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GAIN



# FINAL REPORT

ASSESSMENT OF GAIN'S LARGE  
SCALE FOOD FORTIFICATION  
PORTFOLIO

**EXECUTIVE SUMMARY**

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MAY



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# EXECUTIVE SUMMARY



## 1. Background

The Global Alliance for Improved Nutrition (GAIN) aims at building and supporting innovative public-private partnerships to increase access to and consumption of nutritious foods, necessary for ensuring strong and healthy communities and economies. Lack of diversity in many people's diets means that more than two billion people globally are deficient in at least one micronutrient, which has a transversal impact on individuals, communities and nations.<sup>1</sup> It is within this context that the Large Scale Food Fortification (LSFF) portfolio of projects has been deployed, with the aim of reducing the micronutrient gap by upping intakes of nutrients to ensure that they are adequate for the health and wellbeing of vulnerable population groups. This is achieved through food fortification, which entails the addition of bioavailable fortificants to consumed food in the form of micronutrients (vitamins and minerals).

To meet these ends, GAIN has employed a multi-layered portfolio of projects which operate both at national and global levels. GAIN activities under LSFF include support to national food fortification programmes, focusing on technical support (establishment of food fortification programmes, improvement in the compliance for existing programmes, and the monitoring/measurement of impact related to increase of nutrient intakes) and on building collaboration across national governments, industry and civil society. Underpinning country-level support are GAIN's global platforms, including ENABLE; a knowledge repository for food fortification quality and safety and a service provision for the strengthening of national systems. GAIN also holds a leading, convening or partnership role on major global platforms and aims to raise the profile of fortification on the global stage through recently strengthened advocacy efforts. Finally, the Fortification Assessment Coverage Toolkit (FACT) provides a method and tools for carrying out coverage assessments to build an information base on the coverage of fortification programmes and consumption of fortified foods.

GAIN commissioned Philanthropy Advisors (PA), a consulting firm specialized in the evaluation of development programs, to conduct an independent assessment of its approach to LSFF. Although LSFF activities and ENABLE have been monitored and benefited from studies and learning, no general evaluation of the relevance and effectiveness of the overall portfolio had been carried out previously and GAIN was lacking visibility about the contribution of the portfolio to the global food fortification agenda. The evaluation therefore included an assessment of national support programmes, the ENABLE platform, global advocacy and global platforms, and the deployment of FACT.

Using a theory-based approach which included the co-development of a Theory of Change (ToC) to guide the study, and relying on interviews with GAIN staff, portfolio stakeholders and thematic experts, thorough reviews of literature and three in-country case studies, PA developed a narrative of the contribution that GAIN programming is making to LSFF results. Contribution is assessed at both at the national level (in terms of achieving expected outputs and outcomes and the likelihood of having an impact on the national food fortification situation), and at the global level (considering contribution to the wider goals of support for, and implementation of, food fortification and the likelihood of contributing to impacts on nutrient intakes).

### 1.1. Assessment Objectives

This assessment was designed to present **a more thorough understanding of the relevance, targeting and implementation of the overall portfolio and its constituent projects,**

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<sup>1</sup>GAIN, 2018. Food fortification: the unfinished agenda. GAIN, Briefing Paper.

**program/project activities, and of GAIN's contribution to attained outcomes (globally or at national level).**

GAIN identified the specific objectives of the assessment as being to:

1. Assess the relevance, international consistency and feasibility of GAIN's theory of change (ToC) at global and national levels;
2. Assess the extent to which its efforts are likely to establish, improve and sustain fortification programmes at the national level and be effective in increasing global political and financial support for fortification through advocacy initiatives and diverse platforms (Global Fortification Data Exchange (GFDx), Global Fortification Technical Advisory Group, (GF-TAG)).

## 1.2. Assessment Scope

The analysis covered the three pillars of the LSFF portfolio ToC<sup>2</sup>, including an in-depth analysis of three national contexts: Bangladesh, Ethiopia and Nigeria. The focus was on collecting existing evidence in literature, documentation and through stakeholder consultation. In order to obtain the clearest possible picture of GAIN's contribution to LSFF objectives and results, PA consultants conducted interviews with GAIN staff, donors, partners and consultants as well as with other development organizations and subject experts. This was done in an effort to find consensus around GAIN's contribution and to understand their reputation, the challenges faced by them and others working in food fortification, and alternative explanations for results.

The evaluators did not collect primary evidence at project-level, for example by carrying out direct observation or verification at project sites. This was outside the scope of the assessment, and not necessary to conduct contribution analysis which relies on the collection and analysis of existing information held by practitioners and sectoral experts and found in literature and programming results.

## 1.3. Evaluation Framework

### 1.3.1.1. Approach

The evaluation covered three specific areas of enquiry in order to produce findings and recommendations related to the overall portfolio:

1. Support to national programs;
2. Global Platforms (ENABLE, GFDx, GF-TAG, Food Fortification Advisory Services (2FAS)) and Global Advocacy;
3. FACT.

The assessment approach was informed by the Organization for Economic Cooperation and Development (OECD) Development Assistance Criteria (DAC) criteria for evaluating development assistance, focusing on the criteria of **relevance, effectiveness and impact** (or likelihood of impact) for the purposes of framing research questions to guide this assessment.

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<sup>2</sup> The three pillars are branches of activities linked to three key outcomes, represented in the ToC which guides this study. The ToC was arrived at in consultation with GAIN and is discussed in section 2.3 below. The three pillars are: i) demand creation, ii) increasing the accessibility (availability and affordability) of fortified foods and iii) improving governance of fortification programs.

### 1.3.1.2. Main Research Questions

1. To what extent is the LSFF portfolio contributing to the delivery of more impactful and more sustainable programs?
2. In what specific ways can we improve the way we design, deliver and measure to ensure impactful programs?
3. What contribution do GAIN activities have to outcomes targeted in the ToC?

## 2. Methodology

### 2.1. Contribution Analysis

Theory-based approaches facilitate comprehension of the inherent complexity of multi-layered intervention strategies such as the GAIN LSFF Portfolio, where the scope of activities is large and work is often carried out with several partners. Rather than seeking to directly attribute outcomes to GAIN's activities, the assessment thus aimed to paint a credible picture about the attribution of the portfolio, exploring "plausible association" through the use of Contribution Analysis.

Contribution Analysis is a method created by Dr. John Mayne. Dr. Mayne was concerned with arriving at credible causal claims using program monitoring data (Mayne, 2001).

Mayne's method involves six steps, utilizing an explicit ToC. The steps take the evaluators through a process designed to test the theory against logic and evidence to confirm that an intervention or initiative has contributed to an observed result.

Mayne's six steps are:

1. Set out the cause-effect issue to be addressed.
2. Develop the postulated ToC and the risks to it, including rival (alternative) explanations.
3. Gather the existing evidence on the ToC.
4. Assemble and assess the contribution claim, and challenges to it.
5. Seek out additional evidence.
6. Revise and strengthen the contribution story.

### 2.2. GAIN LSFF ToC

GAIN's programming within the LSFF portfolio is based on several iterations of a ToC. The first basis of the LSFF ToC is the World Health Organization (WHO)/Centers for Disease Control and Prevention (CDC) logic model for micronutrient interventions in public health.<sup>3</sup> GAIN adopted the main activity groups from this logic model, setting their strategic objective and purpose as the advancement of nutrition outcomes through the improved consumption of nutritious and safe food for all people, especially those most vulnerable to malnutrition (a step removed from the impact level of the WHO/CDC model: improved nutritional status).

It is important to note that a single, coherent document illustrating GAIN's ToC for the whole LSFF portfolio did not exist prior to this evaluation. As a first step in this assessment, the evaluators conducted a desk review of existing GAIN ToCs underpinning specific areas of activities within the LSFF portfolio, such as the ENABLE ToC. Since a ToC is necessary for contribution analysis, the evaluators then held a workshop with senior GAIN staff in October 2019 and co-developed a working

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<sup>3</sup> WHO/CDC. Logic model for micronutrient interventions in public health. Vitamin and Mineral Nutrition Information System. Geneva, World Health Organization, 2016 (WHO/NMH/NHD/EPG/16.1) (<http://apps.who.int/iris/bitstream/10665/250746/3/WHO-NMH-NHD-EPG-16.1-colour-eng.pdf>)



ToC covering the entire portfolio in order to provide a logic of inquiry on which to base this assessment (Annex A).

The co-constructed ToC splits activities roughly into three branches, or pillars, which are linked to key outcomes: **i) demand creation, ii) increasing the accessibility (availability and affordability) of fortified foods and iii) improving governance of fortification programs.** Demand creation focuses on raising awareness among consumers, creating demand and fostering acceptance of fortified foods. Increasing the accessibility of fortified foods categorizes GAIN's activities to improve the production and supply of fortified foods, with a heavy focus on capacitating industry. Finally, improving governance of fortification programs encompasses GAIN's work with government: generating support for fortification, advocating for specific policies and legislation, as well as capacitating government through technical trainings and support. Advocacy tends to focus on the governance side of programs, but also flows through the entire ToC. Evidence-gathering is similarly transversal. Please see Annex B for a complete narrative on the development of the ToC.

Findings in the report were split into three sections, following the three key outcomes defined by the LSFF portfolio ToC.

### 2.3. Data Collection Methods

PA used two main methods of data collection: desk/literature review and key informant interviews (KIIs). These methods were conducted iteratively, with rounds of data collection leading to the gathering of new evidence which was in turn analyzed with each iteration to build PA's understanding of GAIN's contribution to LSFF results. PA also conducted workshops with both GAIN Headquarters (HQ) and country office teams.




- ❖ **Desk and Literature Review:** PA conducted an extensive desk review at multiple points in the evaluation process. These desk reviews included pre-existing ToC and GAIN documents on the logic model, existing literature on context and project components, program documentation such as records of activities and outputs, timelines and portfolio documents on global platforms, global advocacy and FACT. Literature reviewed also included academic studies, previous evaluations and grey literature. The desk reviews were conducted to examine the plausibility of, and seek out challenges to, the ToC constructed for this study.
- ❖ **KIIs:** PA conducted several iterations of KIIs, totalling 50 with global GAIN staff, subject experts and international stakeholders, and 40 in case study countries. These interviews were conducted in order to discuss findings of the desk reviews, gather impressions of the validity of the results chain, to better understand the cohesiveness of activities across project contexts and to gather information on project results, as well as perceptions, assumptions and alternative explanations. Interviews were semi-structured, with open-ended questions so as to allow stakeholders to share freely. These stakeholders were identified in consultation with GAIN, as well as through outreach to PA's networks and by recommendation from interviewees.
- ❖ **Workshops:** PA conducted a first ToC Workshop with GAIN to create a working ToC based on the knowledge and understanding of GAIN staff, as well as on existing logic models. PA conducted sense-making workshops with GAIN country staff following field visits in Ethiopia and Bangladesh (this was not possible in Nigeria due to scheduling issues) and a final sense-making workshop to discuss preliminary findings with GAIN HQ in January 2020. These workshops ensured that the consultants obtained a maximum amount of information from those who know the most about the programs and provided an opportunity for GAIN teams to challenge preliminary results.

## 2.4. Analysis of Evidence

PA examined evidence gathered and analyzed them in order to determine the strength of links along the results chain. Links were analyzed using John Mayne's continuum of: good evidence available, strong logic, low risk and/or wide acceptance versus little evidence, weak logic and high risk and/or little acceptance, in order to arrive at the levels of confidence described in Table 1 below.

**Table 1: Analysis of Strength of Evidence**

DEFINITELY NOT THE CASE	HIGHLY UNLIKELY	POSSIBLE	PROBABLE	STRONGLY LIKELY	CERTAIN
There is definitive evidence that makes it possible to fully rule out this conclusion	There is little basis for supporting this conclusion, but it cannot be ruled out	There is a viable case for supporting this conclusion, but the balance of evidence and credibility is against it	The balance of evidence and credibility points to this conclusion	The conclusion can be stated with high confidence but not definitively	There is definitive evidence that makes it possible to be 100 percent sure of the conclusion
					
Little evidence Weak logic High risk and/or little acceptance			Good evidence available Strong logic Low risk and/or wide acceptance		

Within each of the three outcome branches the evaluation team analyzed each sub-outcome individually as well as the various results pathways. Causal problems, assumptions, risks and other influencing factors were identified and activities and sub-outcomes were analyzed to determine GAIN's contribution to each outcome. GAIN activities were each rated *Poor*, *Satisfactory* or *Good* based on their contribution (see Figure 1). According to the ToC, GAIN's activities in generating evidence and advocacy were considered transversal, and thus analysis of those activities was included throughout.

**Figure 1: Strength of Contribution Scale**



### 3. Findings

#### 3.1. Demand Creation

This first section of the ToC postulates that GAIN activities contribute to consumers demanding nutrients through fortified foods through a sub-outcome: *increased knowledge among consumers*.

##### 3.1.1. Increased Knowledge Among Consumers

According to interviews and project documentation, GAIN's strategy for increasing knowledge among consumers has been focused on the creation of logos and labels, and occasional awareness-raising campaigns, the idea being that should consumers have improved knowledge over the benefits of fortified foods, and be able to identify which foods were fortified through logos and labels, they would choose to consumer fortified products. This is also linked to national regulations, most of which stipulate that all fortified foods need to have a logo, which governments are keen on in the absence of, and as an alternative to, running social marketing and Behavior Change Communication (BCC) campaigns.

According to the overwhelming majority of the literature, increasing knowledge among consumers is incredibly difficult to achieve. The method has significant limitations - logos have proven ineffective at increasing meaningful knowledge among consumers and have also been misused, complicating the message. Mass media campaigns have, overall, shown similarly disappointing results in increasing knowledge, and been especially challenged in sustaining knowledge after the campaign.

**GAIN's contribution to increasing knowledge of fortified foods among consumers was found to be poor, with a strong likelihood of certainty.**





### 3.1.2. Conclusions: Consumers Demanding Nutrients Through Fortified Foods

When it comes to turning any increased knowledge into behavior change, there are significant barriers to success. Wakefield et al. argue that effectively promoting behavior change requires significant investment, complementary decisions at the political level, disincentives for not changing and coordination. The majority of research shows that health communication campaigns are rarely done this way, hence their poor performance.

Activities under this outcome branch are conducted to one degree or another by most food fortification actors. This research found that this is based on the success of salt iodization media campaigns in the 1920s in the United States, and later the 1990s. The research shows, however, that significant cultural and contextual factors were present in that scenario that i) made a sweeping, grassroots campaign possible and likely to be successful and ii) would be very difficult to recreate in the contexts in which GAIN intervenes.

This section also briefly explores the barriers beyond knowledge and demand; even if consumers demand fortified foods, they must be able to afford them and have access to them, which is not often the case.

The underlying assumption of this pillar, that demand creation is necessary for the set up or continuation of a fortification programme, was seen as invalid by a majority of stakeholders. Although most interviewees agreed consumers should be informed about the food they are

consuming, there was wide agreement that demand creation should only be a secondary objective and that this has not been a motivating factor in the creation or improvement of fortification programs in recent times. In only the rarest of circumstances will demand from consumers result in sustainable, effective food fortification programs.

**The poor rating of GAIN's contribution to this outcome is more due to the limitations of the method (or at least the methods used until now) than the strategy of GAIN.** The contribution rating is also due to GAIN having placed a reduced emphasis on this pillar of activities in recent years, a relevant decision considering the evidence. As this report elaborates further on, the other pillars of activities exert a much stronger influence on the achievement of an effective and sustainable food fortification program.

### 3.2. Accessibility of Fortified Foods

This section of the ToC postulates that GAIN activities contribute to the improved accessibility (availability and affordability) of high quality fortified foods through three main sub-outcomes: *improved production and supply of fortified foods; improved delivery of fortified foods through markets and improved delivery of fortified foods through distribution systems.*

The evaluation of this second branch of activities **contains important nuance** related to an issue identified with the ToC arrived at during the ToC Workshop with GAIN in October 2019. This evaluation, in assessing this pillar which in theory deals with the role of industry in fortification, kept coming up against the fact that in mandatory fortification contexts, which is the dominant model for large-scale fortification, the improved production and supply of high quality fortified foods is in large part dependent on compliance with standards and legislation, the role of governments. In voluntary contexts, the drivers of fortification are more complicated, linked to industry motivation and consumer demand but also to some extent, as in India where voluntary fortification has been most successful, to governmental encouragement and buy-in.

The third pillar of activities in the ToC (improving governance of fortification programs) deals with the governance of fortification and so, although much of what is done to improve production and supply of high quality fortified foods ultimately links back to government and could fall under the third branch of the ToC, this section covers activities specifically involving the industry, whilst recognising that limiting factors are often related to the level of government buy-in and ownership, which impacts enforcement and compliance in turn.

#### 3.2.1. Improved Production And Supply Of Fortified Foods

The research conducted for this study showed a strong likelihood of contribution on the part of GAIN to improving production and supply of high quality fortified foods through industry interventions. This contribution is highly dependent on the strength and success of the ENABLE platform, and especially the GAIN Premix Facility (GPF), which is the reason it is rated satisfactory. In many countries, this is where GAIN focuses resources and activities with industry, including in connecting producers to high quality premix, supporting industry to consolidate, and providing training to industry on Quality Assurance and Quality Control (QAQC).

The utility and importance of the GPF is recognized by major agencies and peer organizations such as the World Food Programme (WFP), UNICEF, Helen Keller International (HKI) and Action Against Hunger, who are all users. The GPF supplier base is now made up of 21 premix blenders, 16 vitamin and mineral manufacturers and 7 Micronutrient Powder (MNP) producers. Since 2009, a total of USD 73 million worth of premix and micronutrients has been sourced by the GPF, reaching an

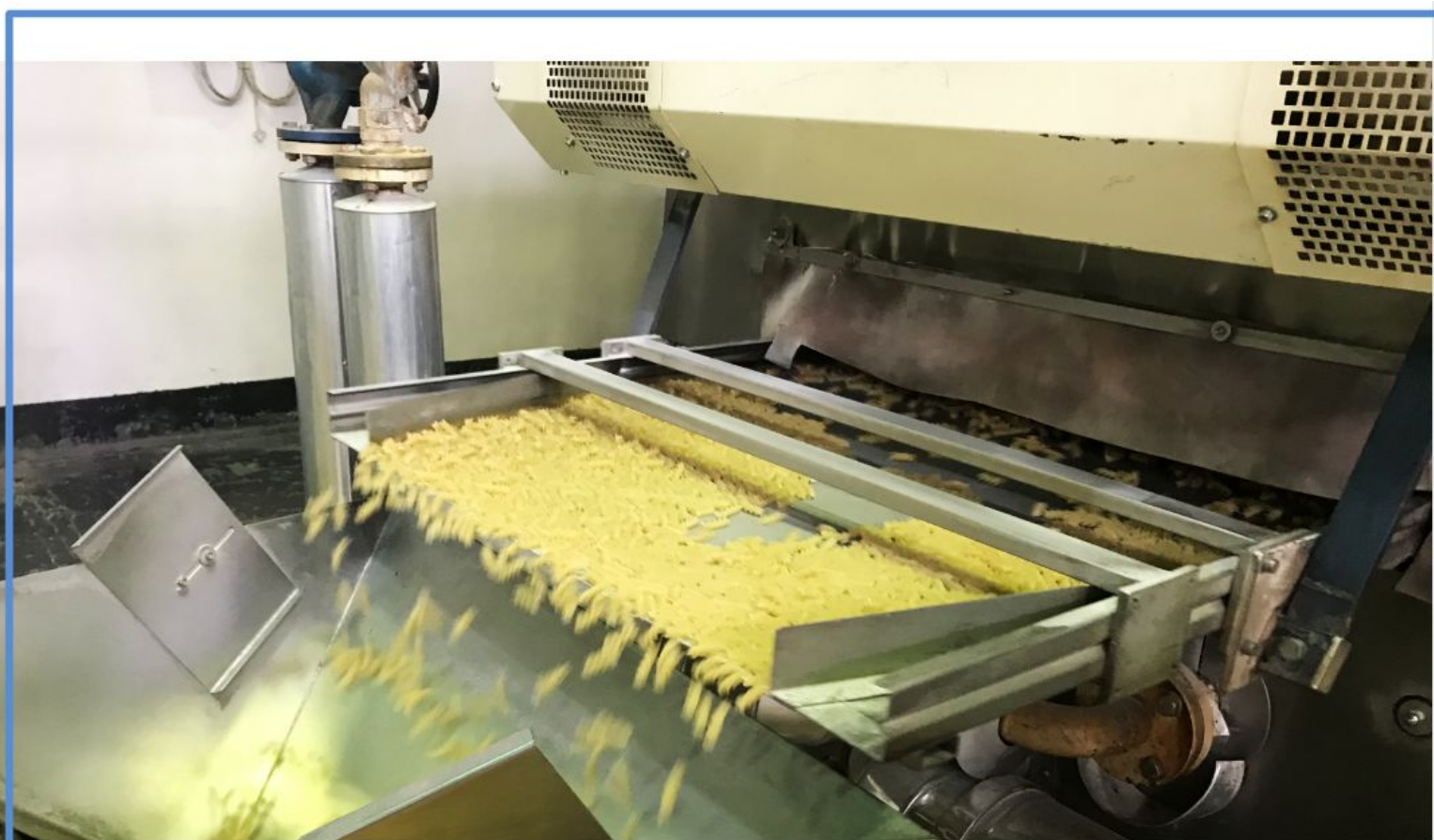


estimated average of 138 million people annually. Cumulatively, the facility is now reaching 48 countries both directly and through partners. GPF also provided technical assistance on the establishment or strengthening of national premix/Potassium Iodate (KIO<sub>3</sub>) supply systems in Cambodia, Laos, Myanmar and Mongolia in collaboration with Iodine Global Network (IGN). Independently, technical assistance on setting up national supply systems was started in the Gambia, Mozambique and Ethiopia. The GPF is also seen as cost-effective, with a cost of US\$ 0.003 calculated per person reached in 2015 (MDF Evaluation of GAIN Programme Driving Nutrition Impact in Food Security, 2017).

A major theoretical contribution of GAIN to improving the production and supply of fortified foods is the training and sensitization of industry. GAIN is highly capable of determining needs and then meeting those needs with the required expertise. However, many stakeholders describe training as inefficient and unsustainable, particularly as done through the current model which relies on external consultants, of whom there are relatively few. Further, the classic approach of providing capacity building training has been criticized as non-innovative, applying the same solutions to the same problems despite not seeing results.

Further activities by GAIN to improve the production and supply of fortified foods is the consolidation of small and medium scale producers and the “pull” strategy of engaging with CSOs, which is a relatively new activity but with the potential to contribute to food fortification results. For now, the contribution of GAIN to improving the production and supply of fortified foods is highly dependent on the success of the GPF and the wider ENABLE platform in generating insights, discussed in more detail below.

This section also discusses government buy-in, and how this impacts industry compliance. Industry is often willing to fortify if it gives them a competitive advantage, but when it creates a disadvantage compared to competitors or becomes otherwise inconvenient, there are few options to incentivize them to fortify without adequate enforcement. In Nigeria, fortification is mandatory for a whole host of vehicles including salt, wheat flour, semolina flour, and maize flour with multiple micronutrients, and the fortification of sugar and edible oil with vitamin A. This does not mean that the industry complies with that legislation, because government buy-in is not strong enough to incentivize



industry to comply. This is the case in many contexts, either due to lack of political will or a lack of capacity and resources to enforce, or both.

**GAIN's contribution to *improving the production and supply of high quality fortified foods* was found to be satisfactory, with a strong likelihood of certainty.**

### 3.2.2. Improved Delivery Of Fortified Foods Through Markets

To improve the delivery of fortified foods through markets GAIN is working through the ENABLE platform to generate relevant insights. Key contributions have included the development of a methodology for market size and share computation to be used in compliance assessments, which has been rolled out in Tanzania, Uganda, Mozambique, Nigeria, Malawi and India, and the first ever large-scale study on vitamin A stability in “real life conditions”, carried out in Senegal, Benin and Morocco. GAIN's capacity to do large-scale, intensive research and present new tools and methods is a key contribution to the sector. GAIN has also proven an excellent capacity to translate research results into advocacy. It was widely agreed among stakeholders that GAIN's contribution to improving delivery of fortified foods by conducting studies through the ENABLE platform was a significant contribution, particularly in Bangladesh. GAIN further has significant contribution through research and advocacy on government premix charges. This study found overwhelmingly that GAIN not only sees results but is recognized by peers when resources are channeled into generating evidence to support advocacy.

This extends to FACT, which was found to be a highly relevant tool which can produce critical information for improving the delivery of fortified foods through markets. There is more nuance around the deployment and usage of FACT however, as many stakeholders reported that it is a heavy, expensive tool. This section also highlights the critical importance of engaging the government in all evidence gathering, to ensure ownership and encourage action on findings.

**GAIN's contribution to *improving the delivery of high quality fortified foods through markets* was found to be good, with a probable likelihood of certainty.**

### 3.2.3. Improved Delivery Of Fortified Foods Through Distribution Systems

GAIN theoretically contributes to improving the delivery of fortified foods through distribution systems by advocating to public distributors to purchase fortified foods. In Ethiopia, GAIN has been working to encourage wheat flour producers to fortify their wheat, and advocating for different market players to buy fortified products. GAIN uses a multifaceted approach here, targeting millers with messaging and the institutional buyers to put pressure on the millers.

In India, linking to public distributors has been a significant strategy of all fortification actors, and has seen real success. In 2017, safety net programs such as the Mid-Day Meal (MDM) scheme and Integrated Child Development Services (ICDS) have mandated the use of fortified wheat flour, oil and double fortified salt nationally (Food Safety and Standards Authority of India (FSSAI), 2017). According to interviews, it is widely agreed that GAIN played a key role in engaging with FSSAI and convincing various levels of government in certain states to include the mandatory use of fortified edible oil in their national social protection schemes. Although not all states and districts have yet included fortified products in their social protection schemes, this is the direction of travel, with the potential to reach around 800 million people (GAIN's calculation). Also, importantly, the success of this program has reportedly primed India to adopt mandatory fortification of edible oil.



There have been some real successes in getting distribution systems to carry fortified products - most notably in India, where millions of people reap the benefits of having fortified foods distributed through public programs. The uncertainty comes from the lack of evidence and ability to triangulate the extent of GAIN's contribution to these achievements. Other than in India where the numbers involved make this activity significant, this is also a fairly niche area of work for GAIN since the LSFF model envisages fortified foods will mostly be delivered by markets.

**GAIN's contribution to *improving the delivery of high quality fortified foods through distribution systems* was found to be good, with a probable likelihood of certainty.**

#### 3.2.4. Conclusions: Contribution To Improved Accessibility (Availability And Affordability) Of High Quality Fortified Foods

GAIN is making a significant contribution to improving the accessibility (affordability and availability) of fortified foods through evidence generation - often conducted under the ENABLE platform and including market studies to determine compliance or identify appropriate vehicles. GAIN's contribution is particularly strong when this is followed up with strategic identification of needs and recommendations, such as in Bangladesh on drum oil or Ethiopia with Potassium Iodate (KIO<sub>3</sub>). The open-sourcing of FACT has contributed to the accessibility of methodologies for the assessment of coverage and brought together existing information in a clear manner. FACT studies have shed light on market and household level compliance, providing knowledge of the situation which wasn't available beforehand and, in some cases, allowing for decision-making including vehicle prioritization. Findings from this study made it clear that GAIN is highly respected for their evidence generation, particularly for the technical and academic expertise at HQ. This is particularly true for the support GAIN provides for micronutrient surveys, cost-benefit analyses (CBA) and market surveys.



Advocacy is interwoven throughout this pillar. GAIN conducts advocacy through workshops and sensitization sessions with industry and government officials to encourage the delivery of fortified foods through markets and distribution systems. This advocacy is particularly effective, according to stakeholders, when it relies on relevant country-level evidence. GAIN's contribution is therefore especially strong when it relies on local evidence generated with the support of GAIN.

It is widely agreed that one of the most relevant and effective contributions GAIN makes to improving the accessibility of fortified foods is through the GPF. The feedback received from stakeholders offered some critiques of GPF - anecdotal evidence of more expensive premix or inefficient service - however, the overwhelming majority of feedback was of the critical relevance of this service, and the associated credit facility. The GPF responds to a very specific need, to which GAIN is uniquely positioned to respond. The need for a centralized database of quality-assured premix and for high quality premix for smaller producers who could not otherwise access it, or who could not access it affordably, could only be answered by an actor capable of setting up and manoeuvring globally. This required significant financial and reputational capital, as well as high level technical expertise and an evidence base. GPF is limited only by its potential lack of sustainability, however the strong relevance of these services allow for a significant contribution to improving accessibility to high quality fortified foods.

The issues that arise in this pillar are the efficiency and relevance for GAIN of the training of industry, and in the strategy to occasionally prioritize the number of beneficiaries over the vulnerability of said beneficiaries. These are both wide, philosophical questions that require significant reflection. Training of industry is widely considered to be a cornerstone of LSFF programs - necessary to prepare the industry for fortification and to maintain quality. In many cases, reaching high numbers of people can seem preferable, especially if the vehicle is easily fortified and produced by large scale producers. The evaluators delve into these issues and question the strategies behind them in the main report.

**GAIN's contribution to *improving accessibility (availability and affordability) of high quality fortified foods* was found to be satisfactory, with a strong likelihood of certainty.**

### 3.3. Governance of Food Fortification Programs

This section of the ToC postulates that GAIN activities contribute to the effective and sustainable governance of food fortification programs through three main sub-outcomes: *increased political and financial support for fortification, improved monitoring and management and adoption of legislation and standards.*

In aiming to improve the governance of food fortification programs to ensure effectiveness and sustainability, much of GAIN's work lies in conducting advocacy. Advocacy is particularly difficult to evaluate, specifically in trying to determine the level of contribution by an actor. It often takes place in contexts that make results unpredictable, and in which the level of control that a single actor or group of actors can exert over the situation is highly limited (Coe & Schlagen, 2019). Instead of focusing strictly on outcomes, advocacy evaluation is **highly contextual**. As advocacy happens in a wide variety of contexts, where advocates come up against all manner of obstacles, an outcome being achieved only provides part of the picture. To understand the significance of an outcome, one must understand the context within which it took place, how it was achieved, what trade-offs were involved, and how sustainable it is. For this reason, **it often makes more sense to focus on the type of contribution, as opposed to the amount of contribution made by an actor.**



In this section, GAIN activities will be evaluated by type of contribution - highlighting where GAIN has a unique added value relative to other actors.

### 3.3.1. Increased Political And Financial Support For Fortification

In increasing political and financial support for fortification, the two main activities carried out by GAIN are identified as national-level advocacy and global-level advocacy. Nationally, GAIN is lauded by stakeholders as being a key actor in many contexts in terms of keeping fortification on the table with governments. They are widely seen to place emphasis on relationship building with authorities, often successful due to individual staff who forge these relationships with key government personnel, as well as a strategy based on a consistent presence and regular contact. GAIN is generally seen as a leader in national fortification programs, though this varies by context. One of the most significant contributions made by GAIN to achieve support for fortification is the generation of evidence specific to the context. Overwhelmingly, stakeholders agreed that this evidence-generation plays a key role in convincing political stakeholders of the need for, and benefits of, fortification and in giving rise to ownership within government of the fortification program.

At the global level, GAIN holds a convening role amongst its peers. There is little question that GAIN has had a significant contribution as a global convener, mainly because they have taken on this role where others have not. Their longevity in the sector reportedly affords GAIN a legitimacy that is difficult for others to match and the 'Alliance' part of the GAIN name creates an expectation that GAIN will play a convening role. They are widely recognized as a leader in the fortification community that at least tries to bring players together, and other actors look to them for leadership at the global level. Particularly clear from interviews was the respect for the high quality academic work done by GAIN HQ, such as the recent review of evidence for the benefits of food fortification. It became clear from interviews that GAIN's global reputation, to which their global advocacy contributes, is often what opens doors for national level activity. Their chairing of the GF-TAG group is said to be a considerable contribution to the sector. The GFDx was also appreciated by many stakeholders as a relevant and useful tool which has filled a data gap, and is often attributed to GAIN.



Despite GAIN's convening role, the organization struggles with its reputation amongst other fortification actors, many of whom report GAIN to be heavy-handed in its dealing with stakeholders. This is partly due to GAIN's difficulty in shedding a reputation tied to a previous time where GAIN operated as a fund or donor, with a highly prescriptive model.

At the national level, some challenges stem from the difficulty of reaching and consistently engaging with political-level decision makers, who often hold more power than technocrats. Part of GAIN's model understandably relies on playing an unbiased, non-political role, however this limits results in some contexts where GAIN is engaging solely with technocrats who do not have the power to make the high-level decisions necessary to move a fortification program forward.

An issue raised by multiple stakeholders of various types was that whilst GAIN has been successful at gaining good access to government, and creating productive working relationships, their conceptualization of the role of government needs to move further towards seeing government as the leading actor, with GAIN in a supporting role rather than driving the process. This is reportedly due, to some extent, to GAIN needing to achieve their own and donor objectives (not unique to GAIN but a sector-wide issue). Likely it is also due to the reality on the ground, which rarely sees nutrition and fortification prioritized by government amidst numerous competing priorities. However, GAIN leading a program creates a lack of sustainability if clear program components are not included to build government ownership.

**GAIN's contribution to *increased political and financial support for fortification* was found to be good, with a strong likelihood of certainty.**

### 3.3.2. Improved Monitoring And Management

This study found improving monitoring and management of food fortification programs to be perhaps the most critical of all outcomes. As indicated by an overwhelming majority of stakeholders, whilst there is near consensus around the need for mandatory food fortification (as opposed to a voluntary model), the introduction of legislation is not the end of the road in terms of running successful (effective and sustainable) national programs. Rather, it is a necessary but insufficient step. LSFF depends highly on compliance - whether the industry is capable and willing to comply with standards, and whether the government is capable and willing to enforce them. GAIN pours significant resources into achieving this highly relevant goal. The main activities of GAIN here are through ENABLE: providing training and equipment to governments on QAQC and bringing in relevant experts, as well as building the capacity of laboratories to conduct testing, and further organizing stakeholders nationally by coordinating meetings and fortification groups.

These activities are found to be highly relevant, and GAIN is generally considered to be effective in conducting them. What limits GAIN in this area is poor governance and a lack of capacity and resources in certain contexts, as well as a lack of government ownership. GAIN's contribution is further limited by the unsustainable nature of capacity building, and by their reputation as a big-budget donor which means governments often expect GAIN to foot the bill for certain LSFF activities. An important area for improvement lies in incorporating government ownership as a key part of GAIN programming. This is a challenge within GAIN's capacity to address, while other root causes, such as governance issues, are largely outside of GAIN's scope.

**GAIN's contribution to *improved monitoring and management* was found to be satisfactory, with a strong likelihood of certainty.**





### 3.3.3. Adoption of Legislation and Standards

Activities related to the adoption of legislation and standards are linked to advocacy initiatives and there is thus some overlap with the advocacy-related activities described above, since increased support for fortification at the national level is a condition for passing standards and legislation.

GAIN's contributions to the adoption of legislation and standards rely on the drafting and amendments of standards and legislation, the fostering of champions and targeted local advocacy supported by GAIN HQ. GAIN often relies on the high level of technical capacity at HQ to support the drafting of standards and legislation, where stakeholders agree there is a clear added value.

Both the literature and interviews made clear that champions of food fortification are one of the most effective components for the introduction of mandatory fortification. Champions can be elusive, but research suggests that there is a profile to look for and specific ways to foster them. The presence of champions in government who support food fortification has proven invaluable to GAIN efforts in contexts including Bangladesh and Tajikistan.

**GAIN's contribution to *the adoption of legislation and standards* was found to be good, with a probable likelihood of certainty.**

### 3.3.4. Conclusions: Contribution to the Effective and Sustainable Governance of Food Fortification Programs

GAIN is widely known for its global reputation as a leader and convener in nutrition and specifically food fortification. This reputation opens doors for them at country-level, providing them with good access in many cases. The role GAIN plays internationally in terms of convening stakeholders, international bodies and other INGOs is crucial to maintaining this reputation and continuing to build on it at national level, as is their excellent reputation in terms of evidence generation.



In multiple contexts reviewed for this study, GAIN has made significant contributions to the capacity for monitoring and management of food fortification programs through market analyzes, surveys and needs assessments. When GAIN deploys their evidence gathering capacities strategically, it has a significant contribution to the effective and sustainable governance of food fortification programs. In Pakistan, for example, GAIN identified the high import duties and taxes on premix as a limitation to fortification in the country. They focused advocacy efforts on this problem, convening stakeholders and advocating with the government, eventually resulting in exemption from those taxes and duties. In Bangladesh, the GAIN market assessment on bulk oil is likely to be a game-changer in adapting legislation and getting adequately fortified edible oil to the population. In Ethiopia, the provision of iChecks to border guards to check imported fortified oil will be crucial to monitoring and management. When GAIN deploys their resources for these types of studies, the contribution is highly effective and efficient.

There are multiple limitations imposed on the work of GAIN by contextual factors such as poor governance, disorganization amongst authorities and political cultures which are less open or democratic. These are limitations to GAIN's contribution that are outside of GAIN's control, to which GAIN can only adapt. GAIN's reputation as a donor is a limitation in some contexts where governments reportedly prefer to wait for handouts than take the lead on food fortification. The research conducted for this study shows that the most successful food fortification programs are those owned and led by national governments - this ownership is absolutely crucial for a favorable outcome. However, GAIN is confronted with the reality of the situation in the countries in which they work, which has often meant that if they don't take the leading role, the needle will not move on fortification.

**GAIN's contribution to *effective and sustainable governance of fortification programs* was found to be good, with a strong likelihood of certainty.**

## 4. Conclusions

The original ToC which guided GAIN's LSFF activities was based on iterations of other ToCs and logic models which themselves were the product of years of study and activity in food fortification. This original ToC prescribed a set of activities; providing support on the demand side, the supply side and the governance side, which GAIN adapted to each country's context.

This evaluation set out to investigate whether those activities made sense - whether they resulted in the outcomes they were expected to, whether they worked in the contexts in which they were employed - according to stakeholders, academic research and information gathered through case studies. What the evaluation found was that the model on which GAIN is basing their interventions is largely valid but in some ways outdated, and with some assumptions not borne out by experience.

This evaluation found that the critical piece of a successful food fortification program is government ownership. Food fortification programs are successful - that is, effective and sustainable - when there are laws in place mandating fortification, and when the government is willing and capable of enforcing those laws. In many cases, industry is able to adapt to these laws and produce fortified foods without too much support. This varies and is especially challenging in the case of smaller producers with fewer resources. Government ownership of food fortification and their ability to enforce standards is also highly dependent on the political culture of the country - whether government authority is respected, to what extent they are open to engagement with outside entities, and how decisions are made and enforced.



The evaluation found that GAIN has rightly moved away from demand-side activities, which have been found to only be successful when heavily funded over long periods of time and conducted in tandem with a myriad of other communication and policy initiatives. These interventions are rarely successful, and thus inefficient and lacking relevance for GAIN, at least in their current format.

GAIN instead focuses resources on the other two branches of activities: supporting industry and governance. The major successes of GAIN in supporting industry include the GPF, which is lauded as a crucial, highly relevant and effective component of the global food fortification landscape. GAIN's major contributions to improving the accessibility of high quality fortified foods also come from the ENABLE platform (of which the GPF is a part) through high quality evidence generation activities. Evidence generation, when coupled with advocacy efforts, has resulted in research results being taken up by key LSFF stakeholders and laid the groundwork for the improved delivery of fortified foods through markets in several contexts.

GAIN's contribution is limited by the ability of LSFF to reach vulnerable and needy populations, and when GAIN is not strategic about the choice of food vehicle it advocates for to ensure it is consumed and accessible by individuals in need. GAIN is further limited by the challenges of capacity building: it is widely agreed that capacity building is an unsustainable and inefficient activity in its current form since GAIN relies heavily on a relatively small pool of international consultants and knowledge has not thus far been sufficiently built, especially in the programmatic regions. Further, it is an activity done by many other actors in the field, making it less relevant for GAIN.

GAIN has major strengths in advocacy and evidence-generation. The organization has the advantage of widespread name recognition which often opens doors at the national level. They also benefit from extensive capacity in terms of geographical reach and presence, significant resources and highly esteemed knowledge among staff at HQ-level. **The evaluation found that the most critical piece in the success of a food fortification program is government ownership, and that this is also where GAIN has some of their greatest strengths and potential for growth**, with distinctive capacity and recognition among their peers. This understanding led to the following recommendations, and the creation of the Revised ToC (Annex D).

## 5. Recommendations

### 5.1. Strategic Positioning

#### **A. Continue to work on fostering improved relationships with other food fortification stakeholders and to lead on the global convening role**

It is clear that GAIN has a somewhat damaged reputation amongst other fortification actors for their (previously) “heavy-handed” approach. Although GAIN has historically not been seen as an alliance-builder, recent efforts, and especially the organization of the Global Summit on Food Fortification in Tanzania in 2015, have started to see improvements in GAIN’s image within the sector. GAIN should continue and augment their efforts to repair their compromised reputation and their relationships with sector peers by building trust through transparency, giving credit to others where due and being clear about their contributions, which will help to improve coordination and the quality of partnerships, as well as GAIN’s potential as a sector convenor.

*“GAIN has changed since 2002, but this exercise you are doing shows they are concerned” (Interview with donor, 12.11.19)*

There should be consistency in messaging and approach across the national and global levels. It will be crucial to also carry this work out at the national level, where most work on LSFF fortification is carried out, where actors are most frequently in contact and where impressions are formed. As discussed in Recommendation D of National Programmatic Level recommendations, improving national-level coordination and communication has seen results in some contexts and will be key to improved relations.

#### **B. Continue to prioritize evidence-generation at the global and regional levels, a key contribution to GAIN’s global reputation and a critical support to advocacy**

GAIN is widely recognized for their role in evidence-generation, which underpins all levels of the LSFF ToC and contributes to the global knowledge pool which legitimizes food fortification as a valid solution for micronutrient deficiencies, as well as being a key contribution to GAIN’s reputation as a leader in LSFF. This should remain a priority since, as well as contributing to the construction of a publicly accessible evidence base, it provides GAIN with credibility at the national level and helps them to secure access to public and private fortification stakeholders.

A specific need for evidence-generation has been mentioned by several fortification actors. They have suggested a standard methodology for the evaluation of compliance would help to coordinate, compare and align the efforts of various agencies. GAIN could take the lead on this, with one of their strengths being in methodology development.



*“One big one that we see that affects all agencies, we all have a singular goal of food fortification, the big gap is regular, reliable data to make informed programmatic decisions. So most projects have to generate a lot of that. But one thing we have lacking across globally is that there is no standard agreement between the agencies on what protocols are being used for evaluating compliance so that we can compare information easily, because right now we can’t compare data from our data to GAIN data. We need a common methodology.” (Interview with food fortification organization, 23.10.19)*

### **C. Clarify GAIN’s role in LSFF - position GAIN as the best partner to co-lead efforts with governments**

Although GAIN is well-known in the food fortification sector, and an apparent leader amongst its peers, many stakeholders still found it challenging to define the role of GAIN or to clearly express what it is that GAIN does exactly, especially since GAIN now also works extensively in other areas of nutrition.

*“I perceive the breadth of activities as a weakness...working in food systems requires a wide set of activities but I’m not sure what GAIN is particularly good at. They need to focus more, I see them all over in funding for nutrition, it’s not clear where the focus is. There are many different initiatives of GAIN, many reports, it’s a bit confusing. What is GAIN really working on? If GAIN would try to summarize that, what they think is important to move the needle on in food fortification and others, would be helpful” (Interview with a food fortification organization, 27.11.19)*

GAIN should continue to prioritize their LSFF efforts, for which they are respected and known, but should clarify their role. Considering GAIN’s apparent area of strength is working with governments, and where they currently have the greatest contribution, GAIN should consider positioning themselves as a sector specialized in this work at the national level, whilst leading on evidence-creation and convening at the global level, along the lines of the proposal in Annex D. Having a clear positioning would also aid coordination efforts with other actors by clearly delineating their area of expertise and responsibilities.

## **5.2. Global Programmatic Level**

### **A. Devolve knowledge and expertise, with the possibility of setting up regional expertise hubs**

Currently technical food fortification expertise is held mostly within a fairly small group of international consultants who are used by the main LSFF actors across the world to conduct training, provide technical advice and carry out assessments and evaluations.

*“The model right now is that there are 10-12 older men who get shipped around the world to do training and then leave. That’s the model right now. We call them the “Elders of Fortification”! They’re great, but they want to retire...but then who’s going to do it? They train people and then leave, there is huge turnover, and that isn’t built into the budget. What happens to those people? Where’s the sustainability? Where’s the local ownership?”- (Interview with former GAIN staff, 16.10.19)*

This is an unsustainable solution due to the maturity of many of these technical expert consultants but also because they are not from or embedded within the communities in which they work. Interviews with many of this group of consultants reveal that sustainability is also a key concern of theirs. Additionally, GAIN expertise is currently too centered within HQ and the reputation of country offices is often undermined by a perceived lack of technical expertise.

Although capacity building efforts have been made by GAIN and others, they have largely been unsustainable by the natural tendency of people who have upskilled moving on to better paid positions (for example in international institutions or the private sector). GAIN should invest in decentralizing technical expertise by building this internally to GAIN within country offices, or regional GAIN hubs which country offices can draw expertise from more easily than from HQ. Nutrition International (NI) has an Asian hub in New Delhi, India and an African hub in Nairobi, Kenya which staff report as being useful in terms of their understanding of regional stakes and their closer proximity to country offices.

*“What’s wrong with GAIN is they are too big. It would be appropriate to set up centers of excellence or capacity regionally, who could then train people locally, rather than GAIN doing it.” (Interview with sector expert, 03.09.19)*

*“I don’t think at the local level that [GAIN] have built up the capacity - we need them to do what they have done at the global level but nationally” (Interview with donor, 05.11.19)*

Alternatively or additionally, GAIN could also consider creating or investing in regional hubs of excellence from which governments and industry could access technical expertise, potentially under the ENABLE platform as an additional facility. These could be ran with a business model, being locally owned and/or operated and driven by local experts (existing or trained through the platform), who would then have less incentive to take their expertise elsewhere. GAIN could provide seed funding for such an initiative, or could provide funding (as now) to governments and industry to use the centers and their national/regional consultants rather than international consultants, thereby ensuring expertise is retained locally or regionally. Another solution could be the embedding of necessary technical provisions in existing national training institutions or curricula.

#### **B. Continue working for a food systems approach which integrates food fortification with food safety to maximize the potential of government buy-in and prioritization for fortification**

In several contexts, such as Bangladesh, GAIN has had success in integrating food fortification with food safety concerns and processes to obtain greater buy-in for prioritization of food fortification enforcement, crucial in achieving effective LSFF programs. The reality is that in most developing countries, regulatory agencies are lacking resources and so prioritize food safety concerns over food fortification compliance because of the more immediate and grave consequences associated with poor food safety management.

*“The fact is, the government just doesn’t enforce. They have way bigger things to do. It’s the lowest of low priority for them. Nutrition is just such a low priority, that they don’t care. And if they do care, they don’t have the time or resources to do it. Some of the countries I’ve been in have 20 inspectors - for the whole country - they’re supposed to inspect every product that comes into the country. Ultimately they’re more concerned about clean drinking water, about concrete that works, animal diseases.” (Interview with former GAIN staff, 16.10.19)*

Going forward, GAIN is going to have a food safety agenda in several countries, including Nigeria. Considering GAIN’s organizational strategy is to work on food systems, which implies working across food sectors, GAIN should reflect on how to integrate food safety and food fortification (for example through integrated trainings on both, Standard Operating Procedures (SOPs) which include compliance testing for both, etc), so as to raise the priority level of fortification. GAIN will also need to bring others on board with this strategy, including other fortification actors and donors. GAIN should use their convening role to communicate successes and advantages of the approach, and should generate evidence to advocate with donors.

*“For example in Nigeria, only 1% of the agencies’ work is to do with food fortification, the rest is food safety. Are we going to ask them to do something different for fortification than for food safety? Difficult ask...food fortification is about the niche versus the broad. Part of food control - how to balance the two.  
” (GAIN staff, sense-making workshop, 24.01.20)*

### **C. Place greater emphasis on sustainability and re-conceptualize LSFF as a government-owned program with GAIN support**

Although sustainability is a key end objective of GAIN and “pathways to sustainability” are included in project designs, sustainability concerns appear to be more implicit than explicit in program designs, with few project components which directly address the issue of government ownership, where the key to sustainability ultimately lies.

*“GAIN has a lack of recognition that work should be done by countries, and that we are here to help rather than take over. It’s not our intervention. It’s all foreign experts...they don’t have a lot of local people talking and exchanging, it’s for the internationals. I think that has been the failure because most of these activities have not been adopted or owned by the countries. Not motivating the countries to do it themselves.” (Interview with donor, 12.11.19)*

*“GAIN hasn’t got the balance between being a forceful partner and telling countries what to do and being an enabling partner and enabling the government.” (Interview with sector expert, 13.09.19)*

In all case study visits, there was discussion over gaining the “buy-in” of government for food fortification. The impression of the evaluators was that very often GAIN were looking for the buy-in of the government to a GAIN project rather than GAIN providing support to a government program. Several stakeholders this was discussed with agreed this is an issue, but that it reflects the reality of the situation on the ground.

“Ownership” is owning or sharing the possession of an idea, a decision, or an action plan; it means participating in its development and choosing of your own accord to endorse it. It means believing in the idea, and being both willing and ready to implement it.

“Buy-in” however is the opposite, related to someone else having done the development and the thinking and now convincing a third party to come along and implement their ideas/plans.

*“They [GAIN] instigate a lot of programs in the fortification area, but when the funding stops the programs tend to collapse, the government ownership isn’t there” (Interview with expert consultant, 12.09.19)*

It is recommended that GAIN reconsiders its conceptualization of sustainability to more explicitly include project components which seek to achieve government ownership of food fortification programs and the transfer of responsibilities.

These could include secondments of GAIN staff to government or the tying of funding to certain commitments such as budgetary engagements which share costs between government and GAIN. This would not necessarily need to be to the extent of performance-based funding models (which have been heavily criticized in the context of health programs in the literature), but rather a cost-sharing approach which sees government commit a minimum percentage of program costs (keeping in mind the budget and resource constraints governments in developing countries often have).



#### **D. Undertake further research on potential demand-side innovations**

GAIN's contribution to creating demand among consumers for fortified foods is currently low, due to their not investing heavily in this element of the ToC, especially in recent years, and the so far limited potential of the approach. However, mass media and marketing campaigns work are effective methods for private enterprise, suggesting there may be learnings which can be transferred to the promotion of fortified products, perhaps using techniques more related to classic advertising than to public health social marketing strategies. There is currently a lack of robust evidence about what works in terms of social marketing, presenting a research gap, and demand-side interventions remain relatively undeveloped.

GAIN should invest in further exploring new approaches, or learning from successes in commercial marketing, looking at whether messaging has been simple and straightforward enough, aspirational, motivational and desirable or only focused on the functional benefits of fortified foods and hoping awareness will be created and this will translate into increased demand. Beyond marketing to individuals, the role which other market actors who operate between producers and consumers, such as retailers, food manufacturers and wholesalers, should also be further investigated as a potential audience for targeted marketing.

### **5.3. National Programmatic Level**

#### **A. Create more context-specific evidence to support and drive national LSFF programs**

The generation of context-specific evidence has been highly relevant in several contexts, helping to generate insights for government and other stakeholders, and providing advocacy material for GAIN to use in working with the government. Many national level stakeholders opined that while global level advocacy efforts were useful in making the general case for food fortification, it was locally conducted research to which stakeholders ultimately paid attention.

Traditionally, lack of programmatic evidence and information has been a significant challenge for food fortification. GAIN should continue to focus on national-level data creation for programmatic use, playing a role in generating actionable evidence which can be used for decision-making, to advocate with governments or to adjust strategies. Market and value chain assessments, micronutrient surveys and cost-benefit analyses have all previously had tangible impacts and high levels of contribution to results in national contexts.

#### **B. Where appropriate, switch from a public health argument for LSFF to an economic development based advocacy narrative**

Although public health is a key concern for many governments, economic arguments related to the potential value contribution of food fortification to development outcomes will be more of a motivator for others, for whom nutrition is seen as less of a priority. GAIN currently tends to lead with public health arguments related to the achieving of Sustainable Development Goals.

In contexts where nutrition and public health related arguments have proven to (or are likely to) gain limited traction, GAIN should work to demonstrate the potential added value of fortification for a national economy and the cost of undernutrition using tools such as the cost-benefit analysis (CBA). This data, by its nature, needs to be localized to be most compelling. Where resource constraints don't allow for the carrying out of CBA in every country, GAIN should prioritize those more challenging cases or contexts where economic development is a key priority.

*“According to the Copenhagen Consensus, the return on investment of food fortification is one of the highest development dividends. For example, in the case of iodine, saving as much as \$30 in higher medical and non-medical expenditures for every \$1 spent. Salt iodization costs pennies – US 20 cents per person per year. A rough estimate for low- and middle-income countries suggests the cost benefit of fortification is around 30:1...GDP losses from undernutrition can be 2%-3% per year.” (The Arusha Statement on Food Fortification, 2015)*

**C. Approach national advocacy strategically to get more sustainable and effective support, playing an activist role where appropriate**

In most contexts, GAIN does not engage politically and keeps a relatively low profile, often working with technocrats, civil servants and directors rather than higher level elected officials. Although this is effective in many places where GAIN works, there are some contexts, such as Nigeria, where this strategy has become untenable. In these situations, GAIN should consider working at the political level, working to gain access to political decision-makers who will have the necessary power to move the needle for food fortification. GAIN should strategically position themselves to partner with a higher political level of government official where relevant, to expedite the policy process and elevate the debate to the appropriate levels of power.

**D. Consider how coordination between LSFF actors can be improved in-country**

There is a reported lack of coordination of food fortification actors at the national level in countries where GAIN works which results in both overlaps and gaps. This is a structural problem that is not just applicable to GAIN but to all actors working in fortification, and indeed to NGOs in general. The situation is also compounded by donors, who are significant in driving the LSFF agenda and who fund multiple fortification actors, but not always in a coordinated manner. GAIN has had some success in tackling the issue, for example in Nigeria, where the convening of development agencies working on fortification has been useful in collectively exploring gaps and increasing transparency (although undermined by other actors having few activities currently), and so this could be replicated elsewhere at the national level. Interestingly, in Nigeria, a key fortification donor funded activities outside of the development partners’ collectively decided scope for government support which undermined the ability of the group to speak with one voice, demonstrating the need for donors to be involved in coordination.

Although the responsibility for coordination is collective, GAIN is in a privileged position in that they have a close working relationship and a long history of collaboration with a major funder of LSFF, a position which they could use to challenge the status quo of the donor and to discuss potential solutions. The recommendation is that GAIN should work with their principle funder to see how coordination could be improved in a more systematic manner ahead of grants being rolled out, at the national or regional levels. This is also something the donor has expressed an interest in addressing:

*“There is a little bit of overlap, to this point I’m thinking of bringing together our largest grantees to really talk about the perspectives, especially as we launch this new grant with GAIN, its country focused and want to make sure grantee partners are not overlapping” (Interview with donor, 05.11.19)*