



Scaling Up Nutrition Civil Society
Alliance in Cambodia
Advocacy Strategy 2021-2024

Table of Contents

Background	3
Purpose	3
Core Outcomes	4
Priority Outcome 1	4
Priority Outcome 2	6
Priority Outcome 3	7
Priority Outcome 4	8
Risks and Limitations	9
Monitoring plan	10

Background

The aim of advocacy is to influence or change policies, laws, regulations, resources, or other decisions that affect people's lives. An advocacy strategy is a clear plan on how to work with decision-makers, policy-makers, leaders and other influential stakeholders on the issues at hand in order to help them make informed and effective decisions, in this case working towards eliminating malnutrition.

To be effective and influential, advocacy activities must be targeted towards decision-makers, focused on achieving a specific change or policy, and based on strong evidence. Advocacy is focused on influencing policy-makers and should not be confused with behavior change activities among beneficiary populations. A strong advocacy strategy lays out the goals, objectives, target audience for change, key messages, and planned actions that will move policy decisions toward the expected aims.

Purpose

The SUN CSA Cambodia developed this Advocacy Strategy to guide our efforts to eliminate all forms of malnutrition in Cambodia for the period January 2021 to December 2024. In 2020, the SUN CSA Secretariat facilitated member input to identify advocacy priorities through a multi-stage consultation process, with additional input from the Executive Committee members and other SUN Network Focal Points. During a one-day in-person consultation, SUN CSA members agreed on four final priorities, which serve as the key focus of this strategy. All four of these priorities were viewed as equally important to members:

1. Governments, development partners and private sector actors are accountable for protecting breastfeeding practices, including monitoring and enforcement of Sub-Decree 133 (BMS Code) on the Marketing of Infant and Young Child Feeding Products.
2. Establish sustainable, government-led, sub-national nutrition coordination platforms, that play a key role in nutrition financing and programming.
3. Strengthen the roll-out and enforcement of the Ministry of Education, Youth and Sport's Directive on Strengthening the Implementation Rules for Promoting Food Safety and Wellbeing at Public and Private General Education Facilities.
4. Establish a national nutrition monitoring system to increase the frequency and coverage of data collection and reporting on nutrition.

This Advocacy Strategy will serve as the guiding document for the SUN CSA Cambodia's advocacy activities over the next four years (2021-2024). For each outcome, the Strategy identifies the key objectives, messages, target groups and activities.

Core Outcomes

Priority Outcome 1

Governments, development partners and private sector actors are accountable for protecting breastfeeding practices, including monitoring and enforcement of Sub-Decree 133 on the Marketing of Infant and Young Child Feeding Products.

Cambodia's Sub-Decree 133 (SD133) on the Marketing of Infant and Young Child Feeding Products was recently assessed by the WHO Code Monitoring Assessment and several loopholes were found. The SUN CSA Cambodia has a strong history of supporting the government in implementing and enforcing SD133; the SUNC CSA has submitted 26 violation reports, resulting in action being taken against 6 companies in violation of the Sub-Decree. Promotions of breastmilk substitutes (BMS) are decreasing; however, violations of labelling requirements are increasing and the prevalence of BMS products in private health care facilities is rising.

Objective 1: By 2024, the Ministry of Health has revised SD133 to address issues/loopholes raised in the WHO Code Monitoring Assessment.

Targets/allies: Council for Agricultural and Rural Development, Ministry of Health, Ministry of Commerce, Ministry of Industry, Science, Technology, and Innovation, GIZ, UNICEF, and WHO.

Key messages: The rate of exclusive breastfeeding is declining while the promotion of formula is increasing. Based on the 2020 WHO Code Monitoring Assessment, we identified six priorities for strengthening SD133 implementation and enforcement in Cambodia. SUN CSA Cambodia will work with other nutrition partners to advocate for the Ministry of Health to update SD133 to remove the loopholes companies can use to promote their products inappropriately.

Activities:

- Advocate for the government to include WHO's six priorities in order to close the loopholes in SD133, by mobilizing UN agencies to join us in meeting with the Executive Working Group (EWG) to discuss the priorities and their justifications. Have the government agree to update SD133 in accordance with those these six priorities.
- Actively participate in developing detailed action plans for updating SD133 based on those six priorities. Develop roles and responsibilities, timelines, and necessary resources.
- Key SUN CSA Cambodia members will participate in inter-ministerial consultation workshops to provide technical assistance and inputs to the update of SD133.
- Join Ministry of Health (MOH) and other line ministries in disseminating the updated version of SD133 to the public.
- Meet with government and UN agencies to develop a joint implementation plan for the updated SD133, with clear activities, timelines, roles and responsibilities, and resource allocations.
- Hold all parties accountable in the implementation of the agreed plan. Actively participate in quarterly meetings of the EWG to discuss progress, challenges, areas for improvement, and next steps for action.

Objective 2: By 2024, reporting of violations and actions/penalties has increased.

Targets/allies: CSOs, government and UN agencies (as above), professional association of nurses, midwives associations, media, and general public.

Key messages: Widespread marketing of infant formula undermines breastfeeding practices and causes the public to question the value of breastmilk. Actions and penalties against violators of national breastfeeding legislation is the most effective way to protect breastfeeding practices. Everyone can help to protect children by reporting inappropriate promotion and marketing of infant formula.

Activities:

- Provide orientation to targets/allies on how to report violations of SD133.
- Establish a system for collecting SD133 violation evidence, using the Kobotoolbox web-based platform.
- Gather and document evidence of BMS label violations and illegal promotions. Alliance members can submit this evidence through the web-based platform.
- Alliance members raise awareness of SD133 components and reporting mechanisms among program staff, community groups, and health providers in their program areas.
- Submit evidence of Sub-Decree 133 violation to the EWG and ensure follow-up action is taken.
- Mobilize UN agencies and other stakeholders to join forces with SUN CSA Cambodia to make sure strong actions are taken by the EWG and law enforcement officers against violators. This could be done through face-to-face meetings with the EWG or through a joint letter to the EWG.
- Issue press releases and/or join statements to condemn violators/congratulate government actions, when needed.

Objective 3: By 2024, the Ministry of Health/Ministry of Labour and Vocational Training has published guidelines on the implementation of ideal lactation rooms in the workplace.

Targets/allies: Ministry of Health, Ministry of Labour and Vocational Training, private sector, GIZ, UNICEF, WHO, WFP, FAO.

Key messages: Lactation rooms allow mothers to return to work while continuing to exclusively breastfeed their children. National guidelines for workplaces are needed to encourage employers to set up lactation rooms and support their employees to exclusively breastfeed.

Activities:

- Research and prepare a multi-stakeholder policy brief targeting various sectors to justify the need for guidelines on implementing lactation rooms.
- Find and partner with private sector companies championing the use of lactation rooms in the workplace.
- Meet with the Ministry of Health and Ministry of Labour and Vocational Training to realise the need for guidelines on implementing lactation rooms in workplaces and discuss the next steps.
- Support the government through consultation workshops (and other means) to draft and finalise the guidelines.
- Identify role model companies/employers and publicize their efforts to support the adoption and dissemination of the guidelines. Create a video documentary on what motivated/influenced them to implement lactation rooms and support breastfeeding mothers in their workplace.

Priority Outcome 2

Establish sustainable, government-led, sub-national nutrition coordination platforms, that play a key role in nutrition financing and programming.

SUN CSA Cambodia has recently undertaken a nutrition budget analysis to better understand the funding landscape in Cambodia and reiterate the importance of funding for nutrition. Simultaneously, the Alliance has been supporting CARD to establish pilot nutrition platforms at the sub-national level, called the Provincial Working Group for Coordinating Food Security and Nutrition (PWG-FSN). There is a need for consistent resources for nutrition throughout the country, specifically for nutrition-specific activities, which extends from the national level all the way down to the commune level. This is particularly important in light of the implementation of the NSFSN 2019-2023. A focus on resource allocation at the provincial level aligns well with government priorities over the next 3 years.

Objective 1: Work with CARD to establish functional and autonomous multi-stakeholder sub-national nutrition coordination platforms in every province of Cambodia.

Targets/allies: CARD, provincial governors, donor agencies, CSOs, PHD, PDRD, PDWA, GIZ, UNICEF, WFP, key provincial departments, commune council.

Key messages: Experience from several provinces shows that sub-national platforms strengthen coordination and lead to increased resources for food security and nutrition at the provincial level. To fully achieve the NSFSN 2019-2023, government and stakeholders must provide increased funding and support for the scale-up of subnational platforms in all provinces in Cambodia.

Activities:

- Produce and disseminate a simple policy brief targeting sub-national decision makers, such as provincial governors, directors of provincial departments and commune councils, on how increased nutrition budget/resources links to economic growth, human development, productivity etc.
- With CARD, meet provincial governors and relevant provincial departments to discuss the need for establishment of sub-national platforms for coordinating nutrition-related activities and mobilizing financial resources in each province.
- Through sub-national platforms, advocate for provincial departments to increase nutrition activities and resources by mainstreaming them into development plans and investment programs.
- Advocate for commune councils to increase nutrition activities and resources by mainstreaming them into commune development plans and investment programs.
- Provide sub-national platforms, including commune councils, with an orientation on planning and costing nutrition activities.
- Provide sub-national platforms, including commune councils, with an orientation on how to track their budgets and spending on nutrition activities.
- Support CARD and sub-national level platforms to monitor their progress in integrating nutrition activities and budgets into local development plans, and actual allocations and spending of nutrition budgets.

Objective 2: By 2024, achieve a 10% increase in Ministry and Economy and Finance (MEF) budget allocations specifically targeted for nutrition at the sub-national level.

Targets/allies: CARD, MEF, FAO, GIZ, WFP, UNICEF, CSOs.

Key messages: Increasing funding for nutrition will create long-lasting economic impacts, resulting in positive economic development for Cambodia. Provincial departments are able to increase their budgets for nutrition, but they need more funding for nutrition from line ministries. This should be supported by a new budget line for nutrition activities from MEF, to allow provinces to track nutrition spending.

Activities:

- Discuss with CARD, FAO, WFP, GIZ, UNICEF and other stakeholders on the importance of increased funding for FSN at the sub-national level.
- Research and create briefs on other country's approaches to tracking nutrition spending.
- Create an advocacy document to share with the government.
- Create a toolkit and share with MEF to track spending by all stakeholders at both national and sub-national levels.
- Conduct an annual budget analysis, that includes sub-national data.

Priority Outcome 3

Strengthen the roll-out and enforcement of the Ministry of Education, Youth and Sport's (MoEYS) Directive 18 on Strengthening the Implementation Rules for Promoting Food Safety and Wellbeing at Public and Private General Education Facilities.

In May 2019, the MoEYS issued a directive aimed at promoting food safety and hygiene in schools. Meal and snack options in schools often feature unhealthy and highly processed foods and sugary drinks, contributing to the poor nutrition of school-aged children in Cambodia. The SUN CSA Cambodia strongly supports the strengthened roll-out and enforcement of the Directive and is eager to see the sale of unhealthy and unsafe foods eliminated from schools across the country.

Objective 1: In partnership with the Royal Government of Cambodia, develop and implement a monitoring and enforcement system for the MoEYS directive using the ISAF process.

Targets/allies: CARD, MoEYS, MOH, PHD, PDEYS, school staff, students and caregivers, GIZ, UNICEF, WFP, FAO.

Key messages: Despite the implementation of MoEYS Directive 18 on the sale of foods in schools, many young children still consume unhealthy foods while at school. Stronger accountability mechanisms are needed to encourage schools to provide healthy food options. MoEYS and partners must strengthen monitoring and enforcement of the directive to improve the health and nutrition of school-aged children throughout Cambodia.

Activities:

- Assess the current situation surrounding implementation and enforcement of the Directive in schools.
- Develop a summary of key findings and recommendations and meet with MoEYS and other stakeholders to discuss.
- Support MoEYS to develop implementation guidelines for the monitoring and enforcement of Directive 18, including necessary tools.
- Develop a detailed workplan to implement these guidelines, including convening a consultation to recommend strengthened monitoring to MoEYS/MoH.

Objective 2: Deliver an awareness and behaviour change campaign to stakeholders across as many schools as possible.

Targets/allies: CARD, MoEYS, MoH, PHD, PDEYS, CSOs, school staff, sellers, students and caregivers, GIZ, WFP, UNICEF.

Key messages: Adolescence is a critical time in a child’s development and growth. There are better alternatives to the unhealthy and unsafe foods currently available in schools. Sellers, school staff, students and caregivers have other options and can sell/select healthier alternatives to improve child health and nutrition.

Activities:

- Convene a meeting with SUN CSA Cambodia to develop a campaign concept.
- Meet with MoEYS and MoH to discuss the development and rollout of a behavior change campaign.
- Identify/profile model schools and work with relevant stakeholders to develop SBCC materials, including a video.
- Formulate a delivery plan and orient SUN CSA members on the materials.
- SUN CSA Cambodia members to deliver the campaign across all provinces of Cambodia.

Priority Outcome 4

Establish a national nutrition monitoring system to increase the frequency and coverage of data collection and reporting on nutrition.

There is currently no national monitoring system established for collecting data and reporting on nutrition across Cambodia. As the NSFSN 2019-2023 rolls out, it is more important than ever to implement a monitoring system so that the progress towards achieving the goals of the strategy, and the achievements, can be tracked nation-wide.

Objective 1: Develop strategic objective indicators for the NSFSN 2019-2023.

Targets/allies: CARD, GIZ, UNICEF, FAO, WFP, WHO.

Key messages: Clear, measurable indicators on nutrition status, program coverage, financing, and governance are necessary for determining if Cambodia is making progress towards its commitments to nutrition. CARD should work with stakeholders at the national and sub-national level in Cambodia to develop and implement a simple, effective and transparent monitoring plan to track the progress of the NSFSN 2019-2023.

Activities:

- Have SUN CSA Cambodia lead in some of the government’s six taskforces for joint priorities: (i) Healthy diets; (ii) Food Value Chains, Food Safety and Fortification; (iii) Nutrition-Sensitive WASH; (iv) Community Led Nutrition; (v) Social Assistance; and (vi) Disaster Management and Climate Change.
- SUN CSA Cambodia members actively participate in and give input to developing indicators and monitoring and evaluation (M&E) framework for monitoring the progress of NSFSN 2019-2023.
- SUN CSA Cambodia will gather feedback from members and consolidate recommendations from civil society to share with the Executive Working Group.
- Support CARD to develop an implementation plan for monitoring the progress of the six task forces.

Objective 2: The relevant ministries establish and implement the monitoring system, and track and report on the relevant indicators.

Targets/allies: CARD, FAO, GIZ, WFP, UNICEF, WHO, relevant line ministries.

Key messages: The monitoring system will only be successful if successful establishment and implementation are carried out. Reporting on milestones and indicators is key to tracking progress.

Activities:

- Support PWG-FSN for orientation of the monitoring system to the sub-national level.
- Support the roll-out, monitoring and progress of the government’s six task forces.
- Use PWG-FSN to monitor outcomes by exploring ways to highlight results, such as a scorecard/dashboard.
- Use the results from monitoring to identify and communicate gaps for improvement.
- SUN CSA Cambodia members actively participate in task forces to monitor progress of NSFSN 2019-2023.

Risks and Limitations

We face many potential challenges, both internal and external, in delivering this advocacy strategy. To mitigate the impact of these risks, we identified the following actions:

Risk	Action
The SUN CSA Cambodia is dependent on external funding to implement its program and advocacy activities, and there are limited sources of funds for advocacy.	<ul style="list-style-type: none"> • Develop concept notes and funding appeals for a range of funding opportunities. • Work with other SUN Network members to identify sources of funding. • Maximize use of staff and resources from SUN CSA Cambodia members to implement activities.
The members of SUN CSA Cambodia have many competing priorities, and participation levels can be low.	<ul style="list-style-type: none"> • Continue to build the capacity of members and the Executive Committee for action. • Increase engagement with members in order to increase ownership over the activities of the SUN CSA Cambodia.
The Advocacy Strategy is based on priorities and gaps as of 2020. New government strategies and approaches may arise that make the advocacy priorities irrelevant.	<ul style="list-style-type: none"> • Advocacy priorities and actions will be reviewed during the SUN CSA Cambodia Annual Workshop and adjusted as appropriate. • The SUN CSA Cambodia Secretariat will continue to monitor national policy developments.
External factors, such as the COVID-19 pandemic, may make it impossible to carry out activities as planned.	<ul style="list-style-type: none"> • The SUN CSA Cambodia Secretariat will utilize alternative approaches for activities, such as holding online consultations, where necessary.

Monitoring plan

Objective	Monitoring Indicator
Priority Outcome 1: Governments, development partners and private sector actors are accountable for protecting breastfeeding practices, including monitoring and enforcement of Sub-Decree 133 on the Marketing of Infant and Young Child Feeding Products.	
Objective 1: By 2024, the Ministry of Health has revised SD133 to address issues/loopholes raised in the WHO Code Monitoring Assessment.	Revised Joint Prakas issued by the Ministry of Health.
Objective 2: By 2024, reporting of violations and actions/penalties has increased.	Number of violation reports submitted yearly.
Objective 3: By 2024, the Ministry of Health/Ministry of Labour has published guidelines on the implementation of ideal lactation rooms in the workplace.	Draft guidelines on the implementation of ideal lactation rooms in the workplace prepared by the Ministry of Health/Ministry of Labour.
Priority Outcome 2: Establish sustainable, government-led, sub-national nutrition coordination platforms, that play a key role in nutrition financing and programming.	
Objective 1: Work with CARD to establish functional and autonomous multi-stakeholder sub-national nutrition coordination platforms in every province of Cambodia.	Number of PWG-FSN established throughout the country.
Objective 2: By 2024, see a 10% increase in funding for nutrition at the sub-national level, from the Ministry and Economy and Finance.	Annual funding figures for nutrition at the sub-national level.
Priority Outcome 3: Strengthen the roll-out and enforcement of the Ministry of Education, Youth and Sport's Directive on Strengthening the Implementation Rules for Promoting Food Safety and Wellbeing at Public and Private General Education Facilities.	
Objective 1: In partnership with the Royal Government of Cambodia, develop and implement a monitoring and enforcement system for the MoEYS directive using the ISAF process.	Development of a monitoring and enforcement system for the MoEYS Directive.
Objective 2: Deliver an awareness and behavior change campaign to stakeholders across as many schools as possible.	Number of schools who have been reached by the behavior change campaign.
Priority Outcome 4: Establish national nutrition monitoring system to increase the frequency and coverage of data collection and reporting on nutrition.	
Objective 1: Develop strategic objective indicators for the NSFSN 2019-2023.	Indicators developed for the NSFSN 2019-2023.
Objective 2: The relevant ministries establish and implement the monitoring system, and track and report on the relevant indicators.	National report published tracking the progress towards key indicators for NSFSN 2019-2023.