

Summary of the SUN Business Network's (SBN) response to the SUN Strategic Review

What's missing?

The SR provides many helpful recommendations on strategy, focus and country and global coordination within SUN. However, the recommendations it provides on the role of business is limited and does not account for the SBN's core focus on engaging Small and Medium Enterprises (SMEs) in SUN Countries.

The implications of the SBN's focus on the SME sector for SUN 3.0

- The private sector is the most influential actor in the food system. SMEs are responsible for most of the food that reaches low-income consumers in SUN Countries and have the most potential within the private sector to innovate to improve nutrition.
- **The independent evaluation of the SBN (2020) and SUN Mid Term Review (2019) found that:**
 - The SBN's core focus on organizing SMEs at country level to act and invest in nutrition – through linkages to investors and technical assistance (TA) – is achieving impact and represents a robust value-add to the SUN Movement.
 - Further collaboration between the SBN and SUN Governments and SUN Networks is essential to create an enabling environment that incentivizes responsible business actions and investments
 - In addition, the SBN evaluation concluded that without the SBN it is *highly unlikely* business, including the SME sector, would be organized around nutrition.

In addition, options are not provided in the SR on the SUN Lead Group's request in September 2019 for *a big a bold role for the private sector in SUN 3.0*, this request was underlined by the SUN Lead Group Chair, Henriette Fore in the Lead Group meeting as a key priority for the next phase of the Movement.

SBN recommendations for SUN 3.0, based on the Strategic Review, SBN evaluation and SUN Mid-Term Review:

A headline summary of the SBN's contribution to SUN 3.0 is to *support SMEs to take-action on all forms of malnutrition through joint-network country level action plans*

1. SUN should focus on food systems transformations that lead to increasing access to healthy diets for low income consumers.
2. The SBN will support extensive regulation by SUN Country Governments (e.g Chile) to address the obesity and NCD agenda.
3. The SBN should maintain its focus on the SME sector, multinationals should continue to be play an important role as investors or TA providers for the SME sector. The SBN will focus linkages for SMEs to improve the nutrition quality of their product portfolio – building on the SBN's pilot project to support SMEs to eliminate their use of industrialized trans-fats.
4. Current principles of engagement will be revised to align with the Responsible Business Pact being developed for the N4G. This will allow national businesses, including SMEs, to commit to improve the nutrition content of their product portfolio over the third phase of SUN. Restricting SBN membership to companies from the outset of SUN 3.0 if they have products

that are high in sugar/salt/fats would exclude the vast majority of businesses at SUN Country level and SUN would lose its ability to influence change amongst businesses at national level.

5. National SBNs agree with the SR that more should be done to engage the retail, technology and investment sectors at country level. This can build on the SBN's 'foodtech' focus from its National Pitch Competitions. We will explore the potential For an SBN Investor Network.
6. The SBN proposes to develop a set of options on the role of business in the development of SUN 3.0 strategy.

The SBN's view on hosting and funding the SBN in SUN 3.0

7. The SBN's evaluation recommended that National SBNs will require long term, reliable, donor support for the next five years, the SUN Pooled Fund should be open to National SBNs to organize the SME sector at SUN Country level. SMEs do not have the means to fund National SBNs. Multinationals will not be inclined to fund the SBN when they pay membership fees for global business initiatives which aim to address malnutrition (CGF, WBCSD, IFBA).
8. The SBN will aim to transition ownership of National SBNs to national business associations by the end of 2025. Building on progress to date in SBN Indonesia and SBN Mozambique to foster greater national business ownership over the SBN.
9. We agree there should be an MoU or similar document outlining the SBN's independence from its co-conveners GAIN & WFP.

Further collaboration with SUN Networks at Country level

10. National SBNs agree that SUN FPs and MSPs are not currently resourced to effectively coordinate country-level multi-stakeholder collaboration – and agree to explore ideas around country coalitions. The addition to support to assist FPs to coordinate would facilitate greater government and SUN network collaboration, implementation and accountability. National SBNs would welcome stronger partnerships with the CSN.
11. National SBNs support a review of MEAL and the JAA to 1) make them more relevant to improve in-country action and 2) to incorporate business actions and SBN programmes (activities and results) to make them more relevant for National SBNs.
12. The position of SUN FPs should be elevated to executive branches of Government.
13. Networks should commit to align funding, advocacy and activities to a common joint network action plan at SUN Country level. The SUN Pooled Fund should support this.
14. Global Business Accountability Mechanisms (e.g. Access to Nutrition Index - ATNI), global SME initiatives (e.g. Aspen Network of Development Entrepreneurs - ANDE) and the investor community (Asia Venture Philanthropy Network) should be invited to join the SUN governance structure.

SUN Strategic Review (SR) Recommendations Table & SUN Business Network (SBN) Responses/Actions

This table provides comprehensive feedback from the SBN Global Team and 16 National SBNs on each SR recommendation.

Category & Recommendation Number	
Vision & Mission	
1	<p>Focus on strengthening the SUN strategy rather than investing time and resources in developing new vision and mission statements. The process of developing vision and mission statements can be a time-consuming and resource-intensive process where the end result is often not worth the investment. Strategy should be the priority and improving the strategy should include ways it will play out in practice and not simply on paper (e.g. scenario planning with key stakeholders to understand the tactical implications). SUN may want to invest in developing vision and mission statements at some point in the future, but it is unlikely the absence of either will reflect poorly on the organisation.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agreed; we spend too much time talking. We know what SUN is about—ending malnutrition in SUN Countries —so let’s make an actionable plan to do it. • There should be a high-level overarching SMS and SUN Network SUN 3.0 strategy – underpinned by a joint network workplan at global level. • SBN will develop a corresponding SBN 3.0 Strategy to help facilitate the private sector’s positive contribution to these efforts.
Scope	
2	<p>Maintain SUN’s commitment to addressing malnutrition in all its forms. The SUN Movement should maintain its commitment to addressing malnutrition in all its forms (i.e. the various forms of undernutrition and overnutrition). Taking that overall stance will not preclude SUN member countries from identifying particular forms of malnutrition as priorities based on their local nutrition dynamics.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • To maintain its relevance to SUN Country Governments, SUN should focus on increasing access to healthy diets through sustainable food systems. • Given the critical role of business on overweight, obesity and diet associated NCDs issues, the SBN will support the adoption of extensive regulation by SUN Country Governments while advocating for the need to incentivize, particularly within the SME sector, responsible business actions and investments. SBN is currently piloting a project to eliminate industrialized trans-fats and is ready to take on further activities around product reformulation.
3	<p>Expand the scope of SUN to actually include all people affected by all forms of malnutrition. It is clear that, at the country level, plans and activities are moving towards being more inclusive of all people facing nutrition challenges. And in light of the above recommendations, it makes sense to expand the scope to include population groups other than mothers and children, whilst recognizing that the focus will depend on the country context. For example, in many member countries where stunting remains high, a focus on mothers and children will continue to be a priority, whilst in others with a multiple malnutrition burden, the population scope will need to be widened.</p> <p>SBN Response/Action:</p>

	<ul style="list-style-type: none"> • Most people worldwide access most of their food from the private sector. SBN has developed an expansive, population-based approach when working with business on nutrition to ensure profitability/sustainability and nutrition impact. • Depending on specific nutrition problems and national contexts, we will also prioritize specific vulnerable populations within our work with business/complementary interventions, but this is the exception rather than the rule. We will continue to promote the importance of good nutrition in every household, and of making nutrition aspirational to everyone.
4	<p>Develop a clearly articulated position on a healthy diet. SUN should have a clearly articulated position on this issue. The fact that a prominent nutrition organisation has no public position on a healthy diet is a significant gap, which undermines its credibility. There are various resources that could be drawn on to develop this position, including ‘Food in the Anthropocene: the EATLancet Commission on Healthy Diets from Sustainable Food Systems’; Sustainable Healthy Diets: Guiding Principles from FAO and WHO; and the Global Alliance for Improved Nutrition’s (GAIN’s) definition of nutritious and safe food. Again, this could be developed by the SMS in consultation with SUN constituencies or commissioned from relevant external organisations/experts.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agreed, this is a major gap which should be addressed
5	<p>Expand the scope of SUN to include important nutrition-related issues such as climate change, food systems and NCDs. This should be done in close consultation with member countries to ensure the expanded scope reflects country priorities vis-à-vis those issues. It will also be important to demonstrate how the Movement’s nutrition priorities are linked to other issues. A good example of this approach is the 2019 report on the global syndemic of obesity, undernutrition and climate change, published by the Lancet Commission.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agreed, in addition the WaSH sector needs to be better engaged. Partnerships with multi-stakeholder organizations such as Sanitation and Water for All and similar organizations in obesity/NCDs and climate change – would provide access to the knowledge and expertise required by the SMS and SUN Networks to incorporate these issues in a holistic approach to sustainable food systems – and adopt already developed policy recommendations. • National SBNs could review national climate and other policies to identify locally relevant synergies
6	<p>Develop related SUN position papers that address wider issues through a nutrition lens. SUN should develop a clear position on how nutrition and related issues are linked—based on available data, evidence on how nutrition in SUN countries is affected by these issues and member country knowledge and experience—and develop position papers. SUN’s position should also inform how the Movement engages with other global initiatives that are addressing these issues. These papers could be developed by the SMS or commissioned from relevant external organisations and/or experts.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agreed, SUN positions papers should be informed by the wealth of literature and publications which already exist – and should be endorsed by the SUN Lead Group or SUN Executive Committee.
Membership & Partnerships	
7	<p>Maintain SUN’s membership focus on low-income / lower-middle-income countries and explore the potential to expand membership to include some middle-income countries. SUN, through the SMS,</p>

	<p>should consult existing member countries and the SUN networks and develop a discussion paper, clearly outlining the advantages and potential disadvantages of expanding membership, to inform decision making on this issue.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> All countries face the burden of some form of malnutrition. If a national government is interested in being a part of the SUN movement to promote its national nutrition agenda, then they should have the option to join. However, some sort of commitment to supporting cross-SUN country learning as a part of membership should be required.
8	<p>Explore other options, including partnership between high-income and low-income countries brokered through SUN. SUN should explore the potential for different types of membership—it could be upper-middle- or high-income countries becoming affiliate members or partners of SUN—and different types of relationships. For example, some high-income countries have expressed an interest in ‘twinning’ with current members to share knowledge and experience. There is also an interest in leveraging the capacity of high-income countries to provide more extensive TA. SUN could explore options with interested prospective members and interested current members that add value to the Movement and to member countries.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> National SBNs recommended SUN membership should be extended to include countries with obesity/NCDs challenges SUN should strengthen non-financial support (TA and knowledge) and linkages between high-income and low-income countries, particularly around Obesity/NCDs. Currently the SBN is working to create a National SBN in Japan (linked to N4G), which has the potential to support activities in SUN Countries/National SBNs in SUN Countries.
9	<p>Develop a clear strategy for SUN Movement engagement with global partners. This should define the objectives, priorities and terms of engagement for partnerships and should be developed by the SMS in consultation with SUN networks and other key stakeholders, including members of the Lead Group. The strategy should also be used to assess the value of existing partnerships and to plan a more results-oriented approach going forward.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> A partnerships strategy would be helpful, although we are trying to understand the scope of what this would entail, we need to have a specific point of view on what we want for nutrition out of the partnership. In terms of partnering with the private sector, this could leverage the groundwork being done linked to N4G. Further we should seek to harness the private sector, not only regulate and control it (as has been indicated in other SR recommendations).
Advocacy	
10	<p>Develop an advocacy strategy, linked to the objectives of the overarching SUN Movement strategy. The SMS should work with the Lead Group, SUN networks and member countries to develop a cohesive advocacy strategy. It should set out clear objectives, messages, actions and responsibilities that support a focused and coordinated approach to advocacy across the Movement. Advocacy should be the core function of the Lead Group (see section 3.3.1), but the strategy should also set out the contribution of countries—and global and country networks, in addition to other SUN structures—in supporting agreed advocacy themes and messages. For example, SUN countries should work together to develop and implement a sustained advocacy campaign based on agreed themes and messages that leverage the power of the full membership in the SUN Movement.</p>

	<p><i>SBN Response/Action:</i></p> <p><u>National SBNs</u></p> <ul style="list-style-type: none"> • Suggestion that guidance provided to countries around better leveraging national election processes for advocacy moments, including potential for development of a national SUN manifesto as elections approach. The national level Joint Work Plan could include this. • National SBNs Champion or members of National SBN governance structure should be used to support National advocacy plans. <p><u>Global SBN</u></p> <ul style="list-style-type: none"> • Agree an Advocacy Plan is needed for the SUN Coordinator’s team (which should have the mandate to lead global advocacy activities), and Advocacy Guidance for countries, but not sure if a formal all-SUN Advocacy Strategy is needed as countries will drive their national advocacy agendas based on the local context (these large global strategies somehow also go against the idea of a country-driven SUN agenda).
Country Leadership	
<p>11</p>	<p>Develop a country-driven, country-led and country-centred SUN Movement strategy. The strategy should be focused on and respectful of the perspectives and priorities of member countries; such a strategy should be significantly more effective in contributing to substantive improvements in nutrition outcomes in these countries. A key aspect of this is distinguishing between being country-led and country-driven and government-led and government-driven strategies; the emphasis should be on the former of each, and this needs to be reflected in country governance structures (see section 3.3.3).</p> <p><i>SBN Response/Action:</i></p> <p><u>National SBNs</u></p> <ul style="list-style-type: none"> • SUN Countries need more guidance to think and act systematically rather than the current ‘anything goes’ approach • SUN should consider introducing technical roles beside coordination roles at country level to advise on implementations to improve implementation quality. • There is need for more integrated programming in SUN, with focus on strong partnerships. • Better coordination among SUN networks in-country is needed to achieve greater impact. This is lacking in many countries as networks are not working together. Need to also strengthen in-country donor network collaborations. • Where possible, a SUN FP at a comparatively high level is needed to lead this inter-stakeholder advocacy agenda and bring decision-makers to the table around nutrition – e.g. President or Prime Minister’s Office <p><u>Global</u></p> <ul style="list-style-type: none"> • We would like to see some recommendations on HOW to do this. Each SUN Focal Point (FP) is overstretched and the current MSP set-up does not work to address this we would recommend • the creation of a coordinating position at Country level would facilitate joint annual network workplans and report into the SUN FP on a regular basis. The development of joint plans will improve coordination and accountability.
<p>12</p>	<p>Ensure the SUN strategy is concise and focused and prioritizes actions that will support countries to scale up nutrition programmes, improve effectiveness and achieve results. Strategic objectives should be based on the 80/20 rule but should be flexible enough to encompass differences in country context, priorities and capacity. The strategy should also champion flexible and innovative approaches to the nutrition challenges that countries face. In addition, the strategy should reflect the time frame</p>

	<p>of SUN—many key informants suggested that the Movement should have a finite lifespan—with activities designed to achieve specific objectives by a specific date.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree. Any strategy should be actionable and look at effectiveness and results. Perhaps consider if the SUN movement/Coordinator should have a general manifesto with a few key asks, that can be tailored to the national context during country exchanges/interactions. This could include broad points about nutrition, healthy diets, food systems, etc. • As SBN develops its own strategy, it will draw on the expanding evidence base linked to private sector and nutrition, while ensuring that innovation and flexibility within the model are maintained and that it reflects the needs of the private sector, especially the SME sector.
<p>13</p>	<p>Facilitate country collaboration to address common challenges and issues. SUN, and specifically the SMS, can play an important role in facilitating SUN countries facing similar challenges to work together to better understand the problems and identify and test possible solutions. This collaboration could be done bilaterally or via working groups convened to focus on specific issues—for example, the impact of climate change on stunting (see the Bangladesh case study in Annex 2).</p> <p>SBN Response/Action:</p> <p><u>National SBNs</u></p> <ul style="list-style-type: none"> • Annual exchange forums should be organized between countries to evaluate what went well and what could have been done better • There is potential to develop integrated work plans across Networks at national level, results frameworks, publications etc. <p><u>Global SBN</u></p> <ul style="list-style-type: none"> • For SBN, we have a strong focus on inter-stakeholder engagement and collaboration; this is something we’ve been required to do since the beginning of the Network because there is a sense that other stakeholder groups need to validate our plans and priorities as representatives of the private sector. • In this vein, we will develop a toolkit to support country Coordinators with aspects of collaboration and convergence. We are also looking at more tangible ways to facilitate south to south learning and mentorship, including looking at ways to imbed this within staff structures and TORs.
<p>Country Priorities & Implementation</p>	
<p>14</p>	<p>Support SUN countries to identify a limited set of actionable priority areas that are currently unaddressed or underperforming. This support should be provided through the SUN Networks and other components of the GSS. It should be feasible to distil these actionable priorities from existing strategies and plans; their selection should be supported by solid reasoning and evidence. It is also essential that ‘actionable’ is defined realistically (i.e. actions with clearly defined steps that can be implemented with available resources and that will accelerate scale-up to achieve nutrition results). The aim should be to leverage knowledge and experience in the country and to encourage innovative, collaborative and rapid implementation to achieve results, using a more focused team of national and subnational actors. This could include ‘piloting’ or testing innovative approaches to addressing problems, and such approaches could be supported through the SUN Movement Pooled Fund (see section 3.3.2)</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree, but there should be realistic expectations about who should/can do what and the level of resourcing required. Identification of gaps (and ‘quick wins’) is critical, as is filling of these gaps, and a range of stakeholders should be willing to support both processes, but in many

	<p>countries resources both financial and human) have already been allocated elsewhere, leaving little for this type of flexible, innovative responses indicated here.</p> <ul style="list-style-type: none"> • Advance planning could be done through development of a joint annual workplan, to define what these actions are and allocate responsibility. This may help governments to allocate some resources and provide a basis for supporting partners to mobilize additional funds/time (even internally within the agencies).
Support for the Strategy	
15	<p>Strengthen the role of the SMS as a linking organisation with an enhanced evidence and knowledge-management function. In its support capacity, the SMS should focus on providing countries with a range of resources that strengthen and support nutrition action. This role would include synthesising and disseminating nutrition information in a way that is useful to countries; providing links to evidence on critical nutrition issues that can be used by countries for advocacy, planning and implementation; working with partners to collate and share normative guidance on nutrition and nutrition-related issues; and providing links to evidence on wider issues that influence nutrition.</p> <p><i>SBN Response/Action:</i></p> <p><u>National SBNs</u></p> <ul style="list-style-type: none"> • The SMS should focus on playing more of a strategic role rather than getting involved in country level tactics - support to SUN countries should be largely behind the scenes, aside from in-country interactions with the Coordinator or senior SMS staff, who are able to interact at the same level as national decision-makers. • Agree - support from SMS/GSS should focus on creating more knowledge resources, guidelines/toolkits to apply programming and help countries prioritize actions within complex SUN operating environments in fragile states <p><u>Global SBN</u></p> <ul style="list-style-type: none"> • For SBN, we will continue to look for ways to strengthen connections with SMS/CLT in our SBN discussions, as well as better sensitize the CLT on the role of business, using tangible examples where possible. • It may be helpful to have an SMS focal point for each of the Networks, but this will need to be discussed further as the structure and functions of the SMS are updated.
16	<p>Strengthen the role of the SMS in facilitating cross-country learning and exchange of experience. The SUN Movement should expand opportunities for knowledge exchange amongst member countries and networks. A key aspect of this is making better use of technology to support effective and efficient exchange and interaction. Currently, the SMS is underutilising opportunities presented by technology—for example, online seminars and virtual meetings. Increased support for knowledge exchange should also include improved tracking of its value and outcomes.</p> <p><i>SBN Response/Action:</i></p> <ul style="list-style-type: none"> • Agree The aspect of cross-country learning and sharing of experiences is key for the future of SUN and for increasing ownership of the SUN movement at country level. • The SBN will also look at better ways of using technology to facilitate dialogue and exchange between national SBNs and national businesses.
17	<p>Strengthen the role of the SMS in collaborating with countries to generate data for action. The SMS should build on the added value of the SUN Movement’s links to countries and its extensive networks to facilitate documenting and sharing country activities, knowledge and experience, new ideas and innovative approaches. This ‘database’ of country information would support meaningful learning and exchange across countries by providing them with access to information on what other countries are doing. This would add more value than the current MEAL Dashboard, which provides summary data on global nutrition indicators that are already available from other sources. The aim is to generate</p>

useful data for action—including frontline and community-based research and evaluation—to help guide programme planning and implementation and, in particular, pinpoint gaps in data relevant to identifying and assessing priorities; designing, costing and implementing effective activities; and assessing performance. Collection of data for action could also be an area of activity that could be supported by the Pooled Fund.

SBN Response/Action:

- We agree that the SMS has a strong role to play in knowledge management – a data facility for SUN Countries would ensure we mitigate institutional memory loss
- National SBN agree that the data collected on the MEAL system is not helpful for them or country actors to inform action or course correction, nor are the data original, as noted.
- The more advanced National SBNs collect a good deal of data on members, commitments, support needed to meet commitments, among other monitoring data.
- At the country level, some of these data would be useful in coordinating how local actors and networks could support SBN members or the network itself to meet some of its commitments (usually technical assistance).
- It might be a good idea for the Pooled Fund and other financial support mechanisms to support efforts which involve at least two networks, to encourage better coordination and sharing of mutually beneficial data. We feel this would be particularly useful for SBN networks which are not a natural partner for many other networks despite the acknowledgement globally that the private sector has a role to play in improving food systems.

18 Review the value and VfM of SUN investment in the MEAL system and in the JAA process. The ongoing investment in the MEAL system should be reconsidered in light of concerns amongst stakeholders and the SR team about its value and its VfM. Assessment of the value of the MEAL should be driven by SUN member countries with support from the SMS. The ongoing investment in the JAA process and its value in holding SUN stakeholders to account at the country level should also be considered, in view of similar concerns. Again, the assessment should be driven by SUN member countries and should reflect the observations and experiences of different in-country constituencies involved in nutrition action.

SBN Response/Action:

- A standardized assessment process is needed across countries; once a joint national workplan is in place the assessment could be linked to this workplan in some way.
- The JAA is not a useful exercise for many SBN networks -if they are engaged in the process- and the MEAL theory of change is considered too abstract and intangible for individual networks.
- The only indicator that SBN contributes, for example, is the functionality index. Therefore the SBN does not see its clear contribution to MEAL.
- It may be a good opportunity to revise the MEAL theory of change and indicators to track progress to which all networks feel they can contribute.
- The JAA process could improve if it's a reporting exercise that is part of a broader in country learning and progress update through workplan updates and progress reporting. There needs to be a balance between reporting into standard global progress against indicators versus those relevant to progress against country-specific indicators.
- National SBNs have recommended a verification process to support the self-assessment focus of the JAA.
- National SBNs would like to see National SBN results frameworks reflected in the JAA for SBN reporting.

19	<p>Explore the potential for a merger with the GNR. Rather than duplicate the work of the GNR, a reinvigorated, country-centred SUN Movement with a strong commitment to generating and sharing data for action could merge with the GNR. There are already many overlaps between the two, including multiple members of the GNR Stakeholder Group who have a formal or close relationship with the SUN Movement. Bringing these two initiatives together could be an effective way to combine the well-respected data platform of the GNR with an action- and results-oriented SUN Movement. If a merger is not feasible, SUN should explore ways to collaborate more closely with the GNR in ways that are mutually beneficial.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • The independence of the GNR is important and should be maintained as such. Opportunities for closer collaboration could be explored.
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Global Governance & Management

20	<p>Transform the ExCom into a functional governing board. The ExCom should assume the responsibilities that are standard practice for boards or management committees and should be renamed the SUN Movement Board to reflect this.²⁷ For example, the Board should be responsible for establishment of broad policies and priorities, oversight of SUN’s strategy development implementation, approval of plans and budgets and review of financing and audited financial reports. Identifying and managing potential conflict of interest is a critical governance issue, and this should also be included in the remit of the Board. A permanent finance subcommittee should be in place to ensure the many financial issues facing SUN receive the requisite attention. Ad hoc committees or time-limited task forces could be established as required to deliver specific Board inputs or outputs. The Board should meet formally at least twice a year, with a clear agenda, including decision points. The SMS should be responsible for servicing the Board and liaising with the SUN networks to ensure that they have an opportunity to contribute to the agenda and to prepare papers for Board meetings. More effective communication of Board decisions and of how these are or will be followed up is also required. This overarching recommendation to reform the ExCom is consistent with the MTR recommendations that SUN needs a board. Light-touch oversight is not sufficient given the need for effective accountability and transparency and the financial resources invested in SUN. The ExCom should assume responsibility as the primary governance mechanism of the Movement and should become the key forum for holding the Secretariat and networks to account.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • No specific comments on this
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21	<p>Revise the composition of the Board. The current balance of representation on the ExCom should be revised to increase country representation and to add members who have no association with SUN, including an independent chair. A reasonable composition of the Board would be as follows: the independent chair; ten country representatives nominated by the network of SUN Country Focal Points; two UN, two donor, two civil society (regional and country) and two private sector representatives, nominated by their respective networks; and three independent members with expertise relevant to SUN’s strategic objectives, including an external global nutrition expert. The Board would include UNOPS, the coordinator and the SMS director as ex officio members.</p> <p>SBN Response/Action:</p> <p><u>Global</u></p> <ul style="list-style-type: none"> • Agree with revising composition; SBN would like to see representation from global business associations on both the ExCom or the SUN Lead Group. This will bring a broad perspective of how the private sector operates across many companies and countries, and potential contributions. Representatives will be well-placed to advocate for greater multi-national
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	<p>company engagement in SUN, aligned to the responsible business principles defined through N4G, and in support of the B2B TA programme for SMEs under the SBN.</p> <ul style="list-style-type: none"> • SBN will also work to strengthen its own Network governance structure, as the current Advisory Group could be made more effective. • Asian National SBNs recommend more Asian business voices should be added to SUN governance structure.
22	<p>Revise the Lead Group’s role and title. The Lead Group should become a Council of Ambassadors²⁸ which includes the SUN coordinator and focuses on ambassadorial and advocacy activities. Whilst it should still provide inputs into the SUN Movement strategy, it should not have responsibility for strategy development or for monitoring progress towards achievements of strategic objectives. The Council should plan its activities around the SUN Movement’s strategy and identified country priorities, meeting once a year to review its performance during the previous year and to make plans for the coming year. The SUN Movement Board should also review the performance of the Council to ensure it is being used to maximum advantage. This overarching recommendation is also consistent with the MTR recommendation that the Lead Group should focus solely on its emissary role to deliver political impact at the country level and globally.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • See above comment; would be useful to have the Executive Director of a major global business association on the SUN Lead Group.
23	<p>Clarify and revise the respective roles of the coordinator and the SMS director. There is a need for a clearer delineation of responsibilities between the Coordinator and the SMS director. The coordinator should primarily have an external focus, on SUN external relations and advocacy, as well as provide inputs into the development of the SUN strategy. The SR review recommends the coordinator have a small, dedicated team to support the coordinator’s activities; the team should include a senior nutrition adviser. The coordinator’s role should not include oversight of day-to-day implementation of the SUN strategy, leadership of the SMS and line management of the SMS director or coordination of the Country Focal Points. This is consistent with the MTR recommendation that SUN should maximise the impact of the coordinator’s role in generating political commitment. The director of the SMS should primarily be responsible for management and operational issues, including oversight of day-to-day implementation of the SUN strategy and leadership and management of the SMS. The SMS director should report to the Board, and the Board should be responsible for reviewing the performance of the director and the SMS.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • No specific comment.
24	<p>Review the focus and role of the SMS. In line with the proposed role for SUN and the SMS discussed in sections 3.1 and 3.2, the structure of the SMS and the roles and skill requirements of its staff should be revised. Responsibility for coordination of the Focal Points should shift from the coordinator to the SMS; given the increased focus on a country-centred and country-led strategy recommended by the SR, it will be important for the SMS to strengthen liaison with and support for member countries. The SMS will need to strengthen its knowledge management, external relations and partnership functions; the latter is critical if SUN is to effectively position nutrition within wider issues and initiatives. In addition, the SMS needs more well-rounded nutrition expertise, including the capacity to understand nutrition policy and programming and specific functions, such as the development or commissioning of position papers, knowledge management (e.g. synthesizing emerging evidence) and documentation of country experiences.</p>

	<p>SBN Response/Action:</p> <ul style="list-style-type: none"> • The recommendations in this document are conflicting, and we need to balance expectations of what the SMS can do, especially when suggestions are being made to scale back the size of the SMS. • A more robust partnerships team could be put in place to do more to strengthen strategic relationships and partnerships, for example with WASH, women’s empowerment, climate, and other platforms (see point linked to recommendation #4). From an SBN perspective, stronger business integration is also needed. • We would also recommend greater clarity around the roles and responsibilities of various teams in SMS (org structure and who does what (perhaps a ppt deck that we can reference?))
25	<p>Maintain the current hosting arrangement with UNOPS. SUN is not maximising the range of services that UNOPS can offer and should explore the potential for UNOPS to provide additional services within the current hosting arrangement. The human resource team within UNOPS should work with existing and former staff members to better understand and address the challenges they face or faced in the workplace.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree, UNOPS is effectively executing SUN; further it does not impose any sort of agency mandate on the movement.
26	<p>Review opportunities to achieve cost savings. The priority should be to reduce staff count by rationalising and prioritising the activities of the SMS and the coordinator support team (see above); reducing the travel budget; sharing resources or activity costs with partners; making better use of technology; and outsourcing key functions and activities, including to SUN Movement partners. The functions and costs of supporting the activities of the coordinator and the SMS should be clearly delineated.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree, this should always be done regardless of focus and level of operations. As SBN, we will look at ways of saving costs in our own work, maintain a lean global secretariat and seeing how we can strengthen more decentralized regional support mechanisms.
27	<p>Review the value and VfM of the Global Gathering and consider more effective and cost effective alternatives. Many organisations have shifted away from large-scale events in favour of more cost-effective alternatives. As a Movement, SUN should consider other ways to bring its many stakeholders together. Smaller, regional or thematic action-oriented meetings could provide better opportunities for face-to-face discussions at a lower cost, especially if they used member- or partner operated venues such as conference facilities run by governments, donors and the UN. Similarly, regular online seminars, which are not currently used by SUN, have proven to be a cost-effective way to bring audiences together for learning and dialogue.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Large annual events cost a lot but are needed, countries get a lot out of the GG in terms of opportunities to share information and lessons learned. • Maybe it would be helpful to understand how countries understand the importance of such events? Also, would be good to know what other organizations and similar movements do to foster this collective sense of action and exchange?
<p>Global structures and mechanisms for country support</p>	

<p>28</p>	<p>Accelerate activities to strengthen the role of the SUN global networks in supporting increased coherence and collaboration across constituencies in support of the national nutrition response at the country level. The global networks have the potential to improve understanding of how the efforts of different constituencies can complement each other in pursuit of common goals and, in particular, to optimise the contribution of civil society. This should be linked to support for multi-stakeholder mechanisms (see section 3.3.3) and for implementation of national plans. Consideration could be given to joint funding across networks for joint action at the country level—for example, through the Pooled Fund—rather than funding individual organisations</p> <p><i>SBN Response/Action:</i></p> <ul style="list-style-type: none"> • Agree. SBN will support/input into joint annual workplans, and provide guidance that helps national SBN Coordinators to identify potential opportunities for collaboration, development of joint activities, etc. • If opportunities for joint fundraising are available, then taking advantage of these will be promoted, if not, then fundraising should be coordinated with other stakeholders to support joint operations where possible.
<p>29</p>	<p>Support the CSN Secretariat to develop a plan for sustainability and to address issues related to hosting and representation. This support should be provided by the SMS. With respect to the CSN Secretariat hosting arrangements, the SMS should establish rules of engagement and work with the CSN and SC to develop a Memorandum of Understanding that sets out clear roles and responsibilities and the principles of independence, autonomy and non-interference. If a satisfactory arrangement cannot be reached in the short term, consideration could be given to identifying an alternative host.</p> <p><i>SBN Response/Action:</i></p> <ul style="list-style-type: none"> • Agree but this recommendation should be broadened across SUN. SBN will incorporate sustainability more strongly in its next strategy at global and country level.
<p>30</p>	<p>Set clear and high standards for business participation in SUN at the global and country levels. The scale and scope of private-sector involvement in nutrition and nutrition-related activities are massive; the production, processing and distribution of the world’s food supplies depend almost entirely on the private sector. However, companies whose activities are not consistent with the SUN Movement Principles of Engagement—in particular Principle 8 (‘Act with integrity and in an ethical manner’) and Principle 10 (‘Do no harm’)—or are contributing to nutrition problems or undermining global efforts to promote a healthy diet should not be part of SUN. Related to this issue, there is scope for SUN to promote corporate social responsibility around nutrition and nutrition-related issues and, potentially, independent benchmarking of performance. As recommended for the CSN Secretariat, a Memorandum of Understanding between the SBN and GAIN should be developed that sets out clear roles and responsibilities and the principles of independence, autonomy and noninterference.</p> <p><i>SBN Response/Action:</i></p> <ul style="list-style-type: none"> • We agree that GAIN and WFP should make a statement on the SBN’s independence, autonomy, and non-interference. <p><i>National SBNS</i></p> <ul style="list-style-type: none"> • SUN is about engagement and fostering co-actions to address a complex problem for which there are no straight solutions. Such initiatives start with principles, not with rules. If you talk about due diligence, then it imposes a rule approach which will deter stakeholders, especially the private sector, from joining the Movement. • Due diligence can be introduced at a later stage after joining of the stakeholder on the basis of specific initiatives. Giving space to stakeholders within SUN doesn’t mean that they will spoil SUN or take huge benefits of this without contributing.

	<ul style="list-style-type: none"> • If needed for the private sector or other stakeholders who might have conflicts in interest, membership within SUN/SUN Networks can be categorized further to limit specific, initiative-based participation, but a clear view of the value proposition of engaging with SUN or nutrition should still be considered. • SUN overall needs to strengthen the rationale for businesses to join – SUN should do more to listen to the private sector instead of directing them what to do. • SBN and SUN should increase awareness and knowledge of business engagement across the SUN Network and wider Movement. <p>Global SBN</p> <ul style="list-style-type: none"> • Business must reduce the harmful effects of its product portfolio on diets while increasing positive impacts on diets. However, restricting SBN membership on the basis that companies with products high in sugar/salt/fat from the outset of SUN 3.0 means the vast majority of SBN members will be excluded from SUN. In turn SUN loses its ability to influence businesses at national level. • <u>Current principles of engagement/membership will be revised to align with the Responsible Business Pact being developed for the N4G.</u> This will allow national businesses, including SMEs, to commit to improve the ‘healthiness’ of their product portfolio over the third phase of SUN. Restricting SBN membership to companies from the outset of SUN 3.0 if they have products that are high in sugar/salt/fats would exclude the vast majority of businesses at SUN Country level and SUN would lose its ability to influence change amongst businesses at national level. • The SBN prioritizes support to the SME sector, as SMEs face significant constraints in operation, but supply food to a substantial percentage of lower-income households; we recommend that the SUN movement also spell out the importance of SMEs as key drivers within the food system. • Further, the work we do aligns strongly with a number of SDGs, including those on partnerships (17), responsible production and consumption (12), and industry, innovation, and infrastructure (9). Constructive engagement of the private sector is woven throughout these goals, and that is something we are working to build on, not by boxing companies out, but by supporting them to be brought in in a way that contributes to national economic development, as well as national social development.
31	<p>Build a network of SUN Country Focal Points and strengthen the communication between the Focal Points and the four SUN global networks. There is no formal network for Government Focal Points, although the SMS refers to this as a ‘network’ and liaises with Focal Points through the SMS Country Liaison Team. There is scope for a more structured approach, particularly to ensure that country perspectives inform strategy and decision making and to strengthen sharing of knowledge and experience between countries (see section 3.2.3). For example, the Guatemala country case study highlighted a desire to learn from the experience of other countries in engaging non-health sectors in the nutrition response.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree. Focal points need increased support, although there is also need for greater support available at country level surrounding the FP. Stronger links with Networks will be helpful to reduce duplication of TA requests (below) and strengthen TA support available/provided.
32	<p>Encourage existing networks to be more inclusive of young people. Rather than create a separate network, it is recommended that existing SUN networks are more proactive in involving young people and that the CSN take steps to promote inclusion of youth organisations in national CSAs. The appointment of a youth representative to the Lead Group has been an important and positive step.</p>

	<p>SBN Response/Action:</p> <ul style="list-style-type: none"> • National SBN: agree we should enhance gender and youth inclusion proactively, with a view of establishing partnerships that support these areas. National policies and strategic documents should also be reviewed to identify potential opportunities and synergies • We will encourage partnerships with organizations that work closely with youth entrepreneurs. • We will also finalize an SBN gender assessment for SUN 3.0
<p>Technical Assistance</p>	
<p>33</p>	<p>Enhance the role of the SMS as a source of information about TA. This should include maintaining an up-to-date roster of providers and types of TA available and information on how to access it and communicating this regularly to country stakeholders via the networks and the SUN Movement website. The roster and information should include sources that are internal and external to SUN.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree. The SMS should serve as a repository of information around TA opportunities and requests; this information should be shared across Networks and stakeholder groups to reduce duplication.
<p>34</p>	<p>Proactively identify country TA needs through the SUN networks. The SMS should proactively identify country demand for TA through regular consultation with Country Focal Points and CSAs and communicate this to TA providers to inform the scope of their activities. Revamped JAA processes can also be used as an opportunity for the SMS to jointly identify gaps and needs with country stakeholders and for countries to determine whether to access UN or TAN support.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree. The Networks/their stakeholder groups are a critical part of TA structures, and these need to be better informed and streamlined to enhance effectiveness and reduce duplication.
<p>35</p>	<p>Strengthen coordination between SUN TA providers and between SUN and UN TA providers. There is scope to improve coordination between the SUN TA mechanisms and ensure that, together, these mechanisms provide a comprehensive and complementary range of TA that meets country needs. The UNSCN (UNN) has an important role to play in establishing a stronger relationship with SUN Movement TA providers at a global level. Consideration could also be given by current TA providers and any future one-stop shop (see below) to making better use of UN agencies to provide TA in areas where they have a comparative advantage.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree. All nutrition TA providers should be considered holistically and drawn on in the most effective (cost, time, expertise) way possible. High-cost international consultants may not always add the greatest TA benefit to a country.
<p>36</p>	<p>Shift the focus of future TA to support for implementation of national plans tailored to country priorities and contexts. This may require a different approach to TA (e.g. providing longer-term or mentoring support rather than short-term inputs). Consideration needs to be given to how SUN networks and other country support mechanisms, including TA, can support subnational implementation. In addition, SUN TA will need to be more responsive to the specific needs of countries transitioning from donor support and those defined as fragile and conflict-affected states.</p> <p>SBN Response/Action:</p>

	<ul style="list-style-type: none"> • This seems reasonable as long as key decisions have been made pertaining to priorities and policy direction. However, defining what this looks like will take time, and guidance for designing such programmes and support will be critical.
37	<p>Consider joint donor funding for nutrition-related TA. Joint funding by donors of TA could potentially be more efficient and effective than current arrangements, as well as improve coordination and increase transparency for those seeking TA (although the SR team recognises that there will be other TA providers and that coordinated supply of TA is difficult to achieve). A ‘one-stop shop’ could be modelled on DFID resource centres, Joint United Nations Programme on HIV and AIDS Regional Technical Support Facilities or other similar mechanisms and managed by an organisation or consortium of organisations with relevant capacity and experience, identified through a competitive tender. The scope of work would include liaising with the SMS to keep abreast of country and civil society TA needs, ensuring all relevant stakeholders are aware of the TA available and how to access it, supporting stakeholders to develop TA requests where necessary (this was highlighted as an issue for CSOs, in particular those in non-Anglophone countries), reviewing requests, identifying appropriate providers of TA and assessing the quality and impact of TA provided.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • Agree. Needs to be streamlined and redesigned, better addressing needs of country level stakeholders. National SBNs should also be included within those able to access TA; SMS needs to play leading role. People should be included who understand business. Donors need to look at better integration with SMS and UN TA platforms.
Pooled Fund	
38	<p>Focus SUN Movement grant taking on concrete actions that will contribute to scale-up of nutrition, not on core funding for country structures. Funding for MSPs and CSAs has been important to establish the foundations for multisector, multi-stakeholder national nutrition responses, but the sustainability of these structures should not depend on the SUN Movement for core funding. If they are effective and add value, it should be possible to make the case for funding by government and donors in-country. As discussed above, the SUN CSN should take responsibility for supporting CSAs to secure core funding. Future grants should prioritise support for innovative and catalytic actions that will contribute to delivering results, including carefully monitored pilot projects and interventions to address bottlenecks with the lessons and results routinely shared with member countries (see section 3.2.2). The grants should supplement core funding for national nutrition programming, not replace it, and consideration could be given to a co-investment model with funding contributed by the Pooled Fund and recipient countries.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • We would recommend that the SUN Pooled Fund supports the core organizational work of national networks (SBNs/CSAs) as the membership of these national networks do not have the means to cover the costs of operating national networks. This funding should support the alignment of joint network country level action plans – potentially in a smaller number of SUN Countries in order to pilot joint network approaches which could then be expanded to more countries based on lessons learned. • SUN Pooled Funds could also be dedicated to activities at a regional level – for example supporting regional investor forums which would catalyse businesses and investors at a regional level, based around regional economic areas. • Two streams should be available depending on country context; for early-stage networks to establish SBNs; and then for more established networks to implement actions. • Countries should be selected for joint actions/funding across networks; fewer number of countries but higher levels of funding available.

<p>39</p>	<p>Review the use of Pooled Fund grants to support SBNs. These networks can and should be self-funded by private-sector partners, and by funding these SBNs this is one-way business can demonstrate commitment to supporting an effective national and global nutrition response.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • National SBNs propose that the SBN should develop an SBN investment network to support the growing finance linkages they can facilitate with the SME sector. • See above comment, as well as comment linked to recommendation 30. • There is a contradiction within the SR around business: if more business engagement is needed, we can't impose stricter requirements on companies or they will not engage, especially at national level (but also applies to global level companies). • The likelihood that multinationals will fully fund national Networks is quite unrealistic and undermines the independence of the SBN. SBN proposes to encourage more in-kind contributions from global SBN members, e.g. secondment of staff into National SBNs. • We have discussed instituting a membership fee model at different levels but would need to expand SBN Secretariat size to allow for increased member service provision. This, however, seems duplicative as others are already working within this space, and goes against our general thinking that we keep a lean global and country SBN structure that focuses on the catalytic role the SBN can play, including linking business to other service providers.
<p>SUN FPs and MSPs</p>	
<p>40</p>	<p>Shift to a 'Country Coalition' approach at the national level. Whilst this would be similar to the MSP in that it could involve stakeholders from different sectors, including government, civil society, academia, business and the media, the focus would be on involvement based on commitment to action rather than on sector representation for its own sake. The Coalition would take the form of a high-performance team or task force and comprise skilled, dynamic individuals with a shared commitment to taking forward national nutrition priorities and achieving results—this should include individuals with frontline knowledge and experience to ensure a practical focus—and would take a responsive, flexible, action-oriented approach to its work. The Coalition's functioning and effectiveness would not be dependent on government or Focal Point leadership but would benefit from their active engagement and support. In some countries, MSPs may already be functioning as task-focused coalitions, and little change would be required. In others, where MSPs are inactive or not functional, it may be feasible to build on or add to other existing structures for nutrition. The expectation is that donor and UN agencies would participate and provide support as appropriate but that the Coalition would be country driven.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • General agreement around this recommendation; only one person as the focal point person in a large country with many networks is highly challenging. Operationally, the current model makes it highly burdensome for Networks to get sign off and or extensive involvement from the SUN FP for each activity. • SUN decision making and authority to act should be more horizontal at national level rather than the current vertical model. Once others are empowered to work together and collaborate, and make joint decisions, convergence will be strengthened. • A stronger mechanism for alignment and meetings between the FP and the Networks would be helpful across many contexts, to drive coordination linked to a joint workplan. This may include a focal point within government linked to each of the SUN Networks/similar stakeholder-based nutrition coordination structures.

	<ul style="list-style-type: none"> • The Pooled fund should be open to fund staff to support the coordination tasks of the SUN FP, as well as (potentially) the SBN and CSN coordinators. This will encourage follow up and reporting against a coordinated joint workplan.
41	<p>Tailor country structures to the country political and institutional context rather than promoting a ‘one size fits all’ approach. As the SR country illustrations (Annex 2) show, in practice, country nutrition structures are diverse. For example, in Afghanistan, the Food Security and Nutrition Agenda has a Technical Secretariat, and there is a high-level MSP with a steering committee that includes ministers, development partners, UN agencies, civil society and the private sector. In Indonesia, the SUN Government Focal Point is the deputy of Human Development and Cultural Affairs within the Ministry of National Development Planning (Bappenas). In Guatemala, the case study highlighted the need for tailor-made approaches and structures that reflect the national drivers of malnutrition, dynamics and capacity. SUN—either the SMS or one of the Movement’s networks or partners—could play a useful role in documenting and sharing different models to support multisector action around nutrition. The relationship between the Country Coalition and other structures for nutrition will also be determined by the country and institutional contexts.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • SUN currently doesn’t promote a one-size fits all approach, and each country takes SUN / SUN principles on board based on local context. This recommendation doesn’t accurately interprets the diversity that is in place across the SUN movement. • Perhaps SUN should have a menu of options that people can choose from. For SBN, while we have a common theory of change, we promote a non-prescriptive approach to setting up SUN Business Networks and defining their priorities and initiatives. Countries are flexible and need to prioritize nutrition issues and priority interventions each based on the national context, including the political and business environments.
42	<p>Support networking between Country Coalitions, other country and regional initiatives and other networks. The SMS and the SUN networks can play an important role in linking country structures to other cross-country networks—including the Nutrition Decade Action Networks,³⁰ which are intended to share experience, promote improved coordination and build political commitment—and other initiatives, such as WFP-supported observatories that have a regional role.</p> <p>SBN Response/Action:</p> <ul style="list-style-type: none"> • This is important, but we need to do this in a practical way that doesn’t waste time and result in more talking. SBN has focused on this in the past, including work with national Chambers of Commerce, and regional and global consortia such as Food Industry Asia, World Business Council on Sustainable Development, International Food and Beverage Alliance, and others. Moving forward, we will explore ways to strengthen this work further and will be more purposeful about inter-network exchanges.