When the SUN casts a shadow

The human rights risks of multi-stakeholder partnerships: the case of Scaling up Nutrition (SUN)
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The human rights risks of
multi-stakeholder partnerships:
the case of Scaling up Nutrition (SUN)

Laura Michéle, Stefano Prato,
Patti Rundall, Flavio Valente
### Acronyms/Abbreviations

<table>
<thead>
<tr>
<th>Acronym/Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>BMGF</td>
<td>Bill &amp; Melinda Gates Foundation</td>
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<td>BPNI</td>
<td>Breastfeeding Promotion Network of India</td>
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<tr>
<td>CAC</td>
<td>Codex Alimentarius Commission</td>
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<tr>
<td>CEDAW</td>
<td>Convention on the Elimination of All Forms of Discrimination against Women</td>
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<tr>
<td>CESSCR</td>
<td>Committee on Economic, Social and Cultural Rights</td>
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<td>CFS</td>
<td>Committee on World Food Security</td>
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<td>CMAM</td>
<td>Community-based Management of Acute Malnutrition</td>
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<td>COI</td>
<td>Conflict of Interest</td>
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<td>CRC</td>
<td>Convention on the Rights of the Child / Committee on the Rights of the Child</td>
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<td>CSA</td>
<td>Civil Society Alliance</td>
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<td>ECOSOC</td>
<td>UN Economic and Social Council</td>
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<td>ETO</td>
<td>Extraterritorial obligations</td>
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<tr>
<td>FAO</td>
<td>Food and Agriculture Organization</td>
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<td>FENSA</td>
<td>Framework for Engagement with Non-State Actors</td>
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<td>GAIN</td>
<td>Global Alliance for Improved Nutrition</td>
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<td>GAVI</td>
<td>Global Alliance for Vaccines and Immunization</td>
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<td>GC</td>
<td>General Comment</td>
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<td>GR</td>
<td>General Recommendation</td>
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<td>GRI</td>
<td>Global Redesign Initiative</td>
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<td>GSO</td>
<td>Global Social Observatory</td>
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<td>HLTF</td>
<td>High-Level Task Force on the Global Food Security Crisis</td>
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<td>IBFAN</td>
<td>International Baby Food Action Network</td>
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<td>ICN2</td>
<td>Second International Conference on Nutrition</td>
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<td>ICESCR</td>
<td>International Covenant on Economic, Social and Cultural Rights</td>
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<td>IFAD</td>
<td>International Fund for Agricultural Development</td>
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<td>IFPMA</td>
<td>International Federation of Pharmaceutical Manufacturers Association</td>
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<td>IFPRI</td>
<td>International Food Policy Research Institute</td>
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<tr>
<td>IMF</td>
<td>International Monetary Fund</td>
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<td>MNPs</td>
<td>Micronutrient Powders</td>
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<td>MSNCTC</td>
<td>Multi-Sectoral Nutrition Technical Committee</td>
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<td>MSP</td>
<td>Multi-stakeholder Partnership/Platform</td>
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<td>NARO</td>
<td>National Agricultural Research Office</td>
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<td>NCD</td>
<td>Non-communicable disease</td>
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<td>NGO</td>
<td>Non-governmental organization</td>
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<td>OPM</td>
<td>Office of the Prime Minister</td>
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<td>OWC</td>
<td>Operation Wealth Creation</td>
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<td>POLSAN</td>
<td>Guatemala National Policy on Food and Nutrition Security</td>
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<td>PPP</td>
<td>Public-Private Partnership</td>
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<td>REACH</td>
<td>Renewed Efforts Against Child Hunger</td>
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<td>RTAFN</td>
<td>Right to Adequate Food and Nutrition</td>
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<td>RUTF</td>
<td>Ready to Use Therapeutic Foods</td>
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<td>SAM</td>
<td>Severe Acute Malnutrition</td>
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<td>SESAN</td>
<td>Guatemala Secretariat for Food Security and Nutrition</td>
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<td>SBN</td>
<td>SUN Business Network</td>
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<td>SID</td>
<td>Society for International Development</td>
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<td>SINASAN</td>
<td>Guatemala National System for Food and Nutrition Security</td>
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<td>SUN</td>
<td>Scaling Up Nutrition</td>
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<td>SUN CSN SUN</td>
<td>Civil Society Network</td>
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<tr>
<td>TNC</td>
<td>Transnational Corporation</td>
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<td>UN</td>
<td>United Nations</td>
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<td>UNDP</td>
<td>United Nations Development Programme</td>
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<tr>
<td>UNDROP</td>
<td>UN Declaration on the Rights of Peasants and Other People Working in Rural Areas</td>
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<tr>
<td>UFNF</td>
<td>Uganda Food and Nutrition Policy</td>
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<tr>
<td>UNGA</td>
<td>United Nations General Assembly</td>
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<tr>
<td>UNICEF</td>
<td>United Nations Children’s Fund</td>
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<tr>
<td>UNSCN/SCN</td>
<td>United Nations Standing Committee on Nutrition</td>
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<td>USAID</td>
<td>United States Agency for International Development</td>
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<td>WB</td>
<td>World Bank</td>
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<td>WEF</td>
<td>World Economic Forum</td>
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<td>WFP</td>
<td>World Food Programme</td>
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<td>WHA</td>
<td>World Health Assembly</td>
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<td>WHO</td>
<td>World Health Organization</td>
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Executive Summary
The past two decades exposed an increased interest and participation of the private sector, and in particular large transnational corporations, in global policy debates on sustainable development and its many domains. Such stronger corporate engagement has generated, and continues to generate, polarizing perspectives, from the enthusiasm of those that view this as an opportunity for greater policy effectiveness and resource mobilization, to those concerned about corporate capture of the public policy space. Interestingly, this phenomenon has also been accompanied by changes in taxonomy, with the emergence of the term ‘stakeholder’ and increased use of ‘multi-stakeholder’ dialogues, programmes, platforms and partnerships.

Despite scant evidence of their effectiveness, States and United Nations (UN) agencies have been increasingly accepting and actively promoting multi-stakeholder models that provide a conduit for the private sector - including large food and agribusiness - to participate as ‘key stakeholders’ in policy making fora related to food and nutrition.

This study explores how this shift influences public policy spaces; the framing of agendas; the capacity and political will of governmental and intergovernmental institutions (such as the UN) to regulate in the public interest; and people’s ability to claim their human rights, with special but not exclusive reference to the right to adequate food and nutrition (RtAFN). The Scaling-up Nutrition (SUN) initiative was chosen as a prominent example of a multi-stakeholder initiative in the food and nutrition area.

Based on research in two SUN countries (Guatemala and Uganda) and three SUN states (Uttar Pradesh, Maharashtra, and Jharkhand – India), the following five key findings emerged:

- SUN promotes nutrition approaches that favour short-term medicalized and technical solutions, mostly focused on chronic undernutrition, rather than addressing the structural causes of malnutrition in all its forms in a sustainable manner. The risks associated with overweight-obesity and related non-communicable diseases are overlooked and might possibly be increased by such approaches;
- SUN’s so-called ‘nutrition-sensitive’ interventions predominantly promote high-input intensive agriculture, biofortification and genetically-modified crops that primarily benefit the agro-industrial food system and contribute to reducing biodiversity;
- SUN interventions appeared to have limited impact on reducing malnutrition while generating negative consequences on the realization of the RtAFN;
- SUN enhanced private sector influence on policy, while redefining the legal conflict of interest concept to suit the multi-stakeholder model; and
- SUN falsely generated the benign illusion of a broad and inclusive ‘movement’ while failing to include meaningful participation of the most affected communities.

While SUN is not the only force pushing for this technocratic, silver bullet approach to nutrition it has certainly influenced policy trends in this direction. SUN country experiences show no strategy in place for fundamentally re-shaping food systems towards better nutritional, environmental, and social outcomes in line with the RtAFN.

The interventions promoted by SUN not only fall short in addressing the structural causes of malnutrition, but they also create additional dependencies and reduce confidence in local foods, thereby undermining the RtAFN. Finally, and importantly, in the countries reviewed, the initiative has contributed to the (further) institutionalization of private sector influence on public food and nutrition policy making and implementation.

The study also examined SUN’s international structure and way of working from a governance perspective. Contrary to the initiative’s claims of a country-led movement, decision making structures fail to give a strong voice to countries and even less to the communities affected by malnutrition. There are no mechanisms in place to balance powers within SUN, hold anyone accountable when things go wrong, or deal with claims of people affected by SUN-promoted interventions. Moreover, the initiative contributes to an erosion of accountability of governments to people by replacing democratic processes with multi-stakeholder structures.
Building on the study’s results, the last section outlines some policy recommendations for national governments, donors, UN agencies and civil society calling for a shift in direction and alignment of nutrition policy with the right to adequate food and nutrition and a people-centred approach.
Introduction
**Background**

The past two decades have seen an increased interest and participation of the private sector, particularly large transnational corporations, in global policy debates on sustainable development. Such engagement has generated, and continues to generate, polarizing perspectives: some view this as an opportunity for greater policy effectiveness and resource mobilization; others are concerned about corporate capture of the public policy space.

Despite scant evidence of their effectiveness, States and United Nations agencies have been increasingly promoting ‘multi-stakeholder’ models that provide a conduit for the private sector - including the food and agro-industry - to participate as ‘key stakeholders’ in policy making fora related to food and nutrition. The most critical commentators would claim that the corporate sector has successfully managed to shift the dominant narrative on the role of industry in malnutrition: from being considered ‘part of the problem’ to being regarded by many as an essential ‘part of the solution’.

The Global Redesign Initiative (GRI) of the World Economic Forum (WEF) advocates for the multi-stakeholder model, with corporations governing alongside States, the United Nations (UN) and select non-governmental organizations (NGOs), as the new model for global governance.

In the nutrition context, a prominent example of a multi-stakeholder initiative along the lines of the GRI model is the Scaling up Nutrition (SUN) initiative. Launched in 2010 at a high-level meeting of the International Monetary Fund (IMF) and the World Bank (WB), SUN brings together governments, UN agencies, donors, business and civil society in a “collective action to improve nutrition”. To date, 61 countries have subscribed to SUN and the initiative has gained substantial political and financial backing.

**Objectives of the study**

While many agree that SUN has raised the profile of nutrition at global level, it has also provided industries with unprecedented access to the public policy domain while failing to adequately address the issue of conflicts of interest. Large corporations are embedded in SUN’s leadership structure and member countries are strongly encouraged to invite them on to national multi-stakeholder platforms.

Over the years, SUN has carried out several evaluations of its progress, most notably its Independent Comprehensive Evaluation (ICE) in 2015 and a mid-term assessment in 2018. However, to date no truly independent assessment has been conducted of SUN’s wider impact on the political agenda on nutrition, both at national and global level, and its possible effects on public health and on the realization of human rights.

The present research study intends to contribute to filling this gap. It assesses, from a human rights perspective, the implications and possible risks generated by SUN with respect to the advancement of the nutrition agenda and the re-architecture of the governance of nutrition, with a focus on the national level. It thereby draws on country research in Uganda, Guatemala and India. More specifically, the research attempts to:

- Assess the theory (principles, objectives and strategy) and practise (activities, initiatives and claimed results) of SUN and its key members from the perspective of the right to adequate food and nutrition (RtAFN) and related human rights (e.g., the right to health); and
- Assess the potential implications of SUN, as well as the multi-stakeholder model more broadly, on the evolution of policies, programmes and governance related to nutrition at country and international level.
Structure

Chapter One describes the conceptual and analytical framework for the study. Chapter Two provides a general introduction to SUN that looks into the initiative’s membership, structure and ways of working. Chapter Three presents a snapshot of the evolution of global nutrition governance, and the motivations and driving forces that resulted in the creation of SUN. Chapter Four presents the findings from the country research. The Final Chapters (Conclusions and Recommendations) discuss the overall findings of the study and provide recommendations to different actors involved in SUN.

Methodology

Research methods consisted of an extensive literature review, key informant interviews, focus group discussions, and questionnaires. Information concerning SUN’s historic evolution, its structure and way of working, as well as its vision and approach to nutrition was gathered through the review and analysis of SUN’s website and publications; studies and articles written on SUN, including the Independent Comprehensive Evaluation of SUN; documents related to the establishment of SUN; and other relevant literature. The historic section moreover benefited from personal recollections of some of the authors and reviewers, who have participated in the United Nations Standing Committee on Nutrition (UNSCN or SCN) and have been observing SUN since its initial phases.10

Country-specific data was collected in Uganda, Guatemala and India11 between November 2017 and June 2018. Given resource limitations, the comprehensiveness of data collected in the three countries varies.

To complement the information from the country case studies, questionnaires were sent to 150 individuals working in (other) SUN countries. The questions asked about the impact of SUN and its Conflict of Interest (COI) policy on governance at country and global level. This approach was abandoned when it became apparent that, for the most part, people were lifting information straight from the SUN website. A shorter, more pointed questionnaire was used as a follow-up with government personnel, UN staff and others who were interviewed during the World Health Assemblies WHA70 and 71. In some instances it was clear that those directly involved in SUN were reluctant to give frank answers in writing.

For Uganda, besides documentary analysis of key documents, data collection included in-depth interviews with key actors, questionnaires targeting health workers, and focus group discussions with mothers/caregivers of malnourished children. In total 36 interviews were held with representatives from the government (eight main sectors and Office of the Prime Minister), including the SUN focal point, donors, UN agencies, civil society, and private sector. A convenience sample was used based on involvement in the SUN initiative. Interviews were held both in Kampala and at district level, where local government officials as well as health workers were interviewed. The districts of Kasese (engaged with SUN) and Mpiigi (which, at the time of the research, was not yet engaged with SUN) were chosen for comparison purposes, while some complementary data was collected in Moroto and Nakapiripirit district. Questionnaires with open-ended questions were completed by 36 health workers from four health facilities (two private and two public) in Kasese and Mpiigi in addition to the National Referral Nutrition Rehabilitation Unit (“Mwanamugimu Nutrition Unit”). Moreover, one focus group discussion was held with 12 mothers/caregivers of malnourished children in the Mwanamugimu Nutrition Unit. All interviews and focus group discussions were conducted by Barbara Nalubanga12. Finally, the analysis was done by triangulation of data by source and method, in order to validate each other and provide a more robust answer than could have been produced using a single-data source.

For Guatemala, besides documentary analysis of key documents, data collection included semi-structured interviews and guided group discussions with community members. A total of 15 interviews were conducted with key informants at the national level. Interviewees were chosen based on their participation in the national SUN Multi-Stakeholder Platform, and included representatives from the government, civil society, business,
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...donors, and UN agencies. In addition, two guided group discussions were held with a total of 62 members of two communities (mostly women) located in the municipalities of Jalapa and Jocotán, two technical staff from the municipalities of Camotán and Jocotán, and representatives of three civil society organizations that support communities in the selected municipalities. These were complemented by two interviews with technical staff from the respective municipalities. Information from the community level focused on local implementation of SUN interventions, if any. The communities selected had all been targeted by the SUN 1000 Days Window programme, because of a high prevalence of chronic malnutrition as well as their localization within the so-called Dry Corridor. Interviews and focus group discussions were conducted by Maarten Immink and Magali Cano.

For India, a documentary analysis of key documents was carried out. This included published reports, journal articles, public online content from relevant websites, including government agencies, SUN, the Global Alliance for Improved Nutrition (GAIN) and the United Nations Children’s Fund (UNICEF). In addition, information was received from the State Governments of Jharkhand, Maharashtra and Uttar Pradesh following an application made using the Right to Information Act (2005). Data collection in India was carried out by Dr JP Dadhich and Dr Arun Gupta.

Analysis of the data collected in the three countries was done jointly by the local researchers and the authors.

Limitations and challenges

The outcomes of the study need to be contextualized within the following four limitations and challenges.

First, the limited sample both in terms of country case studies and communities within these countries does not allow for generalizations about SUN’s impact at country and community level.

Secondly, the difficulty of establishing the causality between the influence of SUN and the policy trends observed at country level. The question of attribution – what governments do because of SUN and what they would be doing also without SUN – is difficult to ascertain given the multiple factors that have an impact on public decision making. It is further complicated by the opacity surrounding the channels of influence of SUN and its members, many of which are informal, and the fact that interviewees may not be able to speak entirely freely.

An additional layer of complexity in the attribution of impacts relates to the fact that SUN is made up of a myriad of actors for whom SUN is but one vehicle to advance their agenda. They may promote the same agenda through other channels of influence independently of SUN. It is hence difficult to establish what members do in the framework of SUN, and in how far SUN provides them with additional leverage for pursuing their agendas.

Thirdly, the research was more focused on nutrition than initially intended. While the framework for the research was purposely chosen to be broad in scope to capture SUN’s impacts on the RtAFN beyond nutrition, the country data collection primarily focused on policies and interventions within the nutrition domain. In the course of preparing and conducting the country research it became clear that a systematic review of all areas relevant to nutrition and the realization of the RtAFN would not be feasible given the resources available. The country researchers, nevertheless, tried to gather information on impacts beyond the mere nutrition sphere (e.g., agriculture).

Lastly, the high profile of SUN and strong dependency on funding from donors linked to SUN presented a significant barrier in some countries to having an open conversation about concerns related to the initiative. In an effort to counter this constraint, interviewees were assured that information provided by them would be treated with confidentiality, and their anonymity preserved. References to interviewees are therefore general without indication of names, titles, and, where relevant, institutional affiliation.
Chapter 1: Conceptual and Analytical Framework
The analytical framework used in the study for analysing SUN has two components. The first is a four-pillar framework based on the normative content of the right to adequate food and nutrition and States obligations under international law in relation to this human right. This is used to assess the impact of policies and interventions promoted and/or inspired by SUN. The second is a framework for assessing SUN as an institution from a governance perspective. The overarching framework for both is the holistic conceptualization of the right to adequate food and nutrition.

The holistic conceptualization of the right to adequate food and nutrition

The holistic conceptualization of the right to adequate food and nutrition\textsuperscript{19} derives from both established international law and emerging developments in this field that respond to gaps in the international protection of this right (see Box 1.1). In contrast to more narrow interpretations focused on access to food, it embraces the various stages of food systems (from production to consumption) and sheds light on the power relations underpinning violations of the right. At the same time, it emphasizes the interdependence and interrelations with other human rights.

Four dimensions of the holistic conceptualization may be highlighted: (a) the emphasis on the nutritional dimension of the right to food (made explicit by the term right to food and nutrition); (b) the recognition of women’s rights as core to the realization to the RtAFN; (c) the framing of the right within the food sovereignty concept (rather than food security); and (d) the recognition of the extraterritorial reach of State obligations.

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Box 1.1

The human right to adequate food and nutrition in international law

The recognition of the human right to adequate food and nutrition, as other human rights, arises first and foremost from people’s struggles against exploitation, discrimination, hunger and malnutrition. It is from these social struggles that international, regional, and domestic human rights law has emerged, and continues to emerge.

The RtAFN has been officially recognized and legally enshrined by the international community of States in a number of international standards\textsuperscript{20}, including the Universal Declaration of Human Rights (1948),\textsuperscript{21} the International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966)\textsuperscript{22}, the International Covenant on Civil and Political Rights, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979)\textsuperscript{24}, the Convention on the Rights of the Child (CRC, 1989)\textsuperscript{25}, and the Convention on the Rights of Persons with Disabilities (2006).\textsuperscript{26}

In addition, several soft law instruments develop the corpus juris of the right to food under international law and guide States in the discharge of their obligations in relation to this right. These include the FAO Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security (FAO, 2004)\textsuperscript{27}, the Declaration on the Rights of Indigenous Peoples (2007)\textsuperscript{28}, the Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security (CFS, 2012)\textsuperscript{29}, the
Guiding Principles on Extreme Poverty and Human Rights (2012), and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP, 2018). UN human rights treaty bodies’ pronouncements, such as General Recommendation No. 34 on the rights of rural women, and thematic reports and principles developed by UN special rapporteurs present further soft law sources that clarify the content and obligations related to the RtAFN.

At the regional level, the RtAFN has been enshrined in the African Charter on Human and Peoples Rights (1981), the Protocol to the African Charter on Human and People’s Rights on the Rights of Women in Africa (“Maputo Protocol”) (2003), the African Charter on the Rights and Welfare of the Child (1990), and the Additional Protocol to the American Convention on Human Rights in the Area of Economic, Social and Cultural Right (“Protocol of San Salvador”) (1988). Several countries have recognized the RtAFN in their constitutions and national law. Furthermore, diverse judicial bodies around the world have recognized and further developed the understanding and legal obligations entailed under the RtAFN in their jurisprudence.

According to the UN Committee on Economic, Social and Cultural Rights (CESCR), which is charged with the authoritative interpretation and monitoring of the implementation of rights enshrined in the ICESCR, the RtAFN “is realized when every man, woman and child, alone or in community with others, have physical and economic access at all times to adequate food or means for its procurement”. In its General Comment No. 12: The Right to Adequate Food (Art. 11), the Committee describes the normative content of the RtAFN in terms of the dimensions of adequacy (quantity and quality, food safety, cultural adequacy, and sustainability), accessibility (physical and economic) and availability (of food and/or natural resources to feed oneself). It elaborates on State obligations to respect, protect and fulfil the right to food (Box 1.2) and human rights principles of participation, accountability, non-discrimination, transparency, priority of marginalized and disadvantaged groups, and indivisibility of rights for the full realization of the RtAFN. Furthermore, the General Comment elaborates on the social and cultural dimensions of the right.

The official definition and normative content put forward in General Comment No. 12 has served as basis for subsequent elaborations of the normative content of the RtAFN and corresponding State obligations. These continuously clarify and enrich the understanding of the right, taking into account overlooked and emerging causes of malnutrition in its various forms, and unveiling the power dynamics and political economies that underpin violations of the right.
**Food and nutrition: inseparable dimensions of one complex right**

The holistic understanding of the RtAFN overcomes one of the fundamental shortcomings of earlier interpretations of the right: the apparent separation of the right to food from its nutritional dimension.

Nutrition can be defined as the act or process of nourishing or being nourished. Not all types of food lead to nutritional well-being, and people need more than just a mixture of energy and nutrients to reach this state. The nutritional dimension of the right to food transcends the entire food system, and is closely intertwined with other dimensions of the right to food, such as cultural adequacy and sustainability. Food must be produced in ecologically and socially sustainable processes that support nutritionally rich, diverse and culturally-accepted diets.

The nutritional dimension of the RtAFN clearly illustrates the *inseparability of human rights* in that it exposes the interrelations between the right to food, the right to health, the right to water, the right to education, the rights of peasants and their legitimate access to natural resources, the rights of workers, and the broader public good represented by a biodiverse and healthy environment.

Public policies and other measures to promote and improve nutrition must be embedded in broader strategies that advance the right to food in all its dimensions. They must take into account the various forms of malnutrition – undernutrition, overweight and obesity, and micronutrient deficiencies – and address the underlying social, economic, and cultural causes of these in an integrated manner throughout the lifecycle. This requires policies and other measures aimed at reshaping food systems so that these deliver better nutrition, health, social equity, and environmental outcomes. These must go hand in hand with measures in other policy fields that aim to ensure access to public services, in particular basic health care, water and sanitation; decent work conditions and pay; effective social protection (including maternity protection); and, safe and healthy environments. All of these must take into account and be accompanied by measures that specifically seek to eliminate existing social inequalities and discrimination, and advance the rights of population groups most affected by hunger and malnutrition, such as women, children, indigenous peoples, peasants, and agricultural workers.

**Beyond empowerment: women’s rights at the core of the RtAFN**

The evolving holistic interpretation places women’s rights at the heart of the RtAFN. It recognizes violence against women, including sexual violence, as one of the main structural causes of hunger and malnutrition. Such violence not only undermines women’s rights to self-determination and control over their own bodies and lives, it also drives gender-based discrimination throughout the life cycle, including unequal pay, lack of equitable access to productive resources, and limited fruition of public services. The gendered division of labour and depreciation of “women’s work” (reproductive, care, housework) play a central role in the maintenance of unequal power relations and the continued oppression of women. All these factors lead to serious consequences for the nutrition of women. At the same time, gender-based violence is also a key driver of the intergenerational reproduction of poverty and malnutrition, resulting in poor nutritional status of children at birth and throughout their lives. Strategies to advance the RtAFN, including its nutritional dimension, must therefore place a central focus on the realization of women’s rights and the elimination of gender-based discrimination.

**Food sovereignty: a broader framework for the RtAFN**

More recent developments in international law and interpretations of the right to food place the right to food within the broader framework of food sovereignty. Food sovereignty has been defined by peoples’ movements and civil society as: “the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture...”
The food sovereignty concept holds that each sovereign nation has the right to set policies to ensure the food security and nutrition of its people, including the right to the preservation of its traditional productive practices and diets. In addition, this process must take place on an environmentally, economically and socially sustainable basis. The incorporation of the concept of food sovereignty into the RtAFN sheds light on the deepest causes of malnutrition related to self-determination and power relations concerning the access to and control over natural resources, and the way food is produced, exchanged and consumed (food cultures).

The extraterritorial dimension of State obligations under the RtAFN

The recognition that State actions and policies impact the rights of people beyond national borders and hence that their human rights obligations have an extraterritorial dimension is a key component of international human rights law, and holds particular relevance for the right to food and nutrition. International trade and investment rules, transboundary eco- and climate-destruction, as well as natural resource grabbing driven by transnational corporations and economic elites, are examples of policy fields with a strong impact on the RtAFN in other countries. They affect countries’ ecosystems and biodiversity, contribute to shaping food systems and people’s diets and have important implications for small-scale food producers’ livelihoods.

Besides the need to ensure that domestic and international policies and actions do not undermine the RtAFN in another country, States must cooperate with each other towards the realization of the RtAFN. This comprises both the creation of an international environment conducive to the realization of this right, as well as the alignment of international cooperation, including development assistance, with human rights principles and priorities.

State obligations with respect to the RtAFN

The RtAFN, like any other human right, imposes three types of obligations on States: obligations to respect, protect and fulfil. The latter involves both obligations to facilitate and to provide. The obligation to respect the right to adequate food and nutrition requires States to refrain from measures that interfere with existing enjoyment of the right (e.g., taking away land people depend on to produce food). The obligation to protect requires the State to take regulatory and other measures to ensure that non-state actors, such as companies or individuals, do not undermine people’s RtAFN. It includes regulation, monitoring, investigation, sanction, and remedy measures. The obligation to fulfil (facilitate) means that the State must proactively adopt legislative, administrative and other types of measures to enable people to exercise their RtAFN (e.g., public policies that protect and support breastfeeding). Finally, when an individual or group is unable to enjoy the RtAFN by the means at their disposal, States have the obligation to fulfil the right directly (e.g., through social protection programmes), and to establish strategies for them to regain, where possible, their ability to feed themselves.

The obligations of States are not limited to their territory. The Maastricht Principles on the Extraterritorial Obligations of States in the Area of Economic, Social and Cultural Rights summarize the human rights obligations of States towards persons living in other countries.
Extraterritorial obligations (ETOs) require States to ensure their policies and actions do not undermine the enjoyment of the RtAFN in other countries (e.g., through human rights impact assessments and monitoring). Moreover, States must regulate the conduct of private actors, including companies, over which they have control to prevent negative impacts of their activities on the RtAFN in other countries. ETOs also include obligations of international cooperation to fulfil the RtAFN.

Four-pillar framework for assessing nutrition policies and interventions promoted by SUN

Based on the holistic conceptualization of the RtAFN, a four-pillar framework has been developed that outlines public policies and actions that are critical for improving nutrition in the context of States’ obligations under the RtAFN and related human rights. It is against this framework that the potential and actual impacts of public policies and interventions promoted and/or inspired by SUN and its members have been assessed. The assessment took into consideration:

- Nutrition policies and interventions advocated for by SUN and its members;
- Nutrition interventions carried out by influential SUN members; and
- Government policies and programmes carried out with the support of and/or following recommendations of SUN and its members.

The four pillars are inspired, permeated and complemented by cross-cutting human rights principles, such as indivisibility of rights; non-discrimination and prioritization of the rights of marginalized and disadvantaged groups; participation; transparency and accountability; and, the utmost focus on human dignity.

Pillar One: Sustainable and healthy food systems

- Public policies, legislations, programmes and spending contribute to protecting and promoting diversified, agro-ecological, local food systems centred on the pivotal role of small-scale food producers;
- Imports and foreign direct investment in the production and distribution of unhealthy food products are regulated with the view to protect people’s health, small-scale food producers, local markets and traditional diets;
- Adequate food safety regulations are in place, differentiating between different modes and scale of production and commercialization;
- Public regulations ensure the protection and enhancement of biodiversity and provide incentives for food production, transformation and commercialization processes that are rooted in truly ecological practices;
- State policies promote those territorial markets that ensure availability of diversified and fresh food produced, where possible, by local small-scale producers; and,
- Measures are in place to foster collective management of food systems (see Pillar Four).
Pillar Two: Underlying conditions determining access to nutritious and healthy diets

› Price, welfare schemes and other regulations are in place to guarantee people’s access to diverse and nutritious food (including breastmilk substitutes for infants who cannot be breastfed);
› Policies and other measures effectively protect and promote people’s, and particularly women’s, access to and control over natural resources (land, seeds, water, forests) guaranteeing the conditions for them to grow or collect their own food and, where relevant, sell excess to local markets for additional income;
› Policies and regulations foster decent employment opportunities and ensure the rights of all workers (including living wages and safe, secure and healthy working conditions), while promoting de facto equality of opportunities between individuals of all genders and countering inequalities and discrimination;
› Social protection schemes (including temporary emergency measures) guarantee a decent standard of living for all, including the ability to access a diversified, nutritious, safe and culturally adequate diet. Such measures respect the autonomy and are sensitive to the (cultural, personal) preferences of individuals and communities, and seek to restore or build, where possible, their capacities to sustain themselves;
› Medical interventions are accompanied by safeguards that ensure the appropriateness of treatment and all necessary care that is required for sustained rehabilitation and the prevention of recurrence; and,
› Policy and other public measures are in place to protect and promote women’s right to make informed decisions about infant and young child feeding, while also protecting, promoting and supporting breastfeeding (early and exclusive until completed 6 months and continued with adequate and safe complementary feeding up to two years and beyond).

Pillar Three: Enabling environment for self-determined, healthy and sustainable food choices, consumption, and nutritional well-being

› The marketing of unhealthy food and beverages (esp. to children and parents), as well as of breastmilk substitutes, foods and other products marketed for infants, young children, pregnant and nursing women is firmly and adequately regulated;
› Selective fiscal policies ensure that healthy, locally produced food is more affordable, while less healthy processed food is rendered relatively more expensive (e.g. subsidies at production and/or consumption level, taxes of unhealthy food products, price ceilings);
› Objective and sound consumer information (strict controls on labelling and claims, controls on the funding and commercialization of education, etc.) and adequate measures to protect and encourage the exercise of positive local food cultures (incl. breastfeeding and complementary feeding with family foods) are implemented;
› Measures to ensure healthy environments (incl. access to sufficient and affordable water and sanitation) are in place;
› Working women, including within the informal sector, benefit of adequate maternity protection schemes along with measures to ensure access to basic adequate health care services, including skilled counselling, free from commercial influence, for pregnant, lactating mothers, father and close family;
› Policies and programmes are in place to promote gender-equitable division of responsibilities related to food and nutritional care for the children and family, among members of nuclear and extended family, reducing the overburden on women;
› Policies and other measures strengthen women’s autonomy and self-determination over their lives and bodies, tackling unequal power relations and structural violence against women; harmful
socio-cultural gender norms and stereotypes in relation to food consumption; sexual division of labour; and, invisibility and non-valorisation of women’s work;

› Policies and strategies take into account the barriers people may face in taking conscious informed decisions in relation to feeding their offspring and their own food consumption, based on past/present discrimination (incl. on basis of gender) and other factors; and,

› Measures create an enabling environment for parents, families and communities to provide babies and young children, with emphasis on the first 1000 days of life, with adequate, healthy and nutritious diets, adequate care, and a healthy environment, so that their children can, through adequate stimulation, care and love, fully realize the RtAFN, including their related capabilities.

Pillar Four: People-centred nutrition governance

› Groups most affected by malnutrition directly and effectively participate in the determination of public priorities, strategies, policies, legislations, and programmes that directly and indirectly impact nutrition (from local to global level), including the protection and support of optimal infant and young child feeding;

› Policy frameworks clearly distinguish and ensure appropriate roles for different nutrition actors, with robust safeguards to ensure transparency and prevent corporate influence and resulting conflicts of interest in health and nutrition policy setting and implementation; and,

› Governments establish, with the support of academia and civil society organizations, independent monitoring mechanisms of corporate activities, with appropriate accountability procedures for transgressions.

Framework for assessing SUN from a governance perspective

The framework for analysing SUN from a governance perspective has been developed on the basis of the extensive institutional experiences of the authors of the study, supplemented by two recent expert publications on multi-stakeholder partnerships and governance: the report on Multi stakeholder partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda by the High-Level Panel of Experts (HLPE) of the Committee on World Food Security (CFS) and Harris Gleckman’s book Multistakeholder Governance and Democracy: A Global Challenge.

While the authors do not agree with everything said in the HLPE report, the framework for analysing MSPs from a right to adequate food perspective was considered useful for the purpose of the study. The HLPE report explores the potential benefits, limitations, and risks of multi-stakeholder partnerships (MSPs) in the context of the implementation of the Sustainable Development Goals (SDGs). It proposes a set of criteria for assessing the process- and results-based qualities of MSPs from a right to food perspective. The various process-related qualities are strongly interrelated and together determine the democratic value of a MSP.

Gleckman assesses multi-stakeholder groups from a governance perspective, discussing the potential consequences of the shift from multilateral to multi-stakeholder governance for democracy, and possible alternatives. Among others, he outlines and critically examines the beliefs shared by participants and advocates of such groups and the different institutional and decision-making structures that underpin them.

With reference to these two publications, and in particular the qualities criteria proposed by the HLPE report, a set of guiding questions has been developed to assess SUN from a governance perspective. Particular emphasis was thereby placed on questions of inclusiveness (a central claim of SUN and cornerstone of the human rights framework), representation, and accountability.

Main function and underpinning beliefs

› What is SUN’s main function?

› What are the underpinning beliefs held and promoted by the members of SUN? How does SUN describe itself?
Composition and governance structure

› Who initiated SUN?
› Who participates in SUN? What are the criteria for becoming a member?
› Who leads SUN? How and by whom are SUN’s leading members (Lead Group, Network steering groups, etc.) chosen? Which are the criteria for selection?
› Is a distinction made between the nature, roles and responsibilities of different members? Are these clearly defined?
› Do members speak for themselves, or do they represent a broader category of actors?
› How is inclusiveness and representation of groups most affected by malnutrition ensured?

Financing structure

› How is SUN funded?
› What is the share of public vs. private funding?
› Which are the mechanisms to channel resources?
   What is the decision-making process for the allocation of resources?

Process-related qualities

Inclusiveness (participation and decision making)

› Are all the relevant categories of actors included?
› Which decision making structures are in place?
   Who can participate in discussions; how is the final decision taken?
› How is diversity balance ensured? Do the rules and mechanisms in place enable meaningful participation of all and especially of groups most affected? How are they represented in decision making and implementation processes?
› Are there any mechanisms to identify and respond to power asymmetries between participants?
› Is there a system for dispute resolution?

Accountability

› What are the effective obligations SUN members hold towards each other (internal)? What are the obligations they hold towards communities affected by malnutrition (external)?
› Is there an effective system for determining who is accountable when things go wrong?
› Is there a system for preventing corporations from using the humanitarian message as a cover for harmful marketing?

Transparency

› Is there clear information on processes, decisions, funding, actions, and outcomes of SUN?
› Is such accessible for people outside SUN, especially those who are affected by the initiative’s actions (i.e., supposed beneficiaries)?

Reflexivity

› To what extent is SUN able to learn and adapt? Are there procedures in place to be followed to decide whether or not to shut down the initiative (e.g., should it become clear that it does not fulfil its purpose, or is no longer needed)?

Results-related qualities

(covered by four-pillar framework described above).

Effectiveness

› To what extent does SUN deliver on its stated objectives?

Impact

› Does SUN make a difference with regard to advancing the RtAFN?
› What is SUN’s ‘added value’? Do the benefits outweigh the risks?
Chapter 2: The Scaling Up Nutrition ‘Movement’
This Chapter provides a general introduction to the SUN initiative. It looks at the underpinning beliefs, principles, approach, and vision of the initiative, as well as its composition, governance and financing structure. It examines how decisions within the initiative are taken and disputes among members solved. Finally, it takes a look at its approach to monitoring and evaluation and the accountability mechanisms that exist towards the communities the initiative claims to serve.

**Vision, objectives, and approach**

SUN is a multi-stakeholder initiative that was launched in 2010 during the World Bank and IMF Spring Meetings. Its members include governments, donors, UN agencies, civil society and private sector.

SUN’s stated vision is “a world free from malnutrition in all its forms” by 2030, in which “every child, adolescent, mother and family can realise their right to food and nutrition, reach their full potential and shape sustainable and prosperous societies”. This is to be achieved through collective action in which all ‘stakeholders’ come together in a multi-sectoral approach.

A central element in SUN’s discourse is its self-description as a “movement”. SUN’s stated objectives and description of itself has changed over time. In 2010,
When the SUN casts a shadow

its goal was to “reduce hunger and under-nutrition”, while today, it is to “end malnutrition in all its forms”. Moreover, SUN and even its business community are increasingly using human rights terminology. SUN makes explicit reference to the “right to food and nutrition”. It also now describes itself as being “government-led”.

SUN’s approach is organized around four strategic objectives identified in the SUN Movement Strategy and Roadmap (2016-2020):

1. Expand and sustain an enabling political environment;
2. Prioritize and institutionalize effective actions that contribute to good nutrition;
3. Implement effective actions aligned with Common Results; and,
4. Effectively use, and significantly increase, financial resources for nutrition.

The promotion of collaboration between all actors and the establishment of multi-stakeholder platforms at country level forms the basis of SUN’s strategy. According to SUN’s Theory of Change, this collaboration will lead to behaviour change in the respective actors, the ‘scale-up’ and alignment of actions and resources on nutrition, and ultimately the improvement of nutrition status (see Graphic 2.1). As put by SUN’s ICE: SUN’s leadership and support structures are “all focused on supporting multi-sectoral and multi-stakeholder nutrition platforms at country level, led by government focal points, with country-level support networks that replicate the global ones”.

Composition and governance structure

Leadership

SUN’s policy and strategic direction is determined by its Lead Group which has the “overall responsibility for the Movement’s progress towards achieving its strategic objectives and preserving its unique character”. The Lead Group is composed of high-profile ‘leaders’ in business, the UN, governments, donors and civil society, who are appointed in their personal capacity by the UN Secretary General. Besides their oversight and leadership function, Lead Group members are expected to act as ‘champions’ for the SUN initiative in their spheres of influence. The current Lead Group is chaired by UNICEF. The World Food Programme (WFP) and the International Food Policy Research Institute (IFPRI) are also members of the Lead Group.

Despite SUN’s claim to be government-led, only four of the 27 recently appointed members of the Lead Group represent SUN country governments. Several members represent donors and private foundations. Business sector members currently include Royal DSM, a Dutch-based international chemical company producing micronutrient ingredients for the food and dietary supplements industry, and Java Foods, a Zambian company manufacturing instant fortified cereals and noodles.

This is the first time that private sector is invited to the table to be part of the solution for countries as they scale up (...) Market-based solutions must be part of the overall approach to fight undernutrition.

From civil society, the CEO of Save the Children participates in the Lead Group.

Besides the Lead Group, a central figure in SUN’s “Stewardship Arrangement” is the SUN Coordinator, equally appointed by the UN Secretary General. Currently the position is held by Gerda Verburg from Netherlands, former Chair of the UN Committee on World Food Security (CFS) and Chair of the Agenda Council for Food and Nutrition of the World Economic Forum (WEF). The SUN Coordinator heads the implementation of SUN’s strategy. She leads the SUN Secretariat, participates in the Lead Group and in the Executive Committee (ex officio), and coordinates the initiative’s networks (government focal points, support networks). She acts as representative and high-level advocate for SUN on nutrition and has the role to “promote and preserve the Movement’s core values, principles, and character”. The Coordinator is also responsible for correcting the direction of the initiative should the strategy not be achieving its expected impact.
SUN’s Stewardship Arrangement also includes an Executive Committee,\textsuperscript{75} the members of which are appointed by the Chair of the Lead Group and act on behalf of the Lead Group to oversee the development and implementation of SUN’s strategy.

SUN’s activities are moreover enabled and facilitated by a global secretariat based in Geneva and hosted by the United Nations Office for Project Services. The SUN Secretariat provides support to the Lead Group, SUN countries, and SUN Networks. Key functions include liaising with countries, tracking progress, sharing experiences, and organization of workshops.

**Country membership**

Today, SUN has 61 member countries, most of whom have joined by sending a letter of commitment from a high-level government official to the Coordinator of SUN.\textsuperscript{76} There is no requirement for democratic governmental processes before joining SUN (see Box 4.1). SUN country governments nominate a focal point to convene a national multi-stakeholder platform that brings together actors “from all sectors that are relevant to nutrition”.\textsuperscript{77}

SUN countries raise their own domestic and external resources for their nutrition agenda, while being expected to follow SUN’s ten Principles of Engagement (see Box 2.1). These aim to ensure a common purpose and “mutual accountability” within a multi-stakeholder and multi-sectoral space. Member countries also commit to “ensuring that programmes in all sectors of government are sensitive to nutrition” and to “increasing coverage of proven interventions that improve nutrition during the 1,000 day period between a mother’s pregnancy and her child’s second birthday”.\textsuperscript{78 99}

**SUN Networks**

The different actors engaging in SUN are organized in Networks that are coordinated at the global level by a Network Facilitator who organizes its support in synergy with the SUN Secretariat and with guidance from SUN’s Stewardship Arrangement. There are four Networks: SUN Civil Society Network (SUN CSN), SUN Business Network (SBN), SUN Donor Network, and the UN Network for SUN.

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*Graphic 2.2*  
SUN Networks\textsuperscript{100}
The SUN Civil Society Network supports the establishment and functioning of SUN Civil Society Alliances (CSAs) at country level. It thereby seeks to promote coordination among CSOs and alignment with national action plans. Support is provided with regard to access to funding, capacity building, and cross-learning. CSO members contribute to SUN through implementation, advocacy, and monitoring in relation to nutrition actions. SUN CSO members are also encouraged to engage with businesses, to bring them ‘round the table’, and encourage them to engage positively in the nutrition agenda. Currently, there are alliances in 39 SUN countries, representing over 3,000 organizations, both national and international.

The SUN CSN is composed of the national CSAs, international NGOs, as well as some national CSOs. Membership is open to all civil society organizations who commit to pursuing SUN’s objectives and respecting its Principles of Engagement. Decision making within the Network is exclusive to the Network’s Steering Group with guidance from national CSAs. The Steering Group composition is to reflect the Network’s membership, and guidelines exist regarding regional representation and type of organisation, amongst other criteria. Steering Group members (including Chair and Co-Chair), are selected in their personal capacities. It is expected that their organizations will, as part of their engagement in SUN, cover the costs related to their Steering Group role.

In practice, most members of the Steering Group at the time of writing are linked to international NGOs. The Steering Group is currently chaired by Care Peru and co-chaired by Save the Children UK. The Network’s secretariat is hosted by Save the Children in the UK.

The SUN Business Network – co-convened by GAIN and the World Food Programme (WFP) and supported by a global secretariat based in the UK – aims to engage and support businesses to act, invest and innovate in responsible and sustainable actions and operations to improve nutrition. To date, more than 400 businesses – transnational and national – have joined the SBN (Global and Country Networks). 29 SUN countries have business representatives participating in multi-stakeholder platforms. “SBN’s business members will be reaching a total of 1.3 billion beneficiaries between 2013 and 2020, equivalent to 166 million each year until 2020.”

Membership is open to all companies who commit to comply with SUN’s Principles of Engagement as well as the SUN Business Network’s Principles of Engagement (see below). Moreover applicants must show an interest in the fight against malnutrition and dedicate resources to the implementation of the SBN Principles. When joining the Network, they also agree to disclose any breach of the Principles.

The Donor Network brings together bilateral donors, foundations and development banks, in support of SUN countries. The Network is currently facilitated by Switzerland (SDC), the US (USAID), and Ireland (Irish Aid). At country level, there are donor conveners who “catalyse collective donor support for scaling up nutrition at the country level” and “prioritise and harmonise investments to address identified gaps”.

The UN Network for SUN, established in 2013, comprises the Food and Agriculture Organization (FAO), the International Fund for Agricultural Development (IFAD), UNICEF, WFP and the World Health Organization (WHO). It is responsible for translating and achieving UN nutrition commitments in SUN countries, creating synergies and enhancing complementarity among UN agencies, governments and SUN networks, in order to enable the UN to work more effectively to deliver “nutrition actions at scale, and to achieve value for money and results”. The network also supports national efforts along the key pillars established by the UN Decade of Action on Nutrition (2016-2025).

Financing Structure

The SUN Secretariat is funded by the Bill & Melinda Gates Foundation (BMGF), Canada, the European Union, France, Germany, Ireland, the Netherlands, Norway, the United Kingdom and the United States.

Each SUN Network raises its own resources independently. The SUN Civil Society Network has received
support from the Multi-Partner Trust Fund (MPTF), the BMGF, the Children’s Investment Fund Foundation (CIFF), the UK, Ireland and Germany. Moreover, there are contributions by CSN members through staff time, organizational resources and strategic leadership.\textsuperscript{19}

Since 2017 there is a SUN Movement Pooled Fund. The Pooled Fund, which replaces the former Multi-Partner Trust Fund\textsuperscript{120}, is intended to provide a “last resort, catalytic source of grant funding to support SUN Civil Society Alliance activities at the national and subnational level”. \textsuperscript{121} The 2018-2020 fund is supported by Canada, Germany, Ireland, Norway and Switzerland and currently focuses on: “Strengthened participation by in-country non-state stakeholders (civil society, private sector actors, academics, and journalists, among others) and parliamentarians in national multi-stakeholder platforms to implement scale up nutrition plans”. \textsuperscript{122}

Little information is available on the management of the Pooled Fund. In the case of the MPTF, priorities were set by the Lead Group, while fund allocation decisions were made by a management committee chaired by the SUN Coordinator and composed of fund contributors and participating UN agencies.\textsuperscript{123} The MPTF was channelled through SUN member UN agencies, while “implementing partners” appear to have been largely international NGO members of SUN.\textsuperscript{124}

**Rules of engagement, decision making, and conflict resolution**

SUN is guided by a set of ten Principles of Engagement (PoE) that all members are expected to adhere to (Box 2.1).

> The SUN Movement Principles of Engagement seek to reflect the common purpose, agreed behaviours and mutual accountability that form the basis of the Movement. They provide the foundation for positive collaboration and underline the requirement that those who engage in the Movement avoid behaving and acting in ways that could disempower – or even harm – those the Movement seeks to serve.\textsuperscript{125}

Box 2.1

**SUN’s Principles of Engagement\textsuperscript{126}**

1. **Be Transparent about Intentions and Impact**: All stakeholders will engage in transparent behaviour, and commit to establishing rigorous evaluations of the impacts of collective action and the contributions of individual stakeholders.

2. **Be Inclusive**: The SUN Movement is open to all stakeholders that demonstrate their commitment to its goals. Exclusion should be avoided if at all possible.

3. **Be Rights-Based**: Act in accordance with a commitment to uphold the equity and rights of all women, men and children.

4. **Be Willing to Negotiate**: Stakeholders will seek to resolve divergences in approach or divergent or competing interests whenever they arise.

5. **Be Predictable and Mutually Accountable**: All stakeholders are collectively accountable for their joint commitments; they should follow up on these commitments in a predictable way and be mutually accountable for the commitments being delivered as intended.
6. **Be Cost-Effective**: Stakeholders should be guided by available evidence about policies and actions that have the greatest and most sustainable impact for the least cost.

7. **Be Continuously Communicative**: All stakeholders are committed to the regular sharing of their intentions, actions, experiences and concerns.

8. **Act with Integrity and in an Ethical Manner**: Stakeholders should recognize that both personal and institutional conflicts of interest must be managed with the highest degree of integrity.

9. **Be Mutually Respectful**: Stakeholders make different contributions to the collective effort. Building the trust needed for collaboration requires respect for these differences.

10. **Do No Harm**: All stakeholders are committed to ensuring that all mothers and children everywhere are empowered to realise their right to proper nutrition. Whatever action is being undertaken, the wellbeing of mothers and children at risk of under-nutrition should be the primary consideration.

In addition, there are specific Principles for companies that join SUN. The SBN Principles, in part drawn from the UN Global Compact, include “support and respect [for] the protection of internationally proclaimed human rights”, and “compliance with UN guidance on health and nutrition and the International Code of Marketing of Breastmilk Substitutes and World Health Assembly resolutions related to Maternal, Infant and Young Child Nutrition”.

Applicants of the Global SBN moreover must not engage in the production of armaments, tobacco or pornography. Companies must sign a form to “guarantee” that their company endorses the Principles and will disclose any breach. Besides companies’ own assessments, the SBN has an online “Whistle blower mechanism” through which documented breaches of the SBN Principles can be reported. No information could be found on the SUN websites as to cases in which this mechanism has been used (if at all) and whether companies have been excluded from membership based on breaches.

While the Stewardship Structure is explained on the SUN website, the actual process for decision making within the Lead Group remains unclear, as does the way in which government focal points and SUN Networks are engaged in this.

SUN has no specific mechanism in place to identify and respond to power asymmetries within and between ‘stakeholder’ groups. As for the Lead Group it appears that the balancing of views is ‘taken care of’ by having selected representatives from the various constituencies of SUN around the table.

While the Lead Group “aim[s] to preserve the Movement’s unique country driven character” there is no indication in the ToR or elsewhere of the mechanism through which this is to be put into practice, i.e., how SUN countries are to be involved in decision making beyond the few government representatives listed as members of the Lead Group. Both the SUN Coordinator and the SUN CSN Steering Group are to take decisions with guidance from SUN governments and CSAs (respectively). But also here, it remains unclear how this guidance is to be sought or submitted, and the weight it ultimately has in the decisions taken.
While SUN’s main premise is inclusiveness and collaboration, there are no clear procedures in place for dealing with disagreements and conflicts between and within ‘stakeholder’ groups participating in SUN. Nor does SUN have complaint procedures in place for people outside of the initiative who may be adversely affected by its activities. Instead SUN builds on each ‘stakeholder’s willingness to be inclusive, negotiate, and seek consensus through dialogue, and to act ethically in line with SUN’s PoE and Ethical Framework. In the words of the latter:

Simply put, acting ethically is thus not about following a strict set of rules, but by doing the “right” thing. By behaving in an ethical manner across all engagements in the Movement, the Movement’s integrity will support the achievement of its collective mission and goals.\textsuperscript{133}

Members of SUN Country Networks and Multi-Stakeholder Platforms are equally to be guided by SUN’s Principles of Engagement. Beyond the Principles there is little guidance on the roles and responsibilities of different members in these platforms (except that they are to be convened by government focal points); representation of specific groups within networks (e.g., people’s organizations); decision making procedures; and how to address power imbalances within constituencies and between networks. The SUN CSN has prepared a Working Note on Good Governance that attempts to provide some guidance to national CSAs on governance questions.\textsuperscript{134} The Working Note provides ideas on general principles of good governance, as well as examples of how different SUN CSAs have put these into practice. However, important issues such as how to ensure representation and meaningful participation of people affected by malnutrition, and power balancing between CSOs are only marginally addressed.

**Monitoring, evaluation, and accountability**

SUN’s approach to monitoring and evaluation consists first and foremost of a process of internal self-reflection (Joint-Assessment exercise). SUN members at country level gather on an annual basis to jointly assess progress and challenges, and “identify where support is needed the most for realising joint goals” and “country priorities for the coming year”.\textsuperscript{135} This exercise then informs SUN’s Lead Group and Executive Committee in decisions concerning the support provided to countries for scaling up. Moreover, SUN members participate in the annual SUN Movement Global Gathering in which they reflect on the year’s achievement and plan for the coming year. The Global Gathering is considered SUN’s “flagship moment, uniting the nutrition community in its collective ambition to inspire, engage and invest in ending malnutrition, in all its forms”.\textsuperscript{136}

Based on the Joint-Assessment exercise and information from the Global Nutrition Report\textsuperscript{137}, the SUN Secretariat prepares an Annual Progress Report that “looks at the current state of the global nutrition landscape and examines progress and results in relation to the four strategic objectives of the SUN Movement”.\textsuperscript{138} The Secretariat moreover maintains an Information System which contains quantitative and qualitative data in relation to progress made, country needs and requests based on the Joint Assessments, and information gathered by the Secretariat.

Within the SUN initiative there are different lines of accountability. SUN Lead Group members report to and are accountable to the UN Secretary General. The Group as such has no legal status or binding obligations.\textsuperscript{139} Members act in their personal capacity and have no legal responsibility for the initiative.\textsuperscript{140} The SUN Coordinator equally reports to the UN Secretary General and is accountable to the SUN Lead Group. At the same time, the ToR stipulate that she/he “has primary responsibility to SUN government focal points”.\textsuperscript{141} It is not clear what this means in practice. SUN government focal points are accountable to their governments and to National Multi-Stakeholder Platforms.\textsuperscript{142}

The SUN CSN Steering Group members are accountable to SUN CSN members.\textsuperscript{143} According to the Networks’ ToR “ultimately the network and its secretariat are accountable to the women and children suffering from malnutrition”. It is not clear though how this accountability would be exercised in practice given that the network is not an elected body, nor are there any
mechanisms in place for affected groups to hold the SUN CSN accountable for actions. In practice, CSN members are accountable to their organization’s boards and funders or – in the case of membership-based organizations – their members.\footnote{144}

In addition to the individual lines of accountability of different actors within SUN, a core feature of SUN is the principle of mutual accountability (See Box 2.1, Principle 5). As stated in SUN’s Strategic Objective One:

\begin{quote}
A shared space (multi-stakeholder platforms) at national and local levels paves the way for collective action, where nutrition change agents take joint responsibility for scaling up impact \textit{(emphasis added)}.\footnote{145}
\end{quote}

The Global Nutrition Report is cited as “valuable evidence-based, independent mechanism” through which actions and progress on commitments by SUN members is measured.\footnote{146}

The recent Mid-Term Review of SUN acknowledged:

\begin{quote}
“At present there is a deficit in mutual accountability among the various actors. In practice, SUN members who are significantly dependent on international assistance are more rigorously assessed than are the funding providers.”\footnote{147}
\end{quote}

In SUN’s submission to the online consultation for the HLPE Report on MSPs, the SUN Secretariat refers to SUN as a “movement of [country] multi-stakeholder platforms”\footnote{148}. Beyond describing SUN’s basic global governance structure, all questions concerning the composition, representation, decision making, etc. are responded by referring to country-level multi-stakeholder platforms. The response provided by the Secretariat is that there are wide variations between countries, so no clear-cut answer can be provided. This shows reluctance by SUN to openly reflect on its global governance structure, as well as distance and disassociation from the functioning of the national multi-stakeholder platforms that it so heavily promotes.

When assessing SUN from a governance and human rights perspective it is critical to look at both the overall (global) structure and way of working, and the changes introduced by the initiative at country level. The latter will be done in Chapter 4 that presents the findings from the country case studies.

The above description and analysis of SUN’s global structure and working modalities exposes a number of serious governance concerns. These particularly relate to representation and accountability of the initiative. SUN’s self-description as country and government driven initiative is not reflected in its Lead Group composition and decision making structures, which privilege multilateral institutions, international donors, and large scale business and NGOs able to dedicate resources to the initiative and their participation in it. There are no mechanisms in place to balance power differentials, ensure meaningful participation of groups most affected, or solve disputes that may arise between participants. The combination of significant power asymmetries and consensus orientation inevitable narrows down the responsiveness of the initiative to any alternative views and claims by those most affected. Accountability procedures are extremely weak and internal, leaving those affected by the initiative’s actions with little recourse to influence or hold the initiative/its members accountable for negative impacts.

The following Chapter (Chapter 3) will take a closer look at the motivations and actors surrounding the creation of SUN, as well as the broader political context at the time. This is crucial for understanding better where the initiative comes from and what the driving forces and beliefs behind it are.
Chapter 3: The Evolution of Nutrition Governance and the Emergence of ‘Multi-stakeholderism’
The assessment of SUN needs to be located in the context of the evolution of global nutrition governance, with special attention to the trend towards increased participation of the private sector. The study therefore tried to trace the emergence of the multi-stakeholder model of governance and the active attempts for it to ‘complement’, if not to entirely replace, state centred multilateralism. The analysis focuses on the period from the late 90s/early 2000s until today, and specifically on developments within the UN Standing Committee on Nutrition (SCN) and the Committee on World Food Security (CFS), and their relations with the establishment and development of SUN.

The World Food Summit and the UNSCN reform

The 1996 World Food Summit elicited a promising response by the SCN, in terms of bringing closer the food and nutrition agendas in Rome and Geneva. At that time, SCN’s recently appointed Chair, Sir Richard Jolly, institutionally linked to the United Nations Development Programme (UNDP) and a known nutrition champion within the UN, came in with the mandate to increase the visibility of nutrition in the new millennium. Before his arrival, the SCN had functioned as the coordinating body of UN activities in nutrition, supported by a group of eight distinguished scholars, the Advisory Group in Nutrition. In 1997, the SCN launched a high level commission to elaborate a report on the nutrition challenges of the twenty-first century. Human rights gained more prominence on the SCN’s agenda with its 1999 annual session dedicated to the relevance of the human rights paradigm for the promotion of nutrition, in the context of the elaboration of the UN CESCR General Comment on the Right to Food. Jolly also promoted, with the support of key UN agencies, a major reform in the functioning of the SCN, attributing a much more prominent role to civil society and academia. The SCN annual sessions from 2000 on became effervescent technical and policy fora, with adequate space to debate the different approaches to food and nutrition in all their dimensions, from the methodological to the philosophical ones, providing guidance to governments and UN agencies. Several scientific publications emerged from this vibrant process.

The first ever joint session of the UN Economic and Social Council (ECOSOC) and the SCN was held in New York in June 2005 on “The Critical Role of Nutrition for Reaching the Millennium Development Goals (MDGs)”, ahead of the Millennium+5 UN General Assembly (UNGA). At the meeting, it was agreed that income poverty reduction and increased food production alone will not solve the nutrition problems of the poor in developing countries. Further, it was reaffirmed that achieving the MDGs means implementing rights, including the right to adequate food.

The 1995-2005 period had, however, also grappled with some very challenging governance issues. One such polemical issue was related to the participation of representatives of private sector-related organizations in the SCN process and governance. Some SCN participants argued that private sector organizations and/or their surrogates, such as the Nestlé Foundation or groups representing private sector interests and agendas, should not be present in SCN’s institutional mechanisms. They reasoned that this could create unacceptable risks of undue influence. On the opposite side, some developed countries, represented by their development agencies and backed by UN organizations (especially the WB, WFP and, as of 2001, also UNICEF), held a view that private sector organizations should participate as members of the NGO constituency. There were also a few participants who proposed that private sector actors should become a constituency of their own, in addition to the three existing constituencies (UN, bilateral donors, NGOs), while others had no clear position on the issue.

The NGO group opposed, in repeated consultations, the participation of private sector-related organizations in the NGO constituency. In 2004, the SCN Steering Committee instituted a working group to discuss and elaborate a policy proposal for engagement with the private sector. At the 2006 annual session, all three constituencies agreed to accept the Draft Private Sector Engagement Policy as an interim document, pending future discussions. This policy, with minor revisions in June 2006, is directly linked to the future downfall of SCN.
Historically, the incursions of the private sector in food and nutrition governance date back to the early 70’s and grew hand in hand with the budgetary cuts imposed on the UN by its main donors, notably the United States and the United Kingdom, in the context of the strengthening of the neoliberal globalization process. The lack of funding placed many UN organizations in an increasingly vulnerable position and, in the absence of public interest safeguards, made the offers of private funding for their activities hard to resist. Yet, most venture philanthropists, such as BMGF, demand seats on the boards, set performance goals and plan exit strategies in case expectations are not met.  

Research by Richter and others gives details on how the UN became progressively captive of transnational corporations (TNCs) and dependent on venture philanthropy under the former UN Secretaries-General Boutros Boutros-Ghali and Kofi Annan, and WHO Director Gro Harlem Brundtland. In July 1999, the year that culminated with the historical demonstrations against the World Trade Organization in Seattle, Kofi Annan and the President of the International Chamber of Commerce, announced the establishment of the Global Compact, prior to its official launch at a high-level UN event in July 2000.

Many civil society organizations manifested their discontent with the opening up of the UN to formal partnerships with private companies, particularly as well-known abusers of human rights were allowed to become partners of the Global Compact. After careful analysis, Richter concludes that the Global Compact has been used by corporations both as a blue washing instrument and to gain greater political influence on decision makers and in policy processes.

One concrete step in applying this neoliberal model to health and nutrition was the launch of the Global Alliance for Vaccines and Immunization (GAVI) at the WEF in 2000. A public-private partnership between the BMGF, UNICEF, WHO, the WB, the International Federation of Pharmaceutical Manufacturers Association (IFPMA), and some national governments, the initiative clearly increased private sector influence in vaccine governance.

Two years later, in 2002, the Global Alliance for Improved Nutrition (GAIN) was launched by UNICEF, the BMGF (a major funder), Procter & Gamble, and the President of Zambia at the UNGA Special Session on Children. The main aim of this “alliance of public and private sector partners” was to lobby governments and the UN to “leverage cost-effective food fortification initiatives” to achieve child wellbeing.

These initial events were followed by a total turn-around of the stakeholder discourse. Originally, the term had been created to argue that corporations should take into account not only their fiduciary duty to ‘shareholders’, but also the effect of their operations on a broader array of actors, the ‘stakeholders.’ In 2000, Kofi Annan defined stakeholders as: “those individuals and groups that have an interest, or take an interest, in the behaviour of a company (...) and who therefore establish what the social responsibility of a company entails.” However, two years later, in the run-up to the 2002 World Summit on Sustainable Development, a Novartis-funded publication redefined the term as: “those who have an interest in a particular decision, either as individuals or as representatives of a group. This includes people who influence a decision, or can influence it, as well as those affected by it.”

How to raise the political profile of nutrition?

While these developments were taking place, criticism grew stronger with regards to the apparent inability of SCN constituencies to reach consensus and have a common and clear message to governments, funders and the public on what must be done to overcome hunger and malnutrition. Some proposed that the NGO constituency should become more pragmatic and present clear pathways for implementation, while others argued that food and nutrition demanded trans-disciplinary approaches and that simplifying the issue would lead to more failed initiatives. In reality, the debate had
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deeper political roots: it was between adopting a comprehensive trans-disciplinary approach or a selective ‘either/or’ policy, with the latter aimed at de-linking nutrition from the structural determinants of poverty and malnutrition and emphasizing the urgency of medical and product-based interventions. At the same time, the presentation of four country case studies, at the 2005 SCN annual session in Brazil, demonstrated the viability of adopting food and nutrition strategies organically imbedded in the overall country development policy framework.169

The language of ‘scaling up’ interventions had been coming up regularly in SCN debates since the mid-2000s, initially with the Ending Child Hunger Initiative (ECHUI, then renamed REACH - Renewed Efforts Against Child Hunger), which was jointly supported by the heads of FAO, UNICEF, WHO and WFP. It then appeared throughout a set of interventions to address undernutrition consolidated and budgeted by the World Bank and its allies, originally under the name of GAP (Global Action Plan).170 The GAP initiative was the precursor of what was proposed as “evidence-based approach” in The Lancet Nutrition series171 and would later be known as Scaling Up Nutrition - SUN. The GAP was proposed to SCN, but the initiative did not manage to obtain the consensus of SCN constituencies. In particular, the NGO sector expressed strong criticism on the following grounds:

- Prioritization of the first 1000 days, from conception to two years of age, without embedding these in broader socioeconomic and public health interventions tackling key socioeconomic determinants;
- The bulk of the budget for implementation of the proposed action plan was allotted to product-based supplementation, targeting children with acute malnutrition; and
- Exclusive focus on undernutrition and lack of adequate attention to other nutritional disorders.

The prioritization of the 1000 days had originally been described in SCN’s 2020 Commission Report,172 in which it was clearly contextualized within a person’s life cycle and with consideration of the social, economic, political and cultural determinants of malnutrition. This perspective, however, had been surgically removed from the GAP (and, later, SUN).

A political shift of gears in the UNSCN

As earlier mentioned, one of the contentious issues in the SCN debates was the participation of the private sector in the SCN. The interim Draft Private Sector Engagement Policy was never implemented. Instead, in 2006, Ann Veneman – at that time Executive Director of UNICEF (2005-2010) – took on the chairpersonship of the SCN and brought major structural changes to its work. It is worth noting that, prior to being selected by US President George W. Bush to lead UNICEF, Veneman was one of the negotiators of the North American Free Trade Agreement (NAFTA).173 She also worked for Calgene, the first company to register a genetically modified seed, and was secretary of the US Department of Agriculture (USDA). In 2011, Veneman became a member of Nestlé’s Board of Directors.174

Veneman was a strong advocate of private sector involvement in nutrition and in the SCN, particularly in the context of product-based interventions, such as Ready to Use Therapeutic Foods (RUTFs).175 Such interventions faced criticisms within the SCN, in particular from the Breastfeeding and Human Rights and Ethics groups, especially when promoted as treatment for moderate malnutrition. The Veneman period also marked the increased involvement of the BMGF in nutrition. In 2007, the BMGF took the step of deciding to fund The Lancet series on Maternal and Child Nutrition, with the objective of setting the nutrition agenda for the future. The process towards elaborating the series further strengthened the schism in the SCN community. The content was seen by many nutritionists as partial, and the exclusion of the socio-economic determinants-based public health interventions framework, was heavily criticized.176

The Lancet series suggested that the international nutrition governance system (mainly the SCN) was broken, lacking leadership, resources, and a clear and consistent message. Based on this conclusion, Veneman, with the support of the BMGF, carried out an external evaluation.
of the SCN. The results of this evaluation, led by Tufts University and carried out without prior discussion with the full Steering Committee, were briefly presented at the plenary of the 2008 SCN annual session in Hanoi, Vietnam, under the protest of different SCN constituencies.\textsuperscript{177}

Following the outcomes of the evaluation, support to the SCN, which had already been discontinued by the WB and WFP, was also ended by UNICEF. Faced with the impossibility of reaching consensus on the GAP and the participation of the private sector, the US, the intergovernmental organizations under the US sphere of influence (e.g. UNICEF, WFP, WB and IMF), and the private sector foundations (BMGF and UN Foundation) had all decided to discontinue their support to the SCN, leading to its deactivation.\textsuperscript{178}

The last SCN annual session took place in March 2008, in the midst of the food price volatility crisis of 2007-08. Contraditorily, less than a month later, the UN Secretary General established a High-Level Task Force on the Global Food Security Crisis (HLTF)\textsuperscript{179} to tackle the grave situation.\textsuperscript{180} Food riots erupted in more than 30 countries, with serious political implications, including the unleashing of the so-called Arab Spring. One month later the G8 launched a PPP initiative called Global Partnership for Agriculture and Food Security,\textsuperscript{181} with a strong participation of the corporate sector.

The food crisis eventually reaffirmed the need for inter-governmental food and nutrition security policy spaces. The CFS, for instance, was reformed (2008/09) and its mandate strengthened.\textsuperscript{182} The FAO’s reform highlighted the need to strengthen the links between agriculture, food and nutrition.\textsuperscript{183} The SCN, however, was silenced and left dormant, its lively annual sessions and working groups clamped down.

The rise of SUN and its search for an institutional home

The initial World Bank proposal for scaling up nutrition under the name of GAP was reworked into a new proposal: the Scaling up Nutrition Initiative with its SUN Road Map.\textsuperscript{184} Described in its early days as “a sound, principled, people-private-public partnership[s] that empower[s] societies for optimal nutrition”, SUN’s main premise, as with GAP, was that technical (apolitical) interventions of global consensus should be focused on in order to galvanize donor funding for nutrition. This stood in direct contrast to the holistic 2008 SCN plenary recommendations on accelerating the reduction of maternal and child undernutrition, which contemplated the need for both emergency action and long-term structural interventions,\textsuperscript{186} but were disregarded when the SCN’s work was curtailed. Notably, SUN was supported by the same international organizations and funds that had withdrawn their support to the SCN (such as the WB, UNICEF and WFP); and it came to occupy the vacuum left by the SCN. The downscaling of the SCN had also brought civil society and social movements to redirect attention to the spaces where food security policies were being actively discussed and decided, such as the HLTF and the CFS. However, these spaces tended to view nutrition as a technical issue and placed it, once again, at a second level of relevance.

Already in 2011, SUN had become more institutionalized, with a coordinator, a small secretariat and multiple constituencies (civil society, donors, UN agencies and the private sector), that were supposed to collaborate in the support of country-led, multi-sectoral strategies to combat undernutrition.\textsuperscript{187} In 2012, a Lead Group was instituted at the annual SUN Movement Global Gathering. The following quotes from David Nabarro, Coordinator of SUN at the time, expose SUN’s attempt to take the lead in reshaping the global nutrition agenda by silencing opposing voices:

\begin{quote}
The big challenge is how to converge and energize actions for nutrition without precipitating discord. We cannot have discord, there is too much at stake. We need to ensure that the technical support comes together at all levels, and everybody in this room knows how hard that is to do. We need to provide a clear, tangible, open and credible institutional framework within which action is taken forward. If the donors are going to come up with significant additional resources, they need to believe that we have something that is credible and is not going to fall apart within a few weeks or months.\textsuperscript{188}
\end{quote}
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And by seeking a formal institutional home that could legitimize its existence:

After the end of September 2010, it was clear that we needed to do something, but there was discussion about whether or not having a transition team that was not anchored in some kind of global institution was legitimate. Then, it was clear we needed to link together the UNSCN secretariat and a number of other stakeholders in order to make sure that we had a way of moving forward. But we put a very tight time limit on it. At the end of June 2011, we have to find an institutional home for the SUN work.\(^{189}\)

But SUN did not find this home in the SCN and has continued to navigate the orbit of the UN Secretary General until today, after the formal establishment, in 2012, of the secretariat of SUN under the Secretary General’s auspices.\(^{190}\) Along the same line, the present coordinator of the SUN initiative, Gerda Verburg, enjoys the rank of UN Assistant Secretary General.

The private sector sneaks in through the CFS and WHO reform

Following its 2009 Reform, the CFS had incorporated the formal participation of the private sector through a Private Sector Mechanism.\(^{191}\) The World Health Organization (WHO) Reform, which started in 2010, established a new framework for engagement with external actors that lumped together, as Non-State Actors (NSA), the private sector, non-governmental organizations, academia and philanthropic foundations.\(^{192}\) This represented the acceptance of the active participation of the private sector in WHO public policy discussion and deliberation, in equal standing with civil society organizations. GAIN and BMGF were among the first to be accepted in 2016 into “official relations status” with WHO under this new framework. During the accreditation process, GAIN’s role as a front organization for the interests of its private sector constituency – consisting of close to 150 Transnational Corporations – was pointed out. Two weeks before the decision was to be taken, GAIN simply transferred its business platform to SUN’s Business Network, which it co-facilitates.

Despite the discomfort of several WHO Member States, GAIN’s hastily revised application was accepted.

Reclaiming the nutrition agenda: ICN2 and new calls on CFS and SCN

During the Second International Conference on Nutrition (ICN2), held in Rome in November 2014, an internal UN memo was leaked. In anticipation of the launch of the “UN Nutrition SUN Network Secretariat” to be hosted by WFP, the heads of the concerned UN agencies requested the formal closure of the SCN, without any formal consultation with the ECOSOC. This appeared to be the last attempt of SUN to find an institutional home. The closure of the SCN could be halted, avoiding the total hegemony of SUN within the UN process related to nutrition. While the SUN UN Nutrition Network established its secretariat within the WFP, it had to recognize the role of the SCN.

The fears that many felt over the possible consequences of SUN’s takeover of the nutrition agenda were clearly formulated already in 2010 by a nutrition professor:

I assume the vast majority of the 7$ billion that (it) budgets for therapy, including moderate malnutrition, will go for Plumpy’Nut type products. The SUN document is thus moving nutrition into the realms of vaccination and oral rehydration, wherein most of the money can be spent on products instead of salaries, which nearly all donors are uncomfortable with. I suspect this is a major reason for the new donor attention it is inspiring. Maybe robots could be manufactured locally to deliver it, further reducing that pesky need for capacity building.\(^{193}\)

Civil society, in its declaration to the ICN2, proposed the CFS as the overarching intergovernmental policy space to harmonize and coordinate food and nutrition policies.\(^{194}\) They suggested that WHO and FAO governing bodies coordinate the normative, regulatory and standards setting initiatives for food and nutrition. As CFS gained importance in international nutrition governance, there was an immediate attempt to increase SUN’s visibility and role in the CFS.\(^{195}\) The first draft of a
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When the SUN casts a shadow, prepared by the CFS secretariat in early 2015, was clearly influenced by this and focused to a large extent on how the CFS could strengthen SUN. In her farewell speech at the 2015 CFS Plenary Session, Gerda Verburg, at that time chair of CFS as well as Chair of the Global Agenda Council for Food and Nutrition Security of the WEF, openly acknowledged and thanked the BMGF for funding her personal assistant and supporting the work of the CFS on nutrition.

In January 2015, the UNSCN secretariat was transferred from WHO to FAO headquarters. The survival of SCN should have helped achieve balance in the international and national food and nutrition agenda. Prior to 2008, the SCN coordinator had enjoyed equal standing with the directors of the nutrition divisions of the major UN agencies. Now, however, SCN had to report to FAO’s Nutrition Division (later renamed Nutrition and Food Systems Division). A year later, in March 2016, UN Secretary General Ban Ki-moon announced the nomination of Gerda Verburg as the new coordinator of the SUN Movement.

In conclusion, the recent evolution of global nutrition governance confirms the unfolding dynamics, well-articulated within WEF’s Global Redesign Initiative, of progressively transferring governance of “conflicted policy areas” from multilateral intergovernmental spaces to multi-stakeholder ones, which are strongly influenced, if not led by private sector agendas and interests. Many would argue that this places market interests over human rights and exposes marked deficits of public participation and democratic accountability, given the active exclusion of dissenting voices and the bypassing of existing intergovernmental food and nutrition policy spaces, such as the CFS, the World Health Assembly and the FAO Conference.

Chapter 3
Chapter 4: SUN’s Influence on Nutrition Policy at Country Level: The Cases of Uganda, Guatemala and India
This Chapter presents the key findings that emerged from the assessment of SUN’s influence on nutrition policies, strategies and governance in selected SUN countries and states, namely, Uganda, Guatemala and India (Uttar Pradesh, Maharashtra and Jharkhand). The findings are based on observed changes in the countries/states since they joined SUN and the perceived influence of SUN and its members in these. They must be read in light of the limitations and challenges laid out in the Introduction.

SUN has without doubt raised the profile of nutrition, not only at global but also at national level in situations where it had been low on the government agenda. Among the countries reviewed, this has certainly been the case for Uganda. It may also be said that it has in such cases opened up spaces for discussing nutrition that may not have been there before and which may remain the only spaces for civil society to engage in nutrition policy discussions. This is a positive contribution. At the same time, human rights scrutiny requires a deeper look into the type of actions and agendas promoted under the umbrella of tackling malnutrition and the (potential) impacts these have in terms of advancing the right to food and related rights. It also requires a critical assessment of the spaces for participation that have been created, including who participates and under what conditions. This is what this Chapter intends to do.

The Chapter will first provide some general information about SUN in the countries reviewed, including the alignment and commitment to SUN. It will then present the five key findings that emerged from the research.

**SUN in Uganda**

“On 17 March 2011, the Republic of Uganda joined the SUN Movement with a letter of commitment from the Chairperson of the National Planning Authority, Kisamba – Mugerwa. At the time, Uganda was improving its Action Plan for Nutrition by incorporating lessons learned during the conference organized by IFPRI on the use of agriculture to improve nutrition and health.”

Nutrition interventions in the country are coordinated by the Office of the Prime Minister. Eight government sectors/ministries are involved: Public Service; Agriculture, Animal Industries & Fisheries; Health; Education & Sports; Trade and Cooperatives; Gender, Labour & Social Development; Local Government; and Finance, Planning & Economic Development. Membership of the SUN Multi-Stakeholder Platform involves the above mentioned government sectors, academia, UN agencies, the private sector, and civil society.

Uganda affiliated itself to SUN in 2011. The National Planning Authority spearheaded the development of the Uganda Nutrition Action Plan 2011-2016 (UNAP) in alignment with SUN’s framework and strategy. The coordination of the different sectors in the implementation of the UNAP was placed under the Office of the...
Prime Minister (OPM). More recently, the OPM initiated the process to review and update the Uganda Food and Nutrition Policy (2003) into a new policy, the Uganda Food and Nutrition Security Policy (draft FNS Policy, 2017). The draft FNS Policy is aligned to several international commitments, including the ICN2 outcomes (Rome Declaration) and the SUN framework. There is also a process underway to develop the second Uganda Nutrition Action Plan 2018-2025 (UNAP 2).

According to government officials, SUN’s framework was adopted because it was considered comprehensive and had all the requisite planning, implementation, monitoring and evaluation, as well as accountability tools in place. SUN members, such as UNICEF, Nutrition International (formerly Micronutrient Initiative), and USAID, have been actively involved in the development and funding of nutrition related policy documents.

The alignment of Uganda’s nutrition policy and action plan to SUN is not surprising in a context where the entire national nutrition budget – apart from government salaries – comes from donors who promote SUN. The strong influence of international donors created by this financial dependency has become institutionalized with the establishment of the Development Partner Nutrition Coordination Committee under UNAP, which provides policy guidance on the “alignment of nutrition programmes to the global and regional nutrition agenda”.

There have been expectations by the Ugandan Government that funding would come in through SUN for a policy area (nutrition) that has been chronically underfunded. However, such funding has not materialized. Most interventions to tackle malnutrition promoted by SUN (see Key Finding 1) are implemented through SUN members’ own structures without channelling funds through the Government. In essence the Government plays a facilitator role for nutrition actions in the country, as illustrated by the overarching goal of the draft FNS Policy: “strengthen an enabling environment for all actors to develop and implement programs that eliminate malnutrition in Uganda”.

This overarching goal resembles SUN’s strategic objective number one: “expand and sustain an enabling political environment”.

Whereas there is strong buy-in on the part of the OPM, scepticism has been voiced by sectoral ministries (e.g., agriculture and health) about the ability of SUN’s approach to make an impact on nutrition in the country. Concerns relate in particular to the technical nature and lack of sustainability of the interventions promoted. These are considered to be expensive and mostly implemented outside established structures, thereby introducing dependency on donor priorities and funding.
When Guatemala joined SUN in 2010, the country already had a comprehensive normative, policy and institutional structure in place to address malnutrition. Interventions to address chronic malnutrition date back to 2005 with the adoption of the National Policy on Food and Nutrition Security (PSAN), based on Article Two of the Guatemalan Constitution, and the legal establishment of a national food and nutrition security system (SINASAN law). In 2011, the project País en el marco de SUN (Country in the framework of SUN) was elaborated. In this context, in 2012, the Pacto Hambre Cero (Zero Hunger Pact) was signed and the Ventana de los Mil Dias (1000 Days Window) declared a national interest by Governmental Accord 235-2012.

While the 1000 Days Window strategy has been adopted in the context of the country’s affiliation to SUN, measures contained under the strategy had already been defined and implemented prior to the country’s membership in SUN. This was echoed by communities who reported that social programmes had not changed in recent years. Therefore, while Guatemala explicitly adopted SUN’s strategy (under the 1000 Days Window), this did not lead to the introduction of new interventions. It did however reinforce the focus on the interventions contained under the 1000 Days Window to the detriment of interventions that address the structural causes of malnutrition and those targeted to other age groups (see Key Finding 1).

While Guatemala’s President Jimmy Morales was a member of SUN’s international Lead Group until September 2019, this high-level commitment was not shared by all government institutions. According to an interviewee, the Secretariat for Food Security and Nutrition (SESAN), the national coordinating body for food security and nutrition, under its current leadership shows little interest in the SUN strategy. The last few years the strategy per se has brought in no additional resources that SESAN can control. Moreover, the SUN platform is considered a parallel and therefore duplicative structure of the SINASAN (see Key Finding 4).
Presently, India as a country is not part of the SUN initiative. However, at the time of research, three Indian states had joined SUN: Maharashtra, Uttar Pradesh and Jharkhand. Maharashtra joined SUN on July 24, 2013 with a commitment letter by Vandana Krishna, Director General of the Rajmata Jijau Mother-Child Health and Nutrition Mission (RJMCHN Mission). Uttar Pradesh joined SUN on May 12, 2016 with a commitment letter by Chief Secretary Alok Ranjan. Jharkhand joined SUN on 7 September 2016 with a commitment letter by the Director General of the Jharkhand State Nutrition Mission, Ms. Mridula Sinha. On January 15, 2019, a fourth Indian State, Madhya Pradesh, joined.

SUN regularly engages with government agencies, civil society and other nutrition actors, either directly or through partners such as the Emergency Nutrition Network (ENN).

In India, the affiliation of Uttar Pradesh, Maharashtra and Jharkhand to SUN in 2013 and 2016 does not appear to have had much influence on the policy making and priorities on nutrition in these states (see Key Finding 1).

Waking up in a SUN Country

The case of India illustrates the lack of transparency and corresponding democratic decision making when countries join SUN. Based on information provided by the three state nutrition missions in response to Right to Information queries, there are no files in the government records pertaining to the important decision of each of these states to join the SUN initiative, nor was any memorandum of understanding between the respective states and the SUN secretariat signed. From the available information it appears that no political clearance for this international collaboration was granted.

As seems to be the general practice with countries joining SUN, in the three Indian states there was no attempt to debate the question of joining SUN in any democratic way, in state government, Parliament, state assemblies or other fora. The decisions were taken based on a commitment letter between a State official and a SUN representative.
Key Finding 1: SUN promotes nutrition approaches favouring short-term medicalized and technical solutions, mostly focused on micronutrient deficiencies, rather than addressing the structural causes of malnutrition in all its forms

The premise of SUN is that if a set of ‘evidence-based’ direct nutrition interventions can be agreed upon, donors will be willing to fund them, and they can be “scaled-up”. The BMGF-funded 2008 Lancet Series on Maternal and Child Undernutrition, re-evaluated in 2013, forms the basis for the interventions promoted by SUN. It proposed 10 nutrition-specific interventions to eliminate 45% of deaths (3.1 million lives) and 20% of stunting among poor children younger than 5 years.

The “First 1000 Days” (from a woman’s pregnancy to her child’s second birthday) is seen by SUN as a window of opportunity for optimal nutrition and presents the core of the initiative’s approach to nutrition. The assumption is that by targeting pregnant women and children during this critical time, the intergenerational cycle of malnutrition can be interrupted and “every child, adolescent, mother and family can realise their right to food and nutrition, reach their full potential and shape sustainable and prosperous societies.”

While SUN in recent years has recognized the importance of other forms of malnutrition, i.e., overweight and obesity, the focus of its strategy and practice remains on undernutrition, and more specifically on stunting. Measures promoted by SUN and its members to reduce stunting entail so-called nutrition-specific (direct) and nutrition-sensitive (sectoral) interventions. There is a clear emphasis on nutrition-specific interventions that address some of the immediate causative factors of malnutrition. These include medicalized interventions for the fast treatment of severe undernutrition and micronutrient deficiencies, such as RUTF, micronutrient supplements, and fortification of food (i.e., adding of micronutrients to food).

Hence, while SUN’s stated vision and the collective belief that drives the initiative, and around which it galvanizes support, is broadly framed and far reaching (realization of the right to food and nutrition), the actual scope of its promoted interventions and the impacts they can possibly achieve is indeed much narrower (largely product-based interventions that address immediate causes within a limited population group).

The following section describes the policy trends and current practice observed in the case countries, and in how far these resemble / appear to be influenced by SUN’s approach to nutrition.
IBFAN published several critiques that two lead authors of the 2013 series were members of Nestlé’s “Creating Shared Value Advisory Committee”; that the majority of proposed interventions involved fortified products and supplements of some kind; and that the private sector was called on to generate “evidence about the positive and negative effects of private sector and market-led approaches to nutrition.” The authors responded with clarifications that they did not “consider [membership of the Nestlé Committee] a conflict per se, but rather a much needed contribution of independent scientists to assist a corporation to fulfil its stated commitment to address local and global issues in nutrition, water, rural development, and environmental protection”.

In Uganda, a policy trend can be observed in recent years towards an increased emphasis on micronutrient deficiencies and the promotion of medicalized and technical approaches to nutrition. Whereas the Uganda Food and Nutrition Policy of 2003 recalled State obligations on the RtAFN and was centred on the prevention of malnutrition and promotion of good nutrition, using locally available resources, the Uganda Nutrition Action Plan 2011-2016 and the draft Food and Nutrition Security Policy (2017) place a much stronger emphasis on the management of malnutrition through product-based, medical interventions, especially the scale-up of RUTF.

The recent policy emphasis on RUTF was also observed during interviews with health workers at the National Nutrition Rehabilitation Unit, Mwanamugimu. While health workers identified poor or inadequate feeding and caring practices as the main causes of malnutrition among children, the funding and most interventions in the Unit were found to be based on the provision of RUTF and F100 formula, with some training of mothers on how to enrich foods. The imported RUTF was provided to the Unit by UNICEF, chair of SUN’s international lead group. At the same time, informants noted a shift in donor priorities (UNICEF, USAID) that had led to reduced funding for basic breastfeeding training for health workers. Without support for re-lactation, skin-to-skin, kangaroo care, etc., mothers with children below six months, who cannot receive RUTF, are left without help, many believing that they do “not have enough milk.”
According to WHO, undernutrition such as wasting, stunting and micronutrient deficiencies, increases the risk of morbidity and early deaths for mothers, infants and young children, as well as impaired physical and mental development in the young child. WHO also estimates that around 45% of deaths among children under 5 years of age are linked to this form of malnutrition.

A large range of nutrition-related products have been developed to prevent and treat undernutrition (i.e. RUTFs, therapeutic-formulas, micronutrient powders and supplements). While WHO and UNICEF still emphasize the importance of breastfeeding, bio-diverse and culturally appropriate foods, there has been an increased emphasis on product-based approaches as the first option since the emergence of SUN.

In 2014, UNICEF, the world’s largest purchaser of RUTF, proposed that the FAO/WHO Codex Alimentarius Commission, the UN body that sets global standards for food safety, composition and labelling, should develop a global standard for RUTF to help national governments “regulate the market and the production facilities in their countries”. UNICEF’s proposal was rejected by developing countries who highlighted the risk that a standard would fuel commercial interest; increase the pressure on countries to accept these products; and divert development funding to curative, temporary ‘quick fix’ solutions rather than sustainable preventive approaches (breastfeeding, community support for home-prepared nutritious foods). The European Union also questioned whether it was appropriate for Codex to discuss a product that was being presented as a medicine. As a consequence, UNICEF called for a ‘guideline’ (which carries similar risks) and Codex has continued on that basis.

The difficulty of achieving essential safeguards (reductions in free sugars, prohibitions on additives, flavourings, and promotions, etc.) has demonstrated that Codex is not the appropriate forum to discuss products for malnourished children. Typically, over 40% of participants represent the food and agriculture industries, so Codex texts – based on consensus rather than evidence – are inevitably a compromise between marketing needs and the protection of public health. Codex has, for example, substantially weakened organic standards and ‘green lit’ many GM foods, food additives, pesticide residues, synthetic hormones and other intrinsically unhealthy food components. Nutriset, the French manufacturer of the world’s biggest RUTF brand, Plumpy’Nut (a peanut paste containing approx. 25% sugar) has been a major player in the discussions and, until 2019, sat on the French Delegation during Codex meetings on the topic.

In 2018, there was an unsuccessful attempt to include RUTF on WHO’s List of Essential Medicines for Children (EMLc).
The 1000 Days Window strategy, launched in 2013, is at the heart of the Guatemalan nutrition strategy. According to interviewees, it is the only component under the Zero Hunger Pact that has been implemented and promoted in practice. The 1000 Days Window strategy contains ten interventions, with a strong emphasis on medicalized and product-based approaches:

1. Promotion of and support for breastfeeding
2. Improvement of complementary feeding from six months of age
3. Improvement of hygiene practices including handwashing
4. Vitamin A supplements
5. Zinc supplements for treatment of diarrhoea
6. Provision of micronutrient powders (“chispitas”)
7. Deworming and vaccination of children
8. Iron and folic acid supplements for prevention and/or treatment of anaemia in pregnant women
9. Iodized salt
10. Fortification of food

Even the second intervention, improvement of complementary feeding, consists in essence in the provision of nutritionally-enriched food products to poor pregnant and lactating women and children below the age of two, accompanied by nutrition counselling.

Several interviewees criticized the strategy for being primarily reactive and failing to be accompanied by measures aimed at prevention that address the structural causes of malnutrition, and go beyond the first 1000 days. While the 1000 days were considered important, parallel measures addressing the structural causes were considered crucial by interviewees in a context where 60% of the population live in poverty, public services fail to reach communities, there is lack of employment and access to land (with 4000 cases of unsolved agrarian conflicts), and the dominant development model tends to result in wealth concentration (see Box 4.4).

The current strategy, it was noted, reduced nutrition to the ‘purely nutritional’ and to the rescue of severely malnourished children (emergency and welfare-oriented approach) instead of putting in place a comprehensive strategy for advancing the right to food and preventing this situation from continuing on a long-term basis. According to interviewees, the political goal of a 10% reduction in chronic undernutrition in four years has resulted in medicalized and food-based interventions that are not well founded but are thought to be more likely to bring immediate results.

**Box 4.4**

**Structural causes of malnutrition in Guatemala and the failure of public policies to address them**

Guatemala – a country rich in natural resources – holds the highest prevalence in chronic malnutrition among children below the age of five in Latin America and the sixth highest in the world. Nearly every second child under five and 38% of first graders (between six and nine years) are affected by chronic malnutrition. Indigenous children are disproportionately affected by malnutrition, which bears testimony to persisting historic and structural discrimination in the country. This situation has changed little in past years and is largely a result of the imposition of an economic development model based on agricultural exports which has placed small-scale food producers as providers of cheap labour for sustaining large farms. Land distribution is highly unequal with nearly two-thirds of arable land occupied by only 2% of farms for cash crops. Meanwhile small-scale food producers (making up 82% of farms) produce 92%
of food consumed in the country on only one-sixth of the arable land. In this context, it should be noted that violence and criminalization against human rights defenders, in particular against indigenous and peasant leaders defending land, territory and natural resources, as well as the collective rights of indigenous peoples, have reached alarming rates over the past years. Other key causes of malnutrition include widespread poverty and extreme levels of inequality; violations of women’s rights; lack of employment and low wages; lack of access to clean water and sanitation; and inaccessibility and poor quality / malpractice of public health services. As a result, 37% of all households were classified as either moderately or severely food insecure in 2017, and only 22.7% as food secure.

The failure of government policies to address the structural causes of hunger and malnutrition, including the lack of access to resources and historic discrimination, is illustrated by the paradigmatic cases of five Chortí indigenous children of the municipality of Camotán in Eastern Guatemala: in 2011, their mothers filed lawsuits against the State claiming that the RtAFN of their children was being violated as they suffered from malnutrition. In 2013, the competent regional court declared that the State of Guatemala had not only violated the RtAFN, but also the right to life, health, education, housing, and work of the children and their families. The judicial sentences, later confirmed by the Constitutional Court, ordered that various State agencies take a wide range of measures to remedy the damages and realize the rights of both the children and their families. These measures included providing food assistance, micronutrients and other supplements, but also ensuring employment opportunities and access to land for their parents to be able to grow food to ensure complementary, adequate nutrition for their families. The cases of Camotán, paradigmatic of the situation of thousands of children in Guatemala, have received international and regional attention as a milestone in the justiciability of the RtAFN. However, several years later, the families’ living conditions have not improved significantly – and one of the beneficiary girls even died, at the age of 8, in August 2017. The State’s behaviour in relation to these cases reflects the general limited approach to tackling malnutrition: the measure most consistently implemented by authorities, despite gaps, was food assistance. Nonetheless, without access to land, water for irrigation, and technical support, several families were not able to grow food and feed themselves adequately and children continued to suffer from malnutrition. Without access to land, their right to adequate housing and sanitation could also not be realized, which contributed to poor hygiene conditions and, ultimately, to the death of the 8-year-old girl.

More specifically it was noted that each of the ten interventions under the 1000 Days Window strategy have been implemented in an isolated fashion and not as a package, which reduced their impacts. Moreover, the coverage of the programme has in recent years become more and more geographically limited and by focusing on the 0-2 age group more population limited. Interventions carried out under the strategy have also been mainly in the area of health and lacked integration or at least coordination with other measures to strengthen food and nutrition security (e.g., social protection programmes).
Community members noted that the only public service available was the health centre, which did little more than encourage parents to give vaccinations to their children (prenatal services were not offered).\textsuperscript{282} The health services for children consisted in measuring their weight for height and distributing vitamin A and iron supplements.\textsuperscript{283} Community members moreover reported that medicines were often unavailable at health centres, and they had to buy them themselves from the pharmacies, particularly vitamins and antibiotics (no one mentioned the names). Some reported receiving ‘chispitas’ (micronutrient powders) at times in the health centre. No reference was made to interventions that supported breastfeeding and complementary feedings (two top interventions of the 1000 Days Window strategy).\textsuperscript{284}

In the case of India, on the basis of information published or received through Right to Information requests, no changes were found in the nutrition approach of the three Indian states based on their affiliation to SUN. Government nutrition programmes have been in place beforehand in all three States and partially very successful.\textsuperscript{285} Most of the funds for the nutrition programmes come from the Indian government, and very little is coming from external donors.\textsuperscript{286} So far none of the states have received any substantial support from the SUN initiative in terms of policy making and programme implementation. Activities related to SUN seem to consist primarily of participation in online discussions and meetings in different parts of the world and the preparation of write-ups for the SUN website.\textsuperscript{287}

While SUN as such does not seem to have impacted much on the states’ nutrition programmes, it appears that the initiative’s key international members have been influential in shaping interventions. The State Governments of Maharashtra and Jharkhand receive technical support for their Community-based Management of Acute Malnutrition (CMAM) programme from UNICEF. Both of them have used RUTF in their programme,\textsuperscript{288} despite the Government of India’s position not to use RUTF for the management of Severe Acute Malnutrition (SAM).\textsuperscript{289}

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**Box 4.5**

**No attention to overweight and obesity, and related NCDs**

In Uganda, non-communicable diseases (NCDs) resulting from overweight and obesity feature only marginally in the current government policy and action plan on malnutrition, despite it becoming a major public health concern in the country.\textsuperscript{290} The draft FNS Policy contains a bullet point on this with no further information, indicating the scant importance attributed by the Government to this form of malnutrition and the lack of a holistic approach to nutrition.\textsuperscript{291} Equally UNAP contains no single point on measures (including regulatory) to reduce the consumption of unhealthy, ultra-processed foods and only marginally touches on the promotion of non- or minimally processed foods.\textsuperscript{292} According to the focus group discussions, ultra-processed foods are being promoted by vendors through moving trucks with loud speakers and were widely available in most shops in the capital city.\textsuperscript{293} Such foods were mainly used as snacks for young children.

Despite notable increases in chronic diseases caused by overweight and obesity in Guatemala,\textsuperscript{294} interventions have largely focused on undernutrition and micronutrient deficiencies (1000 Days Window) with little attention on measures to tackle overweight and obesity. Communities
mentioned that the consumption of junk food is increasing at alarming rates and that nothing is done about it. The school feeding programme, which the Ministry of Education is including as an advancement under SUN, leaves much to be desired in terms of a healthy diet. For example, in one school it was observed that instant soup was being provided to children for lunch.\textsuperscript{295} Commercial distribution channels of ready-made foods and drinks extend into the smallest communities. Advertisements are no longer needed – the people have become used to consuming these products, which are often bought for their social status.\textsuperscript{296}

Recently, soft drinks and ready-made food (instant soups) have been added to the Basic Food Basket\textsuperscript{297} which is based on consumption patterns and expenditure and, in theory, is meant to be used to adjust the minimum wage level (though this does not happen in practice).\textsuperscript{298} This shows the ineffectiveness and contradictions of public health policies that fail to base minimum wages on what is actually needed for a nutritious diet.

The private sector foundations/networks that participate in the SUN Guatemala Multi-Stakeholder Platform include among their members and (funding) partners companies with a clear divergent interest when it comes to the regulation of unhealthy foods. This includes in particular the Guatemalan sugar industry (e.g., Azúcar de Guatemala and FUNDAZUCAR)\textsuperscript{299} and companies promoting ultra-processed food products and snacks (e.g., Nestlé, PepsiCo, Domino’s)\textsuperscript{300}. 
Key Finding 2: SUN’s nutrition-sensitive interventions promote high-input intensive agriculture, including biofortified crops, that primarily benefits the agro-industrial food system.

Nutrition-sensitive interventions in the context of SUN are sectoral interventions that impact on nutrition.301

Biofortification is a method of crop breeding whereby specific nutrients302 are increased or become more bio-available through a range of means such as conventional selective breeding, genetic engineering or other technologies.

Biofortification

IFPRI, an agricultural research centre of CGIAR, a partnership of 3000 governments, academic institutions, private corporations, and NGOs, claims that biofortification is “one of the most promising new tools in the fight to end malnutrition and save lives” and that it addresses “the root causes of micronutrient malnutrition, targets the poorest people, uses built-in delivery mechanisms, is scientifically feasible and cost-effective, and complements other on-going methods of dealing with micronutrient deficiencies”.304

Since 2014,305 IFPRI, initially supported by the United States, Zimbabwe, and Uganda (both SUN members) and South Africa, has been promoting a definition of biofortification at the Codex Alimentarius Nutrition Committee (CCNFSDU). Member States and observers have been sharply divided in their responses to IFPRI’s proposal. The EU, IBFAN and others opposed it, arguing that:

∞ in Germany the term ‘bio’ refers to organically produced foods and products so the term Biofortification would not be permitted by law in the EU;
∞ the term ‘Biofortified’ is a misleading nutrient claim for which there is no criteria and which furthermore can cover genetic modification;
∞ IPRI’s claims that Biofortification radically reduces malnutrition are not substantiated by credible evidence;
∞ over-emphasis of the single nutrient approach runs counter to national nutrition policies and UN recommendations for food-based, bio-diverse approaches; and,
∞ Biofortification is a costly technology favoured and controlled by global agricultural industries.

At the Codex Labelling Committee (CCFL) in Canada in May 2019307 many member states, including the EU, India, Russia, Chile, Mexico, New Zealand, Panama, Nigeria and even the US, proposed to stop the work. This was confirmed at the nutrition meeting in November 2019, when no country except Zimbabwe spoke in its favour.308
A guidance booklet for SUN business members from 2011, the Private Sector Engagement Toolkit\textsuperscript{310} has illustrated the type of agricultural interventions promoted by SUN. The three public-private partnerships presented as examples for nutrition-sensitive interventions in agriculture are geared towards the promotion of commercial, including hybrid and genetically modified,\textsuperscript{315} seeds and fertilizer, and the integration of small-scale food producers into production chains.\textsuperscript{311} None have a direct impact on the nutritional status of those who grow the crops or the local population more broadly. However, it is assumed that the interventions would increase incomes and create jobs, and that this would, in turn, lead to improved nutrition.\textsuperscript{312} Nutrition plays a direct role only in the PepsiCo-Peru project. Here, small-scale farmers grow nutritionally-enhanced potatoes which are then converted by PepsiCo’s Frito Lay into the “best snacks on earth”.\textsuperscript{313}

Little attention is placed by SUN on approaches that promote agroecology to improve nutrition. Nor on strategies that more broadly strengthen the rights and sovereignty of small-scale food producers, in particular of women, \textit{inter alia} by protecting and enhancing their access to land and natural resources, access to basic public services, and the promotion of local and regional food markets.\textsuperscript{314} Where programmes target small-scale food producers this is, as exemplified by the private sector engagement kit, primarily as recipients of biofortified seeds or to foster their integration into (global) markets / production chains. This has also been observed in the country case studies as discussed below.

While SUN’s strategy recognizes the important impact of food systems on nutrition, it does not analyse how food systems impact on nutrition, nor does it acknowledge the antagonism that exists between different types of food systems. Most food systems interventions promoted by SUN are based on and enhance the agro-industrial food system and its key players.\textsuperscript{315} This stands in direct contrast with the international human rights framework, which requires priority to be placed on marginalized and disadvantaged groups, who are most affected by hunger and malnutrition (see Chapter 1).

In Uganda, technical approaches to address dietary deficiencies in particular biofortification have gained prominence in recent years, both in policy and practice. One of the specific objectives of the Uganda Food and Nutrition Policy (2003) was to diversify the production of food commodities to meet the nutritional needs of households. This was to be achieved amongst others through the popularization of under-exploited food crops and animal resources and the provision of user-friendly micro-financial services for small-scale food producers.\textsuperscript{316}

While UNAP 2011-2016 includes an intervention on the promotion of production and consumption of indigenous foods to enhance dietary diversification, it places a strong emphasis on the parallel promotion of “nutrient-enhanced foods” (biofortified foods, fortified foods, RUTF and complementary foods) as a key strategy for enhancing diverse diets.\textsuperscript{317} The production of bio-fortified staple food crops is considered a “cost-effective community-based initiative” which has been identified as “priority investment area” for the country.\textsuperscript{318} The draft Food and Nutrition Security Policy focusses on increasing production and consumption of “diverse high nutrient value foods”, without further elaborating what this means and how this is to be done. The underlying conditions for communities to produce and acquire diverse and naturally nutritious foods, such as access to land/natural resources, protection of biodiversity, decent employment, and women’s rights are not mentioned, nor captured by the proposed indicators for monitoring improvements.\textsuperscript{319}

According to key district informants, in practice hardly any deliberate support was provided to local foods, nor were positive local food cultures promoted and protected.\textsuperscript{320}

\begin{quote}
These [local food cultures] are being killed as the local foods are not promoted and supported. Persistent cultures are attacked. They are slowly dying out leading to malnutrition. There are some attempts to revitalise them through the annual food fair but not at national level.\textsuperscript{321}
\end{quote}
The production and consumption of biofortified foods on the other hand was heavily promoted as nutrition intervention (dissemination of the seedlings and education campaigns).

While the production of nutritious foods, including indigenous foods, is highlighted by the National Agricultural Policy (2013), the Operation Wealth Creation (OWC) under the same policy aims at transforming agriculture from subsistence to commercial, with an emphasis on crops with high market value that can be traded globally. This has partly resulted in shifts in land usage towards large-scale commercial farming, detrimental to small-scale food producers and nutrition objectives.

A key component of the National Agricultural Policy is the generation and dissemination of “appropriate, safe, and cost-effective agricultural technologies and research services”. SUN members play a key role in this. For instance, biofortified seeds (iron-rich beans and vitamin-A-enhanced sweet potatoes) are disseminated to farmers by USAID, the SUN donor convenor for Uganda, implementing partners, spearheaded by Harvest Plus. The National Agricultural Research Office (NARO) cooperates with the International Food Policy Research Institute (IFPRI) and has been channelling funds from the BMGF and USAID, including for research on the genetically-modified ‘super banana’. World Vision, a key corporate-funded NGO member of SUN, which until recently coordinated the Ugandan SUN CSA, has been at the forefront of promoting biofortified sweet potatoes and beans in the communities where it operates. Notably, the promotion and dissemination of biofortified crops takes place without any regulatory framework in place to control marketing, safety and quality. SUN members such as Harvest Plus and FANTA have, according to key informants, also lobbied for the inclusion of biofortification in the draft FNS Policy and the draft National Seed Policy. The OPM itself has lobbied for interventions such as biofortification as a “deliberate move to address SUN interventions”.

In Guatemala, key government informants mentioned that in addition to the 1000 Days Strategy there are “nutrition-sensitive interventions” (agriculture, education, sanitation) but that little of this has been seen in rural areas. One example of such intervention is the dissemination of biofortified seeds (maize, beans) to small-scale food producers by the WFP, Co-Convenor of the Guatemalan SUN UN Agencies Network and of the International SUN Business Network. The WFP also procures maize from small-scale food producers for the “specialized nutritious food” (Super Cereal Plus or Mi Comidita) that it distributes to children below the age of two in support of the 1000 Days Window programme. At the same time, government programmes that support small-scale food producers with an emphasis on structural changes and promotion of agroecology, such as the “Programa de Agricultura Familiar para el Fortalecimiento de la Economía Campesina” (a programme that provides agricultural extension services to peasant families) have in recent years been scaled down. Programmes with an alternative focus, such as agroecology, tend to be introduced but then their funding discontinued, leaving them to exist only marginally.
Key Finding 3: SUN inspired interventions showed to have limited impact on reducing malnutrition while adversely affecting local food cultures and creating dependencies

Key informants in Guatemala highlighted that the 1000 Days Window strategy has had limited impact on the prevalence of chronic malnutrition, which remains unchanged over the years. The discussions with communities affected by malnutrition clearly showed that from their perspective, malnutrition will not be tackled unless structural issues are made a priority in nutrition policies and programmes. They complained about the limited reach and assistentialist nature of government programmes. For example, it was highlighted that there is little point in raising awareness on the importance of personal hygiene such as hand-washing when families have no water in their homes, nor food. Community members noted that breastfeeding was already a widespread custom in the community, independent of any social programme. They reported, however, that no food was available in the household to ensure adequate complementary feeding from six months of age onwards when children become malnourished. According to a doctor working with malnourished children, the complementary food given to children over six months consists of coffee, bread and instant soup.

The views expressed by communities were shared by most institutional informants. According to them, complementary policy changes and fiscal and social investment policies and programmes are needed, as well as reductions in illicit use of public funds. As pointed out by one key informant, the SUN strategy and its “short-term interventions” lack an integral view of all the components of food and nutrition security, and consequently at best contribute only marginally to the realization of the human right to adequate food and nutrition.

It has been noted by CSO informants that while actions and resources for nutrition have remained the same, the country’s affiliation to SUN has fostered assistentialism (a charity approach). 1000 Days Window interventions are not complemented by actions that empower community members and increase their capacity to plan and implement autonomous actions based on self-determination. Rather they foster a dependency relationship between the community and these intervention programmes.

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**Box 4.7**

**Evidence-based? Lack of critical reflection and community involvement in assessing outcomes of interventions promoted**

The fact that the 1000 Days Window strategy has had limited impact on the prevalence of chronic malnutrition in Guatemala provokes, according to key informants, little discussion among SUN organizations and institutions as to why this is the case and what needs to be done differently to achieve positive results. According to an NGO official, the political goal of 10% reduction in chronic malnutrition has resulted in interventions that bring only short-term immediate results. It was also considered to have led to biased reporting of results on the ground.

It was repeatedly noted by informants in Guatemala that monitoring done under the SUN umbrella is not part of an independent evaluation. Rather it is a self-evaluation done by the respective entities that compose the Multi-Stakeholder Platform. This is particularly
problematic in light of the disconnect between achievements as reported under SUN and those perceived by affected communities, and the lack of participation within the national SUN civil society alliance by those groups most affected. It was also noted that parts of the universal SUN evaluation framework that is applied have little relevance in the case of Guatemala. For example, indicators deal with whether a policy and institutional framework for nutrition has been established. Such a framework already existed in Guatemala before it became a SUN country.\(^{353}\)

Another critical observation by informants was that there is no follow-up to the recommendations for action that are generated through the evaluations.\(^{354}\) This calls into question the usefulness of these now annual self-evaluations (with dwindling participation by SUN members over the years), and the interest that the Government has in the SUN initiative.

The fragmentation of nutrition interventions and lack of transparency around them moreover inhibit the ability of communities to hold the government accountable with regard to the human rights compliance of these interventions (see Key Finding 5).\(^{355}\) It was also raised by some interviewees that reports on programme implementation were being invented as no one actually collected data in the field.\(^{356}\) Reported outcomes of different programmes are not shared with communities, which often do not know much about the programme(s) they participate in and what claims about their impacts have been made.\(^{357}\)

The focus of the draft Ugandan FNS Policy on scaling-up technical approaches, such as micronutrient powders and (bio)fortification, rather than the diversification of diets, is surprising considering the poor evidence of efficacy of such products in reducing micronutrient deficiencies in Uganda.\(^{358}\) The draft policy contains a placeholder which assumes that micronutrient deficiencies have decreased in recent years, whereas the opposite has been the case.\(^{359}\) This creates the impression that interventions proposed in the policy have been decided without prior analysis of the nutrition situation and evaluation of the outcomes of past interventions.

In Uganda, interviews at district level and information gathered at the National Nutrition Rehabilitation Unit pointed to the human rights risks implied by a nutrition approach heavily reliant on medicalized, product-based single nutrient approaches, in the absence of safeguards to ensure appropriateness of medical interventions and avoid impact on indigenous food cultures and confidence in local foods.\(^{360}\)

The provision of RUTF, which had become the core of interventions at the National Nutrition Unit (see Key Finding 1), resulted in high dependence on processed products in the management of malnutrition and a reduction in confidence in home-prepared food. Respondents at the Unit stated that clients preferred the RUTF to local foods and tended to return to health facilities in search of more RUTF supplies, rather than utilize the local foods for further management.\(^{361}\) According to key district level informants, some parents only fed their children RUTF but not any local foods until recovery.\(^{362}\) According to key district level informants, some parents only fed their children RUTF but not any local foods until recovery.\(^{363}\) In the words of a district respondent:
When the SUN casts a shadow and F100 (for inpatients) at the National Nutrition Unit. During this time mothers of children in outpatient care were asked to bring food, so that they could be shown how to prepare them to treat their children. This was, however, usually not successful due to lack of financial resources. This illustrates – just as the case of handwashing raised by communities in Guatemala – the limited impact of interventions aimed at awareness creation and “mind-set change” without accompanying measures that address the structural causes (see Box 4.8).

The stock-out – which was caused by the Unit’s failure to send monthly reports regularly – also illustrates the dependency and limited sustainability of product-based approaches funded by donors.

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While UNAP presents the promotion of positive indigenous food cultures and that of nutritionally-enhanced foods (e.g., RUTF, biofortified, and fortified foods) as complementary interventions for enhancing dietary diversity, interviews at district level pointed to a negative relationship between nutritionally-enhanced foods and the protection of local food cultures. Quoting from these informants, “The positive local food cultures are not protected since the importation and promotion of improved foods”, and “The use of therapeutic foods has greatly affected the local food cultures”.

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At the time when interviews were conducted there had been a stock-out both of RUTF (for outpatients) and F75 and F100 (for inpatients) at the National Nutrition Unit.

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Blaming the individual: nutrition a question of mind-set change

The draft Ugandan FNS Policy focusses on “empowering communities with resources, knowledge and skills to support mind-set change towards food and nutrition security”. The policy assumes that malnutrition results from communities’ attitudes and the value they attach to good nutrition and that “awareness creation and a mind-set change” is the solution.

The structural causes and violations of human rights that hinder people in adequately feeding themselves and their families are downplayed or entirely ignored, as illustrated by the following quote:

“Government will ensure that while in as much as households may not afford nutrient mix desired for proper health, the awareness is first created. With knowledge of what the best

Box 4.8

The use of therapeutic feeds provided has both advantages and disadvantages, the advantage is that it is nutrient dense, disadvantage is that the caretakers tend to rely so much on the supplies and ignore the locally available food which is more sustainable. There is a general belief that foods when well packaged can improve the nutrition status of malnourished children.

There is also an evident risk of spill-over and inappropriate use. A district political leader reported that in some districts in the drought affected Karamoja sub-region, families purposely let their children become malnourished to receive and sell RUTF for additional income. Such income was mainly used to purchase alcohol.

The sale of the products to individuals who did not necessarily require them, also increased the risk of over-nutrition, which is currently on the rise among women of reproductive age as reported in the annual Food Security and Nutrition Assessment in the sub-region. According to one key informant, “some women purchase the RUTF so that they may gain more weight and look much healthier”.

At the time when interviews were conducted there had been a stock-out both of RUTF (for outpatients) and F75

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At the time when interviews were conducted there had been a stock-out both of RUTF (for outpatients) and F75
nutrient-intake is for good health, a demand will be created at household level and especially among women to seek these nutrients from time to time.”

**Key Finding 4: SUN enhanced private sector policy influence in disregard of conflicts of interest**

Multi-stakeholder engagement is at the core of the SUN initiative and considerable efforts are geared towards fostering “multi-stakeholder collaboration at all levels” in SUN countries. In Uganda, membership in SUN has led the country to introduce significant institutional changes to comply with SUN’s multi-stakeholder requirement. Coordination of nutrition interventions has been placed under the Office of the Prime Minister (OPM) (previously it was under the ministries of health and agriculture) and policy discussions have opened up to the private sector and other non-state actors. Private sector participation in nutrition policy has been institutionalised at national, district and sub-district levels through the establishment of Nutrition Coordination Committees (Multi-Sectoral Nutrition Technical Committee (MSNCT), District Nutrition Coordination Committees, etc.) under UNAP. The MSNCT (at central level) “fosters multi-stakeholder collaboration and partnership and joint planning and monitoring of the implementation of multi-sectoral nutrition programmes”. Similarly, at district and sub-district levels, the respective Nutrition Coordination Committees provide technical guidance and monitor and evaluate nutrition activities. They also have the responsibilities to reach out to nutrition ‘stakeholders’ beyond those directly sitting on the committees and “build consensus on how best to address nutrition problems”. Hence, the private sector, as well as donors and civil society organizations are directly engaged in the determination of the nutrition agenda and the development, implementation, and monitoring of multi-sectoral nutrition interventions. The principle that guides multi-stakeholder collaboration is, in line with SUN’s framework, one of consensus building among the various actors.

Direct participation of the national private sector in the Nutrition Coordination Committees has been reportedly low, due to the fact that no single association could present the views of the entire private sector. However, transnational corporations have been indirectly involved in the development of policies and plans through public-private hybrids such as GAIN and IFPRI/Harvest Plus. The draft FNS Policy places a strong emphasis on private sector participation and the promotion of multi-stakeholder platforms (where it specifically refers to SUN). The overarching goal of the draft policy is “to strengthen an enabling environment for all actors to develop and implement programs that eliminate malnutrition in Uganda”. The role of the government, rather than being the primary actor responsible for eliminating malnutrition in the country, is hence reduced to one of a facilitator.

The draft Policy also foresees a strong role for the private sector when it comes to funding nutrition interventions, and the country has even recently adopted a law on this. However, no safeguards have been put in place to protect public institutions and officials from being unduly influenced by such funding. This is despite it being widely known in conflict of interest theory that such funding creates conflicts of interest that can undermine democratic and scientific decision-making and affect the integrity and trust placed in public officials. Public-private partnerships in the form of corporate funding may result in weakening of public-interest actors’ resolve and capacity to defend the public
interests they are mandated to protect and promote. The concessions made to the funder can reach from small favours in return to what some have described as mandate drift or shift.

In 2013, the SUN Multi-Stakeholder Platform was established in Guatemala. In contrast to Uganda, where SUN influenced the institutional structure towards the establishment of multi-stakeholder platforms with direct influence on public policy making, SUN in Guatemala represents a parallel platform for nutrition actors. According to key informants, the platform holds marginal relevance (it is one of several platforms in which the same organizations participate) and is perceived as a duplication of the existing institutional structure for nutrition. It was questioned why a new multi-actor platform was created when there already existed functioning multi-actor platforms, a comprehensive political and institutional framework to address FNS issues at national and local levels, and channels for consultation among non-state actors.

As noted by a key government informant:

*The coordinating structure of the SUN Movement is parallel to the coordinating structure for the National System of Food and Nutrition Security, established by law in decree 32-2005. For example, the institutions and organizations that participate in the SUN Strategy are the same as those that are represented in the CONASAN (National FNS Council). The coordination of the SUN Movement should be directly supported by the coordinating structure established for the System.*

With regard to the existing institutional structure, informants pointed to the disconnect between the national and local level with regard to nutrition planning, implementation and monitoring. Decision making is highly centralized, while at the district/municipality level resources and capacities for implementation are lacking. It was repeatedly noted that while local institutional structures are in place, these require strengthening, especially with regard to planning, implementation, and resource administration. The question arises again, why SUN in Guatemala does not work to strengthen existing institutional structures, rather than contributing to duplication and fragmentation of efforts by creating an additional platform for nutrition.

While well-coordinated implementation of nutrition interventions is a key strategic objective of the SUN initiative, interviewees reported that multi-actor coordination under the SUN platform is very weak. Especially at local level there appears to be no coordination among platform members when implementing actions. Each applies its own targeting criteria and employs its own data sources to address FNS issues at national and local levels, and channels for consultation among non-state actors.

Guatemala does not have a policy in place to prevent or manage conflicts of interest in the public sector. Interviewees also mentioned a widespread lack of clarity concerning the role of the private sector. With no safeguards in place, nor a clear definition of different roles, the private sector was invited by the government to participate in policy discussions through the SUN platform. This is despite their interests in some instances being fundamentally at odds with public health nutrition objectives (see Box 4.5).

From the available information, it appears that no institutional changes have taken place in the three Indian states due to their affiliation to SUN. None of the states have established SUN business networks. However, SUN has on several occasions reached out to their contacts in these states encouraging them to establish multi-stakeholder platforms and engage with the private sector. In his welcome letter, Tom Arnold, the coordinator of the SUN initiative at the time, suggested that the state
government of Uttar Pradesh should establish a multi-stakeholder platform. He wrote:

Many SUN Countries have formed a national Multi-stakeholder Platform, comprised of key actors they feel are best positioned to take the actions needed in their national contexts. You have outlined Uttar Pradesh’s efforts to accelerate engagement and dialogue with different stakeholders for nutrition. This existing momentum for collaboration is encouraging and I suggest you consider how best to convene these partners in a platform to strengthen alignment and support behind national priorities.\(^{397}\)

In her welcome letter to Ms. Mridula Sinha, the Director General of the Jharkhand State Nutrition Mission, Gerda Verburg, the current coordinator of the SUN initiative, suggested the inclusion of business representatives as structural partners of the mission. She wrote:

We understand that the Jharkhand State Nutrition Mission has been envisioned as an autonomous body to improve nutrition governance and to bring together technical agencies, civil society organisations, the media, and the academia, to strengthen the partnerships for nutrition. This existing momentum for collaboration is encouraging and I suggest you consider how best to convene these stakeholders along with development partners and local business representatives as structural partners of the State Nutrition Mission to strengthen alignment and support behind the State’s nutrition priorities.\(^{398}\)

In a video interview, Ms. Mridula Sinha, mentioned that taking a cue from the SUN movement, the state mission has developed a number of partnerships with almost everyone who is doing something on nutrition in the country.\(^{399}\)

SUN Coordinator Gerda Verburg visited India in May 2017. She met with national and state government officials in Uttar Pradesh and Maharashtra, as well as with media, UN agencies, and civil society representatives. According to one media report, she “pushed for dialogue among the various stake-holders government, private sector and civil society.”\(^{400}\)

It is interesting to note in this context, that the opening of public policy space to business through SUN – and the conflicts of interests arising from this approach – constitute the main concern and reason for resistance against the country’s joining of SUN among civil society organizations in India.\(^{401}\) Several Indian companies participate in SUN (see Box 4.9). The CEO and Managing Director of Britannia Industries, Vinita Bali, was a member of the SUN Lead Group (2012-2015).

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### Box 4.9: Commitments by Indian companies

Several Indian food, supplement, snack and seed companies are part of the SUN Business Network and have made commitments regarding nutrition. Some examples include: \(^{402}\)

- **Britannia**, a snacks, processed foods and ultra-processed foods company. Products include biscuits, breads, cheese, milk, yoghurt, and cakes. Over 50% of the company’s portfolio is enriched with micronutrients. Britannia, Naandi, and the Global Alliance for
Improved Nutrition (GAIN) came together for a public-private partnership for delivering nutrition through fortification in Andhra Pradesh state of India in 2007 using biscuits as a vehicle.

- **Hexagon Nutrition Pvt. Ltd**, a company manufacturing nutritional supplements and other products like micronutrient premixes, sprinkles for home fortification, and RUTF. The company has committed to produce and distribute at least 100 million sachets of micronutrient powders (MNPs) across the regions of Africa, South America, and Asia; identify at least 1 new emerging fortification project around the world to support; reduce malnutrition for at least 2 countries through new RUTF initiatives; reach at least 1 million people through fortified staple foods and reach 0.5 million beneficiaries (at risk women and children) through nutritional fortification.

- **Gujarat Cooperative Milk Marketing Federation Ltd (Amul)**, a dairy, processed foods and ultra-processed foods manufacturer which includes milk products, butter, cheese, yoghurt, ghee, ice-cream, and chocolate. Amul also manufactures RUTF branded as BAL-AMUL for Valid Nutrition, with financial support from DFID, which is mainly exported.

- **Nirmal Seeds**, a seeds company that has committed to deliver biofortified crop varieties for at least one million farmers.

The pressure and confusion created by SUN in relation to the indiscriminate involvement of the private sector in policy discussions has also been highlighted with regard to other regions. In the context of the complementary interviews conducted for the study, an independent public health nutritionist, who has previously worked with the UN in SUN countries in the Asia-Pacific Region, noted that SUN plays a major role in encouraging countries in the region to set up multi-stakeholder platforms to address malnutrition. According to the interviewee, SUN countries have expressed deep concern about this and have raised the question whether, as a SUN country, a business network has to be established. SUN members have rather aggressively advocated for the private sector to be consulted and to agree on public policies, emphasizing the importance of dialogue with all ‘stakeholders’. One example comes from a meeting among development partners on how to support the government in strengthening the national implementation of the International Code of Marketing of Breastmilk Substitutes. UNICEF called for the meeting together with WFP. At the meeting, WFP suggested involving the private sector in the process arguing that “we can’t stop industry from selling their products, anyway” or from “wanting to make profit”, so it would be best to work with them.

As illustrated by the country case studies and complementary interviews many SUN countries, while being pushed to collaborate with the private sector, do not have effective mechanisms in place to safeguard their policy and other decision-making spaces against conflicts of interest and other forms of undue influence. This presents a huge risk for the human rights-orientation of public policies. While SUN has developed its own conflict of interest tool, this tool has not helped to resolve the situation but rather made matters worse by blurring the conflict of interest concept altogether (see Box 4.10).
When the SUN casts a shadow

SUN’s Conflict of Interest Reference Note and Toolkit

Following criticism by civil society organizations of the strong role played by companies in SUN and the lack of conflict of interest (COI) safeguards, the SUN Lead Group requested a document that would help governments in SUN countries address conflicts of interest. In 2013/14 the Global Social Observatory (GSO), a Geneva-based organization, whose director also brokers business influence in public fora and works with corporate funding, received a grant of nearly one million US dollars from the BMGF “to develop a transparent process to address perceived conflicts of interest and handle credible claims of conflict of interest within the Scaling Up Nutrition Movement in order to achieve delivering better nutritional outcomes”.

The main outcome of this process, a Reference Note and Toolkit for Preventing and Managing Conflicts of Interest (2015), is highly problematic on a number of fronts. The guidance fundamentally redefines the legal concept of conflicts of interest in a way that fits and legitimizes SUN’s multi-stakeholder governance structure and its Principles of Engagement (PoE). The purpose of conflict of interest safeguards should be the protection of independence, integrity and trustworthiness of public actors and institutions, so that these are able to define and implement policies and actions in accordance with their public mandate and obligations.

However, the purpose presented in SUN’s definition is the protection of the “objectives of the joint endeavour”, i.e., whatever has been agreed upon by all members of the initiative, including business. The maintenance of the ‘inclusiveness’ promoted by SUN is placed above the preservation of public interest-based policy making, as illustrated by the following quotes:

“Since its inception, the Movement has aimed to be inclusive, as there is more to be gained by engaging all stakeholders that are working to improve nutrition. […] Exclusion should be avoided if at all possible. […] Stakeholders will seek to resolve divergences in approach or divergent or competing interests whenever they arise; such dialogue and negotiation is the first step toward collaboration while also helping to identify and manage possible conflicts of interest. They are expected to be open and transparent during all aspects of negotiation and to strive for collective solutions.”

The Reference Note moreover suggests that conflicts of interest are ‘external’ and caused by disagreements and differences in opinions between actors that can be resolved (e.g., through transparency and negotiation). It thereby confuses COI – which should relate to a conflict within an individual or institution – with diverging opinions and interests among different actors. In creating confusion about the concept of conflicts of interest and about the means to address them adequately and efficiently, and downplaying the risks COI pose to the integrity, independence and trustworthiness of the public actors and institutions participating in the SUN initiative, SUN’s guidance on COI is likely to cause more harm than good in SUN countries.

The initiative organized learning sessions and is widely disseminating its COI Reference Note and Tool Kit, advising SUN member countries on how to use it. Calls to publicly withdraw
Key Finding 5: SUN generated the benign illusion of a broad and inclusive movement while in practice being detached from those affected by hunger and malnutrition

While the “strengthening of multi-stakeholder collaboration at all levels” is at the heart of the SUN initiative, a closer look at its strategy indicates that SUN ‘stakeholders’ are not necessarily the communities most affected. While by 2020, all SUN countries “will have multi-stakeholder partnerships for coordination at national levels”, they should merely “strive to involve representatives from vulnerable communities in their decision-making processes” [emphasis added]. Throughout the strategy communities are primarily perceived as passive recipients, while it is assumed that the national SUN CSA caters for a diverse civil society voice that reflects the interests of communities and promotes their participation and rights. In both Uganda and Guatemala, nutrition actions implemented by national-level entities who make up SUN seem to be driven by the strategies and pre-defined agendas of a select group of international NGOs and their funders. These organizations are accountable not to local communities but to international headquarters. CSOs that participate in SUN moreover tend to be service delivery oriented rather than advocacy organizations. This top-down internationally-led approach is clearly counter to people’s rights to participation and to define their own food system, a crucial element in the realization of the RtAFN.

In Guatemala, right to food and food sovereignty organizations, and those taking a critical approach on the issue, are not part of the national SUN CSA. The absence of local CSOs and communities affected by malnutrition implies that their knowledge and experience are not taken into account when elaborating and evaluating nutrition actions (see Key Finding 3). The discussions with communities also indicated that there is a gap in local coverage and in information. Communities not only felt under-served by nutrition and health programmes, but also did not know much about the nutrition programmes and actions being implemented by the various actors, unless they are direct beneficiaries of such a programme. The aforementioned lack of transparency inhibits genuine public participation in and scrutiny of SUN / measures applied as part of the country’s affiliation to SUN.

The existing institutional structure for food security and nutrition includes the National Forum for Dialogue and Social Participation (INCOPAS) which serves as a channel of communication and space for participation of different sectors of society in national policy discussions on food and nutrition security. INCOPAS’ mission and...
vision is to ensure implementation of food and nutrition security policies and the realization of the right to food through the promotion of active and effective civil society participation. Presently INCOPAS is facing important challenges concerning its independence. Several interviewees coincided in the view that the strengthening of INCOPAS and of existing local governance structures would be key for enhancing civil society participation and local accountability in Guatemala. It is unclear how a parallel structure – the SUN civil society network which is little representative of national civil society and affected communities, will contribute to this.

In Uganda, most international and national CSOs working in the area of nutrition are supported by donors who promote the SUN approach. The perception of SUN being a top-down initiative was echoed by key informants. Conceived at global level, the initiative was handed down to the country through NGOs and agencies supportive of SUN, and then from there to communities. The active participation of groups affected by hunger and malnutrition in the inception and design of interventions tended to be minimal, if any. For instance, micro-nutrient powders (MNP) were being distributed in one sub-region, but the community was suspicious of the product as it was introduced without involvement of supposed beneficiaries. One of the key informants reported:

In this village, some people received MNP. They say when they gave the children in the evening, and by morning all children had diarrhoea, some were about to die. They then discouraged others to get the product to feed their children. The villagers are now waiting for the people who distributed the powders to take them back. They are furious to even ask them about the powder.

The district official confirmed this was happening in the communities and indicated that MNP were a new intervention and there was no evidence on their effectiveness. The district was at the time still waiting for the results from an impact study conducted by WFP and Centers for Disease Control and Prevention (CDC) on MNP in the sub region. The results from the study were disseminated in May 2018 and showed that MNP were not effective in controlling or reducing micro-nutrient malnutrition especially anaemia among children. This led the Ministry of Health to decide not to distribute MNPs.

The draft FNS Policy foresees the involvement of communities primarily at the level of implementation. While community empowerment is mentioned several times, this refers primarily to promoting a mind-set change at community level, rather than the grounding of interventions in communities’ analysis of the problem and its solutions (see Box 4.8). The understanding of communities primarily as passive recipients of food and nutrition security interventions is reflected in the policy’s section on human dignity:

All Uganda citizens shall be accorded equal treatment and opportunity to enjoy their constitutional rights and have access to food and nutrition security programmes and interventions without discrimination and exclusion.

Civil society participation in Uganda’s Nutrition Coordination Committees has reportedly been low. It was mentioned that there is a lack of adequate resources to invest in strengthening the CSO component.
Women as mothers

The SUN strategy recognizes inequity as key driver of malnutrition in all countries and aims at “equitable improvement in the nutrition status of all people”. It moreover speaks of “empowering women as agents of change” to achieve sustainable nutrition improvements. The causes of inequality and discrimination however are not mentioned nor how these will be overcome. There is little emphasis on the need of marginalized and discriminated groups’ participation in strategies to help overcome existing inequalities, rather the focus is on experts supporting countries on how to integrate a gender / equity perspective into programmes.

The nutrition strategies in both Uganda and Guatemala have a strong focus on women as mothers and emphasize their role in family nutrition without any critical reflection. While this certainly cannot be solely ascribed to SUN given the patriarchal context in both countries, the very essence of SUN’s approach is centred on women as mothers, rather than as individuals with rights on their own. In this sense, the initiative can be said to foster the instrumentalization of women and reinforce rather than confront established gender roles.
Conclusions
SUN has in recent years increasingly adopted and assimilated human rights language. Its current strategy envisions “a world free from malnutrition in all its forms” in which “every child, adolescent, mother and family can realise their right to food and nutrition”. Even SUN business members, facilitated by the SUN business network, have a role to play in “ensur[ing] all people realise their right to good food and nutrition”.447

So how does this rhetoric match the practice observed in SUN countries? What is the added value of the initiative in terms of reducing malnutrition and advancing the realization of the human right to adequate food and nutrition? What are the risks?

The country case studies have shown that country experiences and the influence that SUN holds on national nutrition policy and governance vary. Uganda, a country that was once described as the food basket of Africa, is now highly dependent on donor funding for nutrition. The Government has chosen to base its nutrition policy on SUN’s framework and has introduced significant changes to the institutional framework for nutrition in an effort to comply with SUN’s multi-stakeholder requirement. Guatemala in turn already had a comprehensive legal, policy and institutional framework for nutrition in place, so joining SUN did not result in the adoption of a new strategy, but rather led to the promotion of an existing set of interventions under the umbrella of the 1000 Days Window. Instead of strengthening existing structures, SUN created its own parallel structures. In the Indian states that have joined SUN, the initiative’s influence primarily consisted of attempts to promote partnerships with the private sector.

Both the Ugandan and Guatemalan case studies show promotion of short-term nutrition interventions with a strong emphasis on medicalized, product-based interventions aimed at treatment rather than the prevention of malnutrition. (Pillar II - underlying conditions) These interventions have so far failed to bring meaningful changes to the nutrition situation of those affected by malnutrition, at the same time there is evidence of negative consequences on the right to food and nutrition and related rights. The emphasis is on undernutrition and micronutrient deficiencies, while overweight and obesity and related non-communicable diseases – which are on the rise in both countries – receive hardly any attention. (Pillar III - enabling environment) Within food systems interventions a bias was observed towards technological solutions, in particular biofortified seeds and processed fortified foods, which entail human rights risks for small-scale food producers and consumers. Neither of the countries has a strategy in place for fundamentally re-shaping food systems to support agro-biodiverse production, advance the realization of the rights of small-scale food producers, and promote diversified, healthy and sustainable diets based on minimally or unprocessed food. (Pillar I - healthy food systems)

SUN is clearly not the only force advocating for these types of interventions and one cannot solely ascribe the observed policy trends to SUN. However, there is a strong correlation between the interventions the initiative promotes and those being prioritized in the countries that have been reviewed. A key characteristic of the interventions promoted by SUN is the narrow focus on the first 1000 days (detached from social and economic determinants and other stages of the life cycle) as well as the emphasis on technical solutions to overcome malnutrition. By joining SUN, countries align their nutrition priorities and strategies to those of the initiative, and risk foregoing and/or undermining alternative strategies. Even where SUN does not introduce ‘new interventions’, as in the case of Guatemala, the initiative contributes to an increased emphasis on certain interventions to the detriment of others, possibly avoiding measures aimed at addressing the underlying structural causes of malnutrition.

Importantly, the initiative has contributed to the (further) institutionalization of private sector influence on public food and nutrition policy in the countries reviewed. This is particularly alarming considering the paucity of conflict of interest safeguards to regulate engagement with the private sector and the misleading guidance on this by the SUN Secretariat. (Pillar IV - people-centered governance)
Whereas SUN presents itself as a movement, it is in fact highly detached from the realities of the people affected by hunger and malnutrition, and does not make a visible effort to enhance their effective participation in public policy deliberations, which would ensure that their perspectives and analysis of the situation are taken into account. Far from promoting equitable inclusion, SUN contributes to further exclusion by promoting top-down, internationally-driven measures for local communities. (Pillar IV - people-centered governance).

A closer look at SUN’s internal structures and ways of working raises important governance and human rights concerns. While the initiative claims to be a country-led movement, the review of SUN’s leadership, decision making structures, and accountability mechanisms paints a different picture. While it is difficult to fully assess the internal dynamics and their nuances from the outside, it is clear that those organizations able to contribute both financial and human resources to the initiative are also the ones with a greater say in decision making and priority setting. Key funders (and contributors) such as the Bill & Melinda Gates Foundation are represented on SUN’s Lead Group, as well as on the board determining the allocation of the initiative’s pooled fund. This applies not only to donors but also to other members of SUN. For example, Save the Children hosts the CSN secretariat, is the co-chair of the CSN Steering Group, and one of the main implementing partners of the initiative’s pooled resources. The organization thereby holds significant influence over the initiative’s priorities and direction. Similarly, the UN agencies that have been at the forefront of pushing for SUN (and contributed to the downscaling of the SCN) continue to hold a strong grip on SUN: UNICEF is the Chair of SUN’s Lead Group (which also appoints the Executive Committee), while WFP is a member of the Lead Group, Co-Convener of the SBN, and part of the Global SBN Secretariat.

This stands in sharp contrast to the low representation of SUN government representatives within SUN’s Lead Structure, and the low representation of national civil society organizations – especially grassroots and people’s organizations – in SUN’s Civil Society Network Steering Group. While both the Lead Group/Coordinator as well as the CSN Steering Group are supposedly guided in their decisions by SUN governments and local CSAs (respectively), it is unclear how such guidance takes place in practice.

Another point of major concern relates to the question of accountability. SUN’s concept of mutual accountability is highly problematic. On the one hand, it remains unclear how in practice members are to hold each other accountable. On the other hand, it is an exclusive concept (only within SUN, not towards the constituencies the initiative supposedly serves or those who might be affected by its actions) which diverts the line of accountability away from that between people and their elected governments. The difficulty to attribute impact to the SUN initiative’s influence contributes also to diffusion of accountability of governments. Who is to blame when interventions inspired by SUN do not show fruits or even have negative impacts? SUN country governments can wash their hands by saying they have followed SUN’s approach and done something for nutrition, while SUN’s structure and ways of working make the attribution of responsibility for limited, foregone or negative impacts on the RtAFN extremely difficult.

Last but not least, the emphasis placed by the initiative on consensus and members’ willingness to negotiate and the omission of clear dispute and conflict resolution procedures is highly concerning from a governance and human rights perspective. This is especially in light of the huge power imbalances within and among SUN’s ‘stakeholder’ constituencies and the omission of mechanisms to correct these. These power differences are not even recognized, rather it is assumed that NGOs naturally represent the views of civil society and those affected, and that by placing representatives of international NGOs (acting in personal capacities) on the Lead Group power becomes balanced. The covering up of differences in opinion and approaches on how to deal with malnutrition and the promotion of only interventions on which consensus (within SUN) is possible presents a huge risk for human rights. It inevitably leads to turning a blind eye to the structural causes of malnutrition – including those to do with the corporate food regime and its strategic priority to change food cultures in lower and middle-income countries – which naturally
are a field of contestation and diverging views given the different interests of the actors involved.

Concluding, it can be said that significant discrepancies exist between SUN’s stated nature, vision and goals, and its actual ways of working, the interventions promoted, and their outcomes. While SUN presents a broad vision of a world free from malnutrition in all its forms in which every child, adolescent, mother and family can realize their right to food and nutrition, the operationalization of this goal has been very limited in practice with interventions primarily focused on addressing immediate causes of undernutrition within a limited population group. Similarly, the concept of an inclusive, country-driven movement is highly illusionary in light of the initiative’s actual structures and practices. The principle of inclusiveness has, contrary to the human rights framework, been used to push for inclusion of corporate actors, rather than to guarantee the inclusion of rights holders and in particular those most affected by hunger and malnutrition.
Recommendations
To SUN country governments

- Freeze engagement with SUN;
- Carry out a human rights impact assessment of current nutrition interventions in terms of their contribution to advancing the RtAFN and related rights. Nutrition priorities should be examined within a broader poverty reduction and social and economic policy space to identify policy priorities that address the underlying structural causes. The assessment should involve the meaningful participation of communities most affected by hunger and malnutrition, and start with the realities people face daily rather than being based on supposedly ‘scientific’ evidence;
- Revisit the current nutrition strategy based on the results of the human rights impact assessment;
- Establish clear and enforceable guidelines on nutrition interventions. Adopt a precautionary approach with regard to technical interventions, such as biofortification, which present potential serious risks to our planet’s biodiversity, peasants’ rights, the RtAFN, and the right to health, in addition to concerns related to their sustainability and effectiveness in addressing micronutrient deficiencies, especially in light of viable alternatives;
- Protect the public policy space from undue influence of private sector and organizations promoting private sector interests. Develop effective conflict of interest and other safeguards aimed at this objective and mechanisms to enforce them. These safeguards should be based on accepted legal COI concepts and developed with the support of independent experts and public interest advocates. They should not be based on the misleading guidance developed by the SUN initiative;
- Develop, implement and monitor human rights-based public policies that are in line with States’ public mandate and human rights obligations; and
- Support the development of Guidelines on Food Systems and Nutrition in the context of the Committee on World Food Security and ensure that they are in line with the RtAFN.

To donor countries supporting SUN (including EU and its member countries)

- Support national level efforts to: (a) implement participatory assessments of the impact of current nutrition interventions, (b) develop and implement new action plans that also address structural causes of malnutrition, and (c) monitor the impacts and implementation processes of nutrition actions and their compliance with human rights;
- In line with extraterritorial human rights obligations, ensure that all programmes and projects aimed at improving nutrition which are supported by international development cooperation contribute to the realization of human rights and do not harm human rights. This requires among others ex-ante human rights impact assessments and continuous monitoring of impacts, and a freezing of support to SUN;
- Following from the previous recommendation, redirect funding from technical short-term interventions towards more long-term strategies that address the structural barriers people face in nourishing themselves and their families in a dignified way. This includes a fundamental shift towards public policies and public investments that enable the transition to food systems based on agroecological principles and include support for community-driven initiatives;
- Ensure human rights compliance with extraterritorial obligations and revisit key national and international policies and actions to assess their impacts on nutrition in the Global South, including in the areas of agriculture, trade, foreign investment, climate change, and regulation of transnational companies;
- Strengthen the legitimate intergovernmental bodies that are mandated to advance the governance of nutrition, such as the FAO Conference, the World Health Assembly (WHA) and the CFS;
- Support the development of Guidelines on Food Systems and Nutrition in the context of the Committee on World Food Security and ensure that they are in line with the RtAFN;
• Support national governments in protecting public policy space from undue influence of private sector organisations and to develop stringent guidelines for regulating engagement with the private sector in nutrition and related policy fields; and
• Discontinue support for multi-stakeholder approaches in nutrition and other policy fields that place all actors at the same level and fail to recognize differences between actors based on their interests, roles, power, and legitimacy.

To UN agencies and their member countries

• UN agencies have a direct international obligation to observe and promote human rights internationally based on the UN Charter (Art. 55 & 56). Moreover, member states and in particular those holding influential positions have extraterritorial obligations to ensure that the international organizations in which they participate act in compliance with human rights. In this sense, UN agencies and member states have a duty to ensure that initiatives they support in the context of international cooperation on nutrition and policies affecting nutrition, contribute to the protection and realization of human rights. This includes their participation in and support to SUN;
• Support national level efforts to: (a) implement participatory assessments of the impact of current nutrition interventions, (b) develop and implement new action plans that also address structural causes of malnutrition, and (c) monitor the impacts and implementation processes of nutrition actions and their compliance with human rights;
• UN agencies should take an active role in advancing human rights-based international standards on nutrition and supporting member countries in developing human rights-based strategies for nutrition. They should abstain from promoting narrow approaches that present risks for the realization of the RtAFN and other human rights, including those approaches advanced by the SUN initiative; and
• Apply a vigilant arms-length approach to the engagement with the private sector. Support and highlight the need for countries to protect their public policy spaces from undue influence of the private sector. Abstain from recommending multi-stakeholder approaches in nutrition and other policy fields that place all actors at the same level and fail to recognize differences between actors based on their interests, roles, power, and legitimacy.

To civil society organizations

• Counter the split among civil society organizations working on nutrition that has emerged with the creation of SUN. Engage in constructive and frank dialogue within the SUN CSN and with organisations outside of SUN to address the findings documented in this review. Define a pro-active approach to support nutrition actions that are human rights based;
• Gather the views of local CSOs and communities with regard to the barriers they face and critically assess whether interventions promoted through SUN or based on SUN’s approach, actually contribute to reducing these. Actively participate in participatory assessments of nutrition interventions and their impacts on the protection and realization of the RtAFN and other human rights. Constructively participate in the reformulation of nutrition actions based on the findings of such assessments.
Endnotes
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Endnotes
71 A central point of disagreement is that the Copenhagen Consensus does not challenge these in general as modalities for implement-

72 in the SDGs. As a consequence, the focus of the report lies on improving MSPs without seriously discussing alternative 
models. See Section 3.3 (pp. 73-84). The HLPE report identified eight qualities to assess performance of MSPs to集成

73 in finance and impacts of nutrition and nutrition security: results related: effectiveness, impact, and capacity to mobilize 
resources; process related: inclusiveness, accountability, transparency, consistency and efficiency. See Chapter 4. 

74 The HLPE identifies five main functions of MSPs: Knowledge co-generation and capacity building; advocacy; standard-setting; action; fundraising and 
resource mobilization. See pp. 52-64. Gleckman distin-

75 guishes between policy-oriented, product and process-orien-
ted (standard-setting), and project oriented multi-stake-

76 holder groups. See pp. 16-25. Gleckman describes nine main beliefs that are widely shared among participants of multi-stakeholder projects for implications for governance. These 
include: the existence of an “unsolved global problem”, the ability to identify all relevant stakeholders, equitable decision making, management of conflicts of interest, and enhanced efficiency and efficacy. See Chapter 4. 

77 See HLPE pp. 79-83 for more details on the different process-related indicators and interrelations between the 

78 process-related criteria. A detailed history of the SUN movement will be 

79 provided in Chapter 3. 


82 Supra note 81, p. 19. 

83 Supra note 85, p. 19. 


86 See for example: SUN. “Multi-Partner Trust Fund: Working Note: Enabling Good Governance in Multi-stakeholder Processes and Contact List.” 2018. scalingun.org 

87 The precise criteria for appointment are unclear, except for that they should “include leaders in government, of business, of civil society and the United 

88 Nations’ system”. It is equally unclear what the process for proposing members is: “Members of the Movement will be 

89 invited to provide suggestions for membership in a process to be decided”. Supra note 85. 

90 Supra note 85. 

91 The United Nations Secretary General appointed the new Lead Group on 23 September 2019, Supra note 85. The previous Lead Group included even only 
two government representatives. 

92 For more information, see: DSM. “Food Supply Chain – Communication” 

93 For more information, see: Java Foods. “Our products” java-foods.com 

94 Private Sector Engagement Toolkit. 2011. scalingun.org 

95 SUN: The SUN Movement Coordinator – Terms of Reference. suncivilsociety.com 

96 Scaling up Nutrition. 2011. scalingun.org

97 As indicated by the Movement’s monitoring mechanisms and the advice of the Executive Committee or Lead Group”. Ibid. 

98 For a list of members of SUN’s Executive Committee, see SUN Movement Executive Committee”. scalingun.org 

99 See country descriptions on SUN website. 

100 SUN: “Frequently asked questions”. scalingun.org 

101 Supra note 81, p. 32. For more information, see SUN Civil Society Network website. suncivilsociety.com 

102 How can we strengthen the enabling environ-

103 ments for businesses to take action in improving nutrition? SUN GAIN Side Event. 23 May 2018. youtube.com 

104 See SUN: “SUN Civil Society Network”. scalingun.org 

105 See SUN Civil Society Network. Membership and Contacts list. 2017. suncivilsociety.com 

106 For details on the criteria, see SUN CSN Mem-

107 bership Application Form. 2017. suncivilsociety.com 

108 “By becoming a member, the organisation understands it does not have decision-making power, which remains bound to the steering group of the network, with guidance from SUN Civil Society Alliances in SUN coun-
tries.” Ibid. 

109 The composition of the SG is and should remain representative of the Network membership. In order to achieve this, there is a basic quota system with transparent representation criteria: (a) geographical balance [...] (b) gender balance; (c) sectoral balance [...] (d) typology of CSOs: this is defined based on a mapping of the various constituencies represented on the Network (i.e. grassroots organizations, national CSOs, farmers, women’s groups, INGOs, etc.) Civil Society Network. Terms of Reference. P. 7. docs.scalingun.org 

110 This excludes minimum of 15-day work days and travel to key events and meetings to represent the SUN 

111 CNS as well as the SUN global gathering and annual meet-

112 ing of the SUN CNS. Ibid, p. 8-13. 

113 See note 104 for a list of current Steer-

114 ing Group members. 

115 SUN: “SUN Business Network (Prog-

116 res at Glance)”. scalingun.org 

117 SUN: “SUN Network for SUN”. scalingun.org 

118 SUN: “SUN Movement Secretariat” (as of December 2019). scalingun.org 


120 SUN: Multi-Partner Trust Fund was supported by DFID, SDC and Irish Aid. Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

121 Ibid. 

122 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

123 SUN: “Multi-Partner Trust Fund”. scalingun.org 

124 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

125 SUN: “Preventing and managing conflict of interest”. scalingun.org 

126 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

127 See SUN: SBG Global Members Princi-

128 The 2018 report was also largely funded by the same donors that fund SUN. See Global Nutrition Report 2018: Shining a light to spur action on nutrition. P. 8. globalnutritionreport.org 

129 Supra note 81, p. 30. 

130 Ibid. 

131 scalingun.org 

132 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

133 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

134 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

135 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

136 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

137 The Global Nutrition Report (GNR) is a multi-stakeholder initiative itself. The report’s “Stakeholder 

138 Group” is co-chaired by two prominent members of SUN, DFID (donor) and 1000 Days (NGO). In fact the, the vast 

139 major of its members are also SUN members, including the SUN Coordinator herself, Mars, Save the Children, Cargill, the World Food Programme, UNICEF, and the Somali National 

140 National Coordinator for SUN. scalingun.org 

141 The 2018 report was also largely funded by the same donors that fund SUN. See Global Nutrition Report 2018: Shining a light to spur action on nutrition. P. 8. globalnutritionreport.org 

142 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

143 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

144 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

145 Ibid. On the independence of the GNR, see supra note 137 on the governance and funding of the report. 

146 Supra note 7. 


148 Beaton, G. “The AGN and its evolving role in the 

149 SCN”. SCNNews 18 (2019). scalingun.org 

150 James, P and Grenfell, B. “The Global Nutrition body by 2020: an Agenda for Change in the Millennium. Final Report to the ACC/SCN by the Commission on the 


152 UNSCN. SCNNews 18 (2019). scalingun.org 

153 The report entitled redefined the role of the so-called Advisory Group on Nutrition (AGN) and the establishment of a tripartite governance mechanism represent-

154 ing UN organizations, governmental donor agencies and NGOS. See SCNNews 20 (2020). scalingun.org 

155 The annual sessions gathered close to 400 acade-

156 mics, officials and NGO activists. These debates received the concrete scientific, philosophical, political and empirical inputs of different publications: SCNNews, global Nutri-

157 tion Report, working groups’ reports on specific topics and the output of ad-hoc task forces. 

158 UNSCN. SCNNews 18 (2019). scalingun.org 

159 Scaling up Nutrition Pooled Fund 2018-2020. scalingun.org 

160 Lie provides the ADG the opportunity to change the dif-


162 Especially during the 31st Session that took place in New York in March, 2004. See UN SCNNews Report of the SCN at its Thirty-first Session. scalingun.org 

163 The participants following the 1999 reform were distributed in three groups (known as constituencies).
10 recommended intervention packages involved products of some kind or another. The World Hunger Micro-Finance Road Map (2016-2020) also mentions the ICN2 Framework for Action as source of reference for SUN interventions. Supra note 81, p. 19 loved the term “interaction module”.

236 These are: Adolescent health and preconcep-
tional nutrition; maternal dietary supplementation; micro-

237 When speaking about ‘evidence’ informed interventions, such as those promoted by the SUN initiative, it is important to note that the ‘evidence’ referred to is biased in nutrition-"specific-urban interventions. See for example: Lawrence M. et Al. 2016. “Evidence Synthesis and Trans-
formation of Nutrition Interventions to Combat Micronutrient Deficiencies with Particular Focus on Food Fortification”. In Nutrients 8(9):555: rsti.nlm.nih.gov. A recent World Bank report states that “sufficient, evidence-based interventions, including nutrition-sensitive interventions, are essential for the analysis. For example, when calculating the investment needed for stunting, it is mainly about sup-

238 Indonesia REP15/NFSDU. Paras 166-183.

239 The Lancet. 2018. The only comment made by community


241 Gil, Lone, et Al. 2015. “Tropical Pedia-


243 Thelancet.com

244 Still applied due to delays in adopting the draft FNS Policy. Supra note 204.

245 Suppan 2011. The GMO labeling fight at the Codex Alliance is a commission. How big a victory for consumers? iata.org


247 WHO. Nutrition-related health products and the World Health Organization Model List of Essential Med-

248 Representative of International NGO. Guate-


250 India’s position on RUTF, see: Letter sent by the Ministry of Women and Child Development, Government of India to the 39th Session of CCNFSDU, Berlin, Germany, 2018.

251 An evaluation of the impact of the Zero Hunger Pack carried out by IPGR in 2016 showed that none of the 1000 Days Window interventions, except for deworming, on their own had impacts on the nutritional status of children below five years. Impact increased when measures were combined (=5), however, most households were consuming only between 5-7.

252 The most common interventions households benefited from were supplements (folic acid and iron) and counselling concerning breastfeeding. See: Supra note 291 (Strategy for the Prevención de la Desnutrición Crónica), p. 21.

253 The 2016-2020 strategy on chronic malnutri-

254 The Indian Express, 31 October, 2017. indiantelevision.com

255 The mission did the commendable job through coordinated action on nutrition of children with a reach right up to the households. Haddad, L., Nisbett, N., Barnett I, Valls, E. (2014). Ma-

256 Indonesia REP15/NFSDU. 7 and 8 May, 2018.


258 FIAN International’s website soon. See also (concerning focusing efforts towards the reduction of micronutrient deficiency): Supra note 266.

259 The only comment made by community

260 In one of the communities it was also reported that theઆ veces se esperaba que el crecimiento de la población estuviera alrededor de 2.7% al año. Se estima que el crecimiento de la población en Guatemala ha sido más rápido en la ciudad de Guatemala. Crónica. 2016. nota 205.

261 The Lancet, 2013.

262 Management and supervision of the essential drugs list.


264 Mr. Ali, the Head of SUN in the Guatemala City, 16 May, 2018. This at least in part is attributed to the government setting an ambitious goal of a reduction of 10% in four years in the prevalence of growth retardation.

265 The focus of the 2016-2020 strategy is on children below two years and women who are pregnant and/or with children below two years. Prior to the country’s joining of SUN and the emphasis on the 1000 Days Window, the target groups had been children below five years, pregnant and breastfeeding women, and women of reproductive age. See: Supra note 260, pp. 28-29. See also (concerning the earlier target groups): Unidad Nacional de la Esperanza: Plan de Gobierno. Guatemala, 2008.

266 In the community it was also reported that the “evidence” referred to is biased in nutrition-specific interventions. See for example: Lawrence M. et Al. 2016. “Evidence Synthesis and Trans-
formation of Nutrition Interventions to Combat Micronutrient Deficiencies with Particular Focus on Food Fortification”. In Nutrients 8(9):555: rsti.nlm.nih.gov. A recent World Bank report states that “sufficient, evidence-based interventions, including nutrition-sensitive interventions, are essential for their analysis. For example, when calculating the investment needed for stunting, it is mainly about sup-


268 In one of the communities it was also reported that

269 That the state has been lauded globally as a “success story” for its rapid and significant decline in undernutrition amongst children between 2006 and 2012, when compared to other Latin American countries. It also recommends that the State party to intensify its efforts to combat and prevent mal-

270 The Committee is concerned about reports of the limited impact of the Zero Hunger Plan (...). The Committee urges the State party to intensify its efforts to combat and prevent mal-

271 The Committee is concerned about reports of the limited impact of the Zero Hunger Plan (...). The Committee urges the State party to intensify its efforts to combat and prevent mal-

272 See also (concerning focusing efforts towards the reduction of micronutrient deficiency): Supra note 266.

273 Nutrition-related health products and

274 The World Bank Framework for Action as source of reference for SUN interventions. Supra note 81, p. 19 loved the term “interaction module”.

275 Suppan 2011. The GMO labeling fight at the Codex Alliance is a commission. How big a victory for consumers? iata.org


277 WHO. Nutrition-related health products and the World Health Organization Model List of Essential Med-

278 Representative of International NGO. Guate-


280 India’s position on RUTF, see: Letter sent by the Ministry of Women and Child Development, Government of India to the 39th Session of CCNFSDU, Berlin, Germany, 2018.

281 An evaluation of the impact of the Zero Hunger Pack carried out by IPGR in 2016 showed that none of the 1000 Days Window interventions, except for deworming, on their own had impacts on the nutritional status of children below five years. Impact increased when measures were combined (=5), however, most households were consuming only between 5-7.

282 The most common interventions households benefited from were supplements (folic acid and iron) and counselling concerning breastfeeding. See: Supra note 291 (Strategy for the Prevención de la Desnutrición Crónica), p. 21.

283 The 2016-2020 strategy on chronic malnutri-

284 The Indian Express, 31 October, 2017. indiantelevision.com

285 While state governments may decide about

286 An evaluation of the impact of the Zero Hunger Pack carried out by IPGR in 2016 showed that none of the 1000 Days Window interventions, except for deworming, on their own had impacts on the nutritional status of children below five years. Impact increased when measures were combined (=5), however, most households were consuming only between 5-7.

287 According to an analysis of Results for Devel-

288 While state governments may decide about

289 As the only comment made by community

290 In one of the communities it was also reported that

291 An evaluation of the impact of the Zero Hunger Pack carried out by IPGR in 2016 showed that none of the 1000 Days Window interventions, except for deworming, on their own had impacts on the nutritional status of children below five years. Impact increased when measures were combined (=5), however, most households were consuming only between 5-7.

292 The most common interventions households benefited from were supplements (folic acid and iron) and counselling concerning breastfeeding. See: Supra note 291 (Strategy for the Prevención de la Desnutrición Crónica), p. 21.

293 The 2016-2020 strategy on chronic malnutri-

294 The Indian Express, 31 October, 2017. indiantelevision.com

295 While state governments may decide about using them with approval from the National Technical Board on Nutrition, available nutrition-specific intervention was that such approval had not been granted. For the Government of India’s position on RUTF, see: Letter sent by the Ministry of Women and Child Development, Government of India to the 39th Session of CCNFSDU, Berlin, Germany, 2018, which states that the “use of RUTF in the management of children with SAM” to all the state governments on 28 August, 2017. https://rcd.org.in/sites/default/files/2017-10/ Endnotes
397 Fundaza, a member of the Alianza Donantes. See: Fundaza. “EmpreRaRSE.”
398 is a corporate donor of Fundesa. See: Fundesa. “EmpreRaRSE.”
399 the development of methodologies. Azúcar de Guatemala as its “social arm” to implement educational, health and nutrition activities and has been very active in promoting “Evolución de la Agroindustria Azucarera de Guatemala.”
400 to plant and eat the potato by 2018. USAID. “Orange-Better Bananas.”
401 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
402 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
403 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
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408 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
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410 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
411 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
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414 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
415 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
416 the breeding and dissemination of biofortified orange-yellow sweet potato. USAID. “Better Bananas.”
Health Survey 2011 and 2016. dhisp2program.com. dhisp2program.com
359 Ibid.
362 The IMAM guidelines in Uganda recommend that RUTF should be used/feeder to children alongside locally available foods.
364 Ibid.
366 Ibid.
367 UNICEF imports and directly supplies RUTF to the nutrition unit. For treatment of HIV patients, RUTF is procured with support from USAID from the local manufacturer.
368 RUTF is in the list of essential medicines, the Government has reportedly not allocated any funds for their purchase.
370 District official. Mpigi District, December 2017.
371 See for example: “Core to the implementation of this policy will be awareness creation and a mindset change that views nutrition as an investment and not a costs”.
372 Para 64.
373 According to SUN’s Strategy and Roadmap 2017 to 2020, the initiative will have supported SUN countries to “have multi-stakeholder partnerships for co-ordination at national levels” and “have all key stakeholders, including communities, making measurable contributions to scaling up”. Supra note 81, p. 8.
375 See supra note 209.
377 2017. SUN Business Network Company Commitments. sunbusinessnetwork.wpengine.com
381 See for example: “ ‘SUN will benefit from the merging into one multi-stakeholder platform of all existing SUN CSOs’ ”. SUN Business Network Company Commitments. sunbusinessnetwork.wpengine.com
382 See supra note 209, p. 23.
383 For instance, GAIN in the draft Food and Nutrition Strategy and Investment Plan (2004) and IFPRI in the draft seed policy (2017).
384 The policy explicitly mentions SUN in the introduction (as point of reference for the policy) as well as under Objective 1.7: “It should have been included (legal and regulatory environment for scaling up food and nutrition security interventions”). Action iii: “Promote multi-stakeholder engagement platforms and partnerships for effective delivery of nutrition interventions and joint accountability in the context of SUN Movement.” Supra note 206, para 31.
385 The importance of multi-stakeholder partnerships is highlighted throughout the policy, e.g. “This policy will prioritise multi-stakeholder partnerships to enable achievement of the policy results.” Supra note 205, para 38.
386 See section 6.1.3 “Funding as part of the Public-Private Partnerships: With passage by Parliament of the national public-private partnerships for health policy, Government will attract funding from the private sector to implement a series of interventions under UNAP with joint utilisation of “public” and government and private sector financing.” Supra note 205.
387 A robust conflict of interest policy would have forbidden such dependency on donor and private sector funds to arise in the first place.
388 The OECD Guidelines focus on the integrity of public officials, their duty to serve the public interest and forbidding such dependency on donor and private sector funds to arise in the first place.
389 The OECD Guidelines focus on the integrity of public officials, their duty to serve the public interest and engender an organisational culture.
391 Supra note 81, p. 8.
392 For example, WFP relies on its own VAM information system that takes data from school height surveys and maternal-infant surveys to identify high priority communities. The Nutrition Officer relies on the weight-for-height indicator generated periodically by Save the Children.
394 CSO representative. Follow-up email conversation by Laura Michèle. 20 August, 2018.
395 See for example: “Newly engaged volunteers are required to sign a code of conduct stating that they will act in the interest of children and thereby observe the law.”
396 SUN. 2017. "By establishing a set of common results, agreed by key sectors and stakeholders, supportive partners are bound together to deliver for those who suffer most: "Civil society alliances ensure that...'
397 There will be no sustainable improvements in nutrition until women are empowered as leaders in their families and communities.” Supra note 81, pp. 19, 22.
398 See for example: “The Civil Society Network contribute to ensuring that policy, plans and pledges are implemented in the interest of people and reach the populations most vulnerable to malnutrition. National Councils and Ministries have diverse constituencies, contribute to implementing nutrition priorities, coordinate advocacy and action on nutrition at all levels, ensure government policies and plans reflect the realities of those who suffer most, ensure rights are realised and strengthen citizen action and inclusion in decision making processes.” Supra note 81, p. 32.
399 For example, the case of USAID-funded CSOs was mentioned by interviewees both in Uganda and Guatemala.
400 See membership of the CSA Guatemala (supra note 216) as well as of the international CSN (supra note 104). This is relevant also in the sense that the “watchdog function” of civil society within SUN is often highlighted by SUN members and the SUN Secretariat concerns about the participation of business in the initiative. The argument made is that private sector participants are “cheeked” by the critical CSOs within the initiative and therefore is no longer problematic.
401 See Chapter 1 and especially Pillar Four of Analytical Framework.
402 CSO representative (Guatemala). Guatemala City, 18 May, 2018. At the time of interviews, the Guatemalan CSA had following members: Save the Children International, UNICEF, UNICEF, Save the Children International, UNICEF, and the Secretary of INCOPIAS.
403 Community group discussions. La Paz and Matthias 2017. See also Chapter 2 on how the meaning of the term stakeholder has changed over time.
404 Community members did not know about SUN or its strategy. Two women reported having heard about the 1000 Days Window at a health centre but that they did not understand what it was about.
405 INCOPIAS is integrated by 10 social sectors, which includes civil society but also the private sector. For more information, see: INCOPIAS, “Nosotros” incoapis.org
406 Ibid.
407 INCOPIAS has no financial independence and is linked under the same roof as SENSAN. Hence it is under the direct control of SENSAN. Representative UN Agency Guatemala City, 11 May, 2018. INCOPIAS contributions are only taken into account when SENSAN requests this, which implies that “real” participation of independent organisations is not guaranteed. Several grassroots organisations have in recent years left the space as they felt their contributions were not taken into account. CSO representations. Follow-up email conversation with Laura Michèle.
408 20 August, 2018.
409 In the case of INCOPIAS this would entail in particular ensuring its complete institutional and financial independence from SENSAN.
410 Rather than SUN CSO members participating in INCOPIAS, the INCOPIASorary partners take part in the SUN CSA.
411 This includes World Bank, UNICEF, WFP, DFID and USAID.
415 See also Chapter 2 on how the meaning of the term stakeholder has changed over time.
417 See also Chapter 2 on how the meaning of the term stakeholder has changed over time.
418 Ibid.
419 This policy focuses on empowering communities with resources, knowledge and skills to support implementation of nutrition programmes at country level. Feedback on the WHO Consultation.” whoint.
420 See supra note 81, p. 8.
421 For example: “By establishing a set of common results, agreed by key sectors and stakeholders, supportive partners are bound together to deliver for those who suffer most: "Civil society alliances ensure that...'
mindset change towards food and nutrition security, and full involvement in the implementation of interventions [emphasis added].” Supra note 205, para 44.

440 Supra note 205, para 43.
443 Supra note 81, p. 25.
444 See for example a video published by SESAN on “Intervenciones de la Ventana de los Mil Días” (1000 Days Window Interventions). youtube.com. Examples from the draft Ugandan FNS Policy include: “The policy focus will be on mindset change at the household level on the type of foods that generate nutrients, which women can prepare for their households while involving men in the advocacy and behavior change campaigns”. “This policy will focus on supporting a cultural progression that exposes men to the details of nutrition and attach that importance to their pursuit of income – so that they appreciate that health for each member of the household is wealth”. Supra note 205, paras 73 and 85.

445 SUN’s vision most clearly expresses this in stating that “collective action ensures every child, adolescent, mother and family can realise their right to food and nutrition, reach their full potential and shape sustainable and prosperous societies” [emphasis added]. Supra note 81, p. 6.
446 Supra note 81, p. 6.
447 Supra note 81, p. 32.
Referencing this report

Title
When the SUN casts a shadow.
The human rights risks of multi-stakeholder partnerships: the case of Scaling up Nutrition (SUN)

Authors
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Patti Rundall, Flavio Valente
This study explores how the shift to multi-stakeholder models influences public policy spaces; the framing of agendas; the capacity and political will of governmental and intergovernmental institutions (such as the UN) to regulate in the public interest; and people’s ability to claim their human rights, with special but not exclusive reference to the right to adequate food and nutrition (RtAFN).