ACCESS TO NUTRITION INITIATIVE



India Spotlight Index 2020

Executive Summary

Generated on: 27-03-2024

Introduction



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

Inge Kauer, Executive Director, Access to Nutrition Initiative

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

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

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

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

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

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

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

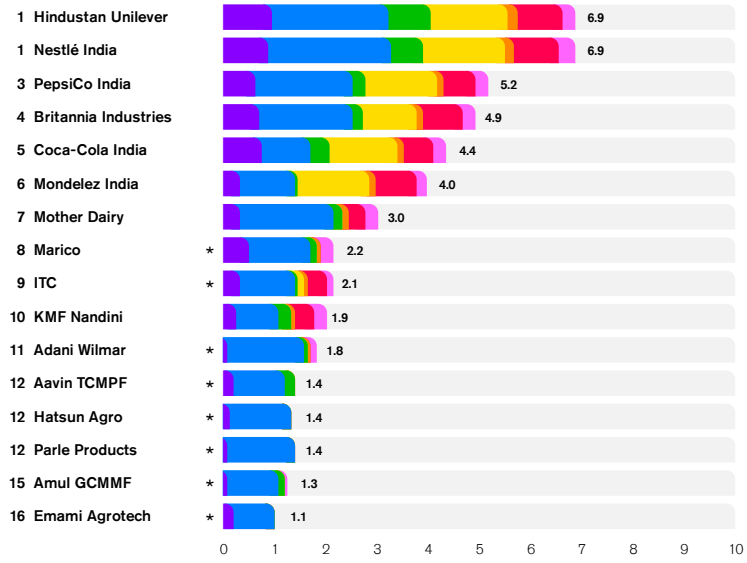
Of the 1456 products assessed in the Product Profile 16% meet healthy standards. All companies are to increase the healthiness of their portfolios.

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

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

Ranking

Overall Ranking



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

A Governance
B Products
C Accessibility
D Marketing
E Lifestyles
F Labeling
G Engagement

* Did not provide information to ATNI

India Spotlight Index 2020 Research Scope

URL: https://new-l40rlzsq.accesstonutrition.org/index/india-spotlight-2020/

Companies

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



Aavin TCMPF



Adani Wilmar



Amul GCMMF



Britannia Industries



Coca-Cola India



Emami Agrotech



Hatsun Agro



Hindustan Unilever



ITC



KMF Nandini



Marico



Mondelez India



Mother Dairy



Nestlé India



Parle Products



PepsiCo India

Findings

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

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

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

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

- For the nine companies assessed in both Indexes, the estimated sales from healthy products[1] increased from 15% in the 2016 India Index to 23% currently. However, the research found no increase in the percentage of healthy products, by number, in the companies' overall portfolios. The number of companies that provided comprehensive product nutrient content data to ATNI for the product assessments increased from three to seven, improving the quality of this assessment.
- Out of 13 companies that sell staple products covered under FSSAI's (Fortification of Foods) 2018 Regulation, 10 voluntarily fortify their staple products to help address micronutrient deficiencies in India. Only Mother Dairy and Britannia Industries fortify all products in their portfolios that are covered by the Regulation. The three companies that do not manufacture products covered by FSSAI's mandate (Coca-Cola India, Mondelez India and PepsiCo India) were found to fortify other products to address micronutrient deficiencies for specific consumer groups in India.
- Having joined FSSAI's initiatives to support the Eat Right Movement, six of the 16 companies have made public pledges to reformulate their products. Four additional companies make other commitments to make their products healthier.
- Hindustan Unilever, Nestlé India and PepsiCo India stand out as having the most comprehensive reformulation targets. Fewer than half of the companies define targets for reducing salt/sodium, saturated fat and added sugar/calories.
- Of the 16 companies, four have a strategy or target to address affordability and physical accessibility of their healthy products[2] This indicates that most companies are not showing if and how they market their healthier products to Indian consumers whose access to these products is constrained by low-income or by location. For example, targeting consumers living in certain rural or urban areas, or those present in aspirational districts.
- Seven of the 16 companies label sodium content on the back-of-packs, which is three more than in 2016. In terms of front-of-pack (FOP) labeling, five companies have made a public commitment to declare FOP nutrition information. A dialogue on interpretive FOP labeling is ongoing between the Government, industry and other stakeholders in India, but no interpretive FOP labeling has been implemented yet.

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

nutrition criteria or incorporate them into their marketing policies.

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

The Indian Context

India continues to face a double burden of malnutrition,[3] defined as the simultaneous manifestation of both undernutrition and overweight and obesity. Malnutrition not only directly affects people's physical growth and health but also their cognitive development and abilities. It has been identified as one of the principal factors limiting India's economic growth potential. The opportunities are equally enormous; cost-benefit ratio analyses of nutrition interventions to reduce stunting in the first year of life report a monetary return (higher wages) later in life of 18:1 per child, and similar analyses found that a 1 cm increase in adult height due to nutrition interventions was associated with a 4% increase in wages for men, and 6% for women.[4]

In recognition of India's nutrition challenges, in early 2018, the Government launched the National Nutrition Mission (NNM), also known as *POSHAN Abhiyaan*, with ambitious targets to reduce various forms of malnutrition and substantial associated budgets. It has also led many initiatives such as the Integrated Child Development Scheme (ICDS), the Mid-Day Meal Scheme, the Maternity Benefit Program and the Public Distribution System (PDS), which all provide food at subsidized rates. The Food Safety and Standards Authority of India (FSSAI) has developed a range of guidelines and standards for food manufacturers, and works with many stakeholders active in the food system.[5]

Aligning with FSSAI's wide-scale staple foods fortification standards, the Ministry of Women and Child Development has issued new directives to mandatorily use fortified rice, as well as fortified wheat flour and edible oil, in the Mid-Day Meal schemes and public nutrition programs under the ICDS across India since December 2019.[6] To further this agenda, in 2019, the Ministry of Consumer Affairs, Food and Public Distribution has approved a 3-year pilot scheme for the fortification of rice with iron, folic acid and vitamin B-12 under the PDS in 15 districts of India.[7]

The food and beverage sector is the fifth largest manufacturing sector in India.[8] Lifestyle changes in India have caused a shift in consumer habits – with an increased consumption of sugar, fat and salt. India is one of the top 10 consumers of fast food in the world[9] and is set to be the third largest consumer economy by 2025.[10]

Almost two-thirds of the disease burden in India is due to lifestyle diseases.[11] Many of these diseases are diet-related non-communicable diseases that link with changes in diets and eating patterns. Several factors have led to the increased consumption of products from the fast-growing food and beverage segments in India (Breakfast Cereals; Savory Snacks; Seasonings, Dressings and sauces; Naturally Healthy Beverages; Ready Meals; Confectionery; Organic Food; Dairy Food; Bakery).[12]

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

Novelties and Best Practices

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

Recommendations

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

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

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

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

Future Opportunities

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

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

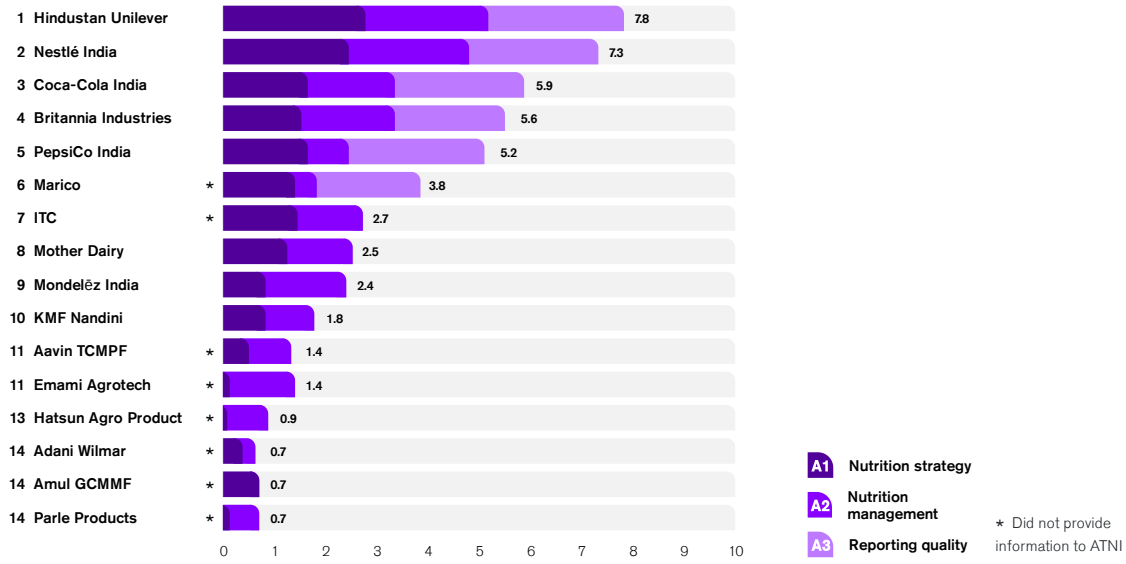
Category Rankings

Category A: Governance

Category A consists of three criteria:

A1 Nutrition strategy
A2 Nutrition management
A3 Reporting quality

This category assesses the extent to which a company's corporate strategy includes a specific commitment and focus on health and nutrition in the Indian market. Moreover, it looks at whether the company makes a specific reference to population groups experiencing or at high risk of malnutrition due to a lack of access to a wide variety of healthy foods. Other key facets analyzed include whether the nutrition strategy is thoroughly embedded in its governance and management systems, as well as the quality of its reporting.



Findings

- Although 14 of the 16 companies claim to focus on improving health and nutrition, as expressed in their mission statements or as part of their corporate growth strategy (all except Emami Agrotech and Hatsun Agro Product), only five companies recognize, to some extent, the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 and/or *POSHAN Abhiyaan* in their commercial strategy. Nestlé India stands out due to its comprehensive approach; it is the only company to refer to all groups experiencing malnutrition or at risk of malnutrition. However, Hindustan Unilever performs best in this Category due to its public disclosure and quality of reporting on nutrition activities.
- Seven companies state that they have assigned oversight for implementing their nutrition strategy to either a CEO or a committee that reports to the Board. However, Britannia Industries and Hindustan Unilever are the only companies that disclose this publicly. Similarly, only six companies provide formal and regular public reporting on their overall approach to, and progress on, tackling nutrition issues in India.
- Only two companies (Hindustan Unilever and Nestlé India) report that their nutrition strategy is subject to an annual internal audit and/or annual management review.

Recommendations

ATNI recommends that companies:

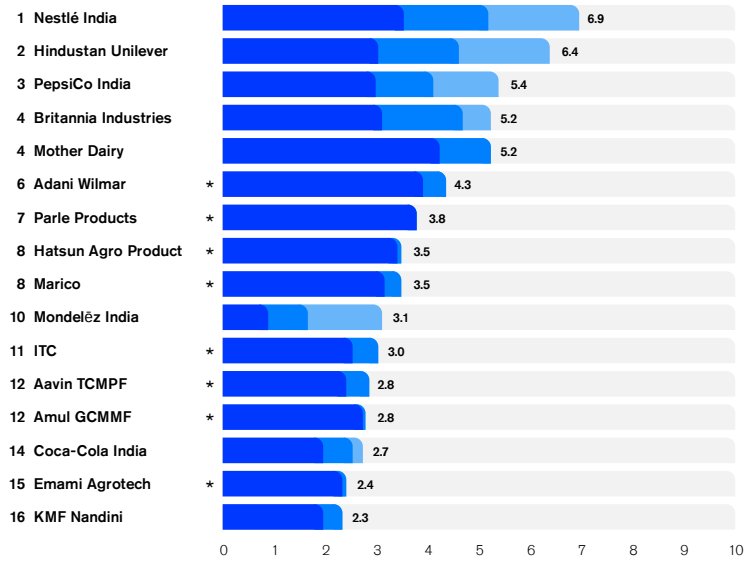
- Develop a formal nutrition policy or strategy that is part of their overall commercial strategy, including their objectives and activities related to nutrition (specific to India), and disclose the strategy publicly.
- Improve their reporting on nutrition-focused activities in India – either in a separate health and nutrition report or sustainability/corporate social responsibility report, or embedded within other (global) reporting.
- Demonstrate how they support the nutrition and health priorities set out in the National Nutrition Strategy and *POSHAN Abhiyaan* through their commercial operations.

Category B - Products

Category B consists of three criteria:

B1 Product profile
B2 Product formulation
B3 Defining healthy products

Companies in India can help consumers in making healthier choices by improving the nutritional quality of foods made available to them. In addition to analyzing the healthiness of the company's product portfolio, i.e. Product Profile results in B1, this category addresses companies' efforts to achieve this goal through research and development (R&D), new product formulation, reformulation of existing products, and tackling undernutrition and micronutrient deficiencies by developing fortified products or using fortified ingredients. It also assesses the quality of the nutrient profiling system that companies use (if any) to guide their product-formulation efforts.



Nestlé India ranks first in Category B, followed by Hindustan Unilever and PepsiCo India. Aside from their respective Product Profile results (B1), these companies publicly disclose more information than most peers, have reformulation and innovation strategies that are aligned with national nutrition initiatives and have adopted a Nutrient Profiling System.

B1 Product Profile
B2 Product formulation
B3 Defining healthy products

* Did not provide information to ATNI

Findings

- Of the 1,456 food and beverage products assessed in the Product Profile, according to the independent HSR system and the 'healthy' threshold of 3.5 or more stars out of 5 – only 16% of the assessed products are considered healthy. An estimated 27% of the companies' 2018 sales combined is derived from these healthy products. Additionally, only 12% of the products assessed met nutrition criteria for marketing to children, according to the WHO SEAR nutrient profile model.
- Mother Dairy ranks first in the Product Profile[13] with a score of 7.5 out of 10. Adani Wilmar performs best on the 'mean healthiness' score, achieving the highest sales-weighted HSR across its portfolio of Edible Oil products. Parle Products performs best in the 'relative category' score as it ranks better than its peers across three product categories: Savory Snacks; Confectionary; and Sweet Biscuits, Snack Bars and Fruit Snacks.
- The India Index 2020 Product Profile revealed a slight increase in the estimated percentage of total sales derived from healthy products when compared to the 2016 results, which may be attributed, amongst other factors, to the better quality data and higher number of products assessed. A positive development is that seven companies provided up-to-date product nutrition information to ATNI, four more than in 2016, which contributed to a more robust assessment of the healthiness of packaged food and beverage products on the Indian market. PepsiCo India is one of the companies that provided comprehensive data for the current Index, and whilst this meant that fewer of the company's products were assessed compared to 2016, PepsiCo India achieved the highest improvement in mean healthiness score. This result increased the company's sales-weighted mean HSR from 1.2 to 2.1 out of 5.
- In alignment with FSSAI's Eat Right Movement, six companies have made public pledges to FSSAI to reformulate their products, and four companies make other commitments to increase the healthiness of their products. But whilst six out of ten companies define relevant trans-fat reduction targets, fewer than half of the relevant companies define targets for reducing salt/sodium, saturated fat and added sugar/calories. Hindustan Unilever, Nestlé India and PepsiCo India stand out as having the most comprehensive reformulation targets. Of the five companies with an NPS, Hindustan Unilever, Mondelez India, Nestlé India and PepsiCo India have explicit nutrition criteria to define their healthy products. These criteria are applied to all of their products. However, none of these companies benchmark their definition of healthy products against the HSR's healthy threshold, or an equivalent internationally recognized and validated NPS.

Recommendations

ATNI recommends that companies:

- Define healthy products based on objective nutrition criteria that align with national and/or international guidelines. Such criteria should then be used to guide the reformulation of products and to develop new healthy products.
- Adopt an NPS or strengthen an existing system by benchmarking it against internationally recognized systems, such as the HSR.
- Define targets for reducing levels of added sugar, salt, trans- and saturated fat in all relevant products across their portfolio. These efforts will help improve the healthiness of products and lead to better results in future Product Profiles.
- Voluntarily fortify all relevant products according to FSSAI's fortification guidance, and for products not under FSSAI's mandate according to internationally acclaimed guidance from Codex Alimentarius and WHO/the Food and Agriculture Organization of the United Nations.
- Ensure that comprehensive nutrition information is available to ATNI, consumers and other stakeholders to improve the accuracy and comprehensiveness of the Product Profile for a robust assessment of the healthiness of India's packaged foods and beverages.

More details on the findings, recommendations and best practices on Category B, including the Product Profile, can be found on the website.

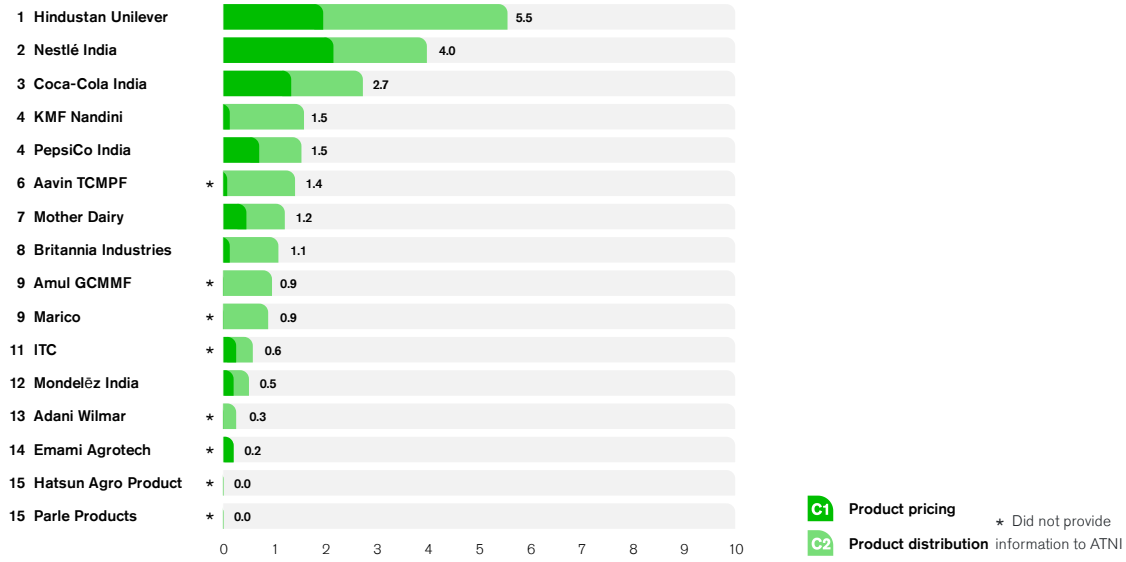
For other Index Categories, ATNI will publish subsequent detailed findings following the launch of this report.

Category C: Accessibility

Category C consists of two criteria:

C1 Product pricing
C2 Product distribution

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



Findings

- Indian food and beverage manufacturers do not appear to have embedded within their commercial strategies clear and substantive approaches to improving the affordability and physical accessibility of their healthy products.[14] The research for this Index did not find evidence of any novel changes in approach to this key issue since 2016. Only four companies across this Category have a strategy or target to address affordability and physical accessibility of their healthy products. Hindustan Unilever is the only company to have some quantitative targets in their pricing strategy to increase accessibility. Additionally, companies that do not have a clear way of defining their healthy products are unable to formalize any specific strategy or target towards delivering such products, and therefore score poorly in this category.
- Only three companies conduct pricing analysis (Coca-Cola India, Hindustan Unilever and Nestlé India) to determine appropriate pricing for their healthy products across all the states in which they are present. In general, none of the companies have focused commitments and policies that specifically address or mention the nutritional needs of groups in aspirational districts of India. These are districts that have been defined by the Indian Government as priority districts for development through specific health and nutrition-related indicators.

Recommendations

ATNI recommends that companies:

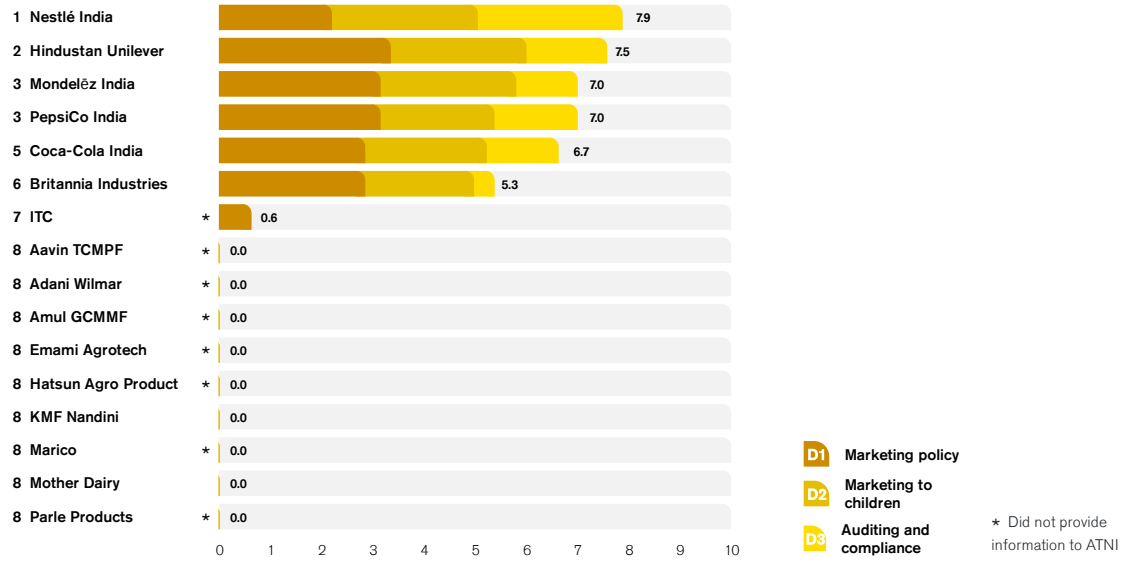
- Adopt and publish a policy to improve the affordability and physical accessibility of their healthy products, taking into account how these products can reach low-income populations or groups that lack regular access to healthy, affordable food.
- Conduct state-level pricing and distribution analyses, periodically, to assess and address the unmet needs of consumers with low incomes and who are based in remote locations of the country. Furthermore, consider taking guidance from national development initiatives such as the Transformation of Aspirational Districts program.

Category D: Marketing

Category D consists of three criteria:

D1 Marketing policy
D2 Marketing to children
D3 Auditing and compliance

This category captures the extent to which companies support all Indian consumers, including children and teenagers, to make healthy choices by adopting responsible marketing practices and by prioritizing the marketing of their healthier products.



Findings

- As per the 2016 Index, the subsidiaries of multi-national companies follow the responsible marketing policies and practices of their parent companies, covering all consumers including children. For India-headquartered companies, there is some noticeable improvement since the 2016 assessment, but still a minimal focus on responsible marketing overall. Britannia Industries has improved the most in this regard by developing a marketing policy and becoming the only India-headquartered company that has embedded in its policy to: advertise responsibly to children under 12 – as well as other commitments to restrict direct targeting of children under 12; only market healthy products in (or near) primary and secondary schools in agreement with schools/parents; and undertake internal audits frequently on marketing practices towards children, teenagers and other audiences.
- ATNI gives credit to companies' commitments not to market their products to children, or to only market those products that meet globally recognized healthy nutrition criteria. The Product Profile indicates that only 12% of the 1,495 products assessed, representing 29% of the companies' total 2018 sales combined, were eligible to be marketed to children according to the WHO SEAR nutrition criteria.[15] This finding underlines the importance and need for more companies to adopt responsible marketing policies. Although two companies pledge not to market any products to children, none of the companies report applying the WHO SEAR criteria or other external criteria to their marketing policies for children. In addition, none of the companies' responsible marketing policies or commitments include teenagers (children above the age of 12).
- Of the 16 companies assessed, only six make commitments not to market in primary schools. Nestlé India goes beyond this stance and commits not to market product categories such as Confectionery or Water-based Sweetened Beverages near primary schools. Mondelez India stands out as the only company not to market any products in both primary and secondary schools.

Recommendations

ATNI recommends that companies:

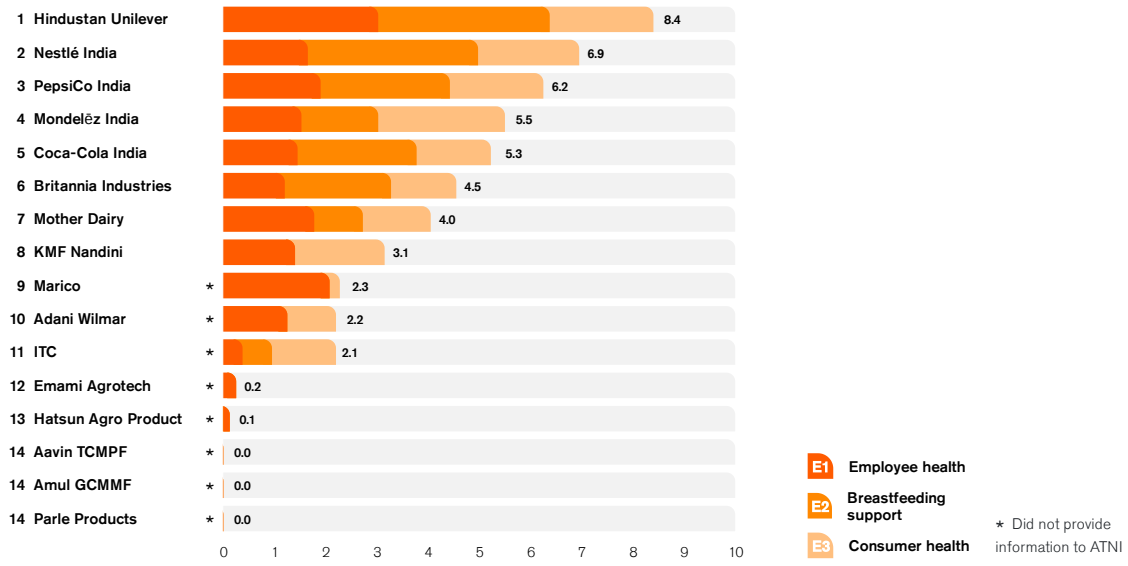
- Adopt or develop a responsible marketing policy for all consumers, including children, that aligns with the and WHO SEAR nutrition criteria for products suitable to market to children.
- Ensure that their commitments are comprehensive, as specified in the ATNI methodology, and explicitly cover all relevant media, including traditional and digital.
- Commit not to market products that do not meet healthy nutrition criteria, either at all, or in/near to primary and secondary schools. Companies should also further align with the dialogue in India towards banning the sale and advertising of foods which are high in fat, salt and sugar in school canteens and within 50 m of school campuses, as per the draft Food Safety and Standards (Safe Food and Healthy Diets for School Children) Regulations, 2019. FSSAI to finalise in 2 months regulations to ban sale, ad of junk foods in schools, within 50 m of campus.[16]
- Set-up audit mechanisms to evaluate compliance with the marketing policy covering all consumers (including children) and publicly disclose this information. Presently, Nestlé India is the only company to do this.

Category E: Lifestyles

Category E consists of three criteria:

E1 Employee health
E2 Breastfeeding support
E3 Consumer health

Food and beverage manufacturers in India can support company staff to eat healthy diets and pursue active lifestyles by providing employee health and wellness programs. As also noted by FSSAI in its Orange [17] and Purple [18] guidance books, in addition to other benefits, these programs can help to facilitate a corporate culture that focuses on nutrition. Supportive working practices and the provision of appropriate facilities can ensure that companies enable breastfeeding mothers to give their infants the healthiest start to life. Companies can also help consumers to adopt healthy diets and active lifestyles by supporting education programs, especially those that target groups suffering from various forms of malnutrition. This category assesses the extent to which companies support such efforts.



Findings

- Most companies (12 out of 16) make a commitment to improve the health and wellness of their employees with programs designed to address physical health and nutrition. While most of these programs (10 out of 12) are accessible to all employees, only six companies demonstrated a commitment to improving the health and wellness of groups across the wider food supply chain and not direct employees. In addition, most companies do not seem to monitor the impact of their health and wellness programs. Hindustan Unilever bucks this trend by conducting independent evaluations to capture this information, and goes a step further by monitoring the impact of programs relevant to employees across the food supply chain.
- Four of the 16 companies make public commitments to supporting breastfeeding mothers at work. Coca-Cola India, Hindustan Unilever and Nestlé India have set out their commitment in a formal policy.
- In respect to increasing nutrition literacy, nutrition education, healthy diet-oriented and active lifestyle programs aimed at groups that experience – or are at high risk of experiencing – malnutrition, eight companies publicly commit to sponsor/fund such programs. Mondelez India is the only company to demonstrate that all of its nutrition and health programs exclude product promotion or branding.

Recommendations

ATNI recommends that companies:

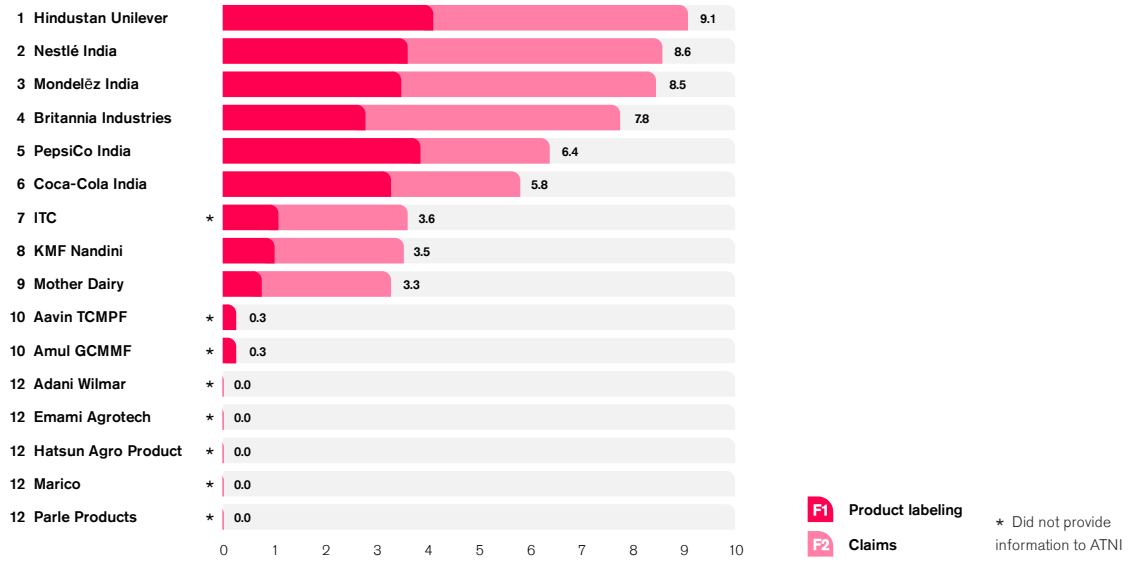
- Implement robust impact assessment tools and monitoring mechanisms for their employee health and wellness programs, and expand the coverage of these programs to include groups across the wider food supply chain that are not direct employees.
- Increase transparency in describing how they extend support to breastfeeding mothers at work, and to supporting maternal health as part of their formal company policy in line with, and beyond, Indian regulations.
- Develop their nutrition education, literacy, healthy diet-oriented and/or active lifestyle programs and conduct external and independently monitored program verifications.

Category F: Labeling

Category F consists of two criteria:

F1 Product Labeling
F2 Claims

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



Findings

- Since 2016, some companies have improved their product packaging by labeling more key nutrients such as sodium, saturated fat (separate to total fat), trans-fat and dietary fiber. Currently, these nutrients are not part of FSSAI's mandatory labeling regulations, but six companies disclose their commitment to labeling them in a publicly available policy. Among all companies assessed, only four companies have committed to labeling dietary fiber. It is therefore the least labeled key nutrient.
- Ten of the 16 companies publish nutrition information about some of their products on their websites. However, the research found clear evidence that only five companies – Britannia Industries, Coca-Cola India, Hindustan Unilever, KMF Nandini and PepsiCo India – provide coverage of 90% of their products or more.
- Eight companies commit to adhere to FSSAI's 2018 Advertising and Claims Regulation, which came into force in 2019. However, only five companies publicly disclose how they comply with this regulation (Britannia Industries, Hindustan Unilever, ITC, Mondelez India and Nestlé India). Overall disclosure practices remain weak and most companies haven't adopted or published a policy covering both the labeling and use of nutrition and health claims.

Recommendations

ATNI recommends that companies:

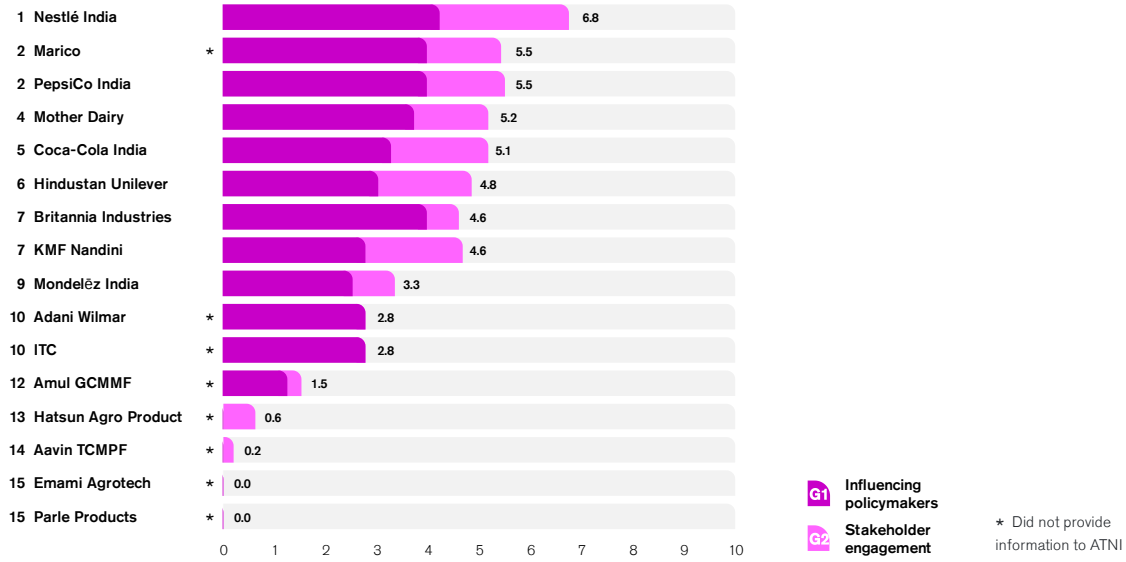
- Formally commit to label all key nutrients on-pack for all products, as stipulated by Codex Alimentarius, and further adopt interpretative FOP labeling, especially in alignment with ongoing discussions with the Government and other relevant stakeholders.
- Adopt and publish a formal and comprehensive policy covering both nutrition labeling and use of nutrition and health claims.
- Publish nutrition information online for all products, including relevant elements such as portion size.

Category G: Engagement

Category G consists of two criteria:

G1 Influencing policymakers
G2 Stakeholder engagement

By responding to requests from policymakers and policymaking bodies, and supporting government activities and positions on nutrition policies, companies can have an impact on Indian consumers' access to nutrition. In addition, constructive engagement by companies with a wide range of other stakeholders (including international organizations, civil society and academics) can help to strengthen their strategies and policies and provide valuable feedback on their relevance and effectiveness. This category focuses on companies' engagement with stakeholders on nutrition-related issues.



Findings

- Despite only seven companies explicitly committing to engage with policymaking bodies in support of measures designed to address all forms of malnutrition in India, 12 were able to provide examples of playing an active and/or constructive role in supporting the Indian Government's efforts in this regard.
- Overall, companies' disclosure about their interaction with stakeholders in India is quite limited. None of the companies get a full score of 10 points even though nine report some degree of disclosure – mostly regarding their membership with industry associations. None disclose their financial support to influencers (individuals or groups), think tanks, interest groups or other such organizations in India. Only Coca-Cola India discloses its Board seats at industry associations and on advisory bodies related to nutrition issues.
- Working in partnership with stakeholders to address malnutrition is more common – nine of the companies do this. However, none provide evidence of one-to-one discussions with key organizations working on malnutrition to solicit input on their corporate strategies, nutrition-related policies or activities. Nestlé India and Marico stand out in respect to their comprehensive, well-structured and focused engagement around their corporate nutrition strategy with Indian stakeholders. Both companies have established regular interaction with stakeholders through trade associations, surveys, direct feedback and in-person convenings.

Recommendations

ATNI recommends that companies:

- Engage with policymakers when requested and in support of government measures designed to address obesity, diet-related diseases and/or undernutrition or micronutrient deficiencies in India.
- Increase transparency around membership of industry associations, think tanks, or interest groups, as well as financial support to these organizations. Similarly, publicly disclose potential governance conflicts of interest, including Board seats at industry associations and advisory bodies related to nutrition issues, and about the positions adopted when seeking to influence nutrition and public health policies in India.
- Establish formal, long-term partnerships and one-to-one discussions with key organizations to address malnutrition within their commercial approach.

Amplifying Impact

Improving nutrition for all Indians



End hunger, achieve food security and improved nutrition



Ensure healthy lives and promote well-being for all

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

Acknowledgements

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

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

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

Research/ Implementing Partners

The George Insititute

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

Innova Market Insights

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

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

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

Studio September
Studio September based in the Netherlands, website development.

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

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

Organizations Consulted

- Alive & Thrive India, FHI 360
- Centre for Responsible Business, India
- Confederation of Indian Industries
- Food Fortification Initiative
- Food Safety and Standards Authority of India
- Global Alliance for Improved Nutrition, India
- National Institute of Nutrition, Hyderabad
- Netherlands Embassy, New Delhi
- Oxfam India
- Rabobank India
- Save the Children, India
- Tata Trusts
- The Bill & Melinda Gates Foundation India
- UNICEF India
- World Business Council for Sustainable Development
- World Health Organization India

ATNI India Expert Review Panel and Global Expert Group Members

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

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

India Expert Review Panel

Dr. Rajan Sankar
Director Nutrition, Tata Trusts

Vivek Arora
Senior Advisor, Tata Trusts

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

Dr. Avula Laxmaiah
Scientist 'G' & Head, Public Health, National Institute of Nutrition (NIN)

Devyani Hari
Director – Programmes, Centre for Responsible Business (CRB)

Rachna Sujay
Senior Technical Advisor – Diffusion States, Alive & Thrive

Dr. Antaryami Dash
Advisor – Nutrition, Save the Children

Shiva Mudgil
Vice President, RaboResearch Food & Agribusiness, Rabobank India

Global Expert Group

Shiriki Kumanyika
Chair, ATNI Expert Group;
Professor Emerita of Epidemiology, Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania;
Research Professor in Community Health & Prevention, Drexel University Dornsife School of Public Health

Lindsay H. Allen
Director, USDA ARS Western Human Nutrition Research Center;
Research Professor, Department of Nutrition, UC Davis

Terry T-K Huang
Professor, School of Public Health, City University of New York

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

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

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

Footnotes

1. Healthy products are defined as products that meet Health Star Rating of 3.5 or higher.
2. In the context of this finding, the definition of healthy products is based on the company's own criteria for determining w hich products are healthy. ATNI does not credit portion-limited unhealthy products in this regard (e.g. in the Confectioner y or Ice Cream and Frozen Desserts categories).
3. Popkin B. M., Corvalan, C. and Grummer-Strawn, L. M. (2019) 'Dynamics of the double burden of malnutrition and the cha nging nutrition reality', The Lancet (online). Available at: http://bit.ly/2T2AcWB (Accessed: 17 December 2019) (doi: 10. 1016/S0140-6736(19)32497-3)
4. 4. McGovern, M. E. et al. (2017) 'A review of the evidence linking child stunting to economic outcomes', International Jour nal of Epidemiology, pp 1171-1191.
5. FSSAI (2017) Transforming the Food Safety and Nutrition landscape in India 2016-17. Available at: https://fssai.gov.in/bo ok-details.php?bkid=195 (Accessed: 25 October 2019).
6. Tay, C. (19 December 2018) Mandatory rice fortification for public programmes in India by December 2019. Available at: https://www.foodnavigator-asia.com/Article/2018/12/19/Mandatory-rice-fortification-for-public-programmes-in-India-b y-December-2019 (Accessed: 25 October 2019)
7. Press Information Bureau, Government of India (19 July 2019) Press Release Page. Available at: https://pib.gov.in/Press ReleasePage.aspx?PRID=1579502 (Accessed: 10 October 2019)
8. MoFPI, CII and EY - (2017) High-Growth Segments of Indian Food and Beverage Industry, pp. 1–88.
9. MoFPI, CII and EY - (2017) High-Growth Segments of Indian Food and Beverage Industry, pp. 1–88.
10. Maerschand, J. and Willaert, M. (2018) Growing Opportunities Food Market in India. Available at: https://www.flandersinv estmentandtrade.com/export/sites/trade/files/market_studies/20180515GrowingOpportunitiesInTheIndianFoodMarke t.pdf (Accessed: 18 November 2019)
11. Deloitte and FICCI (2018) Industry 4.0 in Food Industry India Food Report. Available at: https://invest-india-revamp-static -files.s3.ap-south-1.amazonaws.com/s3fs-public/Deloitte%20publication%20on%20Industry%204.0%20in%20Foo d%20Industry_0.pdf
12. MoFPI, CII and EY - (2017) High-Growth Segments of Indian Food and Beverage Industry, pp. 1–88.
13. The Product Profile score is the equally weighted mean of two scores: ▪ Mean healthiness score: a representation of the nutritional quality of each company's overall product portfolios (the sales-weighted mean HSR). ▪ Relative category score: a representation of the companies' product categories' performance against peers that sell products in the same categor y (based on the ranking within product categories).
14. In the context of this finding, the definition of healthy products is based on the company's own criteria for determining w hich products are healthy. ATNI does not credit portion-limited unhealthy products in this regard (e.g. in the Confectioner y or Ice Cream and Frozen Desserts categories).
15. World Health Organization's (WHO) South East Asia Region (SEAR) nutrient profile model is applied to determine produ cts suitable for marketing to children.
16. The Economic Times, 2020 Available at: https://economictimes.indiatimes.com/news/politics-and-nation/fssai-to-finalis e-in-2-months-regulations-to-ban-sale-ad-of-junk-foods-in-schools-within-50-m-of-campus/articleshow/72943024.cm s?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst
17. https://fssai.gov.in/book-details.php?bkid=149
18. https://fssai.gov.in/book-details.php?bkid=343

Disclaimer India Spotlight Index 2020

The user of the report and the information in it assumes the entire risk of any use it may make or permit to be made of the information. NO EXPRESS OR IMPLIED WARRANTIES OR REPRESENTATIONS ARE MADE WITH RESPECT TO THE INFORMATION (OR THE RESULTS TO BE OBTAINED BY THE USE THEREOF), AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, ALL IMPLIED WARRANTIES (INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF ORIGINALITY, ACCURACY,TIMELINESS, NON-INFRINGEMENT, COMPLETENESS, MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE) WITH RESPECT TO ANY OF THE INFORMATION ARE EXPRESSLY EXCLUDED AND DISCLAIMED.

Without limiting any of the foregoing and to the maximum extent permitted by applicable law, in no event shall Access to Nutrition Foundation, nor any of its respective affiliates, The George Institute, Euromonitor International, Innova Market Insights, or contributors to or collaborators on the Index, have any liability regarding any of the 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. The foregoing shall not exclude or limit any liability that may not by applicable law be excluded or limited.

Euromonitor International Disclaimer. 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 take no responsibility nor is liable for any damage caused through the use of their data and holds no accountability of how it is interpreted or used by any third party.

The George Institute Disclaimer. While the George Institute has taken reasonable precautions to verify the information contained in the report, it gives no warranties and makes no representations regarding its accuracy or completeness. The George Institute excludes, to the maximum extent permitted by law, any liability arising from the use of or reliance on the information contained in this report.