Summary of issues raised through Consultation on the Draft Strategy for Scaling Up Nutrition 3.0

A. Introduction

This Report presents the main issues arising from the Movement wide consultation carried out in reaction to the Scaling Up Nutrition (SUN) 3.0 draft Strategy. The majority of comments can be grouped under three main sections (country leadership and implementation, governance and financing) with a fourth section entitled 'other' to capture issues that were raised but by fewer respondents. The Report is therefore organised under these four headings. For each heading, the main observations are summarised followed by proposed solutions which are set out to inform discussion and to enable ExCom to reach convergence of views on the appropriate way to handle each matter.

The Consultation Report summarises 117 survey responses and 19 inputs submitted directly, together with 7 online feedback sessions between the Executive Committee and all the main parts of the SUN Movement. Feedback sessions have been held with the six Executive Focal Points and five guest Focal points, the Lead Group, all four networks (Civil Society Network, United Nations Nutrition Network, SUN Business Network, SUN Donor Network) and the SUN Movement Secretariat. Prior to these feedback sessions, consultations were held in a number of different countries and the feedback was discussed in regional webinars facilitated by the six Executive Committee Focal Points and the networks also held their own consultations.

B. Areas of Agreement

There is clear appreciation of 'walking the talk' when it comes to the SUN Movement being country-led and country-owned and appreciation that the strategy is trying to do this. Readers like the statement in the Strategy that 'we' are all SUN and also the clear indication of the intended strategic shifts. There is broad support to address all forms of malnutrition and for a multi-sector approach.

Responses support the emphasis on improved quality and consistency of nutrition planning processes at the country level that includes prioritisation and a focus on results. Linking results to WHA and the SDGS is agreed. There is agreement on the need for systemic change and for the impetus to find an institutional home for nutrition and that strong country leadership at political level is crucial, whilst acknowledging that the Focal Point model has had mixed results so far.

Strengthening the enabling environment (Strategic Objective 2) is seen as key to achieving results and the important of technical assistance and knowledge management is recognised as a part of strengthening country capacities.

There is recognition that all areas of the Movement need to 'step up' and the importance of accountability is not disputed, neither is a monitoring system where data is utilised and acted upon to achieve results. The 'More Money for Nutrition and More Nutrition for the Money' section of the finance chapter is seen as important and there is agreement that SUN should not become a financing mechanism. There is appreciation that the strategy includes a chapter on Conflict of Interest.

References to the implications of Covid-19 is seen as crucial.

C. Key issues for attention

1. Country leadership and implementation

1.1. Country Action Plans

Whilst there is extensive agreement on the need for prioritisation within country plans, one of the strongest concerns voiced by the majority of respondents relates to Country Action Plans (CAPs). Respondents feel the draft strategy has largely ignored what has already been achieved with regard to National Nutrition Plans (NNPs) but the main concern is how Country Action Plans fit with NNPs with the feedback stating this has not been adequately explained. Whilst the draft strategy states that NNPs will be built upon this does not come across clearly enough and raises doubt about intentions (e.g. will there be two separate documents?). There is also concern that Country Action Plans will create another planning burden that requires additional resources (human resource, financial and time). A standardised approach such as CAPs and CCs is seen as top-down and prescriptive.

Some of the comments that reflect these concerns include:

> *"I am uncomfortable with the focus on CAP's (SO1 and SO3). While in theory, from the SUN Movement perspective, it makes a lot of sense (esp. to avoid separate workplans from the different stakeholder networks), focusing on the CAPs specifically can entail the following risks : 1) launching yet another planning exercise with all that it entails in terms of time, TA costs, consultation costs etc. A big reason for lack of action is that staff have been so busy planning NPPs, creating accountability frameworks, etc. there is hardly time left for implementation! 2) Creating (yet another) situation where a global initiative creates the need for a new planning exercise that risks being separate from existing country planning exercises. This is what can typically undermine genuine country ownership beyond the few institutions/individuals involved."*

> *"If we already have NNP why do we need a CAP? "the healthy do not need a doctor"*

> *"Focus on CAPs in many of the outputs may undermine the determination to be country-driven and country-owned in Phase 3. Though this is probably not the intention, setting the CAP's at the heart of the strategy can be prescriptive and drive the focus on an additional planning exercise commissioned by the global level, as opposed to really adjusting and building on country processes. It may be a question of nuances in the language but it important. Countries have time and time expressed fatigues about doing a variety of plans - CAADP NAIPs, Zero Hunger, SUN NNP, etc. etc. determined by regional and global agendas rather than their own. Meanwhile, malnutrition rates will really go down when National Development Plans address poverty and inequities, poor education, gender, health system strengthening (include nutrition-specific) etc. in a consistent way."*

> *"To ignore the fact (and actually denigrate the work) that 51 out of 61 SUN countries have prepared or are in the process of finalising an NNP and to propose a further period of planning and renaming to CAP seems a bizarre step at this juncture."*

> *"SUN 3.0 Strategy should work with SUN countries to use existing structures and resources that countries have formed, developed, passed and aligned around to date rather than spending*

additional time and resources to develop new document(s). If development of a new plan is necessary, recommend focusing on developing one document (a CAP or NNP), rather than both."

"In some cases, asking countries to come up with CAP may be redundant to the consultative process the country already did when developing national nutrition policy and strategic plans. What may be needed is to ensure effective implementation these and monitoring progress in terms of both resources (budgets) allocations compared to what was planned, and track results to build a case and encourage governments to increase total budgetary allocation for nutrition with visible budgets across all key ministries."

"Based on the lessons over last decade, nutrition cannot be a stand-alone agenda. It needs to be in national systems and national development agendas"

Proposed solutions

- The strategy needs to explain better the concept of CAPs and what that means for countries – it should clarify that CAPs are not be stand-alone new or parallel documents but will build upon the NNPs in countries where these exist by prioritising actions, and linking to evidence and results as well as emphasising integration with the National Development Plans.

- Reduce the prominence of 'country action plans' in the strategy including in the Strategic Objectives (see other comments on Strategic Objective (SO) below):

  "SO1 does not reflect the spirit of "country led". There is too much focus on CAPs and CC. …..The whole Strategy is built upon a strengthened country leadership role; this should come out clearly as the first Strategic Objective of the Strategy, with the prioritized plan being one component of HOW this is supported, rather than development of the CAP as the SO"

  Change SO4 to "Strengthen leadership of national governments to ensure inclusiveness and accountability of all the members of the Movement to people at risk of malnutrition, and to each other, ensuring all voices are heard, national plans are implemented, and value for money is promoted at all levels."

- Avoid being prescriptive about the name and centrally standardised models – if a new name is required simply taking away the capital letters ("country action plans") could make it less prescriptive and more flexible.

- Focus on the principles that underpin good planning such as prioritisation, costed plans and adaptive management to ensure there is consistency across countries and that there is a minimum level of quality around plans. The SUN Plan Quality Checklist is a tool that can assist with this.[1]

- Let countries use their judgement on how to upgrade their plans, so long as the agreed principles underpinning the plans are adhered to – they could improve NNPs or choose to have an additional document that is more of an action plan for example.

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[1] https://scalingupnutrition.org/wp-content/uploads/2016/12/Scaling-Up-Nutrition-Quality-national-plan-checklist.pdf

- Emphasise more strongly that prioritisation focuses on the Country's priorities rather than Development Partners and clearly define who 'the country' is such as government alone, or government in partnership with others stakeholders and who they are.

- Use high level SUN champions (the SUN Movement Coordinator, Lead Group members and the UN Resident Co-ordinator) to ensure that all actors align behind country priorities and to mobilise resources

1.2. Country co-ordinator and the ecosystem

The concept of a Country Co-ordinator created widespread concern. Whilst there is agreement on the need to support country leadership, particularly at the political level, and for nutrition to have an institutional home, the proposed Country Co-ordinator role raised many issues, including:

- How does this fit with the existing Focal Point (FP) system especially where the FP is already empowered?

- What would a transition from Focal Points to Country Co-ordinators entail?

- It still places the emphasis on one person and risks overburdening that person despite previous agreement that shouldn't happen

- How will the country co-ordinator and the ecosystem be supported and resourced?

- Is it more than just a name change and how would this role be different from SUN 2.0?

Similar to the concerns raised over Country Action Plans, there was a feeling that the Country Co-ordinator idea is still a prescriptive, top down, standardised approach that does not take into account what is happening in different countries and does not allow countries to make the choice according to what suits them best. There is also concern that coordination platforms are already in place and these will be ignored rather than building on them. Comments also suggest that the role of Parliamentarians can also be mentioned.

Some of the comments that highlight these concerns include:

> *"Country coordinator does seem a more appropriate title, but I would like to know why the decision was made to have a single coordinator/focal point rather than a multi-sectoral team. I realise the coordinator does have a team under him/her, but my concern would be that if one person is designated as "the leader", it would reduce the ownership and commitment of those under the coordinator."*

> *"Position/role of SUN FP – recognise challenges and it should NOT be prescriptive (e.g. in Annex – job profile). The strategy cannot make it a MUST to be based in Office of the President (OOP) but rather 'ensure strong linkages with OOP'. Allow countries to decide and organise."*

> *"National level representation – country coordinator? Differ from country lead? Who pays and on what authority? Formal contract (SUN/UN contract) or pro bono (voluntary) Is the function – champions or managers?"*

> *"We need to focus on the institutional architecture rather than just an individual person. If we just a CC when political shifts happen that compromised implementation. This should be*

country-specific as countries have different structures they have put in place. SUN 3.0 should see how to strengthen these structures."

"CFP/CC affects me. Every country has a FP. Concern that "senior CC, empowered etc." means existing one is not? Negative interpretation – agree countries need more senior people (Minister for Health, President Advisor etc.) but another layer, won't have time and will be a title only. Countries will revert to the operational layer (National Nutrition Council) anyway. Make the name meaningful, flexible/adaptable – not prescriptive. The positive – will upgrade status, clarify role, move SUN 3.0 but can countries afford it (given economic pressure)?"

"SUN is an additional layer of work for very busy, senior government people, and not a full time job. Need to be clear on expectations and capacity required to support without more structure. Need a full time facilitator to help CC to get things moving. Good idea but need to think through (beyond name change)"

"Expectations are raised for external resourcing and accountability for resourcing regarding Country Coordinator. Risks placing too much attention on process rather than on results. Risk of duplicating efforts and creating parallel structures."

"Where nutrition is already coordinated at a higher level with existing institutional governance structures who happen to be the same SUN focal point with functional SUN networks, it is important to understand how roles will play out with the proposed a SUN Country Coordinator supporting structures at the same levels. These may be viewed as two parallel structures and may result into SUN being viewed as a project with a Coordinator and a team as was the case in the first phase of SUN than the normal government efforts that need to scale up to achieve nutrition objectives."

"For CC role and structure of the support team, include language that all stakeholders in the Movement commit to funding and supporting the structures at country level; or, how countries will be supported to utilize and maintain the structures they have built to play this function that have shown to be effective for individual countries."

"While welcoming the proposed evolution of Focal Points, the Country Coordinator role risks being simply a rebranding exercise if the emphasis is again on one person. Given political affiliation and excessive workloads of SUN FPs / coordinators, there is a need for a realistic approach which takes into account the probability of turnover at this high-level and which ensures knowledge, capacity, gains in nutrition are not lost with changes in government - putting a broader secretariat in place at national level (distinct from the MSP) which is not politically affiliated is one option; look at models that work, such as Nutrition secretariats in The Gambia or Madagascar or Nepal headed by a Nutrition Coordinator; enabling division of responsibilities between political role and functional/managerial roles. (On p.17 there is one passing mention of the CC's secretariat, but its inclusion in the Annex TOR suggests the 'secretariat' proposed is an MSP with government and non-government members seconded, rather than a functioning government unit supporting the role of CC)."

"While the strategy emphasizes the 'country leadership', the distinction between country-led and government-led is not clear. For instance, the SUN Vision (cover page) refers to the movement being 'led by governments' while the Executive Summary refers entirely to the

movement being 'country led'. This distinction has significant implications for the Multi-Stakeholder-Platform (MSP) model proposed at country level. Recommendation: to use the SUN vision as the reference and thus refer to 'government leadership' or 'country government leadership'.

Proposed solutions

- Increase emphasis in the Strategy on country leadership and representation as an eco-system lead, co-ordinated by the Country Co-ordinator (beyond the capacity of one person) with clear explanation of composition of the team around the country coordinator including the relationships, roles and responsibilities of the co-ordinator and the ecosystem. Also include identification of potential stakeholders (for illustration) within the ecosystem, highlighting that active participation and alignment of stakeholders is the driver according to each country's context.

- Include greater clarity on the principles that underpin country leadership to ensure consistency across countries and also the expectations about support and resourcing for the Country Co-ordinator and the leadership eco-system.

- Provide clearer explanation of how the ecosystem will work to meet countries' needs without being prescriptive. Acknowledge the importance of allowing countries to decide the most appropriate titles and positions. Let countries decide whether a name change is needed. The value add of any change of calling country SUN Focal Point a Country Coordinator needs to be clearly explained.

- Clear explanation in the strategy is needed on what this role entails – does it confer greater responsibility beyond the title? What purpose is it intended to serve (primarily) – managerial, representative, advocacy? Add description of the transition process from Focal Points to Country Co-ordinators.

- Include case studies of countries that have already made this shift to the principle of a country co-ordinator and emphasise that it is to co-ordinate nutrition in a country and not SUN.

1.3. Strengthened capacity at the country level

There was strong feedback that strengthening country capacity is critical for achieving systemic change and better nutrition but the strategy assumes that a focus on planning together with an increased focus on resource mobilisation, represents the most effective way of addressing malnutrition instead.

Strengthening capacity should be a core focus of the strategy but is lacking prominence and weight in the document. There was agreement that focusing on this area is crucial to translate any nutrition plans and priorities into results and many saw this area as the value add of country membership to SUN. However there are different views regarding the areas where capacity strengthening is most needed, for example on financing for nutrition, supporting co-ordination or on more technical areas such as supporting different sectors to implement nutrition sensitive actions but this detail will need to be worked out in the operationalisation phase.

There were several comments that the strategy needed to expand the explanation of technical assistance particularly to provide greater clarity on how it differs from SUN 2.0 given that some argue TA has already been driven by country needs in this phase. There were also suggestions that greater

detail is required on knowledge management such as peer-to-peer learning but recognition that is a large area which will need to also be worked out further in the operationalisation phase.

Comments that support this include:

> *"The current focus is very much on prioritization and financing. SUN's main interest should be on achieving systemic change. Therefore, more emphasis should be on strengthening national and sub-national capacities and addressing structural issues (gender and economic inequalities) for better nutrition."*

> *"The section "Creating and strengthening .." is key and should be strengthened. It should illustrate how the SUN ecosystem is geared towards leading to systemic change. Currently it lacks the perspective on strengthening in-country capacities and coordination at national and sub-national level more generally and beyond the Country Coordinator and the Team. "*

> *"Beyond leadership & ownership other aspects critical to implementation of the plan include: awareness and capacity in nutrition beyond the central team - across national ministries and down to regional/provincial & district/municipal level; "*

> *"More is needed on country capacity"*

> *"It is important to point out the Capacity to develop and implement; this is so important. We have beautiful policies and plans. We need to track the implementation and build the capacity for implementation".*

> *"Agree that there is much that can be achieved through sectors adapting/tweaking programmes to be more nutrition-sensitive using existing resources. However, the latter requires investment in capacity development across sectors – an aspect that is lacking across the strategy."*

> *"Country governments should be encouraged and better supported in enhancing their governance capacities and accountability mechanisms for better nutrition outcomes – including improving their public finance management and strengthening linkages between policy, planning, budgeting and M&E mechanisms"*

> *"The focus on TA is also too limiting. Point 3 on p. 10 should be broadened to refer to capacity strengthening and building more generally as well as learning."*

> *"We suggest unpacking the term TA/technical assistance as this can be understood differently by different stakeholders"*

> *"TA and capacity building should not be just demand driven but a systematic capacity building that is informed by defining required capacities of the countries to successfully lead SUN in their countries, and assessing existing capacities and identifying gaps".*

> *"SO 3 :There should be stronger focus on country-to country learning and experience sharing as well as capacity strengthening rather than only on TA. SUN's role would be to provide a safe space for countries to exchange experiences and learnings."*

> *Pg 11: "TA provision will become more country driven..." Who is helping countries prioritising TA needs? Sounds like the current mechanism.*

Proposed solutions

- Give country capacity and the enabling environment one of the top strategic objectives in the strategy as per the comments received and then amend the supporting text to reflect that shift in prominence:

    - SO2 should come before SO1 and get more weight than SO1.

    - SO2: The current focus is very much on prioritization and financing. SUN's main interest should be on achieving systemic change. Therefore, more emphasis should be on strengthening national and sub-national capacities and addressing structural issues (gender and economic inequalities) for better nutrition. SO2 should therefore be adapted.

    - Change SO3 to "Build country capacity to develop, prioritize, finance, implement, and track national nutrition plans through strengthened knowledge management and TA"

- Include case studies on where capacity strengthening at country level has had an impact, particularly on systemic change

- Provide an expanded explanation on TA such as greater clarity on the difference between SUN 2.0 and 3.0 particularly in terms of being driven by country needs. Provide reference to the current KM work commissioned by the SMS that will inform the operationalisation phase. Add that the detail of SUN and KM will need to be worked out in the operationalisation phase.

1.4.   Sub-national and community level

This needs to be a separate, specific section in the Strategy because it has far wider implications than capacity building alone. It should be a stated focus of SUN 3.0 because this is where results are going to happen. Whilst some detail need to be worked out in the operationalisation phase, it has to be central to the strategy to show the ExCom is serious about focusing sub-nationally. It has come up in every feedback session.

There was widespread feedback that focus at the sub-national level is key for achieving nutrition results but lacks sufficient attention in the strategy. Not only is there a lack of emphasis on supporting implementation at sub-national level but there are particular places where sub-national level details are missing.

With regard to the Country Co-ordinator and the ecosystem, what does this mean for sub-national level? What are the governance and financing arrangements for sub-national level? How do CAPs relate to sub-national planning processes? What implication does capacity strengthening have for the sub-national level? There is also an absence of the community level and the inclusion of grass-roots entities.

Comments the relate to sub-national level include:

> *"Probably the SUN strategy can add specific section about sub-national/regional level that explains about the responsibility, role, coordination mechanism, advocacy, BCC to the community, etc, because sub-national/regional level has a "unique treatment" based on their local context"*

> *"Recognising that SUN currently has a restricted audience in many countries and much remains to be done for nutrition to become a priority for those at the implementation level"*

"However, the challenge of holding government and other stakeholders to be more accountable need to be addressed especially the operations and governance at the sub-nationally level which is beyond the control of the coordinator"

"there is increasing recognition that a lot of the action at the country level happens at the sub-national level. What is SUN's vision for how the sub-national actors will be engaged and involved in SUN 3.0?"

"SUN 3.0 needs to be about implementation: setting up governance and coordination structures at the subnational level; mechanisms for financing, prioritising, implementing and M&E at subnational level."

"Finance and resource allocation needs to be considered at subnational level as well. In many countries budgets are decentralised and allocations are subject to priorities of local planning authorities / municipalities etc so their buy-in/inclusion in this phase is essential"

Proposed solutions

- Up front statement in the strategy state that there will be a stronger focus on the sub-national level under SUN 3.0 compared with SUN 2.0, although it will build on what has already started under SUN 2.0. State that the SUN Movement recognises that attention on the sub-national level is crucial for achieving better nutrition.

- Under each relevant section add text to explain what this means for the sub-national level:

  o How is leadership and the ecosystem at the sub-national level supported and how does this relate to support at the national level

  o State that the principles that underpin national plans should also underpin sub-national plans and that the advances made in sub-national level planning made under SUN 2.0 will be escalated under SUN 3.0

  o How will the enabling environment, systemic change and capacity strengthening at the sub-national level be supported?

  o What are the governance and accountability arrangements for sub-national level

  o What support will there be for financing arrangements at the sub-national level particularly for countries that have decentralised systems

- Include illustrations from country experience on 'what good looks like' and how that can be applied elsewhere.

1.5. Recommitment to SUN

The issue of recommitment was raised mainly by countries who found the strategy did not adequately explain what this meant. As one participant in a regional webinar said '*It is difficult to comment on recommitment when there is nothing to comment on*'. Whilst many see the need for recommitment, particularly for countries where the leadership has changed since joining SUN, there is a lack of understanding on what recommitment means in practice. For example, who within the country should recommit? The link between the development of a CAP and recommitment is not favoured so what would demonstrate recommitment, greater domestic financing for nutrition? What happens to countries that do and do not recommit? As a Focal Point said '*country recommitment to SUN 3.0, but what is in store for us?*'. It is important that recommitment is not too

disruptive. The countries also stated that it is essential for other actors to recommit as well, such as networks and Development Partners.

> *"Countries want clearly set out how all actors in Movement will build and strengthen the ecosystem of support for countries, how to leverage their own institutions for change at country level. All SUN members - not just countries - need to recommit to the Movement through concrete action, resources and behavior change at all levels. Finance alone will not achieve results. We need ownership, buy in."*

> *"Link between CAPs and membership: this link should be cut."*

Proposed solutions:

- Clarity on what recommitment means in practice and how a country is expected to recommit – who might be involved and what would demonstrate recommitment? For example, state that each country must decide what stage they are at and what they would like to recommit with such as an updated NNP/CAP, domestic resources for nutrition, a strengthened eco-system, or something else. State that events like the N4G summit can be used for recommitment.

- Elaborate the implications of country commitment for those that do and do not recommit. For those that do not recommit, would they be excluded from the Movement?

- Identify the recommitments expected or sought from other stakeholders.

- Clarify the implications if recommitments are not adhered to under SUN 3.0 (to mitigate implications of commitments not being met by end of SUN 3.0).

2. Financing

Many comments were made in relation to the section on financing but all of them were broadly along similar lines. In summary, comments suggest that the chapter has two functions: (a) to set out the mechanisms for supporting countries to get finance for nutrition and (b) to identify the financing arrangements for domestic and global structures. On the first, the More Money for Nutrition and More Nutrition for the Money section is a good start but requires more detail, for example on pooled fund arrangements. On the second, Networks have concerns that there is a lack of detail regarding the funding arrangements for their Secretariats and as described above, there are concerns over the funding arrangements to support the country ecosystem. Some countries also raised the point that budget tracking is important for tracking financing and requires more attention.

Comments received on this subject include:

> *"I was surprised to see no mention of the systems for securing and delivering nutrition financing."*

> *"The section only states reasons on why invest in nutrition-specific and sensitive interventions. Not really on "what is needed, and how to mobilize" finances for nutrition as indicated in the section title"*

> *"The financing section needs more specifics especially financing for GSS, country platforms, sub-national platforms across SUN Movement"*

> *"Understanding of budget architecture of member country would help in understanding how to lobby financing from the central government. Need to go beyond having costed plans*

without proper tracking of what is actually allocated and disbursed and eventual results achieved."

"This section is too general, too long, and not well reflecting the country ownership approach and the Agenda 2030 spirit. Hence, it needs rewriting to become more SUN specific. We would like to see….[for example] how SUN intends to explore and further develop integrated financing to effectively address all forms of malnutrition, at country level but also at global level and how SUN intends to contribute to innovative and transformative financing for nutrition by providing a "secured space" for dialogue between stakeholders of different SUN constituencies and investors to seize the opportunity of attracting, promoting and leveraging more investments/resources for nutrition."

"A section on the Pooled Fund should be added as it has the potential to support capacity strengthening at national and sub-national level through catalytic funding in form of tailored small grants for CSOs/CSAs and for strengthening countries' multi-stakeholder collaboration and nutrition governance. This should also include resources for supporting peer-to-peer learning (e.g. through study tours) and knowledge management."

Proposed solution

- Revise the section accordingly, with a stronger focus on financing for countries and financing for structures.

- Explicit affirmation of the priority for increasing capacity for resource mobilisation at country level, embracing all aspects capacity strengthening including all sources of finance, human and technical resources.

- Embrace inputs from Networks for financing the GSS, guided by alignment of resources with country priorities.

- Utilise the SDN's offer to support the revision of this section.

3. Governance

The main concerns relate to three areas: the role of the Lead Group, the role of the Executive Committee and lines of accountability. Many read the role of the Lead Group as being down-graded and comments also suggest that respondents see the Lead Group as still needed to have strategic oversight. Feedback also questioned the process of nominating members of the Lead Group and indicated that this needs to be more transparent.

Other matters identified include:

- The elevated role of the Executive Committee has raised questions about capacity and whether members will have sufficient time to deliver to this function.

- There is no mention of the UN Resident Co-ordinator role in the Strategy nor an increased UNRC engagement in the MSPs

- Definition and application of accountability within SUN needs clarification, including expectations of accountability towards countries, how accountability principles will be applied to enhance and improve nutrition results, and how the concept of 360 accountability will be acted upon

- Emphasis on the need for an independent chair of the ExCom

- Some perceive the current statement on governance to be too globally focused with little recognition of the national and sub-national level including the lines of accountability to Governments and the importance vulnerable people's voices and citizen rights.

Some comments on this section include:

"Governance is about results not power."

"Changes in governance roles are not explained and why necessary."

"The accountability table is very clear. But one question came to my mind: except for Country Coordinators, nobody is accountable to Governments - it may be implicit in the LG and ExCom being accountable to "the entire movement" but the question remains: who can react to whom if they feel the support provided by SUN is not adequate for the country?"

"Accountability needs to come very strongly – all networks need to support government and let government take leadership and ownership. All are accountable to governments, that is the only way the Movement can be sustainable"

"p. 18: The GSS should be introduced as an entity (incl. its goal and collaboration) before the different components are introduced and their contribution to the GSS' common objectives described."

"It will be important that the governance structure of the SUN Movement remains agile and light so that it can support the SUN Movement objectives and vision in a way that enables effective decision-making and action for greater impact at the country level. Following my positive experience in the Lead Group, I believe strong accountability is needed among the different components of the Movement and most importantly to the people. I would therefore recommend the Lead Group remains closely involved in overseeing the SUN Movement's strategic direction focusing on delivering impact at scale in countries through structural and systemic change."

"it probably makes sense to give more responsibility and thus power to the ExCom, but the nomination process must be very carefully tailored to avoid conflicts of interest (personal or institutional)"

'The ExCom to monitor and oversee the SUN Coordinator is very unrealistic'

"I would specifically add under governance the role of ethics advisors to facilitate and support a culture of trust, openness and multi-stakeholder cooperation where there are obstacles to it."

"The annual 360 review is a first step in promoting Movement wide accountability, but the document should discuss who is in charge of following up on those results."

"Need for clearer purposes & priorities - SUN is 360 degree on nutrition (specific & sensitive) but allocate resources differentially. Options for graduating resource allocation to issues. Publicly – broad but internally focus on key interventions, SDG related for impact."

"the chapter on Operations and Governance gives the impression of growing complexity in the SUN management with the risk of appearing overly bureaucratic. This could be considered in the finalization of the strategy including, possibly, how the SUN management is communicated e.g. by use of organograms or graphs to ease the reading"

"When we talk about accountability, if a country is to report to the Movement, what would be the methods and forms?"

"The proposed increased role for ExCom and a change in role for the SUN lead Group - we do not feel that there are sufficient accountability mechanisms in place to ensure the new governance structure is fit for purpose.'

"Taking into consideration the SUN Strategy Review results and given its crucial role to understand how Multisectoral National Plans of Actions (NPA) and Strategies have achieved or not intended outcomes, the role "Monitoring, Evaluation, Learning and Accountability" or "MEAL" plays in the new Strategy could be further clarified:

- *as a key country agenda*

- *vis a vis existing systems in place to monitor, evaluate and course-correct Multisectoral National Plans of Actions (NPA) and Strategies for nutrition*

- *and in what makes the proposed new MEAL approach 'country-led' and 'responsive to country-needs."*

Proposed solutions

- Undertake a governance reform process managed by the LG Chair and led by an independent professional with expertise in change management. This process will be for the entire Movement (LG, ExCom, SMS, networks and countries) and designed to deliver governance and accountability arrangements fit for the purposes of the SUN 3.0 Strategy. This process should commence immediately after the strategy 3.0 is endorsed and will provide recommendations to the LG Chair within 4 months.

- While the governance reform process will be separate to and independent of the strategy development process consideration should be given to the following needs arising from the draft Strategy Consultation process:

  o Make explicit the importance of clarity of SUN governance and accountability in relation to improved nutrition for vulnerable people

  o Explain the principles of accountability relevant throughout the SUN Movement and specify accountability mechanisms for countries and the ExCom

  o Give greater prominence to the need to clarify governance and mechanisms for accountability at national and sub-national level including accountability to Governments

  o Clarify that the LG role is not downgraded and specify the importance of utilising the seniority and influence, expertise and authority for all matters of strategic importance to the SUN Movement. The LG oversight and decision-making role gives authority for the Movement and provides top level management including overseeing the SUN Coordinator performance

  o Clarify how Lead Group members are to be appointed and how any Conflict of Interest will be mitigated

  o Clarify that ExCom provides oversight for SUN activities and structures in partnership with the LG and SC, as the representative of countries and providing support to the Movement and the SUN Coordinator

   o   Clarify that SC reports on performance to UNSG through the LG with input from the
       ExCom

   o   Clarify the mechanisms to ensure that the ExCom will have sufficient capacity to take
       on an elevated role and to avoid Conflict of Interest including appointment of an
       independent chair.

4. Other matters raised

The following matters, whilst receiving fewer general comments, relate to the relevance and
coherence of the Strategy and for which adjustments in the Strategy should be made.

(A) Matters relating to strategic purpose of SUN

4.1. Nutrition and other areas such as food systems, health systems and wider agendas

Some feel there is still not adequate attention to the importance of food systems or health systems;
a food system approach in SUN has been agreed (by LG) to tackle root causes of nutrition and wider
agendas. The Strategy needs to build on this.

SUN embraces all countries (360 HICs, not just LICs/MICs, for action, contribution and learning and
needs to reinvigorate this. E.g. SUN needs to be prepared for Food Systems Summit – how will SUN
help countries to position for this?

One commentator asked '*if the strategy could outline some common platforms where this
collaboration could be leveraged such as linking with Global Environment Facility (GEF)*'.

Having a text box dedicated that explains the linkages between nutrition and food systems, health
systems and other areas can help to emphasise the importance of these approaches.

4.2. Triple burden and bias towards nutrition specific interventions

Some comments suggest there is a general bias towards nutrition-specific interventions i.e. those
interventions, which address the immediate causes of malnutrition and a fear that a focus on
evidence-based planning will preclude important interventions for which evidence may be more
scant, yet may have benefits. Some thought it does not sufficiently mobilise other essential
nutrition-sensitive sectors. One commentator said'

"*While it is important to ensure investments in the nutrition-specific are very well described, I believe
there is still a lot of untapped potential on the nutrition-sensitive side. A key part of the financing
strategy should be more pro-active reaching out - especially to social protection, education and
agriculture investment programmes, seeking to use existing delivery mechanisms as vehicles to
deliver nutrition services at scale. (we still often think of scaling up nutrition in terms of scaling up
individual interventions rather than investing in strengthening the systems which can deliver a range
of interventions in a complementary way - being pragmatic and looking at which systems in place
have the most potential to reach communities in a given context, and working with them to "plug in"
nutrition services, is key and resource efficient!).* "

Some commentators felt the triple burden could be emphasised more strongly.

4.3. Private sector

Some readers perceive that private sector engagement lacks attention in the strategy, particularly the role of private-public partnerships. National SBNs can play a role in this but are not the only platform that should be considered. Commentators said:

> "*Biggest issue we found in the draft strategy is that the private sector needs to be in the conversation in a more significant way*"

> "*There are very good people in business and we need to involve them more. Businesses can provide technology and help to move the SUN Movement. The SUN Business Network can play a bigger role.*"

> "*SMEs are on the front line of COVID pandemic. We deliver food to low income consumer but SMEs are struggling to stay alive. SBN has done a lot of work in this area that SUN 3.0 should build on further. Strategy can be strengthened by calling on government and donors to partner with the financial sector for innovative packages for SMEs to keep food systems alive. Women owned and led SMEs in particular*".

> "*The private sector holds the key to a sustainable improved nutrition, especially, on the availability, accessibility, diversity and affordability of nutritious safe food due to its for-profit nature and outreach. If the enabling environment is right and demonstrated that investment on nutrition is a profitable, then the investment will pick up and self-sustained. Despite its huge potential, the awareness on nutrition investment remain very low and, in most country, the enabling environment is still not appropriate. Establishment of a robust SBN remains a major challenge and required more TA, especially, in awareness, enabling environment including policies, technical (product development…) and financial access. While malnutrition occurs in every corners of the world, it occurs more acutely in LCDs, LMICs where technical and access to finance barriers are more severe. The strategy shall put more emphasis on the engagement of private sector into investing in nutrition and more TA shall be provided in this area.*"

The SBN and its Representative on the Executive Committee can support the revision of the strategy to ensure that private sector is adequately address in the next draft. The following areas have been suggested:

- Increase access to global technical assistance expertise and partners for SUN Countries stakeholders around developing consumer demand creation
- Support the development of consumer awareness campaigns in SUN Countries with the support of Governments and SUN Networks
- Support the development of policy incentives around the production and distribution of nutritious foods
- Diversity its membership base to incorporate the retail, logistics and communications sector
- Increase access to a network of investors for its SME members
- Develop training for SUN Focal Points/Coordinators in SUN Country Government on private sector engagement to support the delivery of National Nutrition Strategies

4.4. Equity, gender, youth and Leaving No-one Behind

These issues require greater visibility in the document. One commentator suggested that '*SO 4 should spell out clearly the equity mechanism to identify and reach out vulnerable population and hard to reach areas*'. Youth Leaders also felt there were clear areas where youth could be included such as participation in governing structures like the country ecosystem and networks. There could

be more emphasis on gender and women's empowerment at the national and sub-national levels as well as disability. The Leave No-one Behind Principle is also missing from the strategy.

"Whilst there is some reference, equity and efforts to leave no-one behind, this is not well integrated or prominent enough in the draft strategy. We recommend stronger reflection on human rights instruments that can help achieve the set goals, with attention the CRC general comment 16 on the State obligation on the impact of the business sector on children's rights . There is no specific reference to gender equality, women's and girls' empowerment or adolescent nutrition. - This is surprising given the May 2019 SUN Lead Group Call to Action on Scaling up gender equality and women's and girls' empowerment to fight malnutrition, on which Save the Children collaborated with Global Affairs Canada and others. We hope the SUN Movement agree these equity concern remain a critical priority if we are to success in our vision of ending malnutrition by 2030. We sincerely hope to see them reflected as such in the next draft of the strategy. "

4.5. Fragile Settings and Conflict Affected States/humanitarian context

There is a view that the strategy is not really applicable for FCAS. For example, are the concepts of CAPs and CCs realistic in this context, given that governments are often not functional and the context is often changing? One commentator asked '*What would be the governance arrangements where democracy does not exist*?'.

Another comments stated' *Add language to show clearer linkages between cluster-led emergency response activities and SUN long term development activities. Many SUN countries have developed platforms and coordination structures for the delivery of long term nutrition interventions. In order to improve coordination between SUN and the cluster system, SUN stakeholders should consider how to design long term platforms that are resilient and responsive to shocks and that humanitarian actors can build from.*"

Another commentator said: "*The SUN.03 strategy should reflect on Humanitarian and Development Nexus at the objective level an introduce concrete outcomes with SMART indicators to measure progress on disaster preparedness, interventions, resilience, etc*."

Focal Points from FCAS should review the next draft to ensure that it adequately reflects their contexts.

4.6. Regionalisation

Some felt regionalisation did not come out strongly enough in the draft strategy with regional dynamics not being adequately reflected. This largely came from country voices and they may need to be called upon to ensure the next version of the strategy adequately reflects such dynamics. Countries support arrangements, not structures, for enabling and increasing knowledge management and technical assistance. (See also – Country graduation, s. 4.8 below)

The civil society network has found great benefits in having a regional co-ordinator and see the value not only of this role continuing but of having a regional co-ordinator across the networks. It has a role to play in elaborating on regionalisation in the next draft of the strategy along with Focal Points on the Executive Committee.

(B) Matters relating to the coherence of the Strategy for SUN 3.0

4.7. More recognition of what exists and what has been achieved so far

This was particularly felt in relation to NNPs but also relates to some of the successes under SUN 2.0. In the next version of the strategy, this could be an addition of a clear statement or weaving text into appropriate sections such as around NNPs. Explaining the gaps in achieving results in SUN 2.0 and possible reasons for it may also help to underpin the measures proposed in 3.0.

Some commentators emphasised the need to make explicit in the Strategy the added value of being part of SUN.

4.8. What Success Looks Like

The proposal (made in the ExCom Small Group discussions) of **graduating countries** has also been entirely omitted from the draft Strategy. This can help to address diverse contexts, stages and prospects for country focus, priorities and impact and also help SUN to develop more dynamic and relevant support drawing on capacity and capabilities across the Movement.

For some this section felt like a draft and that indicators need to be more SMART. Specific comments include:

- the focus on CAPs in many of the outputs may undermine the determination to be country-driven and country-owned in Phase 3.

- Outputs needs to be more specific and resonate with the different stages of accomplishment across countries.

- Section requires a bit more analytical thought, with clear targets of what success means. A goal to "Faster pace of progress towards WHA goals" is vague e.g. it should clearly state increase WHA by 70% to XX. Outcome 1: is clear on scaling up programmes, and policies, however, outcome 2 on financing is vague. What is the actual output following "countries getting behind action plan"? is it an increase in domestic resource for nutrition, commitments? Section needs some review.

- Outcome 1 -- there should be an element of equity added to the outcomes (e.g. priority programmes scaled up equitably); another potential outcome around multisectoral, multi-stakeholder coordination and governance.

- Outcome 2: In addition to outputs below -- need to consider other factors contributing to allocation of resources -- e.g. fiscal decentralisation, coordinated financing etc?

- Setting two key outcomes makes sense, but it is not clear how Outcome 2 can be achieved through Outputs 2.1-2.4. It requires not only advocacy, but also engaging all relevant stakeholders in expenditure review and reallocation processes.

- Outputs 1.1 and 1.2 have already been achieved for many countries.

- Output 1.3: We think it is important to emphasise a technical focal point to carry out the functions. If we elevate the coordinator to a high level they will not be able to do the day-to day functions.

- Output 1.4: How will SUN Value-add be measured? And who will do this?

- Output 2.2 would be difficult to objectively measure.

- Need to add a section here on risk and think about the potential impacts of COVID-19, in particular, which is very likely to affect achievement of the Goal in the next 5 years not only on the burden of nutrition but the burden placed on finances and human resources etc

- It appears that there are two levels at which SUN might want to examine outcomes- the progress that countries achieve and the contribution of SUN itself

- are there ways specific outcomes at sub-national levels could be included

- Consider how to align these outputs/outcomes with the Theory of Change.

4.9. Conflict of Interest

Whilst a section on conflict of interest is welcome, some thought that the fact there are many different types of conflict of interest needs to come out more strongly. One commentator said that *'given our experience on conflict of interest to date, we should be able to articulate what we're going to do already and when, rather than plan to make a plan"*.

And went on to say:

The COI part of the strategy outlines what is needed, and what the context is, but it is not a strategy or a plan for how conflict of interest will be managed and who will be held accountable for it. We believe whoever participates in SUN must have the best interests of the child and the community in mind. We recommend this direction and consideration of COI is mainstreamed throughout the strategy. The table is a useful start, but it should go deeper. Guidance, principles and tools should be considered and recommended to help countries manage and prevent COI situations. Furthermore, the strategy does not reflect the importance of SUN Country teams to focus on country priorities and lead a change process free from COI at the national level. The international Code is mentioned, but the Code plus relevant subsequent resolutions should be also considered SUN had a lot of experience on COI and should be able to better articulate the plan within the strategy. We ask this is rectified in the next draft.

While Conflict of Interest in relation to governance and accountability can be addressed under a Governance Reform Process, CoI with regard to more technical matters can be articulated by components of the SUN Movements such as the networks.

4.10.   Theory of Change

Some thought the ToC should be more of a reflection of the strategic goals and outcomes and some suggested a closer link between the ToC and the What Success Looks Like section. Some commentators thought the premises of the TOC does not adequately address the realities of diverse country contexts, and need to be contextualised to avoid the risk of presenting "one size fits all" solution while others felt the multisector approach and the steps needed to institutionalise nutrition also need to be include.

The TOC seems to vast and needs to be realisable with clarification of the goals, objectives and as roles.

One commentator said *the phrase "The firm placement of nutrition within National Development Plans is also critical...." should be better emphasised in the current TOC of strategy*.

4.11.   Advocacy

Advocacy and communications is felt as key to the success of the strategy and needs to underpin it. This relates to all levels, global down to sub-national and messages need to be tailored accordingly.

"There is a need of an advocacy plan at the highest political level to ensure that there is buy in and sign off by government leaders (including donors) and the UN"

4.12.   Alignment for delivering SUN impact

SUN is important because it includes all sectors. Reference could be made to The Ten Principles of the UN Global Compact and the need for global-local links, and linkages across countries and agencies but with extra offering on nutrition needs and access to resources. Agreement is essential plus the offer of real tools.

Alignment throughout SUN is needed based on identifying needs, topics, centres of gravity plus resources (toolbox of TA) and equipping networks at country level.

- TA - should be defined by strategic priority areas and gap filling through needs evaluation of countries.

- Locally owned agenda - create ownership of countries around SUN priorities (issues focus areas, tools, assign resources to these); utilise assets of all organisations.

- Language - spell out what SUN can offer. Networks can utilise their respective assets, capacities and shared interests and SUN can unify these to what countries want. This needs courage and understanding in leadership to take on public-private interface and what it is really involved in mutuality and collaboration.

(C) Matters relating to the style of the Strategy for SUN 3.0

There was a clear agreement that the strategy needs to be shorter and more succinct with the main purpose to lay the framework on which to build the operationalisation phase.

It needs to be less dense and easier to read, being user-friendly for stakeholders in country to clearly communicate its message whilst at the same time being a compelling case to advocate at the highest political levels for buy-in.