



Category D: Marketing

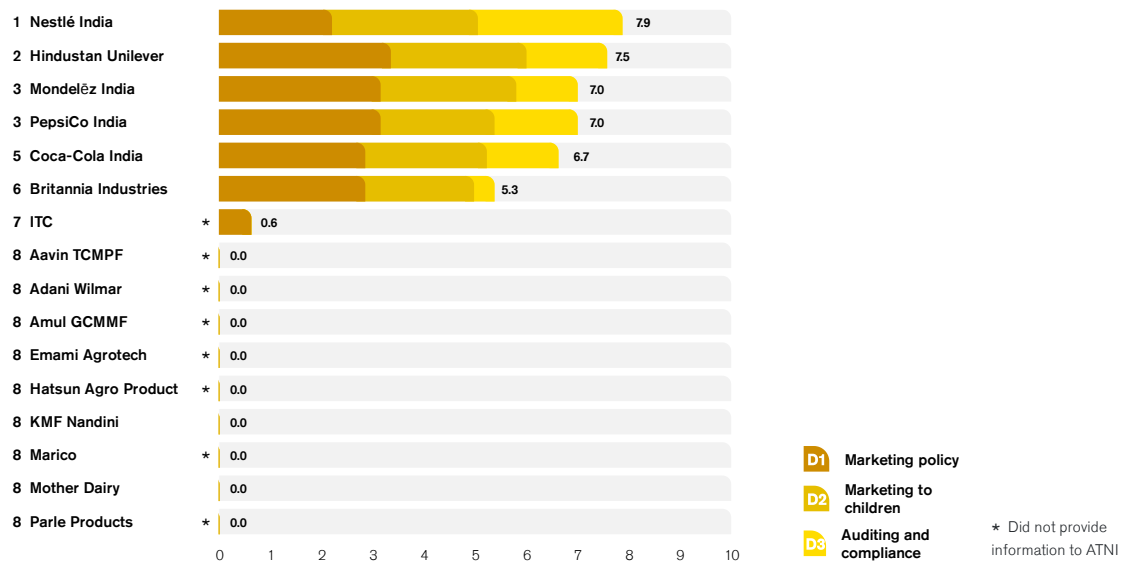
Category D consists of three criteria:

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.¹ 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.²
- 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.

Footnotes

1. World Health Organization's (WHO) South East Asia Region (SEAR) nutrient profile model is applied to determine products suitable for marketing to children.
2. The Economic Times, 2020 Available at: https://economictimes.indiatimes.com/news/politics-and-nation/fssai-to-finalise-in-2-months-regulations-to-ban-sale-of-junk-foods-in-schools-within-50-m-of-campus/articleshow/72943024.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst

