Benchmarking Food Industry Commitments to Create a Healthier Food Environment:

Business Impact Assessment (BIA) - Obesity Malaysia 2019

An analysis of company commitments and disclosure practices related to population nutrition, obesity and diet-related non-communicable disease prevention.
The study (1) benchmarked the commitments across top manufacturers, quick service restaurants and retailers, and (2) provided recommendations to align with government’s directions and international norms.

The study adopted the INFORMAS protocol – Business Impact Assessment (BIA) - Obesity with minor adjustments to suit the Malaysian context. Evidence on 6 domains (corporate strategy, product formulation, nutrition labelling, promotion practices, product accessibility and relationships with external organisations) were collected from publicly available information.

A robust process was undertaken with consenting companies (n=6) able to verify the evidence; whereas random market surveys complemented the evidence collection for non-consenting companies (n=27). An Expert Panel (including national and international members representing government, non-government organisation and academia) assessed the comprehensiveness, specificity and transparency of the commitments to Malaysia. Constructed recommendations were reviewed by senior government stakeholders (n=13).

**Key Findings:**

Most Malaysian food companies’ commitments to addressing population nutrition and health under the corporate strategy domain varied greatly, when matched against global best practice.

Companies’ overall weighted scores ranged from 1% to 60%, with only 8 companies scoring >25%.

Companies that fully engaged in the research may increase transparency of their commitments in population nutrition and health, and some practised substantial sustainability reporting (e.g. using the Global Reporting Initiative Standards).

**Key Recommendations for Food Companies:**

A holistic set of 14 recommendations were directed to Malaysian food companies towards setting SMART targets for product reformulation, standardise explicit nutrition labelling to inform choices, practise responsible marketing policies in all settings, apply sustainable pricing and increase availability of healthier products, and disclose all national CSR activities.

This benchmarking process provides baseline data on food companies’ commitments and disclosures related to population nutrition and health. It provides an opportunity to set accountability frameworks for public health nutrition in Malaysia. The research team welcomes efforts from all stakeholders including food industry, government, non-government organisation, and academia to create healthier food environments for Malaysia.
BACKGROUND

Malaysia has a high prevalence of overweight and obesity, coupled with a high burden of diet-related non-communicable diseases (NCDs).\(^1,2\)

This burdens the health care system financially, with escalating costs to the Government of Malaysia,\(^3,4\) and also affects human productivity due to disease complications. Of concern, the estimated risk of premature death from NCDs is 17%.\(^5\)

Dietary risks play a major role in the burden of NCDs in Malaysia.\(^1\) Unhealthy food environments cultivate poor diet quality associated with obesity and related chronic diseases. Prevention efforts that focus on improving food environments are likely to have a significant impact on the healthiness of population diets. Government, the food industry and civil society all have important roles to play in fostering healthier food environments. This report has a focus on food company policies and commitments related to population nutrition, obesity and diet-related NCDs prevention (hereon referred to as population nutrition and health).

Benchmarking company nutrition policies and commitments

Commitments and disclosures of top Malaysian food companies, covering food and non-alcoholic beverage manufacturers, quick service restaurants and food retailers, were assessed in relation to population nutrition and health. This was a pioneering academic-led study in Malaysia, which aimed to identify gaps in food company policies and their Corporate Social Responsibility (CSR) approaches, using available information and comparing across companies, government mandates and international norms. The findings will inform relevant stakeholders about food industry leadership in relation to nutrition and food environment policies, as well as provide recommendations for improving their commitments and disclosure practices.

Due caution was taken when engaging with the food industry on these food policy issues. Public interest was foremost, while policies supportive of sustainable business models in achieving Sustainable Development Goals (SDGs) were also of importance. Underlying conflicts of interest were managed.

Globally-developed methods, tailored to the Malaysian context

Business Impact Assessment (BIA) - Obesity is an instrument for evaluating food industry commitments and disclosures, developed by the International Network for Food and Obesity / Non-Communicable Diseases Research, Monitoring and Action Support (INFORMAS) group.\(^6\) This instrument is based on the Access to Nutrition Index (ATNI) method,\(^7\) WHO recommendations, and public health literature. The BIA-Obesity instrument covers domains related to: (1) corporate strategy; (2) product formulation; (3) nutrition labelling; (4) promotion practices; (5) product accessibility; and (6) relationships with external organisations. Specific indicators for each sector and domain are based on the level of transparency, comprehensiveness and specificity of the commitment(s) to Malaysia.

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\(^{4}\)The Economist Intelligence Unit (EIU) 2017, Tackling obesity in ASEAN: Prevalence, impact and guidance on interventions, London: EIU.


PROCESS OF ASSESSMENT

In total, 33 companies were selected based on Euromonitor market share data (2016), for the assessment protocol of BIA-Obesity Malaysia. This included 22 Manufacturers (representing 62.9% retail selling price), 5 Quick Service Restaurants (QSR) (79.1%) and 6 Retailers (26.2%). Publicly available information (national and global commitments published between 2014 and 2017) was compiled for all 33 companies. For consenting companies, this information was cross-checked and verified. For non-consenting companies, random market surveys of their associated food brands were conducted to construct evidence for some of the indicators.

Trained members (n=6) of an Expert Panel performed the assessment with an external Expert called in whenever a ‘simple majority’ consensus could not be reached. A minimum of 5 Expert Panel members comprising of representatives from the government, non-government organisation, and academia assessed each company with 94% of indicators reaching ‘simple majority’. Scores were combined across domains to derive an overall weighted score of 100% for ranking purposes. A separate round table session with 13 government stakeholders serving as a Reviewer Panel reviewed recommendations of the Expert Panel, to be in line with the national policies and government’s direction. Prior to the public dissemination, individual scorecards were sent via email to each company for feedback. Companies who did not officially respond prior to the deadline (28th May 2019) were considered as “acquiescent by silence” to the scorecard rating and recommendations.

### Domains of the BIA-Obesity tool

<table>
<thead>
<tr>
<th>Domain</th>
<th>Description</th>
<th>Domain Weightings by Sector (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. Corporate strategy</strong></td>
<td>Company’s overarching commitment to improving population nutrition for reducing obesity and diet-related NCDs.</td>
<td>Manufacturers: 10, QSR: 10, Retailers: 10</td>
</tr>
<tr>
<td><strong>B. Product formulation</strong></td>
<td>Policies related to product development and reformulation, in particular nutrients of concern (salt, saturated fat, trans-fat, added sugar) and portion size/energy.</td>
<td>Manufacturers: 30, QSR: 25, Retailers: 25</td>
</tr>
<tr>
<td><strong>C. Nutrition labelling</strong></td>
<td>Disclosure and presentation of nutrient information, including quantitative ingredients lists, product and front-of-pack labelling, nutrition claims and online nutrition information.</td>
<td>Manufacturers: 20, QSR: 15, Retailers: 15</td>
</tr>
<tr>
<td><strong>D. Promotion practices</strong></td>
<td>Policies related to reducing the exposure and power of non-core food promotion to children and the audit of compliance.</td>
<td>Manufacturers: 30, QSR: 25, Retailers: 25</td>
</tr>
<tr>
<td><strong>E. Product accessibility</strong></td>
<td>Policies related to the affordability, availability of healthy compared to non-core products.</td>
<td>Manufacturers: 5, QSR: 20, Retailers: 20</td>
</tr>
<tr>
<td><strong>F. Relationships with external organisations</strong></td>
<td>Details of policies related to funding and/or support provided to professional organisations, external research, community groups, nutrition education and active lifestyle programs, public-private partnership and industry membership.</td>
<td>Manufacturers: 5, QSR: 5, Retailers: 5</td>
</tr>
</tbody>
</table>

Abbreviations: NCDs=Non-communicable diseases; QSR=Quick service restaurants
Note: Non-core foods refer to products with high undesirable nutrients such as high fat, refined sugars and salt. For each domain and sector, the INFORMAS experts set by consensus the maximum points and weightings based on the impacts on obesity and population nutrition.

*For retailer sector, it refers to in-house brands or products. For promotion domain, it covers responsive to all consumers (including adults and children).

*For quick service restaurant sector, this domain is product and menu labelling.
KEY FINDINGS

The food industry in Malaysia portrays itself as committed to some aspects of population nutrition and health.

However, across all companies there was a lack of comprehensive effort to align with national policies and international norms for addressing healthy food environments. Large disparities in the comprehensiveness and specificity of companies’ commitments were identified. In addition, most companies lacked transparency in reporting of their policies and commitments.

• Few companies consented to participate (6/33) in BIA-Obesity Malaysia, despite significant efforts to engage with industry. Low interest, coupled with limited resources, were barriers that affected participation in this study.

• Company scores ranged widely from 60% for Nestlé to nearly zero for Ramly (1%), Domino’s (2%), Econsave (2%) and Mydin (2%).

• Only 8/33 companies recorded an overall weighted score of more than 25%. This represents a resounding ‘insufficiency’ in implementing policies and actions to support healthy food environments.

• Limited commitments and disclosure practices were evident across all selected companies from quick service restaurant and retailer sectors.

• Consenting companies (6/33) that fully engaged in the process improved resolution in the assessment, which may have contributed to their higher ranking.

• Overall, scoring indicated considerable room for improvement across the Malaysian food industry, with greater commitments required to integrate corporate strategy with population health and nutrition goals.

Assessment was based on:

Transparency
Comprehensiveness
Specificity
Relevance to the Malaysian context

*Consenting company; †Beverage manufacturers
KEY FINDINGS

Areas where food companies in Malaysia have indicated some evidence to population nutrition and health:

Corporate strategy: A high proportion of food companies (28/33) recognised their role to improve population nutrition and health, evidenced by various broad commitments and/or limited progress in one or more domains.

Product formulation: Many companies (24/33) have initiated some efforts to reformulate at least one nutrient of concern (e.g. sodium, added sugars, saturated fat, or trans-fat) or reduce energy content/portion size of products in their portfolio.

Nutrition labelling: Most companies did not publish specific policy statements on nutrition labelling. However, data from the complementary market survey revealed some action (e.g. total sugars or trans-fat declarations; government-led front-of-pack labelling) to facilitate informed choices (30/33).

Promotion practices: Only one-third of the companies published some commitments to restrict unhealthy food marketing, and most of them were signatories of the ‘Responsible Advertising to Children Initiative – Malaysia Pledge 2013’.

Product accessibility: Twenty-one of 33 companies disclosed some evidence on accessibility, such as incorporated a few ‘healthier’ products in the product portfolio (based on their own classification), disclosed broad commitments to improve product affordability and/or published company’s position on fiscal policies, particularly taxation on non-core foods.

Relationships with external organisations: All companies reported at least one type of CSR activity including funding or in-kind support for health and nutrition to professional organisations, research, philanthropic activities, nutrition education and active lifestyle programs or public private partnerships, with some companies explicitly disclosing a business code or guideline to restrict political donations.
KEY RECOMMENDATIONS FOR FOOD COMPANIES ACROSS THREE SECTORS

Abbreviations:
CSR=Corporate Social Responsibility;  
HCL=Healthier Choice Logo;  
MyFCD=Malaysian Food Composition Database;  
NCD=Non-communicable diseases;  
SDGs=Sustainable Development Goals;  
QUIDs=Quantitative ingredient declarations;  
SMART=Specific, measurable, achievable, relevant, time bound;  
WHO=World Health Organisation

Nutrition Labelling
1. Provide comprehensive nutrition labelling online and on pack such as sodium, trans-fat, sugars and quantitative ingredient declarations (QUIDs), consistent with government directions, initiatives and/or regulations.
2. Participate in government-led initiatives such as Malaysian Food Composition Database (MyFCD) and front-of-pack (FOP) labelling.
3. Only ‘healthier’ products (HCL and/or WHO criteria) to carry nutrition claims.

Promotion Practices
1. Establish responsible marketing policies for all settings. Criteria to include:
   • children up to 18 years old,  
   • time-based restriction on children’s programming hours,  
   • restrict advertising when the greatest numbers of children are watching such as 15-25% or more of children audience viewership,  
   • application of the WHO nutrient profiling systems.
2. Regularly disclose independent national audits of compliance.

Product Accessibility
1. Apply sustainable pricing practices to address the affordability of healthier compared to non-core products (i.e. not short-term ‘price off’ marketing).
2. Increase availability (e.g. placement strategies) of ‘healthier’ products (as per WHO nutrient profiling).
3. Support WHO’s position on fiscal policies.

Corporate Strategy
1. Reference national and international recommendations (e.g. WHO NCD action plan, SDGs) to formulate company’s nutrition targets and plans.
2. Link targets to key performance indicators of senior managers.
3. Regularly report on progress towards targets at the Malaysian level.

Product Formulation
1. Set and regularly report against national level SMART targets for reformulation aligned with the Healthier Choice Logo (HCL) and apply the WHO nutrient profiling systems for all relevant products.

Relationships with External Organisations
1. Public and regular consolidated disclosure of all national CSR activities.
2. Practice no commercial branding and product promotion in CSR activities.
BEST AVAILABLE COMPANY’S COMMITMENTS AT GLOBAL LEVEL

Examples of best practice commitments from other countries as identified through INFORMAS database or extracted from the global commitments of the companies for BIA-Obesity Malaysia are summarised as below:

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<th>Domain</th>
<th>Sector</th>
<th>Selected Commitments of Food Industry Across Sectors</th>
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| A. Corporate strategy | Manufacturer | New Zealand: Nestlé and Fonterra published annual reports against their national objectives and targets related to nutrition, and indicated KPIs of senior managers that linked to their nutrition strategy.  
Australia: Nestlé and Lion Dairy & Drinks published annual reports against their national objectives and targets related to nutrition, and indicated KPIs of senior managers that linked to their nutrition strategy. |
| | QSR | Global: McDonald’s published 2020 Aspirational Goals in top 9 markets and the McD-Alliance Partnership on Clinton Global Initiative Commitment to Action in 20 markets. (Note: Markets did not include Malaysia) |
| | Retailer | Japan: Seven & i Holdings Co. Ltd.’s committed to having a good balance of nutrients in food products through in-house products i.e. calorie and sodium content of Seven-Meal adjusted, with menu development and nutrient content supervised by physicians and dietitians.  
United Kingdom: Tesco committed to improving the health and wellbeing of its customers, and aligned its approach to the UN’s SDGs. Tesco UK has nutrition and health related commitments and associated targets, which are regularly reported in their sustainability report. |
| B. Product formulation | Manufacturer | New Zealand and Australia: Nestlé set specific, time bound reformulation targets for the reduction of saturated fat, sodium and added sugar across the company’s global portfolio, and has reported removal of all artificially produced trans-fats from its food and beverage products. Compliance with reformulation targets is audited and publicly disclosed on a regular basis.  
Global: McDonald’s committed to offering healthier drinks and side items for children’s meals, like fruit, water and low-fat dairy.  
United States: Dunkin’ Donuts introduced DDSMART that includes measurable criteria (e.g. 25% fewer calories, sugar, fat, saturated fat or sodium than the comparable fare and/or wholegrain ingredients).  
United States: Domino’s Pizza Smart Slice Program meets the USDA meal pattern regulation by reducing 35% sodium in sauces, using wholegrain dough, reducing 33% fat and 55% sodium in the toppings and using 50% lower fat and sodium lite cheese in the recipes.  
Germany: KFC introduces grilled KFC Gourmet Chicken, Grilled Chicken Salad and Yummy Twister with a dedicated special green menu board space. |
| | QSR | United Kingdom: Tesco Choice or Everyday Value brands in line with the ‘Healthy Living’ brand have at least 30% less calories and meet the Public Health Responsibility Deal 2012 guideline by limiting salt, sugar, saturated fat and trans-fat content.  
New Zealand: Foodstuffs New Zealand committed to reformulating in-house brand products to support the government’s 2015 Childhood Obesity plan. For instance, set a target to reduce sodium and sugar by 10% by the end of 2018 across their home brand product. |
| | Retailer | New Zealand: Countdown and Foodstuffs supermarkets committed to implementing the Health Star Ratings (HSR) system across all own-brand products. In addition, Countdown has committed to add the HSR to products on its online shopping website.  
Australia: Woolworths and Coles committed to implementing the Australian government-endorsed HSR system across all in-house brand products. In addition, Coles has a clear system for determining whether nutrition content claims are made in a responsible way for in-house brand products e.g., only making claims of “99% fat free” on products considered ‘healthy’ overall.  
United States and Canada: Hannaford Supermarkets (United States) and Loblaw Inc. (Canada) have implemented the Guiding Stars program, a licensed, independent shelf tag nutrition rating system to identify healthy foods and beverages in all categories (including fresh produce or meat products and packaged foods). |
| C. Nutrition labelling | Manufacturer | Australia: Sanitarium committed to implementing the Australian government-endorsed Health Star Rating system across all products and providing comprehensive online nutrition information. |
| | QSR | Australia: Subway, KFC and Pizza Hut provide kilojoule menu board labelling.  
United States: Walt Disney restaurants, resorts and theme parks introduced an icon to easily identify healthier menu items (in-store and online). |
| | Retailer | New Zealand: Countdownt and Foodstuffs supermarkets committed to implementing the Health Star Ratings (HSR) system across all own-brand products. In addition, Countdown has committed to add the HSR to products on its online shopping website.  
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<td>D. Promotion practices</td>
<td>QSR</td>
<td>United States: DineEquity, the parent company of Applebee’s (restaurants) and IHOP (family restaurant chains famous for pancakes etc.), removed soft drinks from kids’ meals and children’s menus, whereas soft drinks can still be ordered (menus only list milk and juice). Australia: Since 2008, KFC committed to not advertise or market children’s meals in the media or target advertising campaigns directly to children under 14 years of age. They removed toys from their kid’s meals. Their compliance to the commitments is assessed by external audit on an annual basis.</td>
</tr>
<tr>
<td>G. Product accessibility</td>
<td>Retailer</td>
<td>Australia: In 2015, Woolworths launched a ‘free fruit for kids’ initiative, providing fresh free fruit to children under 12 in all of their major stores nationally. Global: Unilever set a clear, time-bound target towards transition of a portion of its portfolio to a healthier product category. The company made a commitment to increase the affordability and availability of ‘healthy’ products across its global markets and identifies accessibility issues as a key part of its business strategy, aligning with the UN’s SDG. New Zealand: Coca-Cola committed to not directly supply any school with full sugar carbonated beverages or energy drinks. Frucor Suntory commits to have one in three products to be low or no sugar by 2030.</td>
</tr>
<tr>
<td>E. Relationships with other organisations</td>
<td>CSR</td>
<td>Global: Coca-Cola International published a list of the external groups it funds/supports, including details of the nature, date and amount of support/funding given to research institutions, health professionals, scientific experts, professional associations and partnerships related to health and nutrition. The company disclosed all nutrition and active lifestyle programs they are affiliated to, and updates all information annually. New Zealand: Campbell Soup Company’s subsidiary - Arnott’s has a strict policy prohibiting political donations.</td>
</tr>
<tr>
<td>F. Relationships with other organisations</td>
<td>Manufacturer</td>
<td>Canada: Loblaw Companies Ltd. (Canadian food retailer) published its membership in industry and stakeholder alliances in its CSR Report.</td>
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CONCLUSION AND IMPLICATIONS

This study is the first in Malaysia to assess the population nutrition and health commitments and disclosure practices of the food industry, covering food and non-alcoholic beverage manufacturers, quick service restaurants and retailers. The following points summarise the major findings from this study:

Most Malaysian food companies (28 out of 33 companies) recognise their role in addressing population nutrition and health, evidenced by various broad commitments reported in one or more domains to fulfil this obligation, under the corporate strategy domain.

Malaysian food companies’ commitments to population nutrition and health vary greatly, with overall weighted scores ranging from 1% to 60%. Reporting discrepancies were identified, particularly when matching the collective evidence of local practice against best practice available globally, even from the same company.

Only 8 out of 33 companies achieved more than 25% for their overall weighted score. This reflects room for improvement to increase transparency, comprehensiveness and specificity of commitments from all assessed companies. Consenting companies (6/33) who fully engaged in the process improved resolution in their assessments, which may have contributed to their higher ranking.

Food companies that practised sustainability reporting (e.g. Global Reporting Initiative Standards) fulfilled one or more of the characteristics below:


b. Practised or adhered to Malaysian government-led initiatives, such as energy front-of-pack labelling, Healthier Choice Logo, BeSS (Clean, Safe and Healthy), Guideline on the Nutrition Information Labelling of Fast Foods and/or Malaysian Food Composition Database (MyFCD) programmes.

c. Reported as a signatory to the Malaysia Pledge on Responsible Advertising to Children and/or practised an internal marketing policy with compliance audits.

d. Collectively reported CSR and engagement activities, including a published policy or guideline on restricting political donations.

This study provides baseline data on food companies’ commitments and disclosures. It provides a useful reference to all food industry stakeholders (small and medium enterprises, local companies and multinational companies operating in Malaysia), policy makers and implementers, professional bodies, non-governmental organisations and academia. If decision makers in Malaysian food industries assessed in this report could reflect on, examine and compare practice profiles, as well as act on the constructive recommendations, this will contribute positive changes to the Malaysian food environment.

Where relevant, the research team strongly encourages the integration of the principles and areas assessed in this study with nationally endorsed sustainability reporting systems (e.g. incorporated into the Global Reporting Initiative Standards) for publicly listed and other companies, to promote transparency of commitments on population nutrition and health to the public and investors.
LIMITATIONS

Many challenges were faced and steps were taken to mitigate risks, resulting in a longer period of evidence retrieval and analysis. Key issues are detailed below:

a) Low participation, with the non-consenting companies citing reasons such as limited resources, tight schedules and scepticism of the assessment.

b) Implementation performance was not assessed, despite some companies reporting commitments and disclosures in population nutrition and health.

c) As there is no universally accepted system to determine nutritional quality of products, BIA-Obesity Malaysia integrated the WHO nutrient profiling systems such as WHO Western Pacific Regional Office\(^1\) (WPRO) and South East Asia Region\(^2\) (SEAR) models as the best practice standards.

   • WHO recommended Member States to “establish a national nutrient-profiling model to regulate marketing, taxation, labelling and provision in public institutions based on WHO’s regional or global nutrient-profile models”, as articulated in the *Report of the Commission on Ending Childhood Obesity: Implementation Plan*.\(^3\)

   • Where these models are not applicable to one or more specific product’s portfolio (e.g. against standards articulated in the national regulations), the food industry is encouraged to publicly disclose clear justification statements to improve the reviewing process in the future.

d) Product portfolios between companies were very heterogeneous, and different baselines of the nutritional quality limited direct comparisons of the magnitude of companies’ commitments.

e) The data sourced for the BIA-Obesity Malaysia study were primarily from 2014 to 2017. Some companies may have subsequently implemented new policies or approaches or published new evidence of these activities. Such information would not have been included in this technical report but would be included in the next period of assessment. BIA-Obesity Malaysia serves to benchmark the first assessment findings to monitor future progress through periodic follow up assessments that will track new policies or approaches of companies in population nutrition and health.

DISCLAIMER

The research team believed that the information collected was reliable and extensive using a robust methodology, but cannot guarantee its completeness and accuracy as detailed in the limitations. A point to note is that findings did not address whether commitments were being implemented in practice and the performance warrants further evaluation.

The research team strongly recommends the use of this report be limited to informational purposes only (e.g. discuss about the strengths, acknowledge gaps in commitments and actions to be taken based on recommendations indicated in this report), rather than to be incorporated as a promotional material in a marketing campaign for any commercial intention. The research team does not endorse any product, brand nor company.

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ACKNOWLEDGEMENT

The project is supported by INFORMAS (International Network for Food and Obesity/NCDs Research, Monitoring and Action Support), a global network of public-interest organisations and researchers that seek to monitor and benchmark public and private sector actions to create healthy food environments and reduce obesity and non-communicable diseases (NCDs) globally.

Firstly, this Project was enabled through the country clearance provided by the Economic Planning Unit (EPU), Prime Minister’s Department. Access to industry stakeholders was supported through the Federation of Malaysian Manufacturers Food Manufacturing Group (FMM MAFMAG).

The critical role played by the Business Impact Assessment (BIA) – Obesity Expert Panel in this Project was invaluable. Seven members (six internal and one external) were appointed to the Expert Panel to evaluate evidence and perform the scoring. In addition, government stakeholders who contributed their valuable inputs to improve recommendations in line with government’s direction. For the purposes of anonymity, these experts will remain unnamed.

Special thanks to Ms. Nongnuch Jindarattanporn (International Health Policy Program Foundation, Thailand) for sharing Thailand’s experience and giving valuable inputs to improve methods in data collection and/or revise the BIA-Obesity tool. Lastly, Ms. Ruth Merry Paranjothi Yanok, Ms. Lian Si Yi, and Mr. Ong Gild Rick, were the backbone for this Project covering both administrative and technical support.

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The authors declare none of the interested parties had any role in the study design, data acquisition and analysis, or publication. Please refer to the technical report for full declarations of interest.

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