A Nutrition Commitment Repository: Scoping and Alternatives

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About MQSUN⁺

MQSUN⁺ aims to provide the United Kingdom's (UK) Department for International Development (DFID) with technical services to improve the quality of nutrition-specific and nutrition-sensitive programmes. The project is resourced by a consortium of five leading non-state organisations working on nutrition. PATH leads the consortium.

The group is committed to:

- Expanding the evidence base on the causes of undernutrition

- Enhancing skills and capacity to support scaling up of nutrition-specific and nutrition-sensitive programmes

- Providing the best guidance available to support programme design, implementation, monitoring and evaluation

- Increasing innovation in nutrition programmes

- Knowledge-sharing to ensure lessons are learnt across DFID and beyond.

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About this publication

Table of Contents

Abbreviations

ATNI	Access to Nutrition Index
BMS code	The International Code for the Marketing of Breast Milk Substitutes
CSO	civil society organisation
DFID	Department for International Development
EU	European Union
EWEC	Every Woman Every Child
FAO	Food and Agriculture Organization
GNR	Global Nutrition Report
GODAN	Global Open Data for Agriculture and Nutrition
ICN2	Second International Conference on Nutrition
INFORMAS	International Network for Food and Obesity (Auckland University)
MQSUN+	Maximising the Quality of Scaling Up Nutrition Plus
NCD	non-communicable disease
N4G	Nutrition for Growth
SDG	Sustainable Development Goal
SMART	Specific, Measurable, Achievable, Relevant, Time-bound
SUN	Scaling Up Nutrition Movement
UN	United Nations
UNGC	UN Global Compact
UNSCN	United Nations Standing Committee on Nutrition
WBCSD	World Business Council for Sustainable Development
WHO	World Health Organization

Summary

The original intent of this scoping exercise was to better understand how a commitment repository for non-state actors—in particular, business and civil society organisations (CSOs)—might strengthen the commitment of non-state actors to nutrition and increase their accountability for progress. A second objective was to imagine what this repository might look like, how it might work and what guidance might be needed, with the assumption that it might be housed within the Global Nutrition Report (GNR). As the piece of work progressed, it became clear that the assumption that a commitment repository for nutrition would achieve these commitment and accountability goals might be flawed (see further information below). In light of this, the United Kingdom's Department for International Development (DFID) adjusted the scope of the assignment and asked Maximising the Quality of Scaling Up Nutrition Plus (MQSUN+) to outline some alternative options that arose during the research.

Interviews and research revealed a lack of evidence that existing commitment mechanisms—in particular, voluntary commitment and reporting mechanisms—may not achieve the aims of increased commitment and accountability, as well as action. The following factors made it unlikely:

1. **The relevance of commitments** to the areas that governments and CSOs would like to see business progress on is often a challenge.

2. **Voluntary targets** are seldom stretch targets, and they are seldom SMART (specific, measurable, achievable, relevant and time-bound).

3. **Reporting rates** are often—but not always—low and reporting is rarely outcome-focused—making gauging progress difficult.

4. **Trendspotting.** Hundreds of diverse voluntary commitments make tracking big-picture trends difficult—making the systemic changes needed hard to identify.

5. **Commitments as a fig leaf.** Voluntary commitments can act as a fig leaf for unsavoury business practices.

6. **Incentives** for both CSOs and businesses to participate in another voluntary commitment mechanism are unclear, which is particularly true for businesses.

For many of the reasons above, there was limited support from CSOs and businesses alike within the sector for another commitment mechanism, despite widespread recognition of the strength of the GNR and of the challenges that a repository would try to address. During interviews, some other proposals did emerge on how DFID could leverage its influence to bring about change, which DFID requested to be outlined in this report to inform their thinking going forward. These were:

1. **Adjusting an existing mechanism.** In particular, the Access to Nutrition Index (ATNI) was a strong candidate. Fixed categories that are not self-selected by businesses, with independently verified reporting, are more likely to increase business focus on the areas that most matter.

2. Using DFID's convening power and partnerships to foster greater dialogue around enablers and barriers to business engagement in nutrition. Many businesses felt frustrated at the lack of dialogue around existing accountability and commitment mechanisms, and they expressed a desire for high-level dialogue around the enablers, barriers and incentives for businesses. DFID

could ally with other partners, such as EAT, the Scaling Up Nutrition (SUN) Business Network, Global Alliance for Improved Nutrition (GAIN) and the United Nations (UN) Global Compact (UNGC) to convene such discussions.

3. **Addressing sectoral fragmentation.** A recent United Nations Standing Committee on Nutrition (UNSCN) report underlined the 'plethora' of calls to action, policies and initiatives at global, regional and country levels which cause confusion and a lack of harmonisation. It also outlines the challenge that the number of uncoordinated actors poses to accountability for nutrition action. DFID could undertake a detailed landscaping exercise, followed by multi-stakeholder discussions on how to address some of these challenges at both global and country levels.

4. **Supporting lower-income countries and middle-income countries to put in place appropriate legislation.** Many non-business interviewees suggested that legislation was the 'elephant in the room' and that DFID support would be well spent on helping countries to put the right protection legislation in place around non-communicable diseases (NCDs), obesity, breast milk substitute (BMS) code violations and food safety.

5. **Where commitments are being made, push for SMART commitments.** The World Health Organization (WHO) and the Food and Agriculture Organization (FAO) of the UN are facilitating a commitment-making process for governments under the UN Decade of Action for Nutrition. Although this report has focused on non-state actors, there is an opportunity for DFID to support these government commitments to be SMART, through WHO, through SUN or through MQSUN+.

Despite resistance to the idea of a GNR commitment repository, it was clear that there is a strong appetite to drive increased commitment, alignment and accountability to nutrition. The ideas above merit further exploration to work out how to harness that energy.

Background to the Assignment

Since *The Lancet* 2008 series and the foundation of the SUN Movement in 2011/12, nutrition has risen up the international development agenda. This has been reflected in increased commitments to—and investment in—nutrition by state and non-state actors. In 2013, a high-level 'Nutrition for Growth' (N4G) event in London mobilised $23bn of nutrition-specific and nutrition-sensitive commitments from country governments, donors, multilateral organisations and businesses. In 2015, the Second International Conference on Nutrition (ICN2) harnessed further commitments from state actors, with an ICN2 framework for action to follow on. Since 2013, the GNR has tracked progress against N4G commitments. However, the 2016 GNR found that only 29% of the 2013 commitments were SMART, and despite incremental increases in financing for nutrition, the funding gap for four of the World Health Assembly (WHA) nutrition targets alone is $70bn (Shekar et al, 2016). If Sustainable Development Goals (SDGs) and 2025 WHA targets are to be met, stakeholders need to develop a strong culture of monitoring and accountability for actions on nutrition for all actors.

Building on ICN2 and the Decade of Action for Nutrition, WHO and FAO have committed to developing a public repository to record and monitor government nutrition commitments, as agreed by Member States at the 2016 UN General Assembly. Given that malnutrition cannot be solved by governments alone, in November 2016, the GNR Stakeholder Group discussed whether, given its leading status in nutrition reporting and accountability, the GNR could host a separate but

comparable repository for non-state actors to increase commitments to ending malnutrition in all forms, and thereby increase the accountability of these actors around this goal. However, further scoping work was needed to verify whether a commitment repository would be a viable and sustainable tool.

Approach Taken

Desk review and analysis

This work consisted of gathering and reviewing information related to:

- Existing commitment repositories and accountability mechanisms focused on nutrition.

- Commitment mechanisms and indices beyond the nutrition sector, such as the UNGC and FTSE4Good Index.

- Plans for nutrition commitment repositories by FAO and WHO, and existing commitment platforms at the international and country level (e.g. N4G, ICN2 framework for action, ATNI).

- Any evaluations of existing accountability mechanisms, either in the nutrition sector or elsewhere.

Key informant discussions

MQSUN⁺ undertook key informant interviews with over 30 key stakeholders. This enabled: the identification of other sources of information; an understanding of key incentives for actors in civil society and business to make and report on commitments; an understanding of the potential enabling and blocking factors for the implementation of a meaningful commitment repository; and an exploration of potential modalities for a commitment repository.

Group discussions

MQSUN⁺ undertook some brainstorming discussions with the SUN Business Network and the GNR teams, as well as with the DFID nutrition team.

Impact at international and country levels

In discussions on an accountability mechanism for nutrition, there can be a tendency to focus on the international stage and on international platforms for commitments. In this, there is a risk that international commitments do not feel relevant or real at country level and do not translate into action. MQSUN⁺ maintained a focus on how to ensure impact on commitment and accountability at the country level.

Key Findings

The landscape

The landscape for nutrition commitments is more crowded than one might first expect. **Figure 1** outlines the key initiatives that exist; more details on how these initiatives work are outlined in Annex 1. The fact that so many mechanisms exist raises the question of whether it makes sense to add another mechanism to this landscape. As such, at DFID's request, this report also considers options to adjust existing mechanisms in the final section of this report.

Figure 1: Key initiatives for nutrition accountability

Key:

⭕ = initiative   🔵 = sub-initiative
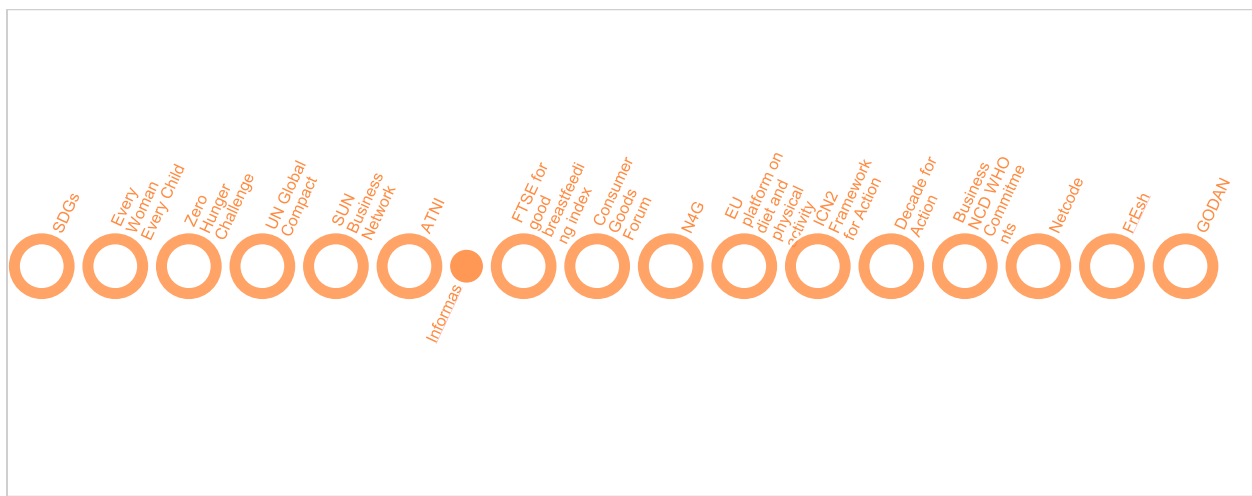
In considering this landscape, it was important to include both commitment-based mechanisms and non-commitment-based mechanisms, as both aim to increase accountability and action. The initiatives in Figure 1 aim to increase commitment and/or accountability for nutrition in a number of ways:

- By encouraging businesses to make voluntary commitments against frameworks, such as the Zero Hunger Challenge, European Union (EU) platform on diet and physical activity, the Consumer Goods Forum, FReSH and WHO NCD commitments.

- By encouraging businesses and CSOs to make and report on voluntary commitments against frameworks (N4G/GNR, Global Compact).

- By assessing businesses against predetermined criteria (FTSE4Good, ATNI).

These mechanisms are explained in greater depth in Annex 1. Despite the range of initiatives, it was not clear that any of the mechanisms based on *voluntary* commitments were achieving their stated objective. Rather, the mechanism most cited by stakeholders as effective on the accountability front was ATNI, which is not commitment-based. A number of reasons for this lack of clarity on impact are outlined below.

Voluntary commitments

All but two of the initiatives listed in Figure 1 are based on voluntary commitments, primarily from business, although the UNGC, N4G and Zero Hunger Challenge also accept CSO commitments. Voluntary commitments seem to undermine the goal of increased commitment and accountability from the outset, for a number of reasons:

- **They report on 'business as usual'.** Key informants said both CSOs and businesses are incentivised to set a 'realistic' target. In the case of N4G, for example, many interviewees within businesses and CSOs reported setting targets that covered activities they were doing already. One prominent CSO reported that, because they set an ambitious target, they are now repeatedly penalised through being assessed as 'off track' in GNRs. In the case of businesses, commitments often need to be approved at board level where there may be a reluctance to expose the business to risk.

- **Voluntary commitments are seldom SMART.** Even with the best will in the world, it is challenging to secure a truly SMART commitment. The 2016 GNR rated only 29% of 2013 N4G commitments as SMART. Evaluations of the EU platform on diet and physical activity repeatedly noted that only 13% of the 116 commitments were SMART. Without SMART commitments, it is challenging to measure progress, which risks setting any repository up for failure.

- **Relevance is a challenge.** One interviewee said that "at best, commitments will be 'SMAT'". Data on relevance is hard to come by, but the 2016 EU platform evaluation found that only 11% of commitments implemented in 2015 made an explicit link to wider EU policy priorities, and links to WHO priorities were implicit rather than explicit (ICF, 2016, p.2). A source who works on the EU platform said that businesses often do not make commitments on the areas where governments and advocates would most like to see greater progress and accountability. They gave the example of Coca-Cola committing to increase physical activity and funding red-and-white, branded soccer pitches, whilst failing to take action on product formulation. Many interviewees attributed ATNI's effectiveness to the set of clear criteria that businesses were assessed against, which had inputs from a wide range of stakeholders and were not voluntary.

- **It is difficult to spot trends in diverse voluntary commitments.** Many interviewees said one potential value of a repository might be to spot overarching trends, such as barriers to progress for business and CSOs. There are currently over 500 business commitments in existence; without set categories or questions, spotting trends in this volume of data would be a mammoth task, if at all feasible.

- **A voluntary commitment can be a 'fig leaf'.** Obesity and nutrition-focused stakeholders expressed concern that a business commitment could be a 'fig leaf' for unhelpful business practices: for example, a commitment focused on workplace practices or physical activity might mask harmful practices around marketing and food formulation. Gilmore et al (2012) argue that a focus on

voluntary regulation and partnerships fails to acknowledge the conflicts of interest involved when corporations engage in activities and policies aimed at reducing the harmful behaviours on which their profitability depends. They also argue that voluntary regulation undermines governments' resolve to legislate.

Response rates

Response rates and quality of reporting to voluntary mechanisms were mixed: the GNR saw a business response rate of 30% in 2016, down from 83% in 2014, compared to a response rate of 80% from CSOs and governments. The EU platform saw a better response rate of 96%, but only 26% of those respondents reported on outcomes. The Consumer Goods Forum received an approximate 20% response across its membership base for its 2016 Health and Wellness Report. The mixed response rates seemed to be driven by the time required, the perceived implications of not reporting and the regularity of reporting cycles.

There were also issues around voluntary reporting without independent verification. In order for a commitment repository to garner media interest, the ratings would need to be robust and independently verified, and the commitments relevant to the key issues at hand. At present, most reporting mechanisms apart from ATNI do not verify the information that is reported to them.

Incentives

The question of voluntary commitments leads to the question of incentives, which are a key barrier. Most businesses and CSOs felt that making and servicing commitments directs valuable resources away from their core business, with limited payback. However, on delving deeper, some incentives that are not currently provided emerged, such as improving internal alignment within organisations. **Figure 2** outlines the reasons businesses and CSOs listed for making commitments, as well as a brief analysis of whether any current mechanisms provide these incentives.

Figure 2: Incentives for making commitments, as reported by businesses and CSOs

Incentive	Is this an incentive for business?	Is this an incentive for CSOs?	Do current mechanisms provide this incentive?
Profile – positioning	Yes	Yes	Yes, to some extent ATNI GNR (examples in text more than N4G tracking)
Learning from others	Yes	Yes	To some extent – SUN Business Network
Identifying trends and barriers	Yes	Yes	No
Increasing consumer trust	Yes	No	No
Potentially useful resources	Yes	Yes	To some extent – SUN Business Network

Positioning was cited as a primary incentive by all businesses and CSOs (100% of business and CSO interviewees, and 50% of interviewees in total). All businesses and some CSOs cited the opportunity to learn from others and identify trends and barriers as an incentive. Of the existing mechanisms, ATNI was seen to provide strong profiling, with some of the 22 food and beverage companies assessed deploying whole teams to ensure their ranking was favourable. CSO interviewees, in particular, valued being profiled in the text boxes in the GNR where they talked about their experience of setting or meeting SMART commitments. This was seen as a rare opportunity for CSO visibility in a widely read report. The credibility of the GNR was clear: it was broadly seen as a strong publication that stakeholders valued. However, all CSO and business interviewees expressed reservations about whether a new commitment repository provided strong enough incentives, given the resource-intensive nature of reporting and the duplication with existing mechanisms: businesses expressed concern about the existing burden of reporting on progress; CSOs said that, although a repository might help them learn and identify new partnerships, the realities of competition for funding in a constrained environment made this unlikely.

Both businesses and CSOs expressed reservations about the focus on commitments and pledging moments without a focus on other big picture issues. One influential business cited the focus on commitments and reporting in the EU platform, without a discussion on the overall direction of travel. Many CSOs expressed frustration at the fragmentation within the nutrition landscape and the proliferation of initiatives. Businesses reported that stretching SMART commitments to yet another mechanism would increase the strain on their resources further. The only incentive that might have shifted this perspective was the opportunity for quality dialogue around findings—helping to shift the discussion on business and nutrition and identify potential enablers to support business engagement in nutrition. With fixed categories rather than voluntary commitments, this might be possible, but it begs the question: why not adjust ATNI and invest more in dialogue around it, working with partners such as the SUN Business Network and EAT? This possibility is explored below.

Levers for change

One key question that arose from key informants was whether commitments were the appropriate lever for change to bring about increased action on nutrition as well as increased accountability for that action. The majority of stakeholders interviewed questioned whether making commitments drives greater impact: they felt instead that the process of commitment making diverts scarce resources away from implementation.

In the case of changing business behaviour, the 2016 GNR found a correlation between business commitments to nutrition and better performance in promoting nutrition based on ATNI data—based on global data and global policies. Evidence is lacking around whether these policies are operationalised on the ground. Kosack and Fung (2014) found mixed evidence of whether transparency improved governance in the context of service delivery.

Some interviewees said that both businesses and CSOs would commit to 'what they were doing anyway', and that on some controversial areas—for example improving food formulation—businesses would 'fly under the radar' rather than be subject to scrutiny, even if they were working to make improvements. Again, this raises the question of whether voluntary commitments measure the changes that many stakeholders think most matter, such as food formulation, marketing to children or BMS marketing.

For many of the non-business stakeholders interviewed, legislation was the 'elephant in the room' with regard to business practices on nutrition. Voluntary, non-binding commitments were seen as fairly toothless in the face of a growing double burden of malnutrition in many countries, continued flouting of the BMS code and a lack of protective legislation around food formulation, marketing to children and BMS in place in many countries. The question arose of whether the funding for a repository would be better spent on supporting countries to get the right legislation in place.

"Data – for what and for whom?"

This question arose repeatedly during interviews. Business interviewees largely felt that this was a donor- and CSO-driven agenda, with limited value for them. CSOs felt that a business commitment repository could be useful, but questioned whether there was value in tracking their own commitments, given the opportunity cost. Interviewees questioned whether this commitment repository would be different from existing commitment mechanisms: one respondent even said, "the definition of insanity is doing the same thing over again and expecting a different result".

Both businesses and CSOs did express interest in improved analysis across thematic areas, along with the identification of trends and gaps. For example, businesses would be able to see where the "big players" are making progress in food formulation or fortification and where they are not. CSOs would be able to see what the trends and gaps are—for example, around programme reach or data work. For this to happen, commitments would need to be SMART and tightly controlled within thematic areas. Again, existing mechanisms could be adjusted to do this.

This scoping also explored the option of gathering all 500+ business and CSO commitments to nutrition in one place and tracking progress via the different mechanisms. At first glance, this is appealing. However, given that so few of these commitments are SMART and reporting is also generally not SMART or is at low rates, this would risk setting any GNR repository up to fail. It would read as a long list of commitments with limited analysis of progress or impact.

Nutrition for Growth

N4G was seen as a positive moment by many CSO stakeholders—showing unprecedented levels of effort and commitment from all stakeholders. The GNR itself was an N4G outcome, and many stakeholders welcomed the opportunity to be profiled in such a widely read report. Despite the recognition of N4G as a key moment, its impact was less clear to many stakeholders. CSOs and businesses alike reported on the lack of follow up on the event, the challenge of un-SMART commitments and the limited resonance of this global event at country level. All interviewees raised the opportunity cost that making and reporting on commitments brought, and almost every key informant challenged whether the GNR "off course/on course" N4G rankings are widely read. Many felt that it was time to make a shift from global events to focusing on impact at the country level and that any global accountability mechanism should have clear links to country impact.

Civil society organisations

This report has often referred to businesses and CSOs together. However, much of the evidence cited around the effectiveness of commitments is drawn from business examples, such as the EU platform or from academic articles focused on business accountability (Swinburn et al, 2015; Sharma et al, 2010; Gilmore et al, 2012). There is limited evidence available on the importance—or effectiveness—of civil society commitments. N4G data tells us that CSOs have a high response rate (80%) and are on track or have reached 73% and 57% of their policy and financial commitments, respectively. On the question of whether making commitments drives increased CSO action and accountability, many CSOs responded in the same vein as businesses: they were incentivised to make commitments to activities which they were already doing to avoid being 'marked down' and the resource implications of making and reporting on commitments was significant in a resource-constrained environment. In addition to this, CSOs said that, in an increasingly resource-constrained environment, much of their activity was driven by what donors and foundations were willing to fund, as unrestricted funds were insufficient to drive increased nutrition commitments within their organisations. This may be reflected in the fact that fewer CSO financial commitments are on track. All CSO interviewees saw the main benefit to them of an N4G-type moment.

Throughout the interview process, representatives of CSOs, academia and WHO seemed primarily focused on business accountability. The importance of CSOs emerged more clearly around the role they have in taking accountability data and holding governments and businesses to account (Swinburn et al, 2015).

Conclusions

The principal conclusion of this report was that a commitment repository housed by the GNR would be unlikely to achieve the desired outcome of increased commitments, changed behaviour and increased accountability in non-state actors. The main drivers for this are: lack of incentives for most stakeholders; the difficulty of getting SMART commitments and reporting; the lack of relevance of commitments in particular; low response rates; and the cost of verification.

Based on these findings, the form of repository with the best chance of adding value would:

1. Be exclusive, accepting smaller numbers of truly SMART commitments from business and civil society.

2. Accept commitments against fixed categories that are relevant to reducing malnutrition.

3. Be framed around overcoming barriers and findings solutions, rather than simply accountability and transparency.

4. Be accompanied by high-level, high-quality dialogues based on the findings.

5. Be verified by an independent third party, which brings considerable cost implications.

Even under all these conditions, however, it is not clear that bringing in a new repository will drive change, and there are some critical barriers to success:

1. Limited enthusiasm with most interviewees—'pull factor' missing.

2. Perception of a repository as a donor-driven agenda.

3. Heavy time investment for CSOs and businesses with an unclear return.

4. Creating another duplicate system in an already busy space: the description above is remarkably close to ATNI.

5. Questions over whether regulation might be more impactful on business behaviour.

A number of alternative options for DFID to work with partners to drive greater investment in nutrition arose in the course of this investigation. The next section explores these options.

Options for DFID to Strengthen Commitment and Accountability, and Incentivise Action

All interviewees agreed that DFID and other players could use their convening power to tackle some key challenges in the nutrition sector, including increasing business engagement in nutrition. Five options for DFID action are outlined below.

Option 1: Adjusting ATNI (or other existing mechanisms)

Areas of impact: (i) business accountability; and (ii) CSO accountability.

Although this option covers a number of mechanisms, the primary recommendation here is to adjust ATNI. This is because the other mechanisms listed (the UNGC, Every Woman Every Child and FTSE4Good) face difficulties that might make them challenging to adjust.

The Access to Nutrition Index (ATNI)

ATNI was cited by key informants from both business and CSOs as a strong—albeit imperfect—accountability tool. The main reasons cited for its strength were:

- A clear set of categories which businesses were rated against.

- The independent verification of business reports: if a business is undertaking harmful practices elsewhere, even if not mentioned in its report, which will affect its ranking.

- The strong stakeholder engagement by ATNI and the willingness to improve this mechanism.

- The attention that it has garnered from businesses and—to some extent—investors.

Some ideas that emerged from this exercise were:

- Review the BMS code violation 'flag': is it strong enough, given that Danone and Nestle can still rank second and third, respectively, overall?

- ATNI could go beyond food and drink multinationals and involve significant multinational and local businesses. For example, Walmart drove a huge amount of change in warehousing and transportation by telling suppliers that they needed to work together to reduce the number of miles that trucks are travelling to distributors. To be on the supplier list for Walmart, businesses had to comply. Are there parallel opportunities around nutrition, for example, in the garment industry in Bangladesh, which has a largely female workforce?

- The shift that ATNI is making towards country-level monitoring is positive, with 'spotlight' indices in place in India and Mexico and one upcoming in the United States. The University of Auckland is undertaking work through INFORMAS (International Network for Food and Obesity) using undergraduate and postgraduate students to roll out ATNI scoring. Some key informants suggested that this might be a sustainable option.

Carnstone Partners LLP is currently undertaking research to better understand how ATNI could develop, and ATNI has indicated that adjusting the index going forward is something it is considering.

The UN Global Compact

The UNGC has the advantage of being set up and already feeding back up to the SDGs and of covering both business and CSO commitments. In its present form, the UNGC is unlikely to deliver SMART commitments or reporting: companies sign up voluntarily, and the process is fairly arduous. They then commit to, and report against, the global compact principles rather than commitments (these principles do not contain measures that would be needed around BMS marketing to satisfy key stakeholders). The UNGC team is looking to bring in nutrition commitments under the Zero Hunger Challenge Framework and working with the SUN Business Network to identify a way to do this, but they are likely to face similar challenges in obtaining SMART commitments, as are outlined in this report. With enough political will from stakeholders, including donors, it might be feasible to push for SMART commitments and reporting, but the challenges outlined above around voluntary commitments still stand.

Every Woman Every Child

Every Woman Every Child (EWEC) is multisectoral and multi-stakeholder, including businesses, CSOs, health care workers, philanthropies, researchers and academics and multilateral organisations. From this perspective, it is attractive—as it moves nutrition commitments beyond the nutrition 'echo-chamber' and maximises the possibility of nutrition-sensitive commitments and actions. It also links to the Global Financing Facility, which channels significant funding to support EWEC objectives. At present, commitments against EWEC are not SMART, and it is difficult to get a sense of progress without going through each commitment one-by-one. DFID may be able to influence a SMART-er approach to EWEC commitments. The challenges around SMART voluntary commitments and self-reporting will remain. However, so although EWEC commitments could be strengthened, doing this is unlikely to move the needle on accountability.

FTSE4Good

Although the FTSE4Good BMS Index has probably had some influence over businesses' global BMS policies, its methodology is seen as less rigorous than ATNI and Netcode by the UN community, foundations and CSOs. This lack of credibility makes it a less likely candidate for adaptation.

Option 2: Fostering greater dialogue with business

Area of impact: (i) business engagement in nutrition; and (ii) identify barriers and enablers for increased business impact on nutrition outcomes.

Business sector engagement

Most businesses interviewed expressed frustration at the lack of quality dialogue around business engagement in nutrition—in particular around identifying the barriers and possible enablers for stronger business action on nutrition. Stakeholders expressed an appetite for these dialogues, which DFID and other donors could facilitate. They could deploy ministers and other leaders to convene high-level discussions:

- Stimulated by the findings (for example) of ATNI. With the right partnerships, these findings could then be followed by high-level and high-quality discussions around the findings. Businesses may be able to identify common solutions or make asks of governments and other stakeholders to enable them to have more impact.

- Through the UNGC, as this focuses beyond food companies and is linked to the SDGs.

- Through existing networks, such as:

    o The SUN Business Network, which is the only network which has strong links to both multinationals and businesses in developing countries and is scoping how to work with the UNGC and the Zero Hunger Challenge.

    o The Consumer Goods Forum, UNGC or EAT/World Business Council for Sustainable Development (WBCSD) 'FReSH' Initiative, which cover businesses globally (though with less coverage in Asia and Africa).

- EAT 'Confidence Forums' which are high-level Chatham House-style discussions around food and sustainability.

Option 3: Tackling nutrition sector fragmentation

Area of impact: (i) more effective use of resources and energy across sector; and (ii) easier to hold actors to account across initiatives.

Many CSO interviewees expressed frustration around the level of fragmentation in the nutrition sector. A March 2017 UNSCN report echoed this challenge, underlining the 'plethora' of calls to action, policies and initiatives at global, regional and country levels which cause confusion and a lack of harmonisation. The report also outlines the challenge, which the number of uncoordinated actors poses to accountability for nutrition action. **Figure 3** shows the number of actors in this field— excluding national governments—and provides a visual snapshot of the challenge.

Figure 3: A network map of global nutrition actors colour-coded by explicit nutrition mandate (UNSCN, 2017)

Note
Green = *has explicit mandate or mission statement to address nutrition*; Red = *does not*.
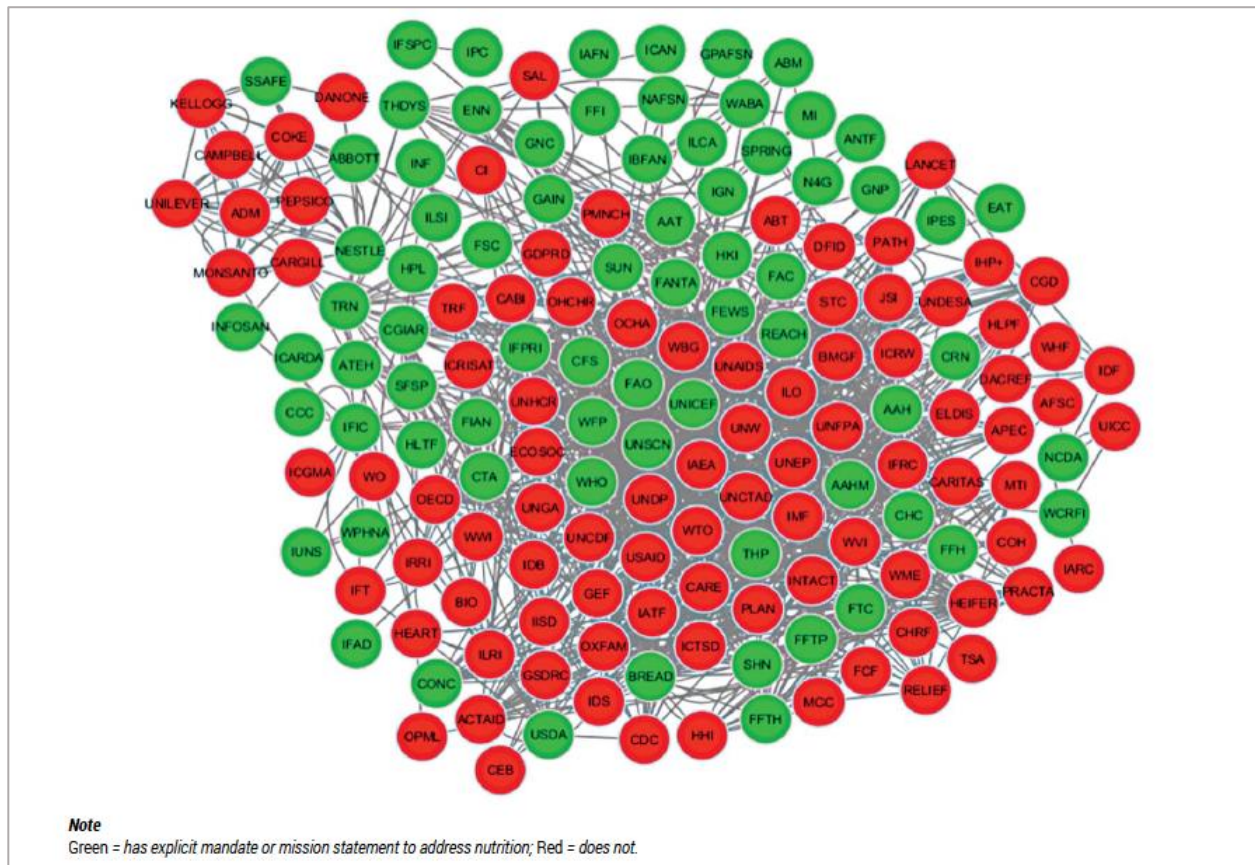
DFID could build on the work undertaken by UNSCN and work with partners to:

- Deepen this review of the landscape, looking at ways to improve coherence—in particular looking at ways to rationalise initiatives and focus the sector's limited resources.

- Work with partners to convene discussions to plot ways to tackle challenges around fragmentation at country and global levels.

- Identify ways to improve accountability across rationalised initiatives.

Option 4: Supporting legislation and regulation

The question of legislation and regulation arose repeatedly from non-business interviewees. In the face of increasing scrutiny, businesses may use voluntary self-regulation or commitments to stave off government regulation (Sharma et al, 2010). The debate around the 'sugar tax' in the UK has brought this question into sharp relief in the past year. There is also limited evidence that voluntary partnerships, such as the Public Health Responsibility Deal in England. have made a difference to obesity and NCD levels (Swinburn et al, 2015). Given that 138 of 140 countries with data face single or multiple burdens of stunting amongst children, anaemia amongst women of reproductive age or overweight amongst women (soon to be published, GNR 2017), increased regulation can play an important role (Swinburn et al, 2015). Given its wide country office reach in countries at risk of a

double burden of undernutrition and overweight and obesity, there is an opportunity for DFID to stave off this costly trend.

Option 5: Where commitments are being made, push for SMART commitments

WHO and FAO are facilitating a commitment-making process for governments under the UN Decade of Action for Nutrition. Although this report has focused on non-state actors, there is clearly an opportunity for DFID to support these government commitments to be SMART. Commitments are beginning to come in, but are not particularly SMART: see the recent example of Ecuador's commitments. DFID and partners could provide support (through WHO, SUN or MQSUN+) to ensure that government commitments going forward are SMART.

Further scoping and research is needed on all of these options.

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Annex 1. Existing Nutrition Accountability Initiatives

Platform	Aim	Members	Who monitors	Framework	Number of commitments	How are they gathered	Commitments	Fixed or Freeform	Measurement of progress	Verification	SMART
EU Platform on Diet and Physical Activity	The EU platform for action on diet, physical activity and health is a forum for European-level organisations, ranging from the food industry to consumer protection NGOs, willing to commit to tackling current trends in diet and physical activity. Led by the Commission, the platform will provide an example of coordinated action on this problem by different parts of society that will encourage national, regional or local initiatives across Europe.	300 business bodies (i.e. bodies representing businesses)	Business	Target groups: 1. Children and adolescents, 2. General public, 3. Health professionals, 4. Educators, 5. Industry, 6. Employees, 7. Parents, 8. Policymakers, 9. Local community. 10. Senior citizens 11. Special groups Categories and active commitments (as of 2016): 1. Advocacy and information exchange (21 commitments); 2. Composition of foods (reformulation), availability of healthy food options, portion sizes (18 commitments); Consumer information, including labelling (12 commitments); 3. Education, including lifestyle modification (33 commitments); 4. Marketing and advertising (14 commitments); and 5. Physical activity promotion (11 commitments).	116 ongoing	Voluntarily	List of commitments as at 2016 here	Freeform	The member organisations monitor their own performance and their evaluation reports are examined by outside evaluators to follow the progress of the Platform. Platform members agreed to monitor their own performance in a transparent, participative and accountable way so that there is a degree of multi-stakeholder involvement in reviewing progress and outcomes that creates trust in the data. There is also a general desire amongst participants to develop not only participative self-monitoring but also some more ambitious good practice on monitoring, including aspects such as evaluation.	No - only self-reporting. "Platform members agreed to monitor their own performance in a transparent, participative and accountable way so that there is a degree of multi-stakeholder involvement in reviewing progress and outcomes that creates trust in the data."	Not usually, very long and wordy commitments
ATNI	The Access to Nutrition Index rates food and beverage manufacturers' nutrition-related policies, practices	No members - but the top 22 food and beverage	Business	198 indicators: A. Governance (12.5%) - Corporate strategy,	No commitments - businesses are assessed	N/A	N/A	Fixed	Companies assessed against 198 indicators based on publicly available company	Research and assessment team are independent	Yes

Platform	Aim	Members	Who monitors	Framework	Number of commitments	How are they gathered	Commitments	Fixed or Freeform	Measurement of progress	Verification	SMART
	and disclosures worldwide on a recurring basis.	companies globally are ranked.		governance and management. B. Products (25%) - Formulation of appropriate products. C. Accessibility (20%) - Delivering affordable, available products. D. Marketing (20%) - Responsible marketing policies, compliance and spending. E. Lifestyles (2.5%) - Support for healthy diets and active lifestyles. F. Labelling (15%) - Informative labelling and appropriate use of health and nutrition claims. G. Engagement (5%) - Engagement with governments, policymakers and other stakeholders.	and report against 198 indicators				reports and other sources. Companies have the opportunity to feedback and feed in evidence.	from businesses. If practices are detected which detract from company reports, this affects their ranking. Breast milk substitute (BMS) rankings are separate.	
Nutrition for Growth (N4G)	To encourage governments, investors, CSOs and citizens to come together to invest in solutions to fight malnutrition.	110 businesses, CSOs, governments	Businesses, NGOs, governments	N/A	204	Global events	List of commitments here	Freeform	Self-reporting	No - only self-reporting	29% SMART
Consumer Goods Forum Health and Wellness Report	The Consumer Goods Forum (CGF) is a global, parity-based industry network that is driven by its members to encourage the global adoption of practices and standards that serve the consumer goods industry worldwide.	400 retailers, manufacturers, service providers, and other stakeholders across 70 countries.	Business	Health & Wellness Resolutions: 1) By 2016: Make company policies public on nutrition and product formulation; 2) By 2016: Implement employee health and wellness programmes; 3) By 2018: Industry-wide implementation of consistent product labelling and consumer information to help consumers make informed choices and usages; and 4) By 2018: Stop marketing communications to	4 set commitments - unclear how many companies have signed up to them.	Company boards agree to sign up to commitments	See 'Framework' column	Fixed	Self-reporting	No - only self-reporting	No

Platform	Aim	Members	Who monitors	Framework	Number of commitments	How are they gathered	Commitments	Fixed or Freeform	Measurement of progress	Verification	SMART
				children under 12 for food and beverage products that do not fulfil specific nutrition criteria based on scientific evidence and/or applicable national and international dietary guidelines.							
SUN Business Network	The SUN Business Network (SBN) aims to reduce malnutrition in all its forms through mobilising business to invest and innovate in responsible and sustainable actions and operations. To do this, SBN provides a neutral platform to broker partnerships and collaboration between business and all actors on nutrition at national, regional and global level to support SUN country plans. We believe that when consumers demand improved nutrition, business will act, and national economies will grow.	164 companies, including multinationals and at country level	Business	Compendium of Action on Nutrition (done by SUN and UN Reach).

Membership form requiring BMS code compliance and commitments. | 200+ | Through membership form | | | | | |
| UN Global Compact | The UN Global Compact (UNGC) aims to mobilise a global movement of sustainable companies and stakeholders to create the world we want. To make this happen, the UN Global Compact supports companies to:

1) Do business responsibly by aligning their strategies and operations with ten principles on human rights, labour, environment and anti-corruption; and
2) Take strategic actions to advance broader societal goals, such as the UN Sustainable Development Goals, with an emphasis on collaboration and innovation. | 9.000 companies and 4,000 non-businesses | Businesses, CSOs, governments | Businesses make a commitment to the UNGC principles when they sign up.

They are invited to make an additional voluntary commitment to the Food and Agriculture Business Principles. | None at present - businesses commit to principles | Businesses volunteer | N/A at present - participants sign up to principles. Future commitments under the Food and Agriculture Principles are likely to be freeform. | Fixed principle | Yet to be done - likely to be non-SMART | No – self-reporting | No |
| International Network for Food and Obesity (INFORMAS) | A global network of public-interest organisations and researchers that aims to monitor, benchmark and support public and private sector actions to create healthy food | Unclear | Tracking business | Still nascent - on step 1 below - using ATNI indicators.
1) The first ('minimal') step is the collation of | N/A | N/A | N/A | Fixed | TBC | Yes | Yes |

Platform	Aim	Members	Who monitors	Framework	Number of commitments	How are they gathered	Commitments	Fixed or Freeform	Measurement of progress	Verification	SMART
Auckland University	environments and reduce obesity and non-communicable diseases (NCDs) and their related inequalities.			publicly available food and nutrition-related policies of selected private-sector organisations. 2) The second ('expanded') step assesses the nutritional composition of each organisation's products, their promotions to children, their labelling practices, and the accessibility, availability and affordability of their products. 3) The third ('optimal') step includes collecting data on other commercial activities that may influence food environments, such as political lobbying and corporate philanthropy.							
FReSH - led by EAT and World Business Council for Sustainable Development (WBCSD)	(FReSH) is designed to accelerate transformational change in global food systems, to reach healthy, enjoyable diets for all, which are produced responsibly within planetary boundaries. To achieve this ambitious goal, FReSH has brought business and science to work together. It draws on knowledge and efforts from premier research institutions and is working with the business community to develop successful, high-impact solutions.	TBC - nascent	Business	TBC	TBC	Likely to be voluntary	TBC	TBC	TBC	TBC	TBC
FTSE4Good - breastfeeding	The FTSE4Good Index Series is designed to measure the performance of companies demonstrating strong environmental, social and governance (ESG) practices. Transparent management and clearly-defined ESG criteria make FTSE4Good indexes suitable tools to be used by a wide variety of	N/A	Business	FTSE4Good Breast Milk Substitutes (BMS) Marketing Criteria (the Criteria) set requirements for company policies, lobbying, management systems, reporting and verification in relation to the WHO International Code of Marketing of	N/A	N/A	N/A	N/A	Unclear	Yes - most recently by Price Waterhouse Coopers	Unclear

Platform	Aim	Members	Who monitors	Framework	Number of commitments	How are they gathered	Commitments	Fixed or Freeform	Measurement of progress	Verification	SMART
	market participants when creating or assessing sustainable investment products. FTSE4Good indexes can be used in four main ways: Financial products - as tools in the creation of index-tracking investments, financial instruments or fund products focused on sustainable investment. Research - to identify environmentally and socially sustainable companies. Reference - as a transparent and evolving global ESG standard against which companies can assess their progress and achievement. Benchmarking - as a benchmark index to track the performance of sustainable investment portfolios.			Breast-Milk Substitutes (the Code) and subsequent World Health Assembly resolutions.							
NetCode	The goals of NetCode are to strengthen Member States' and civil society capacity to monitor the International Code and relevant WHA resolutions and to facilitate the development, monitoring and enforcement of national Code legislation by Member States, by bringing together a group of committed actors to support these processes.	WHO, UNICEF, International Baby Food Action Network, World Alliance for Breastfeeding Action, Helen Keller International	Business	International Code of Marketing of Breast-Milk Substitutes 1981	N/A - not commitment-based	N/A	N/A	Fixed	Ongoing monitoring: Setting up a monitoring system to detect, investigate and act on alleged violations of existing national measures and the Code (Chapter 2). Assessment: Conducting a periodic assessment (every 3 to 5 years) to verify the level of adherence with the national measures and the Code, and identify gaps and issues that will need to be addressed through policy and legislative measures, programming and investments (Chapter 3).	Yes	N/A
Global Open Data for Agriculture and Nutrition (GODAN)	GODAN supports the proactive sharing of open data to make information about agriculture and nutrition available, accessible and usable to deal with the urgent challenge of ensuring world food	521 partners from government, international and private	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.	N/A - framework does not exist yet.

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Platform	Aim	Members	Who monitors	Framework	Number of commitments	How are they gathered	Commitments	Fixed or Freeform	Measurement of progress	Verification	SMART
	security. It is a rapidly growing group, currently with over 521 partners from national governments, non-governmental, international and private sector organisations that have committed to a joint statement of purpose. The initiative focuses on building high-level support amongst governments, policymakers, international organisations and business. GODAN promotes collaboration to harness the growing volume of data generated by new technologies to solve long-standing problems and to benefit farmers and the health of consumers. We encourage collaboration and cooperation between stakeholders in the sector. GODAN does not have a framework yet but has expressed an interest in developing one.	sector organisations									
Every Woman Every Child	Every Woman Every Child is a multi-stakeholder movement to implement the United Nations' Global Strategy for Women's, Children's and Adolescents' Health that will be launched by the UN Secretary-General in September 2015 in support of the forthcoming Sustainable Development Goals framework.	334 have made commitments	Business, CSOs, governments, healthcare workers, philanthropy, research organisations, UN/ multilateral organisations	All commitments advancing the goals outlined in the Global Strategy for Women's, Children's and Adolescents' Health (2016-2030) are encouraged, in particular those which are sustainable (e.g. public/private partnerships with sustainable business models), innovative (e.g. novel policies, new low-cost technologies, innovative partnerships or financing models), and have a long-term focus.	428	Voluntarily submitted; approved annually by a committee.	List of commitments	Freeform	Self-reporting	No, self-reporting	Not always