KEY MESSAGES

• If national plans, sometimes called ‘pathways’, to transform food systems are to be achieved, relevant policies developed nationally must be taken forward at different sub-national levels.

• Given wide variation across sub-national areas within countries, flexibility in interpretation and translation of national food policy is often needed.

• There may be cases where polices developed or piloted at sub-national level (for example, state, village, urban unit or otherwise) merit national expansion.

• Identifying and targeting budgetary support to sub-national zones of greater need may be one way to accelerate progress and equity, but its success depends on careful planning, robust data, and effective coordination across all levels of government.

• Helping to grow and align understandings of public servants involved in different levels of food systems governance can be one way to facilitate the needed food policy change and accelerate pathways delivery.
Introduction

As countries develop their National Pathways for food systems transformation\(^1\), one emerging need is to ensure policies land at different levels. A truly effective ‘national’ policy must span all sub-national areas\(^2\).

This paper briefly sets out:

a) why this is an important issue;

b) examples from two countries where the Global Alliance for Improved Nutrition (GAIN) is working in support of such efforts\(^3\); and

c) some implications of this for ongoing work to transform food systems for the benefit of people and planet.

Broad-brush food policies must fit several contexts

While in many cases, policy (including for food systems) is set centrally by national governments, most countries operate forms of multi-level governance, whereby certain powers to decide and act on policies rest at various sub-national levels as well as at national level\(^4\). Policy documents, directions, and goals around key food systems issues – including nutrition, climate action, agriculture, food-system related livelihoods, and so forth – tend to be drafted at a national level, but room often exists at administrative sub-levels to interpret and cascade such policy.

Decentralising powers from national to subnational levels makes sense as needs often vary by area. A highly urbanised setting for example may have very different food system policy needs than a highly rural setting. Such heterogeneity can exist across many different axes – for instance with areas hosting different productive zones, levels of malnutrition, climate risks, food availability (e.g. deserts and swamps\(^5\)), demographic features and so forth.

Heterogeneity in terms of challenges, problems, and needs, requires flexibility in funding and implementing solutions. Often one-size does not fit all. Consider for example Figure 1 (how rates of stunting in children under five years of age vary by Kenyan county), and Box A (illustrating subnational diversity across Nigerian states in key food systems indicators).

**Figure 1: Under-five stunting rates in Kenya by county, and national average, 2022**

Source: [Food Systems Dashboard (Data from 2022 KDHS)](https://www.gainhealth.org/sites/default/files/publications/documents/kenya-fsd-brief-3rd-06feb24-mg.pdf)

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2 Here we define sub-national as anything below national level, including for instance states, provinces, territories, districts, cities, villages etc.

3 For more on GAIN’s approach to supporting policy development and implementation to transform food systems, see Morrison et al., 2024 at [https://www.gainhealth.org/resources/reports-and-publications/supporting-transformation-food-systems-nourish-people-and-planet](https://www.gainhealth.org/resources/reports-and-publications/supporting-transformation-food-systems-nourish-people-and-planet)

4 Note, some policies are also discussed and set in international fora (conventions on climate change, biodiversity etc), though they must be implemented by each country.

5 Deserts and swamps are used as metaphors in food policy literature for places where healthy foods (e.g. fresh fruits and vegetables) are scarce and unhealthy foods (e.g. calorie dense foods typically found in fast-food outlets) abound, respectively.
Box A: Subnational Food Systems Dashboard for Nigeria reveals the situation varies widely by state

A dashboard collecting data on Nigeria’s state-level food systems indicators, launched in 2023, shows how different many of the indicators are across the nation, e.g.:

- Across 36 states for which data is available, most recent estimates of the proportion of people who can’t afford a healthy diet vary from 5.9% in Lagos to 92% in Ebonyi. In 21 of these 36 states, the figure exceeds 50%.

- Latest figures on fridge or freezer ownership by household varies from as high as 58% in Anambra and 54% in Lagos to lows of under 5% in Bauchi, Taraba, and Jigawa states.

- Per capita annual spending on food and beverages ranges from over ₦200,000 in Lagos and Delta, to below ₦70,000 in Sokoto and Jigawa.

Source: Nigeria’s subnational food systems dashboard can be accessed through this link: https://www.foodsystemsdashboard.org/countries/nga/subnational-data/indicators/admin-1/percent-of-the-population-who-cannot-afford-a-healthy-diet/map

Involving and consulting sub-national stakeholders is key for effective food systems governance

Bridging gaps between national and sub-national actors interested in and responsible for transforming food systems through policy change can be part of the way forward. Holding convenings and information sharing sessions to sensitise key stakeholders to the problems and opportunities can help. Promoting inclusivity and ground-truthing by involving sub-national actors, including those in grassroots or community programmes, in development of national policy can likewise yield positive results. Indeed, many of the national and sub-national consultations held in advance of the United Nations Food Systems Summit 2021 (UNFSS) did just this. This was even dubbed a ‘people’s summit’ given its strong grassroots consultations. In progressing the summit objectives through implementation of pathways, it makes sense to involve sub-national governments. This is also a way to espouse accountability and inclusivity in food systems transformation.

It cannot always be assumed that stakeholders in sub-national settings will automatically understand the decisions being taken and conversations underway at national level – and the reverse. Information may not naturally filter between levels without effort. Moreover, with changing governments or even staff turnover in civil service and related roles, continuity may be eroded. Organisations like GAIN, as part of the ecosystem of support (EoS) for food systems transformation can play a supportive or catalytic role here.

6 Research on subnational implementation of climate-related policies for example has found that success is linked to the way such policies are integrated with sectoral policies, or with those sitting at other levels of government, as well as with civil society (de Oliveira, J.A.P., 2009. The implementation of climate change related policies at the subnational level: An analysis of three countries. Habitat International, 33; 3: 253-259).

7 Be they civil servants from districts or cities, academics, members of the private sector motivated to improve offerings (e.g. SUN Business Network members), members of the NGO or UN community with expertise and interest to share, etc.


10 For more information see Lasbennes et al, 2023 at http://doi.org/10.36072/dp.15.
Although it is often assumed that policies originate at a high level before flowing down to smaller administrative units, it is also worth noting the converse can be true, particularly where powers are heavily decentralised. National policy is often informed by unique subnational experiences. Indeed, one route to achieving scale in changing food systems comes through demonstrating to relevant policymakers that a certain action deserves to be taken from a trial or pilot scale (small or time-bound) to a wider application. A good example in which GAIN has been involved comes from Indonesia – See Box B.

**Box B: Informing wider policy from pilot experiences: the case of GAIN’s Baduta project in Indonesia**

The Baduta project in Indonesia used behaviour-centred approaches to enhance children’s diets. One effective strategy, called emotional demonstrations or emo-demos, engaged participants in game-like activities designed to evoke emotional responses (e.g. surprise, fun, or disgust) to different eating or feeding behaviours.

Building on the success of the initial phase, the program has expanded. By the end of 2023, the emo-demo module had been adopted as teaching material in at least 28 universities across Indonesia, reflecting its growing recognition and acceptance within academic circles. Moreover, since 2022, the program has been designated by the Ministry of Health as a national priority funded program. Organisations including Save the Children and the 1000 Days fund movement have been instrumental in supporting many district governments in implementing emo-demo initiatives. This widespread adoption underscores the effectiveness and potential impact of emo-demos in addressing malnutrition challenges at both local and national levels.


**Examples from Indonesia and Kenya**

**Focus on Indonesia**

**Setting the scene**

While Indonesian governance is very decentralised, with responsibilities devolved to 514 district governments, this creates challenges for national food policies and contributes to persistent, uneven development.

Policy incoherence is a further challenge. Nationally, at least twelve ministries and agencies are tasked with regulation and governance of aspects of food systems; while subnational governments play strong roles not only in policy and implementation, but also in governance of state-owned enterprises that execute government programmes. This division of labour is necessary to achieve national food
and nutrition security, but it introduces tensions and trade-offs, especially where competing interests exist. Ultimately, such competition can fragment Indonesia’s policy approach to food systems transformation – see Figure 2 for an example.

**Figure 2: How policy incoherence affects rice fortification efforts in Indonesia**

<table>
<thead>
<tr>
<th><strong>FEDERAL LEVEL</strong></th>
<th><strong>LOCAL LEVEL</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ministry of Health</td>
<td>At the local level, state-owned enterprises tasked with distributing fortified rice through social safety net programs face challenges aligning their operations with the varying directives and standards set by national and local policies.</td>
</tr>
<tr>
<td>Ministry of Agriculture</td>
<td>Have differing views on import regulations for fortificants</td>
</tr>
<tr>
<td>Ministry of Industry</td>
<td></td>
</tr>
<tr>
<td>Ministry of Trade</td>
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</table>

| **STATE-OWNED ENTERPRISES** |

**Collaborating with Indonesia’s government to select districts in need of extra support for food systems planning**

In 2023, marking a strategic move towards decentralising food system transformation efforts and operationalising them at a sub-national level, a collaborative effort between GAIN and Indonesia’s Ministry of National Development Planning (BAPPENAS) aimed to identify districts requiring greater support to improve food security and reduce undernourishment through enhanced access to nutritious food. Ultimately 148 out of 514 district governments across Indonesia were selected for allocation of additional funds – designed to facilitate the development of comprehensive action plans aimed at transforming district food systems to address food security challenges.

While the additional funding was welcomed by the prioritised districts, when their planning processes began, some exhibited notable readiness gaps in effectively using the funds. These discrepancies highlighted a crucial oversight: the assumption that the allocated funds were primarily for program execution rather than for the initial planning stages necessary for systemic transformation. This misinterpretation underscores the need for clear communication regarding the objectives of funding and for providing guidance to ensure its optimal use.

This situation offers two main lessons, highlighting: 1) the importance of establishing clear guidelines on the use of funds and the preparation of recipient districts to effectively engage in comprehensive planning processes; and 2) the critical role of preparatory groundwork and capacity building in ensuring
the successful implementation of food system transformation projects. In all, targeting budgetary support to sub-national zones of greater need is a fair and strategic approach to accelerate progress and promote equity within Indonesia’s food system transformation efforts. However, its success depends on careful planning, robust data, and effective coordination across all levels of government, ensuring that interventions are inclusive and comprehensive. Effective targeting requires strong political will and coordination among various levels of government and agencies, overcoming the challenges posed by policy incoherence. Care must be taken to ensure that targeting does not inadvertently marginalise other regions or groups that might not fall within the identified “zones of greater need” but still face significant challenges.

**Ongoing work, including in secondary cities**

In 2024, in support of subnational implementation of transformative food systems policies, GAIN in Indonesia is developing a typology of subnational food systems\(^\text{11}\). Knowing what characterises certain (sub)national food systems should help with policy targeting and emphasis.

GAIN is also working in three secondary cities in Indonesia, Mozambique and Tanzania\(^\text{12}\) to empower and facilitate localised, inclusive interpretations of the respective national governments’ food system pathways. In Indonesia, work is being undertaken together with the city government of Bogor, as well as with street vendors and street vendor associations to interpret and promote food safety as a transformative thematic entry point. Food safety was locally prioritised as the national food system pathway which the city and street vendor leadership wished to focus on.

**Key activities in 2024 include:**

a) the local mainstreaming of the OneNutrition critical learning engagement which embeds systemic learning of nutrition, food handling and safety and food waste, with government and street vendors;

b) conducting two inclusive governance workshops beginning the work towards an inclusive pathway stakeholder engagement platform; and

c) globally raising awareness of the value that wet or traditional food markets and local government leaders can play in reshaping and sustaining food environments and wider food systems transformation.

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\(^{11}\) A national typology of food systems is available on the Food Systems Dashboard website. See also: [https://www.frontiersin.org/articles/10.3389/fsufs.2021.746512/full](https://www.frontiersin.org/articles/10.3389/fsufs.2021.746512/full)

\(^{12}\) Each city is a signatory of the Milan Urban Food Policy Pact.
Focus on Kenya

Setting the scene

Kenya’s 2010 constitution provides for two levels of governance, dividing the country into forty-seven counties. It aims to build upon this decentralised government to strengthen inclusion and equity in achieving national goals.

Both levels of government in Kenya have power to secure resources, and each works on a clear mandate to provide a range of significant services. These are outlined in the Fourth Schedule of the Constitution. Several functions have been devolved, including agriculture, trade and market development, health services, early child education (pre-primary), natural resources, and environmental conservation, amongst others. Each county government is expected to domesticate policy instruments developed at national level.\(^\text{13}\)

Kenya’s county governments were heavily involved in the multi-stakeholder dialogues that took place leading up to the UNFSS, and therefore they are expected to play a significant role in the delivery of the national pathways developed at that time.

Engaging county level governments to support Kenya’s commitment to food systems transformation

Following elections in August 2022, GAIN in Kenya has been supporting the new government to develop and follow its pathways to food systems transformation, including through engaging government bodies at county levels. Guided by the national food systems pathways action plan, Kenya has identified and rolled-out a raft of interventions in Nyandarua, Nakuru, and Nairobi Counties, including around a) nutrition budget tracking, b) developing the investment case for nutrition, c) strengthening multi-stakeholder platforms for food systems, d) strengthening capacity of government actors to deliver policy commitments, and e) mainstreaming the private sector in the implementation of policies, especially those touching on tax regimes which currently affect access to healthy diets. The focus of these efforts is primarily on promoting food and nutrition security while building resilience to both climate and price shocks.

\(^{13}\) Okoth Onyango, Forthcoming 2024. Transforming Kenya’s Food Systems: The Role of County Governments.

\(^{14}\) The 3FS budget tool, co-designed by IFAD and the World Bank, aims to provide evidence for smart investment decisions including: How much financing goes towards the food system? To which parts? Does it target areas and people most in need? What are the gaps and needs?

\(^{15}\) This collates data from across all 47 Counties of Kenya. Sub-national food systems dashboards are being taken up in several countries as a way to inform and track food systems transformation.
GAIN, in collaboration with the National technical working group on food systems, has developed a roadmap to guide in the engagement and sensitisation of all 47 county governments on Kenya’s pathways.

Looking forward, in collaboration with the United Nations International Fund for Agricultural Development (IFAD) and the World Bank, GAIN will support the cascading of the 3FS (Financial Flows to Food Systems) tool\(^{14}\) to sub-national levels, once the current piloting at national level is accomplished.

GAIN has also contributed through development of a food systems dashboard\(^{15}\) for Kenya and is currently supporting its uptake across various counties as a critical tool for evidenced-based policy making.

### Conclusions

The often stark variation in how food systems work (or otherwise) across sub-national areas contributes to wide-ranging outcomes and impacts – on people’s health, livelihoods, and wellbeing; as well as on many goals people care strongly about tied to food systems (like healthy soil, water, and climate, biodiversity, wildlife and so forth).

There is a real need to move from national visions or pathways to actions that lead to meaningful shifts in universally desirable goals. Localising, streamlining, and improving the coherence of approaches across national and sub-national levels is part of the solution. This includes the need to make space for sub-national governments to feed local considerations and learnings of local pathway implementation into national pathway plans and agendas – equally as important as designing for implementation from national to local.

The interaction, coordination, and sharing of approaches and efforts across different levels of government within countries must be fostered. This means governments seeking to transform food systems, and other actors on board with this agenda, need to be proactive. GAIN efforts in support of this concentrate in 12 countries in Africa and Asia. We aim to continue documenting and sharing our learnings along the many pathways to food systems transformation and we welcome collaboration with others in the ecosystem of support.

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