRODUCTS** 100% 90% 31% 80% 70% 46% 60% 69% 50% 53% 40% 30% 20% 32% 10% 5% 0% **Alfamart** Indomaret Super Indo* Healthy Unhealthy in excessive amount Unhealthy Other * Values are rounded to the nearest point

fresh fruit and vegetables sourced from local partners, such as the weekly *Pilihan Segar Minggu Ini!* (Choose Fresh This Week!) promotion.

Table 4 presents the proportion of specific healthy food groups promoted in each flyer. Super Indo—which had the highest overall percentage of healthy foods—devoted most of its healthy food promotions to fish and shellfish (8%), followed by vegetables (7%) and fruits (6%).

Both Alfamart and Indomaret displayed a similar pattern in promoting only a few healthy food groups:

nuts and seeds (2%) and low-fat dairy (1-2%). Indomaret also featured unsweetened beverages (2%). This similarity likely reflects their shared convenience store formats, which limits capacity to stock perishable products such as fruits and vegetables—unlike Super Indo, which as a supermarket, has greater space for fresh produce.

Table 5 summarizes the promotion of unhealthy food groups across the retailers. Sweets and ice cream were among the most frequently featured items, particularly at Indomaret (24%), followed by Alfamart (18%) and Super Indo (10%). Refined grains, baked goods, and

TABLE 4

MEAN PERCENT OF HEALTHY FOOD INCLUDED IN FLYERS

| Healthy Food Group | Alfamart | Indomaret | Super Indo |
|-----------------------------|----------|-----------|---------------|
| All fruits | 0.0% | 0.0% | 6.0% |
| Citrus fruits | 0.0% | 0.0% | 1.0% |
| Deep orange fruits | 0.00 | 0.0% | 0.7% |
| Other fruits | 0.0% | 0.0% | 4.3% |
| All vegetables | 0.0% | 0.0% | 7.2% |
| Dark green leafy vegetables | 0.0% | 0.0% | 0.9% |
| Cruciferous vegetables | 0.0% | 0.0% | 0.4% |
| Deep orange vegetables | 0.0% | 0.0% | 0.5% |
| Other vegetables | 0.0% | 0.0% | 5.4% |
| Legumes | 0.0% | 0.0% | 3.0% |
| Deep orange tubers | 0.0% | 0.0% | 0.0% |
| Nuts and seeds | 1.6% | 1.8% | 0.9% |
| Whole grains | 0.0% | 0.0% | 0.0% |
| Fish and shellfish | 0.0% | 0.2% | 7.6% |
| Poultry and game meat | 0.0% | 0.0% | 3.0% |
| Low fat dairy | 1.6% | 1.0% | 0.9% |
| Eggs | 0.0% | 0.0% | 1.9% |
| Healthy ready meals | 0.0% | 0.0% | 0.0% |
| Unsweetened beverages | 0.0% | 2.0% | 1.4% |

TABLE 5

MEAN PERCENT OF UNHEALTHY IN EXCESSIVE AMOUNT AND UNHEALTHY FOOD INCLUDED IN FLYERS

| Unhealthy Food Group | Alfamart | Indomaret | Super Indo |
|------------------------------------------------------------|----------|-----------|---------------|
| High-fat dairy* | 12.8% | 9.1% | 9.1% |
| Red meat* | 0.0% | 0.0% | 3.3% |
| Oils and fats* | 0.3% | 0.5% | 2.1% |
| Processed meat | 1.0% | 0.2% | 3.8% |
| Sauces, dips, and condiment | 7.3% | 3.2% | 3.3% |
| Refined grains, baked goods, and snacks | 8.6% | 26.3% | 17.4% |
| Sweets and ice cream | 18.2% | 24.0% | 10.4% |
| Sugar-sweetened beverages | 17.2% | 13.0% | 3.3% |
| Juice | 0.0% | 1.1% | 0.7% |
| White roots and tubers | 0.0% | 0.0% | 0.5% |
| Purchased deep fried foods and unhealthy ready meals | 0.3% | 1.5% | 6.2% |

^{*} Foods that are unhealthy in excessive amount

snacks were also commonly promoted at Indomaret (26%) and Super Indo (10%). SSBs were most often advertised by Alfamart (17%), followed by Indomaret (13%), while Super Indo promoted them far less (3%). High-fat dairy, mostly whole milk—also appeared across all three retailers' promotional materials, particularly at Alfamart (13%), where it was promoted more frequently than refined grains, baked goods, or snacks.

To the best of our knowledge, this is the first assessment to examine the healthiness of promotions in retailer flyers in Indonesia. While the Ministry of Health and BPOM closely monitor food safety, hygiene, and sanitation within the retail sector, the nutritional quality of foods featured in promotional materials has received limited attention. A similar study conducted in Malaysia—a neighbouring country with comparable dietary patterns and socioeconomic status—found that hypermarket flyers predominantly featured unhealthy food products, particularly during festive seasons.

In Indonesia, wider evidence also points to a strong bias towards unhealthy food promotions. For example, a study on outdoor F&B advertising found that unhealthy items (i.e. high in sugar, salt, or fat) are promoted more frequently than healthier alternatives, and are especially prevalent in areas frequented by children and adolescents.⁷⁵

With the rise of e-commerce and omnichannel retailing, many promotional flyers are now also shared through social media platforms, amplifying their reach. Social media has been shown to be frequently used to promote unhealthy foods and beverages to children, while modelling analyses have demonstrated that increased internet use is associated with a decline in household healthy food consumption. 60,76

Overall, these findings highlight a clear opportunity for retailers in Indonesia to positively influence the food environment by featuring healthier options more prominently across both in-store and online promotional strategies.



COST AND AFFORDABILITY



The pricing analysis compares the cost and affordability of healthier versus less healthy diets across the six countries included in ATNi's Retail Assessment 2025—the US, France, Indonesia, South Africa, Kenya, and the Philippines—using a standardized food basket approach. Retail food baskets were constructed based on the EAT-Lancet reference diet, representing "healthier" and "less healthy" baskets. The full report, including details of the methodology, data sources, analytical framework, results, and recommendations, is available in the ATNi Retail Assessment 2025 Pricing Analysis Report.

Pricing data were available for in total nine of the eighteen retailers assessed. In Indonesia, the analysis covers Indomaret only. Price data for Alfamart and Super Indo were not available at the time of publication on Euromonitor International's VIA platform and therefore could not be included. Pricing data for Alfamart are now being collected by Euromonitor International in response to ATNi's request, and the analysis will be updated to include Alfamart's data in early 2026.

At Indomaret, the healthier retail food basket was consistently more expensive than the less healthy one, although the relative price gap between the two baskets (10.8%) was the smallest among all nine retailers across the six assessed countries. In PPP-adjusted terms, the healthier basket costs USD 21.45 per person per day compared with USD 19.37 for the less healthy basket.

When assessed relative to income, both baskets at Indomaret were among the least affordable across all retailers. As a share of daily per capita GNI, the healthier and less healthy baskets accounted for 48.9% and 44.2%, respectively. When expressed as a share of daily per capita net income, affordability declines even further: purchasing the healthier retail basket would require around 100% of average daily net income, while the less healthy basket would still absorb about 90%.

These findings indicate that in Indonesia, healthier diets purchased through large formal retailers remain financially out of reach for most households, even when price differences between healthier and less healthy options are comparatively small. Although basket prices appear moderate in international comparison, they consume a far larger share of daily net income in Indonesia, highlighting severe affordability constraints—particularly for lower-income groups.

Pricing data for fruits and vegetables were largely based on frozen items, as fresh options were limited in the available dataset. In addition, the analysis reflects only modern in grocery retail (Indomaret); in many lower- and middle-income countries, including Indonesia, informal markets account for a substantial share of food purchases, which are not reflected here.

BOX 11

POLICY: FISCAL POLICIES AFFECTING NUTRITION IN INDONESIA

Market interventions, such as taxes and subsidies, can influence consumer demand and purchasing patterns—both discouraging the purchase of unhealthy foods and lowering financial barriers to healthier options. In Indonesia, agricultural subsidies favour crops such as rice, maize and soybean, and sugar, to support food self-sufficiency and stabilize staple food prices. While these subsidies have contributed to expanded production and improved staple availability, Indonesia remains partially reliant on imports of these commodities to buffer production fluctuations.⁷⁷⁻⁷⁹

Since 2016, Indonesia's Ministry of Finance has considered implementing a SSB excise to address non-communicable diseases (NCDs) and strengthen public health funding.⁸⁰ However, implementation has been repeatedly delayed due to debates regarding potential negative impacts on industry.^{80,81} At present, the draft SSB Tax (MBDK) is planned for implementation in 2026.⁸²

Though the rate of the tax is has not yet been finalised, current proposals include a 2.5% excise tax on the retail price, and fixed rates of IDR 1,500 per litre for packaged sweetened drinks and IDR 2,500 per litre for concentrates.⁸³ In contrast, organizations such as the Centre for Indonesia's Strategic Development Initiatives (CISDI) advocate for a 20% excise tax on the retail price, aligning with WHO recommendations for effective SSBs taxation for NCD prevention.^{83,84}

TABLE 6

AFFORDABILITY OF HEALTHIER AND LESS HEALTHY RETAIL FOOD BASKETS ACROSS THE SIX ASSESSED COUNTRIES

| Income | Country | Retailer | Healthier retail food basket | | Less healthy retail food basket | |
|-----------------|-----------------|----------------|------------------------------|-------------------------------------|------------------------------------|-------------------------------------|
| | | | % daily per capita GNI | % daily per capita net income | % daily per capita GNI | % daily per capita net income |
| US Upper France | | Walmart | 6.89 | 11.10 | 5.82 | 9.37 |
| | 05 | Kroger | 6.66 | 10.72 | 4.20 | 6.76 |
| | France | E.Leclerc | 6.27 | 8.99 | 5.10 | 7.30 |
| | | Carrefour | 7.69 | 11.01 | 6.21 | 8.89 |
| 11 | Indonesia | Indomaret | 48.90 | 100.10 | 44.16 | 90.38 |
| Upper-middle | South Africa | Pick n pay | 44.72 | 28.28 | 34.35 | 21.72 |
| Lower-middle | The Philippines | SM supermarket | 52.63 | 31.91 | 35.68 | 21.63 |
| | | Robinsons | 71.19 | 43.16 | 44.32 | 26.87 |
| | Kenya | Naivas | 154.40 | 64.58 | 116.69 | 48.81 |

^{*}GNI: gross national income

It is also important to interpret these results in the context of Indonesia's broader food environment. The baskets reflect the cost of a 'retail diet' purchased through a major formal retailer; they do not reflect the large share of food that households obtain from traditional or informal markets, where both prices and product availability may differ significantly. As a result, the reported costs likely overestimate what many consumers currently spend in practice, while still highlighting the scale of the affordability challenge if diets were to shift towards healthier patterns and greater reliance on formal retail channels.

At the same time, the findings highlight clear opportunities for retailers to address affordability gaps through more strategic pricing and promotion policies. Integrating affordability considerations into corporate nutrition strategies, setting measurable targets to narrow price differentials between healthier and less

healthy products, and improving transparency in tracking progress are key priorities. Continued monitoring of cost and affordability across retailers and markets remains essential to track progress over time and inform policies to increase access to affordable, healthy diets.

At the policy level, fiscal measures that reduce price gaps between healthier and less healthy foods remain critical to ensuring that healthier diets are accessible and affordable for all.

An update to this analysis is scheduled for early 2026, incorporating the EAT-Lancet 2025 Reference Diet and including two additional retailers from the overall Retail Assessment—including Alfamart—for which data are currently being collected by Euromonitor International at ATNi's request.



CONCLUSION AND RECOMMENDATIONS



The Indonesia Retail Assessment underscores the significant influence that grocery retailers have on consumers choices and identifies clear opportunities to foster healthier, more equitable food environments. The recommendations below outline priority actions for Indonesian retailers—supported by enabling measures for policymakers and investors—to accelerate progress on nutrition, transparency, and accountability across the grocery retail sector.

FOR RETAILERS

1 Strengthen nutrition governance and accountability

- Explicitly recognize consumer health and nutrition as an important material business issue incorporating it into materiality and environmental, social and governance risk assessments, and identify and disclose nutrition-related risks within enterprise risk disclosures.
- Integrate nutrition considerations across commercial strategy, developing a comprehensive strategy to improving the retailer's impact on consumer health, with clear executive level accountability and board-level oversight.
- Link executive remuneration to measurable nutrition indicators, such as the share of privatelabel sales meeting 'healthier' criteria, reductions in nutrients of concern, or increases in the proportion of promotions featuring healthier products.
- Report publicly and annually on nutrition governance and progress, with disclosures disaggregated by operating brand.

Set measurable targets and report transparently

- Establish specific, time-bound targets to increase
 the share of 'healthier' private-label sales, using a
 government-endorsed or internationally
 recognized NPM-such as the proposed NutriLevel (A/B thresholds) or the WHO SEARO or
 WPRO models.
- Report annually on the share of 'healthier' privatelabel sales, ideally following ATNi's proposed NPM reporting guidelines.

3 Improve portfolio composition through reformulation

- Strengthen the nutritional quality of private-label portfolios through product innovation and reformulation, ensuring a higher proportion of products meet 'healthier' thresholds.
- Set specific reformulation targets to reduce sodium, sugars, and saturated fat in high-volume private-label categories—particularly those identified as less healthy in the Product Profile (e.g. savoury and sweet snacks, spreads, baked goods, and processed meat and seafood).



- Reduce the use of unnecessary additives and increase the availability of more minimally processed options within private-label assortments.
- Collaborate with suppliers to improve the nutritional quality of branded products by encouraging reformulation and innovation through shared targets, incentives, and transparent monitoring of progress.

4 Rebalance promotions toward healthier products

- Set measurable targets to increase the share of flyer and e-commerce promotions and loyalty incentives featuring healthier products.
- Track and publicly report the annual distribution of promotions by product healthiness, ensuring clarity and transparency on definitions and methodology.
- Enhance in-store and online shopping environments to promote healthier choices through strategic product placement, shelf positioning, and distribution, ensuring healthier options are visible, accessible, and attractively presented across all store formats.

5 Strengthen responsible marketing, particularly to children

 Adopt a company marketing policy that prohibits marketing products that do not meet nutrition standards to children under 18 years across all marketing channels and techniques, in line with WHO and UNICEF recommendations, and assess compliance through independent third-party audits.

6 Address affordability gaps

- Integrate affordability into the company's nutrition strategy by setting measurable targets and adopting clear definitions of both 'affordability' and 'healthy', reporting on progress annually.
- Implement targeted strategies to narrow price gaps between healthier and less healthy products, including more affordable private-label options, offering discounts on produce, and designing loyalty incentives that encourage healthier purchases.

FOR POLICY MAKERS

A policy brief is published separately including more details.

1 Implementation of the proposed mandatory Nutri-Level FOP label across all F&B categories

- A mandatory FOP label that covers all nutrients of concern and proxies for UPF can empower consumers to make healthier choices and guide retailers and F&B manufacturers in products reformulation.
- Policymakers should also consider using Nutri-Level as a basis for further regulation on advertising—for example, restricting Nutri-Level C and D rated products from being advertised to children, or in proximity to schools.
- To strengthen the labelling system, policymakers could set mandatory requirements not only for C and D products, but also for products receiving A and B, helping to clearly signpost healthier options to consumers.
- It is also recommended that policymakers consider a short/minimal 'interim' period to avoid consumer confusion, and to retire the Healthier Choice logo once Nutri-Level is fully implemented, in line with WHO guidance to use only a single FOP labelling system on pack.

2 Implement the draft SSB Tax (MBDK) in 2026, and align with global guidelines for optimum impact

- Taxation on unhealthy foods such as SSBs can reduce the prevalence of overweight, obesity, and type 2 diabetes, as indicated by CISDI's analysis.
- For optimal impact, policymakers should consider aligning tax design with WHO recommendations for a 20% excise tax on the retail price.



FOR INVESTORS

- 1 Use ATNi's data and the <u>Investor Expectations on Nutrition</u>, <u>Diets and Health</u> to integrate nutrition into sustainable investment strategies, enabling investors to:
- Assess the extent to which retailers are exposed to nutrition-related risks and opportunities;
- Prioritize investments in retailers that are expanding access to healthy food; and
- Identify opportunities for investments in new technologies and innovations that deliver healthier foods to consumers.
- 2 Regularly engage with retailers to encourage them to:
- Publicly set and report against time-bound targets to improve the healthiness of their product portfolios, using internationally recognized NPMs, and support the implementation of the Nutri-Level FOP label as proposed by government;
- Use promotional techniques to drive sales of healthier products relative to less healthy products, and ensure only healthier products are marketed to children;
- Assign executive-level oversight and accountability for nutrition, including linking executive remuneration to nutrition KPIs;
- Address affordability gaps between healthy and less healthy products, particularly for low-income consumers.

- 3 Engage policymakers and standards-setters to create enabling environments that:
- Drive investments towards shaping healthier food environments;
- Expand healthy food retail in low-income settings; and
- Foster transparent and standardized reporting by food retailers on nutrition.



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