

The Kenyan and other Nutrient Profiling Models

A comparative study and implications for UPF regulatory policies in Kenya



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KEY FINDINGS

- A considerable share of Kenyan food and beverage products analyzed were **missing information on trans fats (63%), saturated fats (21%), and sodium (20%)**
- The **Kenyan and WHO AFRO NPMs are more stringent but increase regulatory burden** compared to the SA FOPL and PAHO NPMs
- 4% of the Kenyan beverage supply complies with nutrient thresholds for the Kenyan NPM but **contains non-sugar sweeteners (NSS)**, a proportion that is **expected to increase without regulatory action**

POLICY RECOMMENDATIONS

- **Strengthen mandatory nutrition labeling**; until labeling improves, policies based on the Kenyan NPM will need to **assume that products that do not report targeted nutrient or ingredients are non-compliant**
- To lower the regulatory burden, **exempt products from Kenyan NPM if minimally processed**, or absent of added sweeteners, added sodium, or added fats
- To **avoid an increase in non-sugar sweeteners** in the food and beverage supply, **update the Kenyan NPM to restrict NSS for policies beyond marketing**

Like many other African nations and low-middle income countries worldwide, Kenya is experiencing a nutrition transition.¹ **As pre-packaged, energy-dense food and beverage products replace traditional, mostly plant-based diets, non-communicable disease (NCDs) are becoming a growing concern.**² 39% of deaths in Kenya are now attributed to NCDs, up from 27% in 2014.³ At the same time, dietary shifts are contributing to a double burden of malnutrition among individuals or households. Recent studies based in Kenya reported that 19% of adults in a rural setting experienced micronutrient deficiency while being overweight,⁴ while in an urban setting, 43% of mothers who were overweight had children who were stunted.⁵ **Proactive action is thus needed to improve diets and stem the rise in the double burden of malnutrition and NCDs.**

Nutrient profile models (NPM) are a tool used to design policies that discourage production and consumption of ultra-processed products containing nutrients or ingredients of concern. Kenya's Nutrient Profile Model (KNPM), published in July 2025,⁶ was adapted from the World Health Organization Regional Office for Africa (WHO AFRO) NPM.⁷ Whereas the WHO AFRO NPM was designed to establish restrictions on marketing of certain unhealthy products to children, the KNPM is also intended to establish criteria for front-of-package warning labeling to assist consumers in identifying products containing excess total fat, saturated fat, total sugar, and sodium. Products containing non-sugar sweetener (NSS) and trans-fat are currently subject to marketing restrictions only.

This brief will report on how feasibly and comprehensively the KNPM identifies products of concern compared to other NPMs under consideration in the African region.

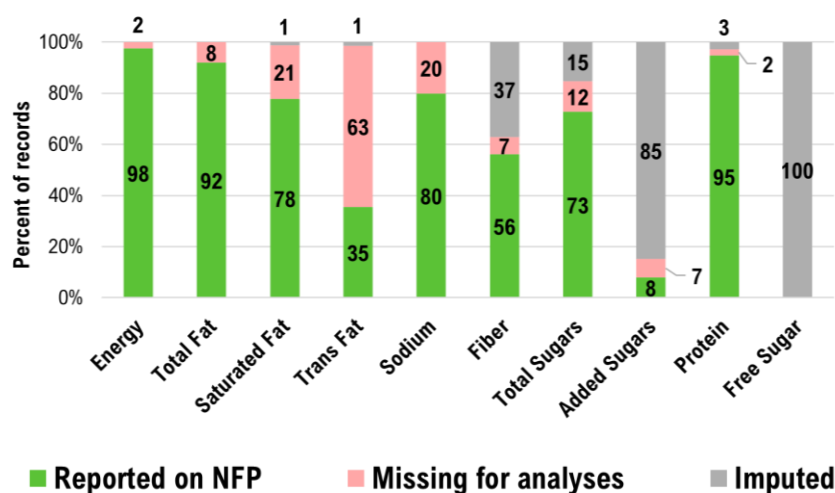


Methodology: Ghana, Kenya, Nigeria, Tanzania and South Africa have all identified nutrition policy priorities that require a NPM to inform practical policy implementation.^{6,8-11} This study applied several NPMs proposed for use to a set of 28,609 total packaged food and beverage products from the five countries between 2020-2023, obtained from the Mintel Global New Product Database. Missing nutrient values were imputed where possible. Records were assessed on nutrition labeling information (**Figure 1**), rates of product exemption and compliance with each NPM (**Figure 2**), and compliance by NSS criteria inclusion (**Figure 3**). The NPMs studied included:

- 1) the Kenyan NPM⁶
- 2) the World Health Organization (WHO) Africa Region NPM (hereafter WHO AFRO)⁷
- 3) the South African NPM for front-of-package labeling, with a free sugar criteria (hereafter SA FOPL)^{8,13}
- 4) the Pan American Health Organization (PAHO) NPM¹²

Brief descriptions of each NPM and their key characteristics are listed in **Table 1**.

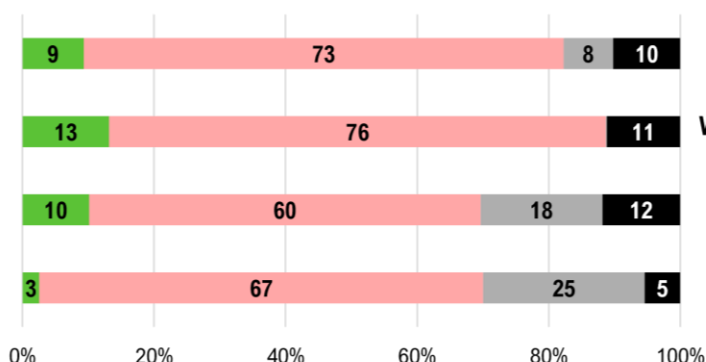
FIGURE 1: AVAILABILITY OF NUTRITION INFORMATION AMONG PRODUCTS IN KENYA



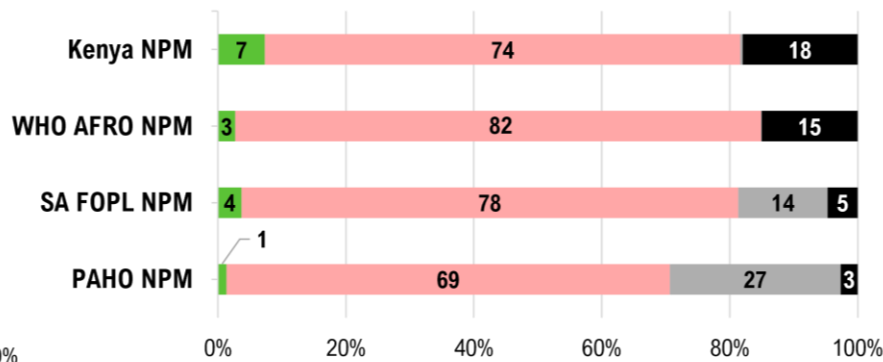
Among the 5 countries studied, Kenya has the largest share of records missing information on trans fats, saturated fats, and sodium. Until mandatory nutrition labeling improves, policies based on the Kenyan NPM will need to assume that products that do not report on targeted nutrient or ingredients do not comply.

FIGURE 2: COMPLIANCE OF KENYAN PRODUCTS BY NPM

a) Foods



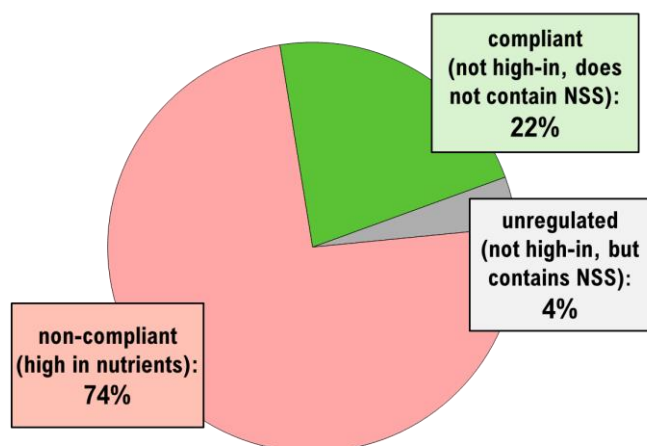
b) Beverages



Legend: ■ compliant ■ non-compliant ■ exempt ■ missing info

The Kenyan and AFRO NPMs are the most stringent NPMs among those considered. To lower the regulatory burden for KEBS, exempt products with certain characteristics (like being minimally processed, not containing any added sugar or other sweeteners, added sodium or added fats) from regulatory policies being developed.

FIGURE 3: NON-SUGAR SWEETENERS AND NPM COMPLIANCE AMONG BEVERAGES



The current Kenyan NPM does not include criteria for regulating non-sugar sweeteners (NSS). As a result, approximately 4% of beverages in the Kenyan market would remain unregulated, despite containing added sweeteners. Evidence from other countries that have implemented front-of-pack labeling policies without simultaneously restricting NSS use shows that such gaps can lead to increased use of non-sugar sweeteners.¹⁴ Therefore, unless the Kenyan NPM is updated to incorporate restrictions for NSS, regulatory policies based on the current model are likely to drive a rise in their use.

Table 1. Key differences between Kenyan NPM and other NPMs

		Kenya NPM ⁶	WHO Afro NPM ⁷	SA FOPL NPM, free sugar criterion ¹³	PAHO NPM ¹²
Year		2025	2019	2021	2016
Inclusion criteria		Applies to all packaged foods and beverages (as consumed)		Applies to all packaged food and beverages (as consumed) with free sugar, added sodium, added saturated fat, or NSS	Applies to all processed and ultra-processed foods and beverages (based on NOVA classification)
Standardized unit of measure		Nutrient per 100g (solids) or 100ml (liquids)			Percentage energy (kCal)
Threshold Approach		Varies according to food group (11 categories, 25 subcategories)	Varies according to food group (18 categories, 10 subcategories)	Threshold applied across-the-board	
Regulated Nutrients	Energy	x	✓	x	x
	Total fat	✓	✓	x	✓
	Saturated fat	✓	✓	✓	✓
	Trans-fat	*	✓	x	✓
	Total sugar	✓	✓	✓	x
	Added sugar	x	✓	x	x
	Free sugar	x	x	x	✓
	Sodium	✓	✓	✓	✓
	NSS	*	✓	✓	✓

† The SA FOPL NPM with the free sugar criterion differs from the current NPM proposed in South Africa's Draft Regulation related to food labelling in that it treats all sugar equally, regardless of source (i.e. sucrose, fruit juice, etc.)¹³

* Restricted in marketing to children but not by other NPM policies (i.e. front-of-package labeling)

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