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Research Article

Access to nutrition initiative global index and spotlight index comparisons: Promoting nation-led frameworks for nutrition accountability

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Highlights/Key Messages

- For the first time, global and national food company rating tools were compared.
- The assessment weight for product healthiness (NPM-based portfolio) rose from 25% to 45% over 10 years.
- Voluntary benchmarking may limit enforcement across companies due to differences in company self-reporting levels
- National indices adapt global standards to local food cultures and regulations, but few exist.
- New frameworks are needed that suit local diets and include independent oversight.

Background
Food and beverage companies significantly impact consumer health, creating recognized concerns regarding their impact on both food quality and the food environment. While these companies have proposed voluntary corporate commitments to address these concerns, such commitments have been widely critiqued for lacking enforcement mechanisms and potentially forestalling binding regulation. Non-governmental benchmarking frameworks have therefore emerged to assess corporate nutrition practices in a more structured and transparent manner.

Objective
This study systematically analyzes the Access to Nutrition Initiative (ATNi) Global and Spotlight Indices across all published editions to document their structural evolution and inform context-sensitive framework development in countries lacking a Spotlight Index.

Methods
A comparative document analysis was conducted using publicly accessible ATNi documents. Editions adopting an identical seven-domain evaluation framework include: the Global Index (2013, 2016, 2018, 2021, 2024) and Spotlight Indices for the US (2018, 2022) and India (2016, 2020, 2023). Index structure, category weights, Nutrient Profile Models (NPMs), and scoring methodologies were systematically extracted and compared.

Results
The Global Index evaluates multinational companies on nutrition improvement and responsible conduct, with core criteria including NPM-assessed product portfolios, front-of-pack labeling, and workforce nutrition-related issues. The weight of NPM-based portfolio assessment increased progressively from 25% (2013) to 45% (2024), reflecting a strategic reorientation. The Spotlight Index adapts this model for domestic markets by integrating country-specific indicators and regulatory frameworks.

Conclusions
The ATNi indices represent a significant corporate accountability effort; however, their effectiveness could be further advanced by increased voluntary participation, provision of data, and incorporation into company goals. The growing emphasis on NPM-based evaluation strengthens empirical credibility, but may need to be reviewed constantly to capture the breadth of accountability. Developing context-sensitive Spotlight Indices in countries with distinct dietary cultures may enhance domestic food environments, provided frameworks are co-designed with local institutions and complemented by regulatory oversight.

Keywords: access to nutrition initiative; food environment; global index; nutrient profile models; spotlight index

Introduction

The world population continues to grow alongside economic development, leading to an expected increase in global food demand (van Dijk et al., 2021). The consumption of unhealthy foods, including ultra-processed foods, is increasing worldwide (Taneri et al., 2022), with the highest intakes observed in North America, Australia, Europe, and Latin America, and rapid growth in Asia, the Middle East, and Africa (Baker et al., 2020). Under current food consumption patterns, there are concerns about rising rates of obesity and non-communicable disease, particularly in emerging countries (Lopez Barrera & Hertel, 2023; Zobel et al., 2016). This trend is closely linked to the industrialisation and globalisation of the food system, as well as the marketing strategies and policies of multinational food and beverage (F&B) companies (Baker et al., 2020). Since food produced by F&B companies significantly impacts consumer health, there is a need to improve the food environment and the quality of these companies' products, as well as to create food and educational environments that increase the desirability and accessibility of healthier products.

Nationally, governments and the private sector have sought to address poor dietary quality through collaborative policy initiatives. For example, the United Kingdom introduced salt reduction policies in 2003, and the salt content of typical processed foods was gradually reduced, aligning with national targets; urinary sodium levels decreased significantly by 15% over seven years, accompanied by significant reductions in deaths from ischemic heart disease and stroke (He et al., 2014). Argentina implemented a salt reduction decree in 2013, following an agreement in 2011 with major food and beverage companies, bakeries, and restaurants, which resulted in a minor reduction of average national salt intake from 11.2 g to 9.2 g per day between 2011 and 2015 (Trieu et al., 2015). However, the alignment of corporate interests with public health objectives is neither straightforward nor guaranteed. Voluntary industry commitments have been widely critiqued for relying on vague language, lacking independent enforcement mechanisms, and, in some cases, likely functioning primarily to forestall binding government regulation (Erzse et al., 2022; Sharma et al., 2010). A systematic review of voluntary actions by F&B companies in low- and middle-income countries found no evidence that such initiatives effectively safeguard public health, and documented instances in which their adoption resulted in weaker policy responses (Erzse et al., 2022). These tensions between corporate accountability and public health imperatives underscore the importance of robust, transparent, and independently monitored frameworks for influencing and assessing industry performance in nutrition.

There has been growing global attention on the demand for healthy foods and the responsibilities of the companies that produce them. This trend is expected to contribute to the expansion of the food market by increasing the availability of healthier food products. In recent years, the Access to Nutrition initiative (ATNi), a Dutch non-governmental organization, has established a survey to evaluate F&B companies' efforts to make their portfolios healthier (Global Index) (*ATNi Global Index 2024*, n.d.). Scores assess not only the healthiness of products but also companies' nutrition-related efforts to create a healthy food environment and promote health management, serving as a tool to guide and enhance their activities.

It is challenging to evaluate F&B companies' initiatives using uniform criteria, given differences in food cultures and domestic market characteristics across countries. Therefore, the Spotlight Index has been introduced in the U.S. and India, with the Global Index evaluation items adapted—through additions, deletions, or modifications—to align with each country's laws, regulations, and specific public health issues (*ATNi India Spotlight Index 2016 Full Report*, 2016; *ATNi US Spotlight Index 2018 Full Report*, n.d.).

A regional comparison of Global Index 2024 scores reveals that Japanese companies achieved an average score of 2.58 out of 10, compared to 3.83 for companies in Europe and 2.93 for those in the United States (*ATNi Global Index Full Report 2016*, n.d.). One contributing factor is the frequent use of condiments and seasonings in daily meals in many Asian countries—products that often contain high levels of sodium, which negatively affects their scores. Consequently, there is a growing need for evaluation frameworks that account for the unique characteristics of local food cultures and public health policies when assessing F&B companies' products across different regions.

The present systematic comparative analysis examines the structure, historical evolution, and contextual adaptation of the ATNi Global Index and Spotlight Index across all published editions. Specifically, it documents and interprets changes in category weighting, indicator composition, and the adoption of Nutrient Profile Models (NPMs) over time, thereby providing analytical synthesis not readily available in the existing literature. This study aims to reflect on both the contributions and constraints of voluntary corporate nutrition benchmarking frameworks in order to further enhance binding enforcement mechanisms. Finally, drawing on this comparative analysis, the study identifies key considerations for countries in Asia and elsewhere that currently lack a Spotlight Index and seek to develop context-sensitive nutrition accountability frameworks suited to their local food industries, dietary patterns, and regulatory environments.

Methods

Study Design

This study employs a comparative document analysis to examine the structure, historical evolution, and contextual adaptation of the ATNi nutrition indices. No primary data were collected; all analyses are based exclusively on publicly accessible institutional documents published by ATNi. Documents were retrieved from the official ATNi website (*ATNi (Access to Nutrition Initiative)*, n.d.) between August 2024 and January 2025.

Data Sources and Inclusion Criteria

Eligible documents were defined as official full reports published by ATNi that adopt the Global Index evaluation framework, comprising the seven domains of Governance (corporate nutrition strategy and management systems), Products (nutritional quality of product portfolios and reformulation efforts), Accessibility (affordability and distribution of healthier products), Marketing (responsible

marketing practices, particularly toward children), Lifestyle/Workforce (support for healthy diets among employees), Labeling (nutritional information and health claims on packaging), and Engagement (interaction with governments, policymakers, and other stakeholders). Indices that do not share this seven-domain structure were excluded, as the absence of a common framework would preclude meaningful direct comparison with the Global Index. All reports meeting the inclusion criterion were retrieved, with no further exclusions applied. The following editions were identified and retrieved: Global Index (2013, 2016, 2018, 2021, and 2024) (*ATNi Global Index 2013 Full Report*, n.d.; *ATNi Global Index Full Report 2016*, n.d.; *ATNi Global Index 2018 Full Report*, n.d.; *ATNi Global Index 2021 Full Report*, n.d.; *ATNi Global Index 2024*, n.d.) and Spotlight Indexes, including the US Index (2018, 2022) (*ATNi US Spotlight Index 2018 Full Report*, n.d.), (*ATNi US Index 2022 Full Report*, n.d.) and the India Index (2016, 2020, 2023) (*ATNi India Spotlight Index 2020 Full Report*, n.d.; *India Index 2023 – ATNi (Access to Nutrition Initiative)*, 2023).

Data Extraction

For each index edition, the following information was systematically extracted: (1) index structure, comprising categories, criteria, number of indicators, and category weights; (2) NPMs applied to product portfolio evaluation; (3) participating organizations, companies, and expert contributors; and (4) score calculation methodologies. NPMs are recognized as foundational tools for assessing the nutritional quality of foods, and they underpin a range of public health nutrition initiatives (Martin et al., 2023).

Analytical Approach

Longitudinal comparisons were conducted by mapping changes across index editions relative to the Global Index 2021, which served as the primary reference point given its position as the version immediately preceding the major structural revisions introduced in the India Index 2023 and Global Index 2024. Shifts in category weighting, indicator composition, and NPM adoption were documented and presented in tabular form to facilitate transparent cross-index comparison. The analysis was conducted qualitatively and descriptively, consistent with the exploratory objectives of this study.

Results and Discussion

Overview and Objectives of the ATNi Indexes

Table 1 outlines the characteristics of the Global Index, U.S. Index, and India Spotlight Index (India Index) published by ATNi. While the Global Index evaluates multinational companies with a significant share of the global processed food market, the Spotlight Indices (US and India) focus on companies with substantial market presence within their respective domestic contexts.

Table 1. The characteristics of the Global Index and Spotlight Index published by the ATNi

Dimension	Global Index	US Index (Spotlight)	India Index (Spotlight)
Target companies	30 multinational F&B manufacturers	11 major US domestic companies	20 leading Indian companies
Market coverage	~23% of global packaged F&B market	~30% of US packaged F&B market	~36% of Indian packaged food market
Evaluation framework	7 categories; global nutrition frameworks (e.g., WHO guidelines)	7 categories; 127 indicators (2022); US regulatory context (USDA guidelines, school food regulations, Lobbying Disclosure Act)	7 categories; 58 indicators (2023); Indian regulatory context (FSSAI); includes micronutrient fortification
Primary NPM	HSR; supplemented by Nutri-Score, UK NPMs, WHO EURO NPMs (2024)	HSR	HSR; supplemented by WHO SEAR model
Primary audience & purpose	Investors and global policymakers; cross-country corporate performance benchmarking	National policymakers, investors, civil society; addresses food insecurity, obesity, diet-related chronic diseases	National policymakers, investors; addresses double burden of malnutrition (undernutrition, micronutrient deficiency, overweight/obesity)
Publication history	2013, 2016, 2018, 2021, 2024 (every ~3 years)	2018, 2022	2016, 2020, 2023

ATNi: Access to Nutrition Initiative, F&B: food and beverage NPM: Nutrient Profile Model, HSR: Health Star Rating, USDA: United States Department of Agriculture. FSSAI: Food Safety & Standards Authority of India, WHO SEAR: The World Health Organization South-East Asia Region Organization.

Regarding objectives, the Global Index aims to assess and visualise the comparative performance of global F&B companies in improving nutrition and implementing nutrition strategies. In contrast, the Spotlight Indices are designed to benchmark the efforts of national companies in addressing country-specific nutritional challenges and food environments, including adherence to national laws, guidelines, and regulations, thereby supporting stronger alignment with public policy and investment agendas.

The Spotlight Indices achieve somewhat higher domestic market coverage than the Global Index. While all three indices employ the Health Star Rating (HSR) as the primary NPM for product portfolio evaluation, the Global Index 2024 additionally incorporates Nutri-Score and UK NPMs as supplementary tools, indicating a trend toward more diversified nutritional assessment. Furthermore, whereas the Global Index is primarily designed to benchmark corporate performance for investors and policymakers at the global level, the Spotlight Indices are explicitly oriented toward addressing country-specific nutritional challenges and aligning with domestic public health priorities and regulatory frameworks—a distinction that has important implications for the design of new national indices.

Evaluation Frameworks

Historical changes and indicator reduction

Since the initial publication of the Global Index in 2013, all indices have been updated periodically every few years. The

total number of indicators used in the evaluations has gradually decreased over time. Notably, both the India Index 2023 and the subsequent Global Index 2024 eliminated the previously used criteria framework, resulting in a more simplified assessment framework. In Appendix 1, Additional Tables 1-1, 1-2, and 1-3 present the composition of the Global Index (2013, 2016, 2018, 2021, and 2024), the US Index (2018 and 2022), and the India Index (2016, 2020, and 2023). Each table presents the categories and criteria of the respective index, along with the number of indicators per category and the total number of indicators across all categories. Each category is assigned a specific weight (%) to reflect its relative importance in the overall evaluation.

Changes in category weights

The evolution of the indexes has involved adjustments in category weights and the removal of certain evaluation elements. Prior to Global Index 2021, there were no significant changes in category weight, except for Category B (Products; see Table 2). In the India Index 2023, greater emphasis was also placed on Category B, and the weight of other categories was generally reduced. A similar trend was observed in the Global Index 2024, which featured a 10% increase in the weighting of Category B (Products), while the weights of other categories either declined or changed only marginally. Category G (Engagement) was removed entirely. Table 2 presents an overview of changes in the weighting of each Index. Category weights reflect the relative importance assigned to each evaluation domain in calculating the overall company score. The most substantial shift observed across editions is the progressive increase in the weight of Category B (Products), from 25% in the Global Index 2013 to 45% in the Global Index 2024 and India Index 2023.

Table 2. Category weights by index*

	Category	Description	Global Index 2013	Global Index 2016	India Index 2016	Global Index 2018	US Index 2018	India Index 2020	Global Index 2021	US Index 2022	India Index 2023	Global Index 2024
			Weight (%)									
A	**Governance**	Corporate nutrition strategy and management systems	12.5	12.5	12.5	12.5	12.5	12.5	12.5	12.5	10	15
B	**Products**	nutritional quality of product portfolios and reformulation efforts	25	25	25	25	27.5	35	35	35	45	45
C	**Accessibility**	affordability and distribution of healthier products	20	20	20	20	22.5	15	15	17.5	15	15
D	**Marketing**	responsible marketing practices, particularly toward children	20	20	20	20	22.5	20	20	20	15	15
E	**Lifestyle**	support for healthy diets among employees	2.5	2.5	2.5	2.5	5	2.5	2.5	5†	5†	5†
F	**Labeling**	nutritional information and health claims on packaging	15	15	15	15	5	10	10	5	5	5
G	**Engagement**	interaction with governments, policymakers, and other stakeholders	5	5	5	5	5	5	5	5	5	—

† Category name: Workforce

*Changes in weights across editions reflect shifts in the relative priority assigned to each evaluation domain by ATNi and its expert advisors.

Use of NPMs

In earlier editions of the Global Index, the Product Profile assessment evaluated whether each company had developed or adopted its own nutrient profiling system, the extent to which that system met established quality criteria, and the extent to which it aligned with existing front-of-pack labeling systems and dietary guidelines. The supplementary use of the World Health Organization NPM (first edition) (*WHO Regional Office for Europe Nutrient Profile Model*, n.d.) was then introduced in Global Index 2016. The India Index 2016 marked the first documented use of the Health Star Rating (HSR) system (*Health Star Rating System*, n.d.), thereby clearly establishing the application of standardized NPMs in the assessment process. HSR was used as the primary NPM in every index published after the India Index 2016. Additionally, Nutri-Score (Julia & Hercberg, 2017), UK NPMs (*The Nutrient Profiling Model - GOV.UK*, n.d.), and the World Health Organization Euro NPMs (*WHO Regional Office for Europe Nutrient Profile Model: Second Edition*, n.d.) served as supplementary models in the Global Index 2024.

Participating organizations, companies, and individuals

The development of each Index has primarily been led by two groups: the ATNI Expert Group and the George Institute for Global Health. The ATNI Expert Group comprises researchers and professionals from universities and public institutions. The members of the Expert Group serve in their personal capacities and in an advisory role. They voluntarily provide guidance to ATNI and are not compensated for their contributions. In the earlier stages of the Global Index, an Independent Advisory Panel was also involved, providing

strategic, institutional, and governance advice on the Index's design and development, including communications, stakeholder engagement, and financial sustainability. For the Spotlight Indices, domestic organizations–including universities, public institutions, and nonprofit organizations–also participated in a consulting capacity. However, the number of consulting bodies tended to decline as the publication of each Spotlight Index approached finalisation.

Index Score Calculation Methods and Scoring Adjustments

Appendix 2 summarises the scoring methodology used to calculate each index and shows that, based on the Global Index 2021 approach, the US Index changed the multiplier content, criteria, and the category score calculation method. Moreover, adjustments for breast milk substitute products were not made in the US Index or India Index because domestic companies had already been evaluated through the Breast Milk Substitute and Complementary Foods Marketing Index process under the Global Index (*The BMS and CF Marketing Indexes 2024*, 2024).

Recent Shifts in Index Evaluation Criteria and Policy-Oriented Adaptations: Defining and Targeting Priority Populations in National Contexts

Starting from Global Index 2021, the concept "Priority Populations" was established to address the global double burden of malnutrition (World Health Organization, 2016). Conversely, the US Index defined "Priority Populations" as individuals living in low-income areas, those facing geographic challenges (including residing far from fresh food stores or with limited availability of healthy products in their region), and those affected by one or multiple social determinants of health. Priority Population is not included in the India Index, but the Index assumes that it corresponds to the risk factors involved in the double burden of malnutrition in the country (*India Index 2023 – ATNi (Access to Nutrition Initiative)*, 2023).

Promoting Workforce Nutrition Through Corporate Responsibility

Prior to the US Index 2022, Category E was titled 'Lifestyle' and comprised three sub-criteria: E1 (Supporting employee health and wellness), E2 (Supporting breastfeeding mothers at work), and E3 (Supporting community-level healthy eating and active lifestyle programs). With the introduction of the term 'Workforce Nutrition' in the US Index 2022, E3 was removed, and the category narrowed its focus to workplace-specific nutrition. Category E includes company relations with employees and aligns with the four pillars of the Workforce Nutrition Alliance (WNA): Healthy Food at Work, Nutrition Education, Nutrition Health Checks, and Breastfeeding Support. It also addresses potential conflicts of interest in nutrition education involving the promotion of company products (*GAIN-Global Alliance for Improved Nutrition-Workforce Nutrition*, n.d.). The WNA was established by the Global Alliance for Improved Nutrition in partnership with the Consumer Goods Forum (a powerful, unified, global platform where the corporate leaders of the consumer goods industry collaborate to align on self-regulatory policies), and its goal is to be implemented by 2030. This goal is to engage 10 million employees and their families, including farmers and supply chain workers, in their nutrition programs.

Aligning Evaluation Items with National Regulatory Frameworks

Although the US Index framework does not include the double burden of malnutrition directly among its Priority Populations, it states that it was designed to address domestic issues, such as obesity and food insecurity. Compliance with national nutritional guidelines, including regulations governing food vending in schools and fortification, was also evaluated. However, evaluation items related to food labeling were eliminated, and the relevant category weights were significantly lowered because these items are regulated by domestic law. In the US Index, lobbying and stakeholder engagement were evaluated under Category G throughout both published editions. In the US Index 2018, this category was titled "Influencing governments and policymakers, and stakeholder engagement," and in the US Index 2022, it was retitled "Responsible lobbying and stakeholder engagement," with the category weight remaining unchanged at 5% across both editions. However, the number of indicators in Category G increased in the US Index 2022 compared with the 2018 edition, reflecting a more detailed assessment of corporate lobbying transparency. Both editions evaluated whether companies voluntarily disclosed information beyond the minimum requirements established under federal legislation, including the Lobbying Disclosure Act of 1995 (*Lobbying Disclosure Act 1995*, 1995) and Federal Election Commission regulations (Federal Election Commission, 1971). In contrast, Category G ("Engagement") was entirely removed from the Global Index 2024. The official ATNi documentation explicitly states that this removal was attributable to the absence of standardized evaluation methods, underdeveloped management practices, limited transparency regarding conflicts of interest, and the difficulty in assessing the actual impact of stakeholder engagements. The Global Index 2024 summary further notes that food-related lobbying activities fall outside the scope of the index.

India has no regulations on lobbying. In the India Index, Category G underwent gradual refinement across successive editions. The 2016 edition assessed companies across two criteria: G1 (lobbying and influencing governments and policymakers) and G2 (stakeholder engagement). The 2020 edition expanded the indicator scope, notably requiring companies to demonstrate a commitment to respond constructively to governmental nutrition initiatives and to engage in formal long-term partnerships with governments and non-governmental organizations. By the 2023 edition, the category was retitled "Policy engagement," with the focus shifting toward the transparency of corporate policy

influence, including companies' internal governance of policy engagement activities and their public disclosure of positions on key regulatory measures such as sugar taxes and mandatory front-of-pack labeling.

Discussion

This study documented the structural evolution of the ATNi Global Index and Spotlight Index across all published editions, revealing systematic shifts in category weighting, indicator composition, and NPM adoption that reflect changing priorities in voluntary corporate nutrition benchmarking.

The structural evolution documented across successive ATNi index editions is characterized by the sustained increase in the weighting of Category B (Products)—from 25% in the Global Index 2013 to 45% in the Global Index 2024 and India Index 2023—together with the elimination of Category G (Engagement) in the Global Index 2024, which indicates a strategic reorientation toward NPM-based assessment of product portfolios. ATNi requires that NPMs used for reporting account for both positive and negative nutrients and be validated in peer-reviewed literature, and it convened a multi-stakeholder process in 2023-2024 to standardize NPM reporting practices. To supplement the product profiling by the HSR in the Global Index 2024, the full Product Profile report also includes unscored results using the WHO Euro Nutrient Profile Model and Nutri-Score, along with results for the UK NPM in the ATNi dashboard (Table 1). Notwithstanding these efforts, nutrient profiling models may remain susceptible to low-cost manipulation through fortification and the substitution of sugar with artificial sweeteners (Scrinis & Monteiro, 2018). The expansion of product profile weighting raises a related question. Corporate practices that may have a significant impact on public health, such as environmental sustainability, corporate tax avoidance practices, and country-specific food lobbying practices, may also need to be considered.

The trajectory of Category G (Engagement) across index editions reveals a noteworthy divergence between the US Spotlight Index and the Global Index. Whereas the US Index progressively strengthened its assessment of lobbying-related transparency—expanding the number of indicators in the 2022 edition relative to 2018—the Global Index 2024 eliminated this category entirely. This divergence may be partly explained by the differing regulatory environments: the US Index was able to use mandatory federal disclosure requirements (i.e., the Lobbying Disclosure Act and Federal Election Commission regulations) as a benchmark against which voluntary corporate over-disclosure could be assessed. In the absence of equivalent regulatory infrastructure at the global level, ATNi acknowledged the difficulty of applying standardized evaluation methods to lobbying and engagement practices, ultimately removing the category from the Global Index 2024.

While this decision may reflect a pragmatic response to methodological constraints, given the role the food industry played in shaping nutrition policy (Lacy-Nichols & Williams, 2021; Sharma et al., 2010; Slater et al., 2024), future development of evaluation methods for lobbying and engagement activities is anticipated (Lacy-Nichols & Williams, 2021; Sharma et al., 2010; Slater et al., 2024).

While the Global Index and Spotlight Index represent a significant effort to promote corporate accountability in nutrition, they must be situated within the broader academic and policy debate on the effectiveness of voluntary, industry-engaged benchmarking frameworks. Voluntary corporate commitments in the F&B sector have been widely critiqued for relying on vague language, lacking independent enforcement mechanisms, and, in some cases, functioning primarily to forestall binding government regulation (Lacy-Nichols & Williams, 2021; Sharma et al., 2010). A systematic review of voluntary actions by F&B companies in low- and middle-income countries found no evidence that such initiatives effectively safeguard public health, and documented instances in which their adoption resulted in weaker policy responses (Erzse et al., 2022). This interpretation is further supported by evidence that company nutrition performance may vary substantially depending on whether evaluation frameworks prioritize corporate commitments or actual product sales composition (Robinson et al., 2023).

It is worth noting, however, that NPMs used in the ATNi indices—particularly the HSR and Nutri-Score—have themselves been assessed for criterion validity with respect to diet-related health outcomes. A recent systematic review and meta-analysis found that higher diet quality, as defined by the Nutri-Score, was associated with significantly lower risks of cardiovascular disease, cancer, all-cause mortality, and BMI change, while the HSR demonstrated intermediate evidence of criterion validation (Barrett et al., 2024). These findings suggest that the nutritional assessment tools underpinning the ATNi indices are grounded in systems that are meaningfully relevant to health. Nevertheless, whether participation in or improvement of ATNi index scores translates into measurable improvements in population-level nutrition outcomes remains an important but largely unaddressed question that could be addressed in future studies.

A further limitation inherent in the ATNi indices is their reliance on self-reported data. Companies are responsible for submitting their own information, and while ATNi conducts verification procedures, the absence of fully independent third-party audits or surveys by governmental agencies raises concerns about the completeness and accuracy of the data disclosed. Related to this is the issue of selective disclosure: as discussed below, evidence suggests that some companies strategically avoid displaying HSR scores on products that receive low ratings (Keaney et al., 2024), which raises questions about whether index participation reflects a genuine commitment to transparency or mainly serves reputational (public relations) purposes. Furthermore, the indices may have limited utility as tools for evaluating real-world public health impact because they do not currently incorporate mechanisms for assessing the actual impact of corporate practices on population-level nutrition outcomes,

which are also influenced by food and nutrition policies

The involvement of a larger number of external advisory organizations in the earlier editions of the Spotlight Indices may have served to enhance institutional legitimacy and diversify stakeholder perspectives. The reduction in the number of consulting bodies in more recent editions may reflect a rationalization of governance processes. The available data are insufficient to draw definitive conclusions, and this trend warrants continued monitoring in future editions of the Spotlight Indices.

Notwithstanding these limitations, voluntary benchmarking frameworks such as the ATNi indices may serve a useful function in contexts where binding regulatory mechanisms are absent or underdeveloped. By making at least some aspects of corporate nutrition performance visible to investors, policymakers, and civil society, these indices can generate reputational incentives for improvement and contribute to a culture of transparency within the F&B sector. The critical perspective advanced here is not intended to dismiss the value of such frameworks, but rather to underscore the potential value of complementing voluntary initiatives with robust regulatory oversight and independent monitoring.

The establishment of a new Spotlight Index may offer countries not currently covered by existing Spotlight Indices an opportunity to examine the health-oriented initiatives undertaken by their domestic F&B companies. One of the most critical considerations when developing a Spotlight Index is selecting an appropriate NPM. Both the Global Index and existing Spotlight Indices primarily utilize the HSR system (*Health Star Rating System*, n.d.), which was developed in 2014 by Australian federal and state governments in collaboration with industry, public health experts, and consumer advocacy groups. The HSR was designed with Western dietary patterns in mind and may not be fully compatible with food cultures in many Asian, African, and Latin American countries. In some of these countries, meals typically consist of multiple dishes consumed together rather than single packaged items. Consequently, traditional food ingredients—such as seasonings and culturally specific components—may be ineffectively assessed under this model (Tousen et al., 2024).

For instance, the Japanese NPM for processed foods, an adaptation of the HSR algorithm using national nutrient reference values (*Dietary Reference Intakes for Japanese (2020)*, n.d.; *Food Labeling Act, Etc. (Laws and Regulations and Unified Information) (in Japanese)*, n.d.), may provide a more culturally appropriate evaluation framework for Japanese products However, for any NPM to be effective, it is crucial to promote greater awareness and understanding among food manufacturers. The HSR system itself is subject to structural limitations that may constrain its effectiveness as an accountability tool. The algorithm was developed through a multi-stakeholder process that included food industry representatives, and industry support for the system has historically been conditional on it remaining voluntary (Jones et al., 2019). In practice, the system has functioned selectively as a marketing tool -- manufacturers have consistently displayed the HSR label preferentially on higher-scoring products while withholding it from lower-scoring ones (Jones et al., 2019; Keaney et al., 2024; Shahid et al., 2020). Shahid et al. (2020) quantified this disparity, finding that products displaying the HSR logo had a significantly higher mean score (3.4) compared to those not displaying it (2.6; $p < 0.001$), with over three-quarters of labeled products scoring 3.0 or above. This selective use provides marketing benefits to manufacturers while restricting HSR's utility as a public health intervention (Shahid et al., 2020). These structural limitations suggest that any newly developed Spotlight Index should consider whether a fully voluntary NPM-based system can serve as an independent and effective accountability mechanism, and whether governance arrangements adequately safeguard against conflicts of interest.

The evolution of Category E (Workforce/Lifestyle) also merits attention when developing new Spotlight Indices. The alignment of workforce nutrition criteria with the four pillars of the Workforce Nutrition Alliance—Healthy Food at Work, Nutrition Education, Nutrition Health Checks, and Breastfeeding Support—reflects an acknowledgement that corporate responsibility extends beyond consumer-facing products to encompass employees and supply chain workers. A nutritious diet positively impacts the health and well-being of employees, and ultimately benefits corporate performance (Grimani et al., 2019; Wagner et al., 2016). Since employee well-being aligns with the nutrition-related targets of the United Nations Sustainable Development Goals (UN Department of Economic and Social Affairs, n.d.), countries developing new Spotlight Indices should consider incorporating workforce nutrition criteria adapted to local labor contexts and cultural norms. Future editions of the Global Index and Spotlight Index are likewise expected to continue evolving in response to emerging global nutrition challenges, and newly developed national frameworks would benefit from being designed with sufficient flexibility to accommodate such shifts.

Regional variation in Global Index scores may also inform the case for developing context-sensitive national frameworks. For instance, Japanese companies achieved an average score of 2.58 out of 10 in the Global Index 2024, compared to 3.83 for European companies and 2.93 for those in the United States. One potential contributing factor is that nutrient profiling models developed primarily for packaged foods in Western dietary contexts may not fully capture how foods are consumed within different dietary patterns and meal structures. For example, the frequent use of discretionary condiments and seasonings in Asian dietary patterns, which often contain high levels of sodium, may not be properly evaluated using such models. Similar challenges may arise for foods that are typically consumed as part of composite meals, concentrated ingredients used in small quantities, and foods whose nutritional role depends on customary dietary patterns, all of which may be disadvantaged under NPMs originally designed with Western food structures in mind. It should be emphasized that this cultural adaptation of NPMs is not intended to weaken

health protection standards; rather, it aims to improve contextual validity while maintaining alignment with public health objectives. These observations suggest that Spotlight Indices applying localized NPMs, tailored to the regulatory environments and dietary cultures of countries not currently covered may offer a more contextually appropriate basis for evaluating corporate nutrition performance.

Several additional challenges must be addressed when developing a new Spotlight Index in countries or regions where one does not currently exist. To effectively support the development of healthier food systems, any newly developed Spotlight Index should be tailored to the specific context of the country or region, designed in partnership with local institutions and regulatory authorities, and structured to ensure public accessibility and clarity.

Some countries may wish to create a broader index that includes issues beyond those directly controlled by the food industry, such as irregular eating habits, nutritional imbalances associated with diverse lifestyles, rising food prices, and the widespread dissemination of misleading nutrition information, all of which influence the local food environment (Baker & Friel, 2016; Darmon & Drewnowski, 2015; Wang et al., 2019). Furthermore, a broader index must consider the imperative of environmentally sustainable food production.

Several limitations of this study should be acknowledged. First, the analysis relies exclusively on publicly accessible institutional documents published by ATNi, without triangulation with other data sources. Interpretations are therefore necessarily shaped by ATNi's own published materials, and the findings should be read with this constraint in mind. Second, no primary data were collected; the absence of interviews with relevant stakeholders limits the depth of insight regarding the practical implementation and real-world impact of the indices. Third, as all documents included in this analysis were produced by ATNi, the study is subject to the limitations inherent in single-source institutional data, including the potential for selective reporting. Although the document analysis was conducted systematically and all reports that met the inclusion criterion were retrieved without further exclusions, this constraint cannot be fully mitigated without triangulation with independent sources. Fourth, the findings are specific to the ATNi framework and should not be uncritically generalized to other voluntary corporate accountability indices or to different regulatory and cultural contexts.

Conclusions

This study provides the first systematic cross-edition and cross-index comparative analysis of all published ATNi Global and Spotlight Index editions, revealing a progressive reorientation toward greater weights for NPM and a simplification of the indicator framework. These structural shifts reflect evolving institutional priorities and may strengthen the empirical credibility of the indices among investors and policymakers.

For policymakers, voluntary benchmarking efforts of this nature should be regarded as complementary to, rather than substitutes for, robust and independently monitored regulatory oversight. National governments should ensure that any adopted NPM is grounded in domestic nutrient reference values and validated for local dietary patterns.

For researchers, priority directions include: stakeholder interviews with ATNi Expert Group members, national regulatory bodies, and civil society organizations; and empirical studies examining whether improvements in ATNi index scores translate into measurable improvements in population-level nutrition outcomes.

For countries developing new Spotlight Indices, any newly developed framework should adopt culturally appropriate NPMs, incorporate workforce nutrition criteria adapted to local labor contexts, be co-designed with local institutions and regulatory authorities, and be structured with sufficient flexibility to accommodate evolving global and national nutrition standards.

Author Contributions

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Declaration of Generative AI and AI-Assisted Technologies in Scientific Writing

During the preparation of this manuscript, the authors used DeepL solely for language translation purposes. No generative AI tools were used for study design, data analysis, interpretation of results, or scientific content generation. The authors reviewed and edited the translated text as necessary and take full responsibility for the content of the publication.

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The authors declare that they have no conflicts of interest.

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Appendices

Appendix 1. Comparison of ATNi Index Series (Global Index, US Index, and India Index)

Additional Table 1-1. Index published by ATNI: Global Index

		Global Index 2024			Global Index 2021				Global Index 2018				Global Index 2016				Global Index 2013				
Category		Wt.	Sub-Category	No. Inds	Wt.	Description	Criteria	No. Inds	Wt.	Description	Criteria	No. Inds	Wt.	Description	Criteria	No. Inds	Wt.	Description	Criteria		No. Inds
A	Governance	15		7	12.5	Corporate strategy, management and governance	A1 Corporate nutrition stragtegy	14	12.5	Corporate strategy, management and governance	A1 Corporate nutrition stragtegy	12	12.5	Corporate strategy, governance and management	A1 Corporate nutrition stragtegy	16	12.5	Corporate strategy, governance and management	A1 (Strategy) Corporate nutrition strategy		NA
							A2 Nutrition governance and management systems	7			A2 Nutrition governance and management systems	23			A2 Nutrition governance and management systems	23			A2 (Management) Nutrition governance and management systems		
							A3 Quality of reporting	4			A3 Quality of reporting	8			A3 Quality of reporting	8			A3 (Reporting) Quality of reporting		
B	Products	45	B1 Product profile results (30%)	2	35	Formulating appropriate products	B1 Product profile results (20%)	3	25	Formulating appropriate products	B1 Product formulation	42	25	Formulation of appropriate products	B1 Product formulation	50	25	Formulation of appropriate products	B1 (Formulation) Product formulation		NA
			B2 Portfolio improvement (10%)	16			B2 Product formulation (7.5%)	19			B2 Nutrient profiling system	6			B2 Nutrient Profiling system	6			B2 (Profiling) Nutrient profiling system		
			B3 NPMs for reporting (5%)	4			B3 Defining healthy and appropriate products (7.5%)	12													
C	Accessibility	15		6	15	Delivering affordable, accessible products	C1 Product pricing	7	20	Delivering affordable, accessible products	C1 Product pricing	13	20	Delivering affordable, available products	C1 Product pricing	14	20	Delivery of affordable, available products	C1 (Pricing) Product pricing		NA
							C2 Product distribution	7			C2 Product distribution	15			C2 Product distribution	15			C2 (Distribution) Product distribution		
D	Marketing	15		7	20	Responsible marketing policies and auditing of compliance	D1 Marketing policy: general aspects of responsible marketing	6	20	Responsible marketing policies, compliance and spending	D1 Responsible marketing policy: All consumers	6	20	Responsible marketing policies, compliance and spending	D1 Responsible marketing policy: All consumers	3	20	Responsible marketing policies, compliance and spending	All consumers	D1 (Policy) Responsible marketing policy	NA
							D2 Marketing policy: specific arrangements regarding responsible marketing to children and teens	12			D2 Auditing and compliance with policy: All consumers	3			D2 Auditing and compliance with policy: All consumers	3				D2 (Compliance) Auditing and compliance with policy	
							D3 Auditing and compliance with policy	8			D3 Responsible marketing policy: Children	19			D3 Spending: Advertising focus: all consumers	12				D3 (Spending) Advertising focus	
											D4 Auditing and compliance	7			D4 Responsible marketing	18			Children	D4 (Policy) Responsible	

Category		Global Index 2024			Global Index 2021				Global Index 2018				Global Index 2016				Global Index 2013				
		Wt.	Sub-Category	No. Inds	Wt.	Description	Criteria	No. Inds	Wt.	Description	Criteria	No. Inds	Wt.	Description	Criteria	No. Inds	Wt.	Description	Criteria		No. Inds
											with policy: Children				policy: Children					marketing policy	
															D5 Auditing and compliance with policy: Children	7				D5 (Compliance) Auditing and compliance with policy	
															D6 Spending: Advertising focus (children) and policy impact	8				D6 (Spending) Advertising focus	
E	Lifestyle	5		6	2.5	Supporting health diets and active lifestyles	E1 Supporting employee health & wellness	6	2.5	Supporting health diets and active lifestyles	E1 Supporting staff health & wellness	13	2.5	Support for healthy diets and active lifestyles	E1 Supporting staff health & wellness	13	2.5	Support for healthy diets and active lifestyles	E1 (Employees) Supporting staff health and wellness		NA
							E2 Supporting breastfeeding mothers at work	5			E2 Supporting breastfeeding mothers in the workplace	5			E2 Supporting breastfeeding mothers in the workplace	5			E2 (Consumers) Supporting consumer-oriented healthy eating and active lifestyle programs		
							E3 Supporting community-supporting healthy eating and active lifestyle programs	7			E3 Supporting consumer-oriented healthy eating and active lifestyle programs	16			E3 Supporting consumer-oriented healthy eating and active lifestyle programs	16					
F	Labeling	5		3	10	Product labeling and use of health and nutrition claims	F1 Product labeling	12	15	Product labeling and use of health and nutrition claims	F1 Product labeling	12	15	Informative labeling and appropriate use of health and nutrition claims	F1 Product labeling	12	15	Informative labeling and appropriate use of health and nutrition claims	F1 (Facts) Product labeling		NA
							F2 Health and nutrition claims	5			F2 Health and nutrition claims	8			F2 Health and nutrition claims	8			F2 (Claims) Health and nutrition claims		
G	Engagement				5	Influencing governments and policymakers, and stakeholder engagement	G1 Lobbying and influencing governments and policymakers	6	5	Engagement with governments, policymakers and other stakeholders	G1 Lobbying and influencing governments and policymakers	7	5	Engagement with governments, policymakers and other stakeholders	G1 Lobbying and influencing governments	7	5	Engagement with policymakers and other stakeholders	G1 (Lobbying) Lobbying and influencing governments and policymakers		NA
							G2 Stakeholder engagement and partnerships	9			G2 Stakeholder engagement	6			G2 Stakeholder engagement	6			G2 (Stakeholder) Stakeholder engagement		
	Total No. Indicators	51			150				244				250				NA				

NA: not available No. Inds.: Number of Indicators Wt.: Category weight (%)

*Note: The category weight is equally distributed over criteria except for category B where Product Profile results carry a higher weight. Terms are presented as in the original source, including capitalization.

Additional Table 1-2. Index published by ATNi: U.S. Index

		US Index 2022				US Index 2018			
Category		**Weight (%)**	**Description**	**Criteria**	**No. Inds**	**Weight (%)**	**Description**	**Criteria**	**No. Inds**
A	**Governance**	12.5	Corporate strategy, governance and management	A1 Corporate nutrition strategy	6	12.5	Corporate strategy, governance and management	A1 Nutrition strategy	8
				A2 Nutrition governance and accountability	5			A2 Nutrition management	9
								A3 Nutrition reporting	5
B	**Products**	35	Formulation of appropriate products	B1: Product profile	1	27.5	Formulation of appropriate products	B1 Formulation	27
				B2: Product formulation	23			B2 Nutrient Profiling System	6
				B3: Nutrient profiling model (NPM) — defining 'healthy' products	6				
C	**Accessibility**	17.5	Delivery of affordable, available products	C1: Product pricing	10	22.5	Delivery of affordable, available products	C1 Affordability	7
				C2: Product distribution	10			C2 Accessibility	9
D	**Marketing**	20	Responsible marketing policies, compliance and spending	D1: Responsible marketing to all audiences	8	22.5	Responsible marketing policies, compliance and spending	D1 Responsible marketing policy (all consumers)	7
				D2: Responsible marketing to Children	13			D2 Auditing compliance	3
				D3: Auditing and compliance	12			D3 Marketing expenditure (unscored)	4
								D4 Responsible marketing policy (children)	23
								D5 Auditing compliance	8
								D6 Marketing expenditure (unscored)	3
E	**Lifestyle**	5 (Category name: Workforce)	Support for healthy diets and active lifestyles	E1: Supporting employee health and nutrition	8	5	Support for healthy diets and active lifestyles	E1 Employee health and nutrition	13
				E2: Supporting breastfeeding mothers at work	4			E2 Supporting breastfeeding at work	5
								E3 Consumer health	10
F	**Labeling**	5	Informative labeling and appropriate use of health and nutrition claims	F1: Product Labeling	8	5	Informative labeling and appropriate use of health and nutrition claims	F1 Labeling	4
G	**Engagement**	5	Engagement with policymakers and other stakeholders	G1: Responsible lobbying	6	5	Engagement with policymakers and other stakeholders	G1 Lobbying policymakers	4
				G2: Engaging with stakeholders	7			G2 Stakeholder engagement	5
Total No. Indicators					**127**				**190**

No. Inds.: Number of Indicators
*Note: The category weight is equally distributed over criteria. Terms are presented as in the original source, including capitalization.

Additional Table 1-3. Index published by ATNi: India Index

		India Index 2023				India Index 2020				India Index 2016			
Category		**Weight (%)**	**Description**	**Criteria**	**No. Inds**	**Weight (%)**	**Description**	**Criteria**	**No. Inds**	**Weight (%)**	**Description**	**Criteria**	**No. Inds**
A	**Governance**	10	Nutrition governance and management		9	12.5	Corporate strategy, management and governance	A1 Corporate nutrition strategy	9	12.5	Corporate strategy, management and governance	A1 Corporate nutrition strategy*	8
								A2 Nutrition governance and management systems	5			A2 Nutrition governance and management systems*	12
								A3 Quality of reporting	2			A3 Quality of reporting*	4
B	**Products**	45	Product profile, product (re)formulation & defining healthy products	B1. Product Profile (30%)	18	35†	Formulating appropriate products	B1 Product profile results‡ (20%)	3	25	Formulating appropriate products	B1 Product formulation*	18
				B2. Product Reformulation (7.5%)				B2 Product formulation (7.5%)	13			B2 Nutrient profiling system	4
				B3. Nutrient Profiling (7.5%)				B3 Defining healthy and appropriate products (7.5%)	6				
C	**Accessibility**	15	Delivering healthy, affordable, and accessible products		4	15	Delivering affordable, accessible products	C1 Product pricing	6	20	Delivering affordable, accessible products	C1 Product pricing*	9
								C2 Product distribution	5			C2 Product distribution*	8
D	**Marketing**	15	Responsible marketing and auditing of compliance		8	20	Responsible marketing policies, compliance and spending	D1 Marketing policy: General aspects of responsible marketing, relevant to all consumers	4	20	Responsible marketing policies, compliance and spending	D1 Responsible marketing policy: all consumers	3
								D2 Marketing policy: Specific arrangements regarding responsible marketing to children and teens	10			D2 Auditing and compliance with policy: all consumers	3
								D3 Auditing and compliance with policy	7			(D3 Spending: Advertising focus: all consumers*)	
												D4 Responsible marketing policy: children	11
												D5 Auditing and compliance with policy: children	7
												(D6 Spending: Advertising focus (children) and policy impact*)	
E	**Lifestyle**	5	Supporting healthy diets and nutrition programs in the workforce		7	2.5	Supporting healthy diets and active lifestyles	E1 Supporting employee health & wellness	5	2.5	Supporting healthy diets and active lifestyles	E1 Supporting staff health & wellness	5
								E2 Supporting breastfeeding mothers at work	4			E2 Supporting breastfeeding mothers in the workplace	4
								E3 Supporting consumer-oriented healthy eating and active lifestyle programs	5			E3 Supporting consumer-oriented healthy eating and active lifestyle programs*	6
F	**Labeling**	5	Product Labeling & nutritional information online		3	10	Product labeling and use of health and nutrition claims	F1 Product labeling	6	15	Product labeling and use of health and nutrition claims	F1 Product labeling	6
								F2 Health and nutrition claims	4			F2 Health and nutrition claims	4

		India Index 2023				India Index 2020				India Index 2016			
Category		**Weight (%)**	**Description**	**Criteria**	**No. Inds**	**Weight (%)**	**Description**	**Criteria**	**No. Inds**	**Weight (%)**	**Description**	**Criteria**	**No. Inds**
G	**Engagement**	5	Policy engagement		5	5	Influencing governments and policymakers, and stakeholder engagement	G1 Engaging and influencing governments and policymakers	4	5	Influencing governments and policymakers, and stakeholder engagement	G1 Lobbying and influencing governments and policymakers*	3
								G2 Stakeholder engagement and partnerships	5			G2 Stakeholder engagement*	6
Total No. Indicators					**58**				**99**				**121**

No. Inds.: Number of Indicators

† Category B is the only category that does not have equally weighted criteria as indicated in parentheses behind the criteria names, due to the integration of the Product Profile scores (Criterion B1).

‡ Criterion B1 will be scored based on the outcomes of the Product Profile assessment that will be performed by The George Institute. The Product Profile will assess nutrient quality of products available in Indian supermarkets based on preselected nutrient profiling systems described in chapters 3, 4 and 6. * Criteria with additional undernutrition specific indicators. ** D3 and D6 were not scored for the Global Index and are therefore excluded from the India Spotlight Index.

Note: Terms are presented as in the original source, including capitalization.

Appendix 2. Methods used to calculate the scores for each index

Index	Global Index 2021	US Index 2022	India Spotlight Index 2023	Global Index 2024
STEP1	Calculate indicator score · Commitment and disclosure: maximum 10 points · Performance: maximum 20 points · Adjustment by multiplier to detailed item scores if eligible	Calculate Indicator score · Commitment and Disclosure: maximum 10 points · Performance: maximum 20 points · Adjustment by Multiplier to detailed item scores if eligible	Calculate indicator score · Removed commitment, disclosure and performance · Adjustment by multiplier to detailed item scores if eligible	Calculate indicator score · Removed commitment, disclosure and Performance · Adjustment by multiplier to detailed item scores if eligible
Multiplier	(1) Healthy multiplier Evaluate the quality of corporate NPM and products based on B3 scores (2) Geographic multiplier Evaluate companies that have expanded their efforts globally	(1) Healthy multiplier Evaluate the quality of corporate NPM and products based on B3 score (2) Age ccope multiplier Evaluates companies that develop responsible marketing policies for children under 18 years old	(1) Healthy affordability multiplier Evaluate the affordability and price of products in category C. (2) Workforce nutrition scope multiplier (Workplace nutrition) Evaluates whether the company has a nutrition enhancement program for all employees in category E. (3) Disclosure multiplier Evaluate the company's efforts and information disclosure	(1) Disclosure multiplier Evaluate activities and disclosure status (2) Geographic multiplier (Geographic) Evaluation of companies that have developed global initiatives
STEP2	Calculate criteria score · Calculate the criteria score by summing the indicator scores for each criteria	Commitment+Performance+Disclosure / Maximum total score of the indicator	-	-
STEP3	Calculate category score	Calculate category score (1) Category A and C-G: Average of medium item scores (2) Category B: (0.571*B1) + (0.214*B2) + (0.214*B3) Weighted category score = Category i score * Category i weight (0-100%)	Calculate category score · Total indicator score/maximum total score of the indicator	Calculate category score · Total indicator score/maximum total score of the indicator
	BMS score adjusting	-	-	BMS score adjusting
STEP4	Calculate Final Score	Calculate Final Score	Calculate Final Score	Calculate Final Score