



Draft Sustainability Focused Exit Strategy for the Food Fortification Programme (FFP)

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Draft Sustainability Focused Exit Strategy for the Food Fortification Programme (FFP)

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Contents

1.	Executive summary	5
2.	Introduction	7
2.1.	Background to the Food Fortification Programme	7
2.2.	Rationale for a sustainability focussed exit strategy	8
2.3.	Scope of the strategy	8
2.4.	Approach to developing the strategy	9
3.	Sustaining the environment for fortification	10
3.1.	Capitalise on the new national programme to tackle malnutrition induced stunting in Pakistan	10
3.2.	Support mandatory legislation for wheat flour fortification	11
3.3.	Strengthen the business case for wheat flour fortification	12
3.4.	Step up public awareness and demand generation	13
3.5.	Ensure continued tax exemptions and duty rebate	15
3.6.	Strengthen the premix supply chain	16
4.	Sustaining engagement by the private sector	16
4.1.	Continue to improve relationships with PFMA	16
4.2.	Ensure the mills can carry out internal quality control	17
4.3.	Sustain the capacity of mill staff	18
4.4.	Use the Provincial Fortification Alliances more effectively	19
5.	Sustaining government capacity	19
5.1.	Encourage better delineation of the roles of food authorities and departments	19
5.2.	Encourage better funding for food fortification oversight	20
5.3.	Build public sector capacity to monitor food fortification	21
5.4.	Provide MIS support for monitoring fortification	22
5.5.	Hand over in-country premix quality assurance	23
5.6.	Strengthen the district governments' strategic commitment to fortification	23
5.7.	Hand over the programme knowledge base	24
6.	Operational Plan	26
7.	Annexes	34
	Annex 1: Terms of reference	34
	Annex 2: Literature review	38

Annex 3: Planning Matrix for exit strategy	43
Annex 4: Overview of a sustained wheat flour/oil ghee fortification system	45
Annex 5: Guidelines for consultation with stakeholders	46
Annex 6: Consultation with FFP staff and stakeholders	56

List of abbreviations

AAP	Accelerated Action Plan for Reducing Malnutrition and Stunting
DFID	Department for International Development
DMAC	District Malnutrition Addressing Committee
FBR	Federal Board of Revenue
FFF	Food Fortification Facilitators
FFP	Food Fortification Programme
FortIS	Fortification Information System
HPLC	High Performance Liquid Chromatography
LHS	Lady Health Supervisor
LHW	Lady Health Worker
MIS	Management information system
MoNHSR&C	Ministry of National Health Services, Regulation and Coordination
NFA	National Fortification Alliance
NIFA	Nuclear Institute for Food and Agriculture
P&D	Planning and Development
PFA	Provincial Fortification Alliance
PFMA	Pakistan Flour Mills Association
PSQCA	Pakistan Standards and Quality Control Authority
PVMA	Pakistan Vanaspati Manufacturers Association
QA/QC	Quality assurance/ Quality control
RDS	Rolling District Study
RTAG	Research and Technical Advisory Group
RTK	Rapid testing kit
SNIP	Supporting Nutrition in Pakistan
SUN	Scale Up Nutrition
TMISP	Programme to tackle malnutrition induced stunting in Pakistan
TOC	Theory of change
WFP	World Food Programme

1. Executive summary

The UK Government's Department for International Development (DFID) funded Food Fortification Programme (FFP) is coming to an end in early 2021. Exiting in a sustainable manner is a major focus of the programme in its remaining 12 key operational months and closure period. This sustainability focused exit strategy does not cover the entire range of activities currently being carried out by the programme but instead prioritises the most effective interventions to be addressed to ensure sustainability. It was developed in close consultation with FFP team members and stakeholders in the government and private sectors.

Key actions by the programme team should focus on three main areas: sustaining the environment for fortification, sustaining engagement by the private sector and sustaining government capacity.

Sustaining the environment for fortification

Capitalising on the new national programme to tackle malnutrition induced stunting in Pakistan gives the programme an opportunity to transfer some of its key strategies to government mainstream funding. It also presents some entry points FFP where its experience would provide valuable assistance to the development and implementation of the programme.

Supporting mandatory legislation for wheat fortification is regarded by stakeholders as the most critical factor for sustainability of the FFP. In addition to sustained follow-up on the draft bills, FFP should step up its advocacy for legislation with the provincial and federal governments, develop a policy brief on the issue, address the importance of legislation through the media campaign and adopt specific strategies for engagement with the Pakistan Flour Mills Association (PFMA). These should include presenting legislation positively as "levelling the playing field" and incorporating incentives to fortify and specifically addressing PFMA's reservations.

Strengthening the business case for wheat flour fortification is essential to address the incentives in the market. The issue of who carries the cost of fortification underpins this. FFP should encourage either the provincial governments to pass on the cost to consumers and/or develop an approach to using subsidies within the wheat quota system. Addressing the issue of discolouration will build PFMA's support for fortification as will ongoing demand generation.

Stepping up public awareness and demand generation to a more broad-based strategy involving mass media campaigns will help to establish demand for fortified products. Strategies should involve cobranding with government, progressively handing over the advocacy and awareness component to government and ensuring that FFP itself has the resources to engage properly on this issue.

Ensuring post FFP support for tax exemptions and duty rebate must be addressed at federal level, by sensitising nutrition cells to take up advocacy for the concessions should existing exemptions be reversed.

Strengthening the premix supply chain is expected to happen as a result of market forces. However, FFP can assist this by timely phasing down of the support and helping mills to undertake their own procurement.

Sustaining engagement by the private sector

Improving relationships with PFMA has already been a successful feature of recent FFP activity. The programme should now try to bridge the gap between PFMA and government, and further strengthen the mechanism of ongoing dialogue, programme progress reporting and joint reflection on challenges and corrective actions. Again, presenting regulation and compliance as a positive levelling of the playing field will help, as well repeated emphasis on the importance of strategies beyond just a demand campaign.

Ensuring mills can carry out internal quality control depends on detailed agreement with mills about how costs are to be transferred. FFP needs to work out the annual cost of a cluster lab and negotiate with PFMA and Pakistan Vanaspati Manufacturers Association (PVMA) to agree a funding mechanism, either adding the cost of cluster labs to the annual fee they charge the millers, agreeing that groups of mills will share the cost or opting for fee-for-service. In addition, FFP should connect

PFMA and PVMA with suppliers of iCheck equipment, reagents and rapid testing kits (RTKs); establish a mechanism whereby the mill staff carry out their own testing in cluster labs and thus maintain anonymity; and consider re-evaluating the composition and number of cluster labs.

Sustaining the capacity of mill staff should be reasonably straightforward but will require some input especially regarding capacity to calibrate micro-feeders. Online tutorials in Urdu could help.

Using the Provincial Fortification Alliances more effectively will necessitate stepping up advocacy with the National Fortification Alliance to make them more active, and correspondingly with the Provincial Fortification Alliances themselves and widening their engagement with strategic stakeholders. The funding support to improving coordination envisaged in TMISP PC-1 could help build the NFA/PFA resources and aid this process.

Sustaining government capacity

Encouraging clearer delineation of the roles of food departments and food authorities will be challenging but nevertheless important in anticipation of legislation. FFP should aim to build consensus among key stakeholders. There are also signs in certain Provinces (KP) and in GB that rationalisation is already occurring with merging of senior Managers and reporting to the Secretary Food.

Encouraging better funding for food fortification oversight will mean helping food authorities/departments to identify the scope of work and associated costs of better monitoring and compliance and encouraging the inclusion of these costs in regular budgets.

Building public sector capacity to monitor food fortification will enable government to carry out one of its key roles. The programme will need to work with the provincial food department/authorities to ascertain their fiscal space, design feasible monitoring and compliance plans and advocate for this to receive a government budget. In addition, an in-house technical resource should be developed within the department/authorities. The advent of TMISP may help to encourage capacity development in this area.

Providing Management Information System (MIS) support for monitoring fortification will help operationalise this activity in the food department/authorities. FFP should identify their priorities and either hand over a modified version of FortIS or help design or develop another system to meet their needs depending on requirements, timescale and resources available.

Handing over in-country premix quality assurance will involve supporting the food authorities to take on quality check functions. Alternatively, efforts could focus on PSQCA but it no longer has the mandate for this.

Strengthening district governments' strategic commitment to food fortification will involve building high level relationships, strengthening existing engagements with DMAC (District Malnutrition Addressing Committee) meetings where they exist and then, through lessons learned, encourage the development of similar committees as a suitable governance structure at district levels for future expansion beyond the life of FFP. This should only be in existing priority districts which are either high risk for malnutrition and/or which have many flour/oil mills, taking into account time left on the programme and where their role would be enhanced by progress on securing legislation and the enabling environment.

Handing over the programme's knowledge base to stakeholders would mean establishing an online resource on the FFP website, uploading existing material, developing online tutorials and eventually handing material over to the nutrition cell of the Ministry of Health and/or Chief of Nutrition at the Planning Commission.

2. Introduction

2.1. Background to the Food Fortification Programme

In order to combat micronutrient malnutrition in Pakistan, FFP was designed and funded by DFID for a period of five years (2016-2021). The programme is being implemented by Mott MacDonald and technical partner Nutrition International in collaboration with key government departments at National and Provincial level and with industry associations, namely PFMA and PVMA. FFP supports industry to adequately fortify wheat flour and edible oil/ghee in Pakistan, provides advice to Governments to improve the food fortification regulatory system, to help raise public awareness and conducts operational research.

Table 1: FFP Outputs and outcome contributing to the impact

Impact	Reduction in undernutrition with a focus on micronutrient deficiencies in women and children
Outcome	Improved access and consumption of nutritious food for women of childbearing age and children to improve nutritional status
Outputs	1. Food fortification programme to ensure a sustainable supply of high-quality wheat fortified with iron, folic acid, Zinc, and Vitamin B-12
	2. Food fortification programme to ensure a sustainable supply of high-quality edible oil /ghee fortified with Vitamin A and D
	3. Raised public awareness of the nutritional benefit of fortified food
	4. Contribution to evidence and research for food fortification
	5. Improved Government commitment ownership and action to support food fortification

The programme aims to fortify wheat flour produced at commercial roller mills with iron, folic acid, vitamin B12, and zinc, as well as edible oil/ghee with vitamins A and D. Currently in the third year of its implementation, it was planned that FFP would reach more than 24% of the population of Pakistan to consume fortified wheat flour, with over two-thirds using fortified edible oil and ghee.

The objective of the programme is to contribute to the improved nutritional status of people in Pakistan. FFP will achieve this through sustainably improving access to and consumption of fortified wheat flour and oil/ghee. Consequently, FFP seeks to reduce iron deficiency anemia by 13.5% in children and 12.3% in women and reduce vitamin A deficiency in children by a third and in women by 27%. Population sub-groups of particular priority to FFP are:¹

1. Women of reproductive age (15-49 years), with an emphasis on pregnant and lactating women;
2. Children under 5 years (6-24 months; and 2-5 years);
3. Adolescent girls (10-14 years).

¹ Women, adolescent, and young children in the poorest two wealth quintiles are a specific priority

FFP has been designed around four key components:

Component 1: Technical assistance to federal, provincial and special area governments

This component entails following domains of interventions to assist the government

- (A) Establishing and supporting multi-stakeholder co-ordination platforms
- (B) Legislating and developing standards and specifications pertaining to wheat flour and edible oil/ghee fortification
- (C) Strengthening public/private management for food quality assurance/quality control (QA/QC) with regards to wheat flour and edible oil/ghee fortification
- (D) Supporting the development and implementation of a monitoring system
- (E) Ensuring financial sustainability for the regulators

Component 2: Technical assistance to the flour and edible oil/ghee industries

As a first step, the wheat flour and edible oil/ghee industries were recruited to the FFP and then the following support was provided to the recruited industries under this component:-

- (A) Identification of equipment needs and provision of feeders
- (B) Procurement, importation, storage, and distribution of a sustainable supply of high quality premix with the aim to establish a supply chain system
- (C) Provision of premix/ oil fortificant through the established system
- (D) In-mill quality control

Component 3: Public advocacy, media and communications

Component 4: Targeted studies to improve implementation strategies

The approach towards achieving FFP objectives adopted is participatory and inclusive and involves coordination with a wide range of relevant partners including national, provincial and district government departments, donors and donor programmes, UN agencies and non-governmental actors. This helps to avoid duplication of effort and to maximize synergies and effectiveness whilst minimizing transaction costs and supporting good value for money and local ownership leading to sustainability.

2.2. Rationale for a sustainability focussed exit strategy

FFP in both its design and implementation, has sustainability at its centre. This principle underpins the approach of engaging all key stakeholders, developing skill sets and developing systems. The programme recognises that sustainability of fortification beyond its own life is key to achieve the intended outcomes and impact. Therefore, exiting in a more sustainable manner must be a major focus of the programme in its remaining 12 months. This warrants a specific strategy.

2.3. Scope of the strategy

This sustainability focussed exit strategy is applicable to all provinces where the programme is currently active i.e. Punjab, Sindh and KP, as well as Federal level². Whilst the situation in Balochistan is different in a number of ways, not least that the programme is in an inception stage, it is hoped that the recommendations on sustainability for other provinces may have some relevance there as implementation progresses.

² The ToRs had originally anticipated including Baluchistan in the exit strategy but discussion during inception concluded that this would not be feasible because the FFP programme was in its inception stage (no staff hired at that point and so no interventions) with public sector entities such as the food authority in the process of being established.

This strategy also:

- Covers the programme's strategic approaches and associated activities on a prioritised basis of key areas needed to ensure sustainability between now and programme end.
- Has been developed in close consultation with FFP team members who will be delivering the approaches and activities.
- Has been developed in close consultation with stakeholders to ensure that approaches and activities are likely to be effective.
- Includes a work plan to guide inputs and enable monitoring by the programme management team.

This sustainability focussed exit strategy does not cover the entire range of activities currently being carried out or planned by the programme. Instead it has prioritised the more effective interventions to be addressed. Therefore, it should not be regarded as an exit strategy for the programme as a whole but rather one with a special focus on activities that will promote sustainability.

2.4. Approach to developing the strategy

The following steps were followed for the development of the strategy (see also Annex 1: Terms of reference).

The consultant carried out a comprehensive literature review. A key document was the external independent midterm evaluation completed by Oxford Policy Management³ which identified many of the key areas that needed to be addressed to ensure greater sustainability and also provided a valuable analysis of issues and challenges. The literature as a whole informed the design of the approach and content of this proposed strategy. A summary of findings is in Annex 2: Literature review.

The consultation was also framed by:

- A planning matrix tool⁴ which framed the key question guided the process of developing the exit strategy and was used for consultation.
- A schematic concept of a sustained wheat flour/oil ghee fortification system which reflects the key elements of the system and their role in Pakistan (Annex 4: Overview of a sustained wheat flour/oil ghee fortification system).

These fed into an analysis of the availability of resources, the extent of capacity and motivation to continue fortification, the strength of linkages between public and private sector actors and consumers, and the opportunities and risks presented by external factors. The consultant also analysed how the programme has addressed stakeholder engagement, considered interventions intended to promote sustainability and identified programme elements that could cause problems with sustainability.

Key areas for the exit strategy were then identified. These were prioritised and finalised with the programme team and a consultation guide developed (Annex 5: Guidelines for consultation with stakeholders).

Consultations were held with the FFP team on each of the key areas and potential approaches in order to agree preferred options. The consultant interviewed the FFP Project Director, Team Leader, Technical Director, National Fortification Managers, National Managers covering Monitoring and Evaluation, Research, Advocacy and Communications, and Provincial Fortification Managers (Annex 6: Consultation with FFP staff and stakeholders).

³ Evaluation of the Supporting Nutrition in Pakistan (SNIP) Food Fortification Programme Midterm Evaluation Report, May 2019, Oxford Policy Management, ITAD, GAIN.

⁴ Levinger, B. and McLeod, J., Hello, I Must Be Going: Ensuring Quality Services and Sustainable Benefits through Well-Designed Exit Strategies, Educational Development Center, October 2002.

External consultation was carried out with stakeholders for their feedback and concurrence on the preferred options. The external stakeholders included the National and Provincial Fortification Alliances, the PFMA/PVMA, food departments and food authorities, and health and education departments

Annex 6: Consultation with FFP staff and stakeholders). FFP team members were involved (where needed) in arranging this consultation process to enable detailed discussions of options.

A draft of the strategy was developed for consultation with the FFP team. On the basis of their comments the strategy was finalised.

3. Sustaining the environment for fortification

3.1. Capitalise on the new national programme to tackle malnutrition induced stunting in Pakistan

Analysis of current situation

The MoNHSR&C of the Federal government is in the process of finalising a 538,123 million PKR programme to tackle malnutrition induced stunting in Pakistan (TMISP). This is expected to run until mid 2024. A draft PC 1 document is currently under consultation at provincial level. The programme goal is to significantly reduce nutrition related stunting in children by 2024 and virtually eliminate it in those born in 2022 by 2030. This will be achieved through two programme outcomes – improved nutritional status of adolescents, pregnant and lactating women and children under three, and also creation of a sustained conducive policy environment and programme response. Programme output four – addressing micronutrient deficiencies – has a specific strategy of providing micronutrients through food fortification for everyone. Output five – strengthening institutional arrangements and implementation of the project – is also highly relevant for food fortification.

Actions

The draft programme document suggests number of possible entry points for FFP where its experience would provide valuable assistance to the development and implementation of the programme, and where the strategies deployed by FFP should be picked up by TMISP. FFP should consider how best to ensure that its knowledge and achievements are transferred to TMISP in the following areas. Details are further explored in the relevant sections:

- Lessons from existing programmes are to be transferred into the design of the current programme (see section 5.7).
- A regulatory mechanism is to be put in place to ensure legislative means for mandatory universal fortification of wheat flour and other food items. In addition, fortification policies and guidelines will be revised. TMISP identifies the need for technical assistance in this area (see section 3.2).
- Enforcement mechanisms will be defined (see section 4.1).
- A mechanism for sustaining the supply of commercial premix fortification of wheat flour is to be introduced, there will be strengthening of the premix supply chain and capacity building is to be carried out for in-country premix quality assurance (see sections 3.3, 3.5, 3.6 and 5.5)
- There will be a review of the law governing fortification of edible oil/ghee in order to develop a more effective regulatory/enforcement mechanism (see section 3.2).
- Stakeholder consultation is frequently mentioned as part of the process for developing better regulation etc (see sections 4.1 and 5.6).
- A national database on nutrition status and interventions will be developed (see sections 5.3 and 5.4).
- There will be better inter-ministerial/departmental coordination of supporting different components of food fortification (see section 5.1).

- Capacity building will be a crosscutting theme, including the areas of standards, guidelines and quality assurance (see section 5).

3.2. Support mandatory legislation for wheat flour fortification

Overview of the current situation

Mandatory legislation for edible oil/ghee is already in place. This key action area therefore addresses wheat flour.

Mandatory legislation for wheat flour food fortification is regarded by stakeholders as the factor most critical for sustainability of the fortification programme because:

- It is necessary to monitor and ensure compliance with standards, especially in Punjab.
- It is expected to help create demand for fortified wheat flour.
- Making food fortification mandatory through legislation (as opposed to modifications in standards, rules/regulations) provides more stability to the fortification agenda and steers political support, as any attempt to undo the mandatory food fortification legislation would have to go through the whole process and unanimous passage in the provincial assembly.

Draft legislation for mandatory wheat flour fortification (developed with support of FFP) is at various stages of approval across the provinces:

- In **Punjab**: at the time of consultation the food department was reviewing the draft legislation on wheat flour fortification in light of the food grain law so that they complement each other. The FFP consultant had addressed the first round of feedback provided by the food department.
- In **KP**: there is currently no legislation, so food fortification is based on standards. However, there is interest in developing legislation to help the fortification agenda withstand changes in political leaders or key senior executives.
- In **Sindh**: the legislation bill is expected to receive final approval in approximately two months from their assembly.

Actions

FFP should:

- **At federal level**: explore how the experience of FFP can contribute to the development and implementation of TMISP.
- **At federal level**: Advocate for the mandatory wheat flour fortification legislation with the federal government politicians (urging them to also raise the issue with their Provincial counterparts) on a more regular basis. There has been clear political support from the current Prime Minister for tackling malnutrition and the political economy around wheat flour fortification is less complex than at the provincial level.
- **At federal and provincial levels**: Include the message of “need for mandatory wheat flour fortification” in the planned media campaigns.
- **At federal and provincial levels (especially Punjab)**: identify a sustainable means of advocacy and follow up on the draft bill that could continue after the end of the programme. This is in anticipation of the possibility of not getting the mandatory legislation in place during FFP programme life. One option could be to engage the relevant food authorities/food departments through a stakeholder working group to focus on incentives and ways to progress the legislation.
- **In all provinces**: Step up existing efforts to develop ongoing government ownership.

- **In all provinces:** Scale up activities to seek political support for the fortification agenda based on the political economy of the respective province.
- **In all provinces:** Accelerate advocacy to the political leadership including the provincial Ministers for food and development.
- **In all provinces:** Develop and share a policy brief on the importance of having separate legislation for food fortification.
- **In all provinces:** present legislation positively to PFMA as a “levelling of the playing field” to ensure mills who fortify are not disadvantaged and as a means to reduce the number of non operational mills distorting the allocation of wheat quota allocations from more efficient mills.
- **In all provinces especially Punjab:** Continue to address any reservations of food department/authority and PFMA with regards to wheat flour fortification to remove bottlenecks.
- **All provinces:** Accelerate further follow up on the draft bills to expedite processes and overcome slow bureaucratic procedures.
- **In Punjab:** ensure more concerted effort and engagement of the senior FFP leadership with the political leadership. These efforts can be timed well with the national/provincial mass media campaigns and synergised with the **interactions**/meetings planned in that regard. It is anticipated that during mass media campaigns, the political leadership would be more receptive to such propositions. There should be follow up meetings and regular engagement of all concerned stakeholders.
- In **KP:** respond to recent **interest** in legislation.

3.3. Strengthen the business case for wheat flour fortification

Analysis of the current situation

The key factors that will determine the sustainability of the fortification programme from the private sector perspective, are the effect of fortification on profitability margins, consumer demand for fortified products, the potential cost of those products and whether the regulatory environment provides a level playing field for fortification.

Profitability margins in the wheat flour sub-sector are generally narrow, particularly for smaller mills. Moreover, for wheat flour atta, provincial governments determine the market price, but are yet to increase it to cover the cost of fortification; this effectively restricts the incentive for fortification by millers. Currently, as the subsidy from FFP is incrementally decreased, the motivation to fortify wheat flour is also decreasing.

There is low awareness among communities with regard to the benefits of fortified wheat flour and oil/ghee. Although the acceptance for fortified food is reasonably good, it is adversely influenced by price and taste of the fortified food. The issue of discolouration of fortified wheat had been raised by PFMA/some mills and FFP has recently commissioned an independent research institute to identify the cause.

The findings of the millers’ incentive study reflect that the development of a business case and hence sustainability, is dependent on generating adequate demand for fortified food in the community coupled with the mandatory legislative environment where all the producers are provided with a level playing field. Mandatory legislation will contribute to scale up the supply side of the food fortification.

Currently, provincial food departments release a quota of wheat flour to mills (the amount of which is determined by the mill’s capacity) at a fixed price which is lower than the market price. The DFID annual review 2018/2019 recommended that provincial governments could instead offer two different release prices of wheat to flour mills: a lower price to those who agree to fortify (thus increasing their profit margins) and a higher price to those who do not. FFP has since developed and shared with the

Punjab Food Secretary and Secretary National Ministry Food Security and Research, proposals that use the subsidies within the wheat quota system to incentivise uptake of fortification.

Actions

FFP should **in all provinces**:

- Investigate ways of stimulating supply through revising existing subsidy levels to counter increased out of pocket expenses faced by millers until agreed price increases can be negotiated for fortified flour.
- Encourage the premix cost to move from the mills to either the consumer or government. There are two ways of approaching this, as discussed below. However, given that mills buy most but not all of the wheat that they grind from food departments, a mixed approach may be necessary.
 - FFP should follow up with the provincial governments to pass on the cost of the fortification to the consumers. FFP should lobby the Government of Pakistan and provide technical support to amend the currently fixed consumer prices for wheat, pushing for a difference in price between fortified and non-fortified flour⁵or
 - FFP should continue to lobby Federal and Punjab governments to adopt the proposals to use subsidies within the wheat quota system to incentivise uptake of fortification. This will be important for the development of TMISP.
- Motivate the mills to continue fortifying the wheat flour whilst the premix cost is shifted, as above.
- Address the issue of discoloration affecting certain baked by products using maida and fine atta. FFP has agreed to share the findings in this regard with PFMA to resolve the issue and further strengthen their confidence and trust in food fortification.
- Continue demand generation efforts. Demand generation is an ongoing process and it is important to gear the demand generation to stimulate the supply side via the demand side. (See also next section.)

3.4. Step up public awareness and demand generation

Analysis of the current situation

In the first part of the programme in line with the programme design, FFP focused on the supply side. The focus on the demand side was further strengthened in the Theory of Change (ToC) in October 2018 and the strengthened demand creation component has been in place since early 2019 i.e. only for the last 7 to 8 months with the hiring of one FFP to concentrate purely on this but more is needed. To date FFP's public awareness and demand generation activities for oil, ghee and wheat flour have focussed on trying to match the supply side with localized/geographic based activities.

There may be some risks associated with generating demand for fortified wheat flour at a national level given the relatively small scale of roller mill flour availability. However, stakeholders consulted on this exit strategy held the unanimous view that FFP should move to a more broad-based strategy involving mass media campaigns. This they believe will greatly augment the food fortification agenda in Pakistan. Generation of adequate demand for fortified food will contribute to establishing a business case for wheat flour fortification and long-term sustainability of fortification. The former DFID adviser endorsed this move away from cable TV to National TV Channels when reviewing the effectiveness of the advocacy interventions in year 3 and approval has recently been obtained for the campaign for 7 months.

It is important that FFP takes into account the relationship with PFMA and their preference for the demand driven approach - PFMA has strongly recommended that FFP steps up its public awareness

⁵ This option is recommended by the majority of internal and external stakeholders.

and demand creation activities using a national television campaign and the programme is working towards this.

Therefore, there is now an urgent need for FFP to further strengthen stimulation of both supply and demand side.

Government ownership and branding will be key. People trust government and if the awareness and advocacy campaign is solely led by FFP and not co-branded with any government entity, it will fail to buy the trust of the people and there may even be a negative impact. In universal salt iodization, government did a very intense and consistent mass media awareness campaign which showed very positive results. There should be commercials/advertisements similar to iodized salt with FFP cobranding with government.

FFP is utilising various entry points to promote public awareness of food fortification:

- In Sindh 45000 teachers will receive training on nutrition under the Accelerated Action Plan (AAP). FFP will add fortification messages into this curriculum.
- In Punjab the programme has ensured that key advice on fortification is included in the training curriculum for School Health and Nutrition Supervisors and the manuals they use.
- A basic introduction to food fortification and health benefits of fortified wheat flour and edible oil has been included in the LHWs curriculum in Sindh and KP, and the manual used by LHWs in Punjab.
- The new Federal Government Programme Prime Minister's social protection programme EHSAS includes a package of subsidised staple food commodities for poorer households. These will be made available through the Utility Stores Corporation with which FFP has an existing MoU. FFP has had meetings with the USC Managing Director and Chairman to explore how the package can include fortified wheat flour and edible oil/ghee. Both parties are keen to explore including fortified wheat flour and edible oil and ghee and work is proceeding on assisting USC develop the procurement standards to do this.

Actions

FFP should in all provinces:

- Ensure that it has the resources to carry out more concerted activities in public awareness and demand generation. Stakeholders reflected that follow up by FFP with government departments on advocacy and communication activities had been limited to date; they also considered that provincial teams were not sufficiently aware of the issues and programme activities.
- Switch to a more broad-based demand generation strategy.
- Co-brand with government to enhance people's trust and acceptance.
- Food fortification is currently not in the school curriculum in any province. FFP should explore the possibility of including it.
- Progressively hand over the advocacy and awareness component to the relevant government departments to ensure sustainability. Public awareness raising and demand generation requires sustained ongoing effort so it is appropriate that it should become a core government activity. This should include:
 - Handing over the mass media campaigns (national and provincial) to the National Fortification Alliance (NFA), Ministry of National Health Services, Regulation and Coordination (MoNHSR&C) at **national level**; at **provincial level** hand over to departments of health. This should include handing over all relevant material (commercials, IEC material source files etc).

- Engaging the respective departments in the procurement process by building their capacity to carry out procurement and connecting them with the potential quality vendors in the market.
- Advocating for allocation of budget by respective departments in this regard.
- Handing over the Lady Health Supervisors (LHSs)/Lady Health Workers (LHWs) component to departments of health. Specifically, FFP should work with health departments to advocate for continued reinforcement of food fortification messages to LHWs by LHSs. LHWs are overwhelmed with the number of health education messages they are expected to deliver and they are likely to forget fortification messages if reminders are not provided at regular intervals. However, the Programme needs to be realistic with how far this strategy can be expected to go given the LHW workload. This is not expected to require additional resources.
- **In Punjab** handing over FFP's public awareness activities implemented through School Health and Nutrition Supervisors, to the health department. The programme should encourage the health department to ensure that supervisors continue to deliver the correct messages. It is also important for FFP to encourage liaison between health and education departments to promote effective use of the supervisors.
- Handing over public awareness and advocacy components related to sensitization of traders, retailers and mills to food departments/ authorities. This should include handing over all the relevant material to the respective food department/authority and advocating with them to allocate resources in this regard.
- Hire a press and production public relations firm to train and sensitise journalists, obtain regular placement of positive news stories and to suggest other PR strategies e.g. appearances by FFP "champions" on TV shows such as morning shows, cooking shows etc.
- Consider allocating more dedicated senior human resources at provincial level to follow up with stakeholders, and support provincial teams to make them better placed in their communications with the industrial associations.

3.5. Ensure continued tax exemptions and duty rebate

Overview of current situation

Tax exemptions and duty rebate on equipment and premix are currently provided by the federal government. However, there is a risk that tax/duty exemptions could be withdrawn in the future. In anticipation of this the programme has been focussing on the National and Provincial Fortification Alliances (NFA/PFAs) in liaison with PFMA/PVMA, as the entities which would advocate and coordinate with the Finance Ministry/Federal Board of revenue (FBR). However, at the moment the key NFA/PFAs coordinator posts are funded by a donor and therefore vulnerable to sustainability issues. TMISP, currently under consultation (see section 3.1) may enable a more permanent solution to be found through government funding of the posts.

Actions

FFP should:

- **At federal level:** Sensitize the nutrition cell within the MoNHSR&C to take up the advocacy and coordination role and to coordinate with the FBR if there are some issues after the FFP programme ends.
- **At federal level:** Develop and share with the nutrition cell a short guide providing the rationale and process involved in seeking the tax and duty exemptions with information on the relevant stakeholders within the FBR.
- **At federal level:** Ensure tax and duty exemptions are included in TMISP.

3.6. Strengthen the premix supply chain

Analysis of the current situation

It is anticipated that as food fortification scales up, the premix supply chain will be strengthened by market forces. More suppliers should enter the premix supply market and create market competition that would help keep prices of premix competitive.

Actions

FFP should, in all provinces:

- Phase down the support provided by Food Fortification Facilitators (FFFs) with time to enable mills to make entirely independent procurement.
- Develop a procurement guideline for procurement of microfeeders and the premix (in Urdu) to assist mills in future procurements.
- Ensure that lessons learned by the programme are transferred to TMISP.

4. Sustaining engagement by the private sector

4.1. Continue to improve relationships with PFMA

Analysis of the current situation

The millers' associations are key stakeholders in FFP. Whilst relationships with PVMA have generally been cordial, those with PFMA have been more problematic brought about in part by the lack of legislation to mandate fortification of wheat flour. At one point FFP and PFMA tensions put at risk the programme's further engagement with the industry and individual mills. Despite having signed MoUs with the programme and engaging with its implementation, PFMA reportedly even advised mills to stop fortifying under FFP programme. The wheat flour industry questioned FFP's approach to mobilise government to increase mill enrolment in the programme.

FFP, responding to the reservations of the PFMA and flour mills made concerted efforts to re-calibrate the relationship with FFP on mutual trust and a partnership-based approach of engagement rather than compliance. In this regard, FFP took a number of confidence building measures which are reflected below:

- Revision of MoU with PFMA
- Regular monthly meetings of senior FFP staff at PFMA offices and discussions and updates on agreed actions by both parties
- Installation of FortIS in the PFMA office
- A paradigm shift in the engagement approach, moving from compliance to partnership with a new strategy of involvement and sharing of plans. There has been engagement at the regional/provincial and central/national levels and the FFP team has shared and agreed plans for roll out of microfeeders, addressed resistant mills, and carried out orientation and communication and demand generation with them.
- Changing the position titles of FFPs field team staff from Food Fortification Officer to Food Fortification Facilitators.
- Having the Central PFMA team countersign all MoUs with the mills and Mott Macdonald.

Consequently, the programme's relationship with PFMA has improved considerably.

FFP has since been able to facilitate closer relationships between government and PFMA. In response to discussions with the Punjab Secretary Food, formation of a working group has been agreed and terms of reference are being finalised. This experience is also informing the approach in Baluchistan where a joint working group has been formed with membership from government, PFMA, Ministry of Industry, PFA and FFP. A joint roadmap has been agreed meetings are to be held every two months.

Actions

FFP should in all provinces:

- Make use of the improved relationship between FFP and PFMA to bridge the gaps between PFMA and the government (Food department/authorities), specifically addressing the reservations/apprehensions of PFMA regarding public sector management of food fortification. FFP will be well placed to lay groundwork for TMISP. FFP should consider:
 - holding a tripartite dialogue involving FFP programme, PFMA and food department/authorities.
 - Using the provincial food alliances as a platform to develop a good working relationship between food department/authorities and PFMA that can foster partnership between them.
- Present regulation and compliance to PFMA as a positive "levelling of the playing field" that can ensure mills who fortify are not disadvantaged and potential way of removing non operational mills who only exploit allocations of wheat flour quotas and are not genuine producers.
- Continue to explain to PFMA why a demand campaign alone is insufficient and why a universal approach is needed.
- Further strengthen the means of ongoing dialogue, programme progress reporting, and joint reflection on challenges and corrective actions. This will contribute to, and be supported by the development and implementation of TMISP.

4.2. Ensure the mills can carry out internal quality control

Overview of current situation

FFP has MoUs with PFMA, PVMA and the mills in which they agree to ensure funding for the recurrent cost of QC/laboratories after two years of FFP support. However, there is no detailed agreement with these stakeholders on how they are to take on these costs after the programme ends.

In addition to the issue of financing of the cluster labs, four further aspects need to be addressed to ensure their sustainability:

- iCheck equipment and reagents are currently being provided by FFP. Although they are anticipated to last for quite some time (reagents shelf life is 1 year), the programme still needs to address supply in the longer term.
- FFP is providing mills with RTKs which the programme has acquired from the Nuclear Institute for Food and Agriculture (NIFA). Again, longer term supply needs to be addressed.
- Quantitative testing in cluster labs is currently dependent on FFP for sample collection and result dissemination. FFP has also put in place a process of anonymization of samples to be tested at cluster labs which will need to be continued.

- The geographic proximity of some of the mills to their cluster lab was reported to be poor and could compromise the ability of mills to send the samples for testing after the programme ends.

Actions

FFP should address the financing issue **in all provinces** by:

- Ascertaining the average annual operating costs of a cluster lab.
- Working with PVMA/PFMA to agree a funding mechanism, based on one of the following options.
 - PFMA/PVMA should add the cost of cluster labs (equipment maintenance, reagents and human resource) to the annual fee charged to the millers
 - Cluster based financing - mills using a cluster lab should pay the hosting mill a share of the cost
 - The cluster lab should charge a fee for service; however, there is a risk that this may discourage millers to conduct tests.
- Incrementally transferring the costs of cluster labs to PVMA/PFMA before the end of the project.

In addition, FFP should, **in all provinces**:

- Connect PFMA/PVMA with the suppliers of the iCheck equipment and reagents to encourage continued purchase in the long term. FFP should develop a short procurement guideline in this regard to help future procurements.
- Connect the mills with NIFA and explore whether NIFA would be willing to supply rapid testing kits with or without cost.
- Establish a mechanism with the mills whereby the mill staff can bring the sample and perform test themselves to maintain anonymity while the person at the cluster lab plays a facilitating role.
- Re-evaluate the composition of clusters and increase the number of clusters labs, if need be. FFP is already in process of setting up more cluster laboratories and this aspect should be kept in mind while ascertaining clusters.

4.3. Sustain the capacity of mill staff

Analysis of the current situation

Mill staff currently have the capability to carry out food fortification. It is anticipated that staff turn-over is not a threat to loss of mills capacity as FFP has trained more than one mill member of staff and even if someone leaves a job, they stay in the same sector. Despite this some ongoing capacity building is needed.

Actions

FFP should, in all provinces:

- Further strengthen capacity of the mill staff, especially focussing on capacity to calibrate the microfeeders.
- Develop online tutorials on key mill staff trainings in Urdu language.

4.4. Use the Provincial Fortification Alliances more effectively

Overview of the current situation

Each province has its Provincial Fortification Alliance (PFA), which is housed in either the Food Department (Punjab), or the Health Department (other provinces). The PFAs are supported by the NFA which is funded by the World Food Programme (WFP). FFP is a member of each of the core committees of the WFP-supported provincial fortification alliances; however, the meetings of the PFA have not been regular which has limited the utilization of the platform for FFP's engagement with the relevant stakeholders. The funding support to improving coordination envisaged in the TMISP PC-1 could help build the NFA/PFA resources and aid this process.

In Punjab: the PFA has facilitated FFP to engage with the government (especially the Food Department and Food Authority). However, it has had difficulties in effectively engaging the flour mill association.

In KP: the PFA has never met and there has been little or no engagement between FFP and PFA which affected a meaningful co-working environment. .

In Sindh: the PFA has had the key position of programme officer vacant for a while which has affected the co-working environment between FFP and PFA.

Actions

In order to have effective and meaningful support from the provincial fortification alliances, FFP programme should, **in all provinces:**

- Advocate with the National Fortification Alliance to make the provincial fortification alliances more active so that the general body and technical core committee meetings are held regularly with good attendance of the member organisations.
- Step up its engagement with the provincial fortification alliance (**especially in KP**) to effectively utilize the platform for seeking further support of the stakeholders.
- Further utilize the provincial fortification alliance to help with widening the programme's engagement with strategic stakeholders such as finance departments, e.g. to enlist their support for ensuring continued budget support for monitoring and compliance action at the district level.

5. Sustaining government capacity

5.1. Encourage better delineation of the roles of food authorities and departments

Overview of the current situation

At national level, government has expressed its commitment to food fortification by exempting imported premix from tax/duties and using the Council of Common Interest (CCI) mechanism to harmonise fortification standards across jurisdictions. At provincial level however, government ownership of fortification is weak, and in the case of wheat flour, a lack of clarity about whether it is the food departments or food authorities who are responsible for supervision. The situation is clearer in oil and ghee fortification – provincial food authorities have that responsibility.

In the long term the TMISP PC1 has stated government's commitment to improving interministerial – departmental coordination for food fortification. In addition, clarity about responsibility for wheat flour is expected to improve with legislation, with Sindh ahead of other provinces in terms of progress towards promulgation of legislation. However, given that this has not yet been implemented, the respective roles of the food departments and food authorities remain unclear and vary in practice

between provinces and the draft PC-1 itself recognises the initial preparatory and start up stage would take at least 2 years.

Even after fresh legislation is enacted and roles are clearer, any effective compliance of wheat flour fortification will need to operate within a complex political economy of what is a highly political staple food item. The challenge arises in part from government's high level of involvement in the wheat and wheat flour markets – in procuring and selling wheat, allocating wheat quotas, fixing sale prices of wheat flour and monitoring market prices. Moreover, there is also an inherent conflict-of-interest faced by all provincial governments which are dependent on the mills to ensure regular supplies of wheat flour; this gives the mills a monopolising position and the potential to interrupt supply. Therefore, as government subjects the mills to compulsory food fortification, it risks possibly interrupting regular wheat flour supply through industrial action.

Splitting the providers of wheat (food department) from the regulators of wheat flour fortification (food authorities) could potentially help to counteract this conflict of interest and mitigate the concerns of the flour mills. Moreover, there is consensus across all three provinces that provincial food authorities would be a reasonably effective compliance agency as they have the skill, capacity and mandate to monitor and ensure food fortification. Nevertheless, the mills may still have the collective power to resist wheat flour fortification.

Space for action in this area by the programme is constrained by the lack of clarity but there is merit in continuing the conversation about roles and responsibilities in anticipation of legislation.

Actions

FFP should in all provinces especially Punjab:

- Build consensus within the food department and food authority on better delineation of their respective roles with regard to wheat flour fortification. There should be regular tripartite meetings involving food department and food authorities.

5.2. Encourage better funding for food fortification oversight

Overview of the current situation

The effectiveness of the food authorities will depend not only on legislation but also on future funding for monitoring and compliance, which is currently inadequate. It is therefore essential that FFP offsets reliance on programme resources by encouraging the integration of monitoring and compliance in regular government budgets, in line with functional responsibility. It will be important that the broad commitments of TMISP to develop capacity in this area are translated into meaningful budgets. The programme is taking the opportunity to work with provincial counterparts to ensure it captures aspects currently supported by FFP such as HR operating costs. Actions

FFP should in all provinces:

- Help the food authorities/departments to identify the detailed scope of work and the associated cost of public management of food fortification for inclusion in TMISP. This could include providing technical support to:
 - ascertain necessary changes in scale and scope of work (e.g. increase in human resource, public sector labs for quality assurance, field data collection etc) of the food authorities/departments.
 - Carry out a costing exercise to ascertain the additional costs incurred.
- Build stronger linkages between food authorities/departments and planning and finance departments in order to help mainstream food fortification in regular budgets. Once a food authority/department ascertains its scope of work and requirement for additional resources with the help of technical support from FFP, the provincial team can facilitate meetings of these departments: with the planning department for project-based support and with the finance department for activities identified as important to be included in the regular budgets.

5.3. Build public sector capacity to monitor food fortification

Overview of the current situation

Public sector monitoring and compliance has a key role in ensuring adequate food fortification. This needs to be underpinned by mandatory legislation. Whilst the mandate for this function remains somewhat unclear, as discussed above, stakeholders in all three provinces agree that the provincial food authorities are the entities who have, or should be given, the skill, capacity and mandate to monitor and ensure fortification of edible oil, ghee and wheat.

External monitoring of edible oil, ghee and wheat mills currently relies on the programme's FFFs and is mainly geared to facilitating subsidy payment. The absence of monitoring by FFFs after the programme ends and in the absence of monitoring from food authorities/departments poses a considerable threat to sustainability of food fortification and QA/QC of the whole process.

In Punjab the government has shown interest in assessing the continuation of the FFFs after the FFP programme ends. Most respondents consulted were of the view that government staff should take over the responsibilities of the FFFs. In terms of technical capacity to carry out monitoring, FFP has already strengthened the reference laboratory in Punjab and has trained the staff to operate the High-Performance Liquid Chromatography (HPLC) in Punjab Food Authority while Spectrophotometers are being provided to food department; in addition, FFFs continue to build capacity in the laboratories.

The programme is in the process of strengthening the laboratory services in KP and Sindh and intends to provide the HPLC and Spectrophotometers. Overall, provincial QC testing capacity remains weak and is affected by technical staff shortages at provincial food department/authorities.

The advent of TMISP may help to encourage capacity development in this area.

Actions

FFP should in all provinces:

- Work with the provincial food authorities/departments to ascertain their available fiscal space and on the basis of this design a monitoring and compliance plan which is financially and organisationally feasible for them. Consideration should be given as to which elements could be picked up by TMISP.
- Engage with food authorities/department to ensure that at least one person per district is formally notified/specified by them who can continue the functions performed by the FFFs. The Programme should then anticipate the handover from the FFFs, involving the specified person in the performance of the FFF functions to build their capacity and identify additional skill development needs. However the details of this approach would need careful consideration to ensure acceptability by the mills.
- Develop an in-house technical resource in the form of a pool of master trainers in the food departments and food authorities. These would help to develop capacity to cater for the future needs of the department. Master trainer groups could include monitoring and compliance for food fortification QA/QC in the field, and laboratory skills pertaining to

operating HPLC and Spectrophotometer. The sustainability aspect could further be strengthened by developing online tutorials on key trainings in Urdu language.

- Provide refresher training for provincial and district staff once inspections become regular; this could be conducted by FFP trained pool of Master trainers.
- Strengthen field monitoring and compliance by connecting the food department/authorities with NIFA and explore whether NIFA would be willing to supply RTKs with or without cost (see also 4.2).

5.4. Provide MIS support for monitoring fortification

Analysis of the current situation

The Food Fortification Programme has developed its own MIS for monitoring fortification specifically for oil, ghee and wheat flour. The system is used to collect, store analyse and report information on mill, lab and supplier registration, as well as fortification and production levels. Some quality control data is available on test samples collected and results from iChecks, cluster labs and independent laboratory tests, and fortification rates, but not on applicable standards and achievement. FortIS has recently been effective in timely provision of programme related data to FFP and has contributed to better implementation of the programme interventions.

It had originally been intended that the system would be handed over wholesale to food departments. However, the programme has recognised that it needs to rethink the approach to handing over FortIS for a number of reasons including millers' sensitivity to their data being shared with government, the fact that provincial food authorities rather than food departments are now acquiring the mandate for monitoring fortification, and the development by GAIN of a national level MIS to monitor fortification. TMISP will also be relying on better data.

An initial brief assessment suggests moreover that provincial food authorities and food departments are at different stages in their information needs and their approaches to meeting them. Punjab and KP food authorities have developed MISs to support their food safety inspections and which cover some of FFP's interest areas as well as other food stuffs. Punjab's system includes oil and ghee and KP's covers oil, ghee and wheat flour. These primarily focus on field activities related to food safety monitoring such as the number of inspections conducted, number of improvement notices given, number of fines, number of sealed premises, number of samples collected, quantity of discarded and disposed items etc. This information is collected at the entity level and can provide analysis at entity, district, divisional and provincial level. In Punjab the MIS spans the province while the KP one only covers seven out of 34 districts. In Sindh, an MIS has not been developed and the Food Authority uses WhatsApp for field reporting of oil and ghee fortification (among other food stuffs) covering six districts out of the 29 in Karachi, Hyderabad, Larkana, Mirpur Khas.

In order to identify the way forward, FFP has commissioned two consultants to carry out a review of the information system needs of provincial food authorities and / or food departments and establish how the FFP could support these information needs either through handover of all or some of FortIS or development of a new system.

Actions

FFP should in all provinces:

- Identify the priorities of provincial food authorities and food departments with regards to MIS data requirements for effective monitoring of edible oil, ghee and wheat flour.
- Assess how FortIS or another system could meet these needs, taking into account the mandate of the programme, available resources and time remaining on the programme. Options may include:
 - Repackaging FortIS for use by the provincial food authorities/food departments. This may also need to enable monitoring of other foods.
 - Assisting with the further development of existing systems to include edible oil, ghee and wheat flour fortification.

- Implement the recommendations.

5.5. Hand over in-country premix quality assurance

Analysis of the current situation

After the FFP programme ends one ongoing challenge will be with regard to quality assurance of premix. It will still be necessary to import it, so checks will still be necessary to ensure its quality before distribution across the Provinces.

Food is a devolved subject and a provincial issue after the eighteenth constitutional amendment. It is the mandate of the provincial government to quality check any food that is imported to the province/ Pakistan.

With the constitution of the provincial food authorities, the mandate for ensuring food quality and safety standards was shifted from the national level Pakistan Standards and Quality Control Authority (PSQCA) to these authorities. There has been friction between the food authorities and the PSQCA as the transition of the mandate for food quality and safety standards took place, and this needs to be navigated to find a satisfactory solution.

The premix supplier currently bears the cost of in-country premix quality assurance, with FFP taking samples after clearance for quality testing (at the supplier's cost) to accredited laboratories (most commonly in Germany) before the product is distributed. This testing arrangement persists as no government department or in country laboratory has the capacity to carry out the required QA on premix imports. It is critical for FFP to hand over the in-country premix quality assurance function. Given that the premix cost includes testing and that this arrangement of external testing could continue, the issue is primarily one of capacity. It is also hopeful that TMISP intends to tackle the issue of how to sustain the supply of commercial premix fortification.

Actions

FFP should consider the following two options **in all provinces**:

- Support the food authorities to take on the quality check function. This was the recommendation most strongly favoured by provincial stakeholders. The food authorities would check the quality of the premix, develop and maintain a register of acceptable suppliers and provide the register to the mills. They could decide to take on the cost of quality checking or they could require the suppliers to continue to cover it.
- Support the PSQCA to take on the quality check function. FFP should ascertain the equipment and capacity requirements of PSQCA and provide support considering the available timeframe and build capacity to ensure in-country premix quality assurance. Again, PSQCA could cover the cost of quality checks or maintain the current arrangement. However, provincial stakeholders were very sceptical about whether PSQCA could carry out these functions; moreover, it no longer has the mandate to do so.

5.6. Strengthen the district governments' strategic commitment to fortification

Analysis of the current situation

In all districts the governments' understanding of the fortification agenda is weak and misses a strategic commitment. This is further undermined by frequent transfer and postings which undermined the support for food fortification.

In Punjab, where DMACs exist, FFP has been able to leverage them as a platform for multi-stakeholder engagement. However, DMACs are only functioning regularly in 11 districts in south Punjab, which limits their effectiveness. In other districts in Punjab DMACs have limited functionality reflected by infrequent meetings. FFP's lack of engagement with Planning and Development (P&D) Department has limited its efforts to make DMAC an effective partner in the food fortification agenda.

Also, FFP's constrained relationship with PFMA has held its staff back from utilising DMAC meetings to encourage compliance with fortification.

DMACs do not exist in KP, although in Sindh the AAP has District Coordination Committees in districts where the AAP is operating.

The development of TMISP may help to catalyse commitment to fortification.

Actions

FFP should:

- **In all provinces** take account of the remaining time on the programme – 12 months – and prioritise activities and districts accordingly, to achieve the most impact within the time available.
- **In all provinces:** Attempt to mitigate the issue of frequent transfers of government officials at district level by engaging and building relationships. This should be at the highest tier with the central authority of the district commissioner and relevant sector officials, and also with the second tier. This should be done by FFFs and so only cover those districts where they are active.
- **In Punjab:** Engage with PFMA for continued restoration of their confidence in the FFP programme so that FFP staff can start having meaningful participation in DMAC meetings (see also 4.1).
- **In Punjab:** Step up engagement with the P&D department to encourage it to use DMAC more effectively to engage the district stakeholders.
- **In Punjab:** In selected existing priority districts of Punjab - where DMAC is not fully functional or does not exist, which are high risk districts for malnutrition and/or have flour/oil mills and where their role would be enhanced by progress on securing legislation and the enabling environment - seek P&D's help to formalise their district level engagement with a committee of a smaller group of stakeholders. The purpose of the group would be to review progress of food fortification at least once a quarter. Membership could consist of the DC, District Food Controllers, District Health Officers and the Food Safety Officers.
- **In KP:** The programme should consider forming similar committees in some priority districts of this province, if programme capacities allow. District selection should be based on risk factors and the presence of flour/oil mills.
- **In Sindh:** Use the APP District Coordination Committees to engage stakeholders on fortification.

5.7. Hand over the programme knowledge base

Analysis of current situation

FFP programme has conducted a number of studies as part of the programme, not only for continual programme improvement but also to contribute to and generate evidence on food fortification in Pakistan. The research studies have been supported by the Research and Technical Advisory Group (RTAG) which has both national and international experts who bring in fortification expertise, global good practice examples and contextual knowledge for adaptation of evidence to Pakistan. It is important that the knowledge base developed during the course of the programme should be handed

over to the relevant stakeholders. Moreover TMISP intends to learn lessons from existing programmes such as FFP.

Actions

FFP should in all provinces:

- Hand over the knowledge base to stakeholders⁶ including research tools, protocols, reports, datasets etc.
- Establish an online resource containing all material related to training, and research studies and related material, temporarily hosted on the FFP website.
- In the remaining time available develop online tutorials on key trainings.
- Disseminate the online resources to all relevant stakeholders.
- Hand over the online material to the nutrition cell of the health ministry and/or Chief of Nutrition at the Planning Commission for maintenance after FFP ends.

⁶ Nutrition cell at federal level; food authorities and food departments at provincial level

6. Operational Plan

Table 2: A detailed operational plan for the exit strategy is presented below, in line with the key areas and actions above.

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
3. Sustaining the environment for fortification								
3.1	Capitalise on the new national programme to tackle alnutrition induced stunting in Pakistan							
	Transfer FFP knowledge and achievements to TMISP	Ongoing	Federal and provincial	X	X	X	X	X
3.2	Support Mandatory Legislation for wheat flour fortification							
	Explore how the experience of FFP can contribute to the development and implementation of TMISP	Specific	Federal and provincial	X				
	Advocate for mandatory wheat flour fortification legislation with federal government politicians	Ongoing	Federal	X	X	X	X	X
	Include the message of “need for mandatory wheat flour fortification” in the mass media campaign.	Specific	Federal and provincial	X				
	Identify a sustainable means of advocacy and follow up on the draft bill that could continue after the end of the programme.	Specific	Federal and provincial (especially Punjab)		X			
	Step up existing efforts to develop ongoing government ownership.	Ongoing	All provinces	X	X	X	X	X

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Scale up activities to seek political support for the fortification agenda based on the political economy of the respective province.	Ongoing	All provinces	X	X	X	X	X
	Scale up advocacy with the political leadership including the provincial Ministers for food and development.	Ongoing	All provinces	X	X	X	X	X
	Develop and share a policy brief on the importance of having separate legislation for food fortification.	Specific	All provinces	X				
	Present legislation positively to PFMA as a “levelling of the playing field” to ensure mills who fortify are not disadvantaged.	Ongoing	All provinces:	X	X	X	X	X
	Continue to address any reservations of food department/ authority and PFMA with regards to wheat flour fortification.	Ongoing	All provinces especially Punjab	X	X	X	X	X
	Accelerate follow up on the draft bill to expedite the process.	Ongoing	All provinces	X	X	X	X	X
	Ensure more concerted effort and engagement of the senior FFP leadership with political leadership, timed with the national/provincial mass media campaigns.	Ongoing	Punjab	X	X	X	X	X
	Respond to recent interest in legislation	Ongoing	KP	X	X	X	X	X
3.3	Strengthen the business case for wheat flour fortification							
	Encourage the premix cost to move from the mills to either the consumer and/or government	Ongoing	All provinces	X	X	X	X	X
	Continue to lobby governments to adopt the proposals to use subsidies within the wheat quota system to incentivise uptake of fortification	Ongoing	Federal and Punjab	X	X	X	X	X
	Motivate the mills to continue fortifying while the cost is shifted.	Ongoing	All provinces	X	X	X	X	X

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Address the issue of discoloration	Specific	All provinces	X	X			
	Continue demand generation efforts	Ongoing	All provinces	X	X	X	X	X
3.4	Step up public awareness and demand generation							
	Review programme resources to make sure they are enough	Specific	All provinces	X				
	Switch to broad-based demand generation strategy	Specific	All provinces		X	X		
	Co-brand with government	Ongoing	All provinces	X	X	X	X	X
	Explore the possibility of including food fortification in the school curriculum	Specific	All provinces			X		
	Hand over the advocacy and awareness component to government	Specific	All provinces			X		
	Hire a press and public relations consultant	Specific	All provinces	X				
	Consider allocation more resources at provincial level to follow up with stakeholders and support provincial teams.	Specific	All provinces	X				
3.5	Ensure post FFP programme support for tax exemptions and duty rebate							
	Sensitize the nutrition cell MoNHSR&C to take up advocacy and coordination role	Specific	Federal		X			
	Develop and share with nutrition cell a short guide on seeking the tax and duty exemptions	Specific	Federal			X		

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Ensure tax and duty exemptions are included in TMISP	Specific	Federal	X	X			
3.6	Strengthen the premix supply chain							
	Phase down the support provided by FFFs	Specific	All provinces				X	X
	Develop a procurement guideline for micro feeders and premix	Specific	All provinces			X		
	Ensure that lessons learned by the programme are transferred to TMISP	Ongoing	Federal and all provinces	X	X	X	X	X
4. Sustaining engagement by the private sector								
4.1	Continue to improve relationships with PFMA							
	Bridge gaps between PFMA and government	Ongoing	All provinces	X	X	X	X	X
	Present regulation and compliance to PFMA as a positive	Ongoing	All provinces	X	X	X	X	X
	Continue lobbying PFMA on the importance of a universal approach to fortification	Ongoing	All provinces	X	X	X	X	X
	Strengthen means of ongoing dialogue	Ongoing	All provinces	X	X	X	X	X
4.2	Ensure the mills can carry out internal quality control							
	Ascertain the average annual cost of a cluster lab.	Specific	All provinces		X			

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Work with PVMA/PFMA to agree a funding mechanism	Specific	All provinces			X		
	Incrementally transfer the costs of cluster labs to PVMA/PFMA	Specific	All provinces				X	X
	Connect PFMA/PVMA with suppliers of iCheck equipment and reagents.	Specific	All provinces		X			
	Develop a procurement guideline	Specific	All provinces			X		
	Connect the mills with NIFA and explore continued supply of rapid testing kits by NIFA	Specific	All provinces			X	X	X
	Establish a mechanism with mills for mill staff to bring samples and perform tests.	Specific	All provinces		X			
	Re-evaluate the composition of clusters and increase the number if necessary.	Specific	All provinces			X		
4.3	Sustain the capacity of mill staff							
	Further strengthen capacity of mill staff, focussing on capacity to calibrate microfeeders	Ongoing	All provinces	X	X	X	X	X
	Develop online tutorials	Specific	Provinces				X	
4.4	Use the Provincial Fortification Alliances more effectively							
	Advocate with the National Fortification Alliance to make provincial fortification alliances more active	Ongoing	All provinces	X	X	X	X	X
	Step up engagement with the provincial fortification alliances	Ongoing	All provinces (especially in KP)	X	X	X	X	X

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Further utilize the provincial fortification alliances to help with widening the programme's engagement with strategic stakeholders	Ongoing	All provinces	X	X	X	X	X
5. Sustaining government capacity								
5.1	Encourage clearer delineation of the roles of food authorities and departments							
	Build consensus within the food department/authority on better delineation of the roles of the food department and food authority.	Ongoing	All provinces especially Punjab	X	X	X	X	X
5.2	Encourage better funding for food fortification oversight							
	Help the food authorities/departments to identify scope of work and associated costs for inclusion in TMISP.	Specific	All provinces		X	X		
	Develop stronger linkages between food authorities/department with the planning and finance department	Ongoing	All provinces	X	X	X	X	X
5.3	Build public sector capacity to monitor food fortification							
	Work with the provincial food authorities/departments to design an affordable and feasible monitoring and compliance plan.	Specific	All provinces	X	X			
	Ensure that at least one person per district is formally specified by food authorities/ departments to continue functions performed by FFFs.	Specific	All provinces	X				
	Develop a pool of master trainers in the food departments and food authorities	Specific	All provinces		X	X	X	
	Provide refresher training for provincial and district staff once inspections become regular	Specific	All provinces			X	X	X

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Connect food department/ authorities with NIFA and explore continued supply of RTKs	Specific	All provinces	X				
5.4	Provide MIS support for monitoring of fortification							
	Identify the MIS priorities of food authorities/ and food departments	Specific	All provinces	X				
	Assess how FortIS or another system could meet these needs	Specific	All provinces	X				
	Implement the recommendations	Specific	All provinces		X	X	X	X
5.5	Hand over in-country premix quality assurance							
	Support either the food authorities or PSQCA to take on the quality check function	Specific	All provinces/ Federal			X	X	
5.6	Strengthen the district governments' strategic commitment to food fortification							
	Engage and build relationships at the highest level in districts	Ongoing	All provinces	X	X	X	X	X
	Engage with PFMA to enable better participation in DMAC meetings by FFP	Ongoing	Punjab	X	X	X	X	X
	Step up engagement with the P&D department to encourage it to use DMAC more effectively to engage the district stakeholders.	Specific	Punjab		X			
	Where DMAC does not exist or is not fully functional work with P&D to set up stakeholder committees	Specific	All provinces			X	X	
	Form similar committees in some priority districts	Specific	KP	X	X			

S.NO	Activities	Action	Level	2019	2020			
				Q4	Q1	Q2	Q3	Q4
	Use the AAP for engagement at district level	Ongoing	Sindh	X	X	X	X	X
5.7	Hand over the programme knowledge base							
	Hand over research tools, protocols etc	Specific	All provinces		X			
	Establish an online resource on the FFP website	Specific	All provinces		X			
	Develop online tutorials	Specific	All provinces			X	X	
	Disseminate online resources	Specific	All provinces			X		
	Hand over the resources to the nutrition cell of the Ministry of Health	Specific	All provinces				X	X

7. Annexes

Annex 1: Terms of reference

Development of a Sustainability Focused Exit Strategy for the Food Fortification Programme (FFP)

1. Background

In order to combat micronutrient malnutrition in Pakistan, the Food Fortification Programme (FFP) designed and funded by the UK Government's Department for International Development (DFID) is being implemented for a period of five years (2016-2021). The programme is being implemented by Mott MacDonald and Nutrition International in collaboration with key government departments at National and Provincial level and with industry associations, namely the Pakistan Flour Mills Association (PFMA) and Pakistan Vanaspati Manufacturers Association (PVMA). FFP supports industry to adequately fortify wheat flour and edible oil/ghee in Pakistan provides advice to the Government to improve the food fortification regulatory system, helps to raise public awareness and conducts operational research.

The programme aims to fortify wheat flour produced at commercial roller mills with iron, folic acid, vitamin B12, and zinc, as well as edible oil/ghee with vitamins A and D. Currently in the third year of its implementation, it is expected that FFP will reach more than 24% of the population of Pakistan to consume fortified wheat flour, with over two-thirds using fortified edible oil and ghee.

Impact	Reduction in undernutrition with a focus on micronutrient deficiencies in women and children
Outcome	Improved access and consumption of nutritious food for women of childbearing age and children to improve nutritional status
Outputs	1. Food fortification programme to ensure a sustainable supply of high-quality wheat fortified with iron, folic acid, Zinc, and Vitamin B-12
	2. Food fortification programme to ensure a sustainable supply of high-quality edible oil /ghee fortified with Vitamin A and D
	3. Raised public awareness of the nutritional benefit of fortified food
	4. Contribution to evidence and research for food fortification (TA)
	5. Improved Government commitment ownership and action to support food fortification

The objective of the programme is to contribute to the improved nutritional status of people in Pakistan. The log frame (table 1) shares the impact, outcome, and outputs of the programme. FFP will achieve this through sustainably improving access to and consumption of fortified wheat flour and oil/ghee. Consequently, this programme seeks to reduce iron deficiency anemia by a third, and vitamin A deficiency in women and children by a quarter. Population sub-groups of particular priority to the FFP are ⁷

1. Women of reproductive age (15-49 years), with an emphasis on pregnant and lactating women;
2. Children under 5 years (6-24 months; and 2-5 years);
3. Adolescent girls (10-14 years)

⁷ Women, adolescent, and young children in the poorest two wealth quintiles are a specific priority

The approach towards achieving FFP objectives is participatory and inclusive and involves coordination with a wide range of relevant partners including national, provincial and district government departments, donors and donor programmes, UN agencies and non-governmental actors. This helps to avoid duplication of effort and to maximize synergies and effectiveness whilst minimizing transaction costs and supporting good value for money and local ownership leading to sustainability.

2. Background to this assignment

The programme recognises that sustainability of fortification beyond its own life is essential to achieve the intended outcomes and impact (see log frame). Therefore, exiting in a sustainable manner must be a major focus of the programme in its remaining 20 months. This warrants a specific strategy.

The presentation of midterm evaluation shared by OPM indicated that a detailed analysis of the factors likely to affect the continuation of the programme were assessed and analysed. This included an analysis of the availability of resources, the extent of capacity and motivation to continue fortification, the strength of linkages between public and private sector actors and consumers, and the opportunities and risks presented by external factors. It also included how the programme has addressed stakeholder engagement and reflected on interventions intended to promote sustainability. It also identified programme elements that could cause problems with sustainability.

The key areas for attention by the programme within an exit strategy that could improve sustainability include:

- Strengthening public and private sector sense of ownership of the programme
- Strengthening mechanisms of mutual accountability and reporting
- Strengthening mechanisms to raise the necessary resources to continue activities
- Addressing the underlying weak enabling environment for food fortification including establishing resources and capacity
- Establishing motivation and incentives to fortify adequately
- Strengthening linkages between all stakeholders
- Embedding fortification of wheat flour and edible oil and the political and economic systems

Based on the presentation shared by OPM it was agreed by the programme team that OPM has correctly identified the key areas for attention and provided a valuable analysis of issues and challenges, which is the first step towards developing an exit strategy. However further work is needed to establish, in conjunction with stakeholders, exactly how these areas are to be addressed effectively.

3. Objective of the assignment

The objective of this assignment is to develop a comprehensive sustainability focused exit strategy for FFP that captures what and how the programme should deliver over the remainder of its life, to ensure that programme achievements are sustained beyond the end of funding.

4. Scope of work

The sustainability focussed exit strategy will be applicable to all provinces i.e. Punjab, Sindh, KP and Balochistan, as well as Federal level. It should also:

- Cover all the programme's strategic approaches and associated activities needed to ensure sustainability between now and programme end.
- Be developed in close consultation with FFP team members who will be delivering the approaches and activities.
- Be developed in close consultation with stakeholders to ensure that approaches and activities are likely to be effective.
- Include a work plan to guide inputs and enable monitoring by the programme management team.

The sustainability focussed exit strategy will not necessarily cover the entire range of activities being carried out by the programme so should not be regarded as an exit strategy for the programme as a whole.

5. Approach / Methodology

Note: inputs specified here are specifically for the National Consultant. Inputs by the Team Lead will focus on reviewing deliverables and ongoing oversight and engagement, as needed.

The team will:

1. Carry out a detailed analysis of the whole of the Midterm Evaluation Report of FFP to identify the key areas which will need to be the focus of the exit strategy and to capture the approaches proposed in the report (2 days).
2. Prepare a short summary of the key areas and approaches (1 day).
3. Conceptualize the assignment and prepare a draft inception report. It should include the summary above, a methodology including a detailed account of how the assignment will be delivered, a timeline, specific deliverables and a report outline (2 days).
4. Consult with the FFP team on the inception report (0.5 days).
5. On the basis of feedback from the FFP team, finalise the inception report (0.5 days).
6. Develop and agree with the FFP team an approach to consultation with the programme team and stakeholders (2 days).
7. For each key area develop a detailed draft of potential approaches and possible activities (where feasible) for consultation with the programme team (3 days).
8. Consult with the FFP team on each of the key areas and potential approaches to agree preferred options. People to be consulted could include but not be limited to the national team lead, technical director, national programme managers, monitoring and evaluation manager, provincial managers and field fortification facilitators (up to 8 days).
9. Based on the agreed key areas and approaches, develop material for consultation with external stakeholders (2 days).
10. Consult with external stakeholders. These could include but not be limited to NFA/PFAs, PFMA/PVMA, food departments and food authorities, and health and education departments. FFP team members should be involved in this consultation process to enable detailed discussions of options. All participating provinces and the federal level should be consulted (12 days).
11. Write up findings from consultation (4 days).
12. Consult with the FFP team on findings from the consultation with external stakeholders to agree key areas, approaches and activities (up to 3 days).
13. Draft the exit strategy, including an operational plan containing detailed activities and timelines for each key area (4 days).
14. Finalise the exit strategy based on feedback from the FFP team (2 days).

6. Deliverables

1. Final inception report including potential approaches and possible activities (where feasible) for consultation with the programme team with work plan and identified list of stakeholders (24th June 2019)
2. Material for consultation with external stakeholders (19th July 2019)
3. Draft exit strategy and operational plan (30th August 2019)
4. Final Strategy after feedback (14th September)

7. Timeline

It is envisaged that the assignment will commence by 12th June 2019 and will be accomplished by 14th September 2019

8. Implementation arrangement

The team will consist of two members - Team Lead Health Systems Specialist (an international consultant) and a Public Health Specialist (a national consultant). The Team Leader (UK based) will have oversight of the assignment. The national consultant will carry out the consultations and writing up.

9. Level of effort

International health systems specialist. Up to 6 days.

Public Health Specialist (National): Up 45 working days

Annex 2: Literature review

Findings related to sustainability - OPM Midterm evaluation of FFP programme

The primary purpose of the midterm evaluation was to assess the FFP programme's progress using an independent perspective, to understand whether the programme is being implemented as envisioned, and to assess its sustainability. Based on the findings, the midterm evaluation proposed suggestions to inform potential improvements to programme implementation.

- The key recommendations of the midterm evaluation are summarised below
- Engagement with the industry associations PFMA and PVMA should be strengthened.
- The local presence of the FFPs at the district level and their ongoing engagement with the mills should be fully capitalized.
- Public sector engagement should be strengthened by extending the engagement beyond the immediate sector stakeholders.
- Concerted and focussed efforts should be put in to ensure the promulgation of mandatory wheat flour fortification legislation.
- The capacity building support to the Food Authorities should be closely aligned with their operations for it to remain relevant and sustainable.
- Efforts should be made to further improve the quality of FFPs engagement at the district level.
- A comprehensive exit strategy in consultation with the food alliances and its members should be developed.
- The programme should adopt more sensitivity in its approach to operations taking into account the differing political economy of wheat flour and oil/ghee sub-sectors.
- To further clarify who the audience for the public awareness campaign is and improve targeting. Make the public awareness raising and demand generation into a joint effort involving the private, public and civil society sectors.

Findings from internal FFP Advocacy Review

The FFP programme extensively revised its Theory of Change and included the demand side and pathways of change to further the achievement of project objectives. The demand of fortified food can play a critical role in sustaining the food fortification. The changes to the Theory of Change were made in October 2018 based on the recommendations of DFIDs annual review and the evidence available from studies conducted by GAIN (FACT) and the programme (District rolling study). The demand of the fortified food can play a critical role in sustaining the food fortification. FFP conducted an internal Advocacy Review in May-June 2019, that focused particularly on reviewing advocacy activities targeting mills/industry and consumers, given the important interlinkage between supply and demand. This internal Advocacy Review is based on the review of the two recent programme studies

(1) Advocacy and Awareness study (2) Rolling District Study II and the Mid Term Evaluation, and further supplemented by discussions with the FFP team and stakeholders.

With regards to the overall approach, the internal review proposed to have a broad-based awareness strategy, rather than focussing/targeting the areas with supply of fortified wheat flour. The premise for this proposal was based on the strong buy-in from PFMA and the urgent need to stimulate the supply side via the demand side.

The internal review reflected the various activities that were carried out under the advocacy and awareness component of the FFP programme since its inclusion in Theory of change in October 2019. The key activities and their strengths/weaknesses as reflected by the review are provided below

- Contract with Civil Society Organisations (CSOs): Three large CSOs (One in each province) were contracted to undertake a general launch event in each roll-out district, plus one session each with School Health and Nutrition Supervisors (SHNS), Lady Health Supervisors (LHS) and market traders.

Mass Media:

- **Logos and Character** - The advocacy and awareness study found that although awareness of the campaign character is so far fairly low, however, the campaign character was adequate as it was easily interpreted by the target audiences as someone who is healthy, powerful and full of energy. Awareness of fortification logos and messaging as a whole were more widely recognised. The Rolling District Study II found that the labelling of the products was incorrect and in many instances the products labelled as fortified were not actually fortified.
- **TV commercials**: The internal Advocacy Review reinforced the Mid Term Evaluation suggestion that the messages should not target pregnant and lactating women only, but rather all women of reproductive age (WRA) and proposed to edit the TV Commercials in this regard.
- **Billboards** – The internal Advocacy Review reinforcing the external advocacy and awareness study reflected that one billboard per district is not sufficient to create an impact on the awareness levels of the community.
- **Mobile Messaging** - FFP has used mobile messaging as a cost-effective means to reach out and communicate messages to LHSs. It is important that FFP collaborates with IRMNCH programme and ensure that this channel continues to be available after the FFP programme ends. This will provide a useful way of mainstreaming messages through other platforms as part of a sustainability strategy.

Engagement with industry:

- **Food Fortification Facilitators (FFFs)** – FFFs play a pivotal role in establishing/maintaining positive engagement with mills, however it is undermined by their dual responsibility of engaging with the Food Authorities/department at the same time. The Mid Term Evaluation proposed to avoid this perceived conflict of duties and has proposed one or two FFFs per province specifically designated to deal with the Food Authorities.
- **Industry Awards** – For the oil mills in Punjab, the awards were a success, creating interest and a sense of pride in performing well. No such awards are being held for wheat flour mills, however, the internal Advocacy Review team discussed the idea with PFMA, and it showed cautious interest and a desire to be included in setting parameters for the awards.
- **PFMA/PVMA** – The relationship with the PFMA and the flour mills has been very delicate. The stoppage of fortification by numerous mills during the period November 2018 to March 2019 in year 3, exhibited the power of the PFMA and large mills. The wheat flour industry and the PFMA had reservations with regards to FFP's approach to mobilise government to ensure mill enrolment and fortification of wheat flour under the programme. After extensive meetings FFP responded effectively to seek to resolve the issue considering the complex political economy around wheat flour fortification. FFP recalibrated the strategy of engagement with PFMA beginning in February 2019 and after several months of active engagement and agreements this resulted in a clearly defined approach based on a joint partnership between the FFP and the PFMA leading to more positive changes. The MoU with PFMA was revised and reservations addressed without undermining the

objectives of the programme. FFP has further strengthened the relationship with PFMA by engaging them in key consultation and sharing of reports and recommendations across several areas of the programme and on specific activities related to demand creation, as PFMA has strongly advocated for demand creation and the use of National TC campaigns in the absence of price adjustment by Government to adjust for fortification costs.

- The relationship of FFP with the PVMA has been generally very positive and oil mills displayed active engagement with the FFP programme and as further reflected by their interest and participation in industrial awards and other programme activities.
- MoUs with Large Consumers – FFP has successfully deployed a strategy to engage with large consumers/institutional buyers and has commenced separately with large retail outlets to sign MoUs with them to stock fortified products as standard practice and thus boost demand. FFP is in process of identifying more of the large consumers and expanding the base for this intervention.

Based on the findings of the internal Advocacy Review, following recommendations were put forth

- Broaden TV media purchase to a national campaign on widely watched channels such as PTV/Geo to increase visibility. Develop new TV spots which differentiate oil and wheat.
- Engage a Press and Public Relations consultant to sensitise journalists, place positive news stories and propose PR strategies.
- Change the strategy for engaging Market Traders (wholesalers, traders, retailers), conducting face to face sessions more intensively in geographically selected areas, for example in the poorest districts/tehsils, and abandoning them in other areas.
- Continue to advocate on price to allow millers to pass on the costs of fortification with a concurrent push for the legislation requiring all flour to be fortified.
- Continue and scale up the use of MoUs with large consumers.
- Expand Industry Recognition Awards to wheat flour millers to recognise and reward millers for their performance.
- Step up efforts to check products are correctly labelled as fortified with the universal logos
- FFP should reconfigure its advocacy support team to support the recommended changes in advocacy activities in phase II.
- Requests for proposals from the CSOs for the 50 new districts should explicitly seek ways of targeting messages to the poorest, using existing platforms. It is recommended that the same CSOs be contracted for refresher activities in the 50 districts already covered, to ensure the campaign remains visible and active.
- FFP should substantially increase the IEC material provided to the LHWs/LHSs to ensure household distribution.
- FFP should trial spot test experiments in schools as an innovative interactive activity for children, especially targeting the poorest districts / tehsils with the worst nutritional deficiencies
- FFP should use the FortIS database to provide real time monitoring data with which all advocacy activities can be tracked to see if they lead to any uplift on the supply side.

Findings from Rolling District Study II

Rolling District Study II (RDS II) was conducted with the objective to assess relevant aspects of the target population's food purchase and consumption habits, awareness and perception about food fortification and food economics - primarily with reference to fortification of wheat flour and Ghee/cooking oil. RDS II covered eight

districts including four districts from round I (RDS I), for which a follow-up survey was conducted; and four additional districts for which a baseline was established.

The key findings of the RDS II are provided below

- Awareness about fortification of wheat flour appears to have improved as 97% respondents considered that wheat flour can be fortified in RDS II as compared to 71% in RDS I. Similarly, Ghee/cooking oil is also seen by a greater proportion to be fortified – 73% as compared to 67% in the first round. However, top-of-mind awareness about food fortification among Household respondents was recorded at 11.2%, based on an unaided question added to RDS II survey (was not asked in RDS I). Among the foods most widely reported as first mentions at 'Food Fortification', Wheat Flour (26.8%) was most frequently cited.
- Most of the Households surveyed had never heard or seen any promotion about fortified wheat flour (67.7%) or Ghee/cooking oil (64.5%). Among those who had heard or seen any promotion about fortified food, analysis of the sources from where the respondents got to learn about food fortification of wheat flour and Ghee/cooking oil, TV, word of mouth from people in the network, family and friends remained the top cited sources, for both products and rounds.
- The household consumption of wheat flour was expectedly high (95.4%). With regards to source of wheat flour 36.6% of households consumed packaged, branded wheat flour which they bought from the market while nearly 58.9% reported using unbranded chakki atta (own wheat grains or buying directly).
- The concept of fortification is broadly acceptable with most people willing to buy fortified products, and resistance observed in less than 3% of households and retail users. However, only 2 out of 360 wheat flour samples taken from retail suppliers were found to be fortified, and none of the business retail users' or households' samples were fortified.
- For Oil and Ghee 85.4% of the samples checked were found to be adequately fortified, and a relatively small proportion (6.1%) of households buying loose, unpackaged oil or ghee.
- The RDS II study found an average household consumption of 1.32 kg of wheat flour per day or about 40 kg per month. On a per capita basis this comes out to be 96.4 kg, using a mean household size of 4.98 members. The per capita cost is estimated at PKR 3,359.

Findings from Millers' incentive study

This study was conducted in July 2018 with the intention to determine the importance of a premix subsidy, and other types of incentives for millers across Pakistan, and accordingly determine if these incentives are framed and executed at the right level. The study employed quantitative methodology with a sample size of 100 flour mill owners (that were not registered with FFP) across four provinces of Pakistan. The study was designed in two parts:

- Discrete Choice Experiment; conducted in order to evaluate the relative importance of the different types of incentives offered to millers as factors in their decision making.
- Questionnaire based inquiry including a behavioural scorecard (Capability, Opportunity and Motivation), direct preference questions and a demographics section; aimed at finding the different behavioural barriers for millers to fortify their flour.

The key findings of the study reflected that the level of importance that millers give to different attributes of incentive packages (equipment, marketing, pre-mix subsidy) depends highly on whether the government regulates fortification or not. In scenario where fortification is regulated, Millers prefer marketing over pre-mix subsidy and equipment. However, in the non-regulated scenario, subsidy is relatively most important, then comes marketing and equipment. Millers do not appear to differentiate between pre-mix subsidy levels; the subsidy was

to be offered at a diminishing rate (options were given for four levels) for 2 years after which the cost will be shifted on the consumers.

Some of the major behavioural barriers to fortification at the Mills were found to be: lack of the necessary skills to fortify flour; lack of peer support around fortification; inability to fit fortification into current routines; and lack of clarity in planning for fortification.

The sanctions for non-compliance perceived by the millers, from most to least effective, were: Mills losing access to quota; mills that are shut down for 3 months; mills fined equivalent to 10% of their annual turnover; and mills highlighted in the local press.

Based on the findings, the study concludes that incentive of free marketing carries more weight than the rest, in view of the lack of knowledge consumers have regarding the programme. The second most important output from the results is regarding the importance of regulation as millers fear to compete with the other mills while taking a risk of introducing a new product that has no awareness among consumers. This fear can only be overcome if there is legally binding compliance, and a properly executed marketing campaign.

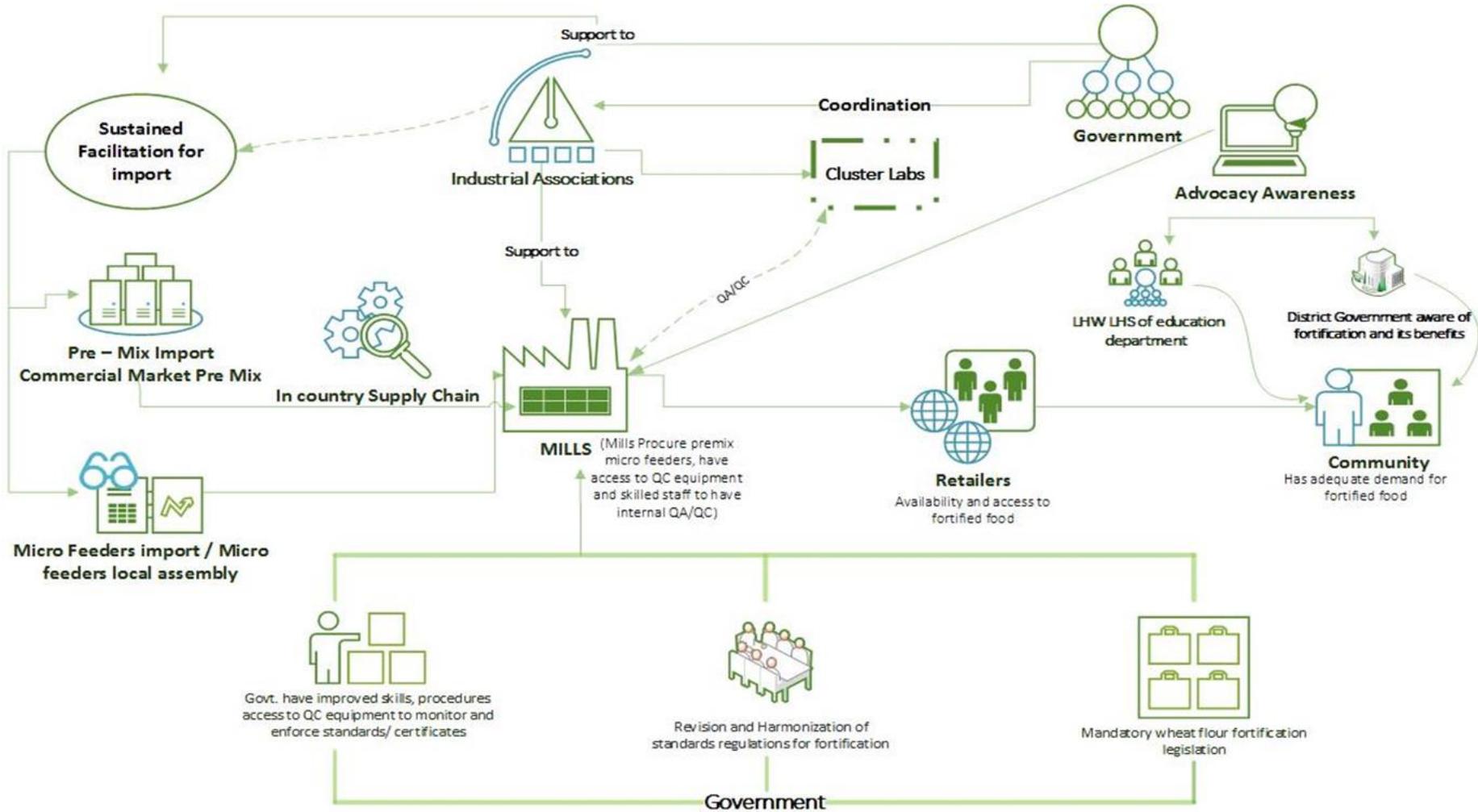
Annex 3: Planning Matrix for exit strategy

QUESTION: WHAT PARTS OF YOUR PROGRAMME AND WHICH OF ITS OUTCOMES DO YOU WANT TO SUSTAIN?			
COMPONENT	KEY QUESTIONS	GUIDING PRINCIPLES	CHALLENGES
1. Plan for exit	<ul style="list-style-type: none"> • How will we “phase-down” our programme? Will we “phase out” activities or hand them off to a local actor? • What is the appropriate time line? • How will we know we are on track for phase out? • What indicators or benchmarks will we use? How will we monitor them? • What are the specific action steps to reach the benchmarks? 	<ul style="list-style-type: none"> • Flexibility • Programme review and revision • Transparency: especially regarding programme limitations and funding cycle • Participation: include FFP staff, public sector stakeholders (NFA, PFA, Food department/ authorities, health and education department) and the private sector (PFMA, PVMA) 	<ul style="list-style-type: none"> • Balancing firm commitments with flexibility as conditions change • Allowing adequate time to develop capacity, while working within the programme funding cycle
2. Partnerships and Local Linkages	<ul style="list-style-type: none"> • With what types of organizations should we partner with regards to programme exit? • What will our partners bring to the partnership? What can we offer? • How will the partnership prepare for exit? • How can the partnership help facilitate a successful exit? 	<ul style="list-style-type: none"> • Diversity • Complementarity: consider all possible partners, build in coordination • Clear and common goals 	<ul style="list-style-type: none"> • Aligning the needs and objectives of diverse stakeholders • Supporting local partners without building dependency

3. Local organizational and human capacity	<ul style="list-style-type: none"> • What capacities are needed? • What capacities already exist? • For which capacities a refresher training is required/or training with modified approach? • What indicators will we use to monitor progress in building these capacities? 	<ul style="list-style-type: none"> • Build on existing capacity whenever possible • Implementing agency/Donor and partners model appropriate organizational & individual behaviours • Create environments that support new behaviours and skills • Monitor progress 	<ul style="list-style-type: none"> • Designing a monitoring system to track capacity building • Providing appropriate, sustainable incentives • Retaining experienced staff in programme areas
4. Mobilize local and external resources as an Exit Strategy	<ul style="list-style-type: none"> • What inputs will we need to maintain services? • Who can provide these inputs? To what extent are they available locally? Externally? • Which benefits of the programme can be sustained without continued inputs? To what extent can the benefits be sustained without ongoing inputs? 	<ul style="list-style-type: none"> • Continue to progress toward sustainability, • Generate / procure? resources locally where possible • Increasingly, bring external resources under local control 	<ul style="list-style-type: none"> • Difficulty in finding adequate or available local resources • Sources of other funding may not buy-in to all of the original programme's objectives • Resisting the tendency to cover a lack of sustainability by simply finding a new donor to fund inputs
5. Stagger phase out of various activities	<ul style="list-style-type: none"> • What are the key elements of the programme? • Which elements are dependent on others? • What is the exit plan and timeline for the programme components? How will it be implemented? How will it be monitored? 	<ul style="list-style-type: none"> • Flexibility; the logical sequence for staggering phase out of various activities may change once consultation with external stakeholders is conducted 	<ul style="list-style-type: none"> • Sufficient time in programme cycle to start seeing the impact of activities in order to effectively transition to them
6. Allow roles + relationships to evolve and continue after exit	<ul style="list-style-type: none"> • What types of ongoing support would be most useful (e.g. advice, mentoring, TA) • How will such ongoing support be funded when the project finishes? 	<ul style="list-style-type: none"> • Prevent slippage of programme's results by re-entering if necessary 	<ul style="list-style-type: none"> • Availability of funding for ongoing support • Availability of programme staff who can focus sufficient time and energy on ongoing support

Annex 4: Overview of a sustained wheat flour/oil ghee fortification system

This reflects the key elements of the system and their role in Pakistan.



Annex 5: Guidelines for consultation with stakeholders

Consultation guide for Food Department/Food Authorities

1. Identification Particulars	
1.1	Name of Province
1.2	Name of respondent
1.3	Name of Organization
1.4	Designation
2. Consultation	
2.1	What is your role and responsibilities in Food department/ Food Authority?
2.2	Are you aware of the FFP programme? If yes, how frequently FFP engages with your department? In what areas has FFP provided support to your department?
2.3	In your opinion, what are the key factors that will ensure the sustainability of food fortification (Wheat flour and edible oil/ghee) in Pakistan?
2.4	In your opinion, what steps should be taken to expedite the enactment of mandatory legislation of wheat flour fortification in Pakistan?
2.5	In your opinion, what are the hurdles that need to be overcome to ensure enactment of mandatory legislation of wheat flour fortification in Pakistan?
2.6	In your opinion, how can the food department/authority play its role in bringing the PFMA on-board and address their reservations (if any) on the mandatory wheat flour fortification in your province?
2.7	In your opinion, what role can FFP play in addressing the apprehensions of PFMA regarding food fortification?
2.8	In your opinion, will the wheat flour fortification sustain without legislation mandatory wheat flour fortification in your province?
2.9	In your opinion, how important is the role of monitoring and enforcement in ensuring adequate food fortification?
2.10	In your opinion, can your department monitor and effectively enforce compliance with standards without the mandatory wheat flour fortification in place?
2.11	In your opinion, why is it important to delineate the roles of food department and food authorities for effective public sector management of wheat flour fortification in Punjab? How can it be done?
2.12	What are the capacity needs of your department to ensure effective public sector management of food fortification?
2.13	Would your department seek FFPs technical support for ascertaining the additional activities/any change in scope of work for public sector management of food fortification? Will it be helpful if FFP provides support in ascertaining the costs associated with public sector management of food fortification? Based on this cost ascertainment, is your

	department willing to seek additional funds from finance department to make them part of the regular budgets? If yes, how can FFP facilitate in seeking support from finance department? If no, why?
2.14	With regards to capacity building support, which capacities do you consider important for which a group of master trainers is established by FFP? In your opinion, such master trainer groups should be formally notified by your department to ensure their utility after the FFP programme ends?
2.15	Currently, the reference labs in Punjab has staff to operate HPLC and Spectrophotometer provided by FFP; what are departments plan to sustain this resource (probe whether they would prefer to take up the staff on their payroll or they have staff who could be trained on this or they would prefer a fresh induction)?
2.16	Would your department seek support in designing monitoring and enforcement plan which is financially and organizationally feasible? With your current staffing, what frequency of flour mill/edible oil/ghee mill is feasible for monitoring and enforcement (Monthly, Quarterly)?
2.17	Currently, FFP staff is involved in the field activities for support to food fortification at mills, do you think it is important to nominate a field level staff from your department who could spend time with the FFP staff in their performance of functions to build capacity and identify additional skill development needs? If no, why not?
2.18	In your opinion, which entity/department should be responsible for in-country premix quality assurance before it is being distributed to millers?
2.19	Currently, premix is being imported and distributed by two suppliers to the millers; will your department be willing to provide support to ensure sustained premix supply chain? If no, why? If yes, what capacity building support would you seek from FFP in this regard?
2.20	Is your department currently using an information system for the data from the field? If yes, what are the key information elements that are collected through the information?
2.21	Does your department feel the need to have an information system on food fortification? If no, why? If yes, what are the key elements of information you seek to gather through that system? Is your department willing to host this information system? What capacity needs do you foresee in this regard? Would you prefer integrating fortification information system into your current system (if available)?
2.22	In your opinion, in order for mills to fortify the wheat flour, how important is it to shift the cost of fortification from mills? What do you recommend in this regard (probe for the two options: Govt. providing subsidy on premix or the cost of premix being shifted to consumers)?
2.23	In your opinion, how important it is to have public awareness and advocacy for food fortification to sustain it in the long term? And why?
2.24	In your opinion, a broad based public awareness strategy through mass media campaigns would support the supply and demand side of the food fortification? If yes, how? If no, why?
2.25	Which government departments in your opinion, should be handed over following components of FFP programmes public awareness and advocacy intervention? <ul style="list-style-type: none"> • Mass media campaigns (National and Provincial) • Community outreach through LHSs and LHWs • Localized advocacy events, awareness of traders, retailers

2.26	In your opinion, how important it is to have the support of the district government in taking forward the food fortification? How can your department play its role in strengthening the district government commitment for food fortification?
2.27	In order to mainstream food fortification in regular budgets, What support FFP should provide your department to build stronger linkages with planning and finance departments?

Consultation guide for Pakistan Flour Mills Association / Pakistan Vanaspati Manufacturer Association

1. Identification Particulars	
1.1	Name of Province
1.2	Name of respondent
1.3	Name of Organization
1.4	Designation
2. Interview	
2.1	What is the mandate of your association?
2.2	What is the mechanism of interaction with the mill owners? How frequently do mill owners meet at this forum?
2.3	Have you heard of the Food Fortification Programme? If yes, can you explain, what is it and how has it been interacting with you?
2.4	In your opinion, what are the key factors that will ensure the sustainability of food fortification (Wheat flour and edible oil/ghee) in Pakistan?
2.5	In your opinion, what steps should be taken to expedite the enactment of mandatory legislation of wheat flour fortification in Pakistan?
2.6	In your opinion, what are the hurdles that need to be overcome to ensure enactment of mandatory legislation of wheat flour fortification in Pakistan?
2.7	In your opinion, how can the food department/authority and FFP play its role in addressing your reservations (if any) on the mandatory wheat flour fortification in your province?
2.8	In your opinion, will the wheat flour fortification sustain without legislation mandatory wheat flour fortification in your province?
2.9	In your opinion, how important is the role of monitoring and enforcement in ensuring adequate food fortification?
2.10	In your opinion, how important it is to have public awareness and advocacy for food fortification to sustain it in the long term? And why?
2.11	In your opinion, a broad based public awareness strategy through mass media campaigns would support the supply and demand side of the food fortification? If yes, how? If no, why?

2.12	<p>As part of engagement, what were your initial apprehensions regarding the FFP programme? How were they addressed?</p> <p>How is the current status of trust between FFP, Govt and private sector (PFMA, PVMA, mill owners)?</p> <p>How has FFP attempted to bridge the trust gap between the private sector and the Govt. departments? Were there any bottlenecks? How can they be overcome?</p>
2.13	<p>What is the frequency and mode of engagement of FFP with your association to coordinate implementation activities and report progress?</p> <p>How has been your interest in coordinating with FFP?</p> <p>When FFP interacts with you, Is Govt. (Food department/authorities) involved during these interactions? If yes, how? If no, why not?</p> <p>Will involving the Govt. in FFPs engagement with your association help in improving your relationship with Govt.? If Yes, how? If No, why?</p>
2.14	<p>In your opinion, has the food department and food authorities prioritized the food fortification? If yes/no, why do you think so?</p>
2.15	<p>In your opinion, how good is the current demand of the retailers to stock fortified wheat flour and edible oil/ghee?</p> <p>How can the demand of the retailers be improved?</p> <p>What is FFP doing in improving the retailer demand? Has it been effective? If Yes/No, how and why?</p>
2.16	<p>Is your association (PFMA/PVMA) and the Mill owners satisfied with the tapering premix subsidy? If No, why not?</p> <p>Will they continue buying the premix after the subsidy? If no, why not?</p>
2.17	<p>In your opinion, in order for mills to fortify the wheat flour, how important is it to shift the cost of fortification from mills? What do you recommend in this regard (probe for the two options: Govt. providing subsidy on premix or the cost of premix being shifted to consumers? How important will be the enforcement of mandatory fortification legislation in this scenario?</p>
2.18	<p>What initiatives has FFP taken in establishing linkages between Wheat flour / edible oil/ghee mills and equipment providers and premix suppliers? To what extent mills have been engaged in procurement of equipment and premix? What is the current status of linkages between mills and the premix providers? What are the gaps? How can they be overcome?</p> <p>Has FFP built capacity of mills to procure independently?</p>
2.19	<p>Are flour mills with currently installed microfeeders investing in keeping microfeeders functional and paid the extended warranty cost? If yes/no, why?</p> <p>Is the average cost of maintenance reasonable enough to be acceptable to mill owners? If no, why?</p> <p>Are the flour mills who haven't installed microfeeders willing to do so (pay extended warranty cost, invest in keeping microfeeders functional)? If yes/No, Why?</p>
2.20	<p>Have flour mills and edible oil/ghee producers allocated staff to conduct QA/QC processes?</p> <p>Has the mill staff been trained on QA/QC? Was the training useful? If yes, how? Did the training develop the skills required to perform QA/QC procedures?</p>

	<p>Were the mill staff provided guidelines/manuals for implementing QA/QC procedures? Have they applied the skills acquired during training and are currently performing the QA/QC functions? Is there any on-job support in this regard?</p> <p>Will the mill staff require refresher trainings in future? If yes, who is going to provide these trainings after the FFP programme ends?</p>
2.21	Is there a need to strengthen the skill of the mill staff to calibrate the microfeeders?
2.22	<p>Are the wheat flour and edible oil/ghee mills and PFMA/PVMA willing to fund the cluster labs and keep them functioning (Staff, Space, Maintenance)? Are there any commitments from Mills with the Govt. in this regard?</p> <p>How will the contribution mechanism be established and what will be the criterion for contributions (contribution proportionate to size of the mill)?</p> <p>Have they been trained in operating and maintaining these cluster labs?</p> <p>Have linkages between mills and the equipment/reagents providers for cluster labs been established? What are the gaps? How can they be overcome?</p> <p>Who will oversee/manage these cluster labs, who will maintain the funds? Who will be the adjudicator in times of conflict?</p>
2.23	Were the mill staff trained on forecasting the premix requirements? If yes, was the training effective in imparting the required skill? Are the mill staff currently forecasting the premix requirements? If no, why not?
2.24	<p>Were the mill staff/management trained on the procurement procedures required for procuring premix?</p> <p>Has the mill staff been involved currently in procuring premix to give them hands-on experience? How were they involved?</p>
2.25	In your opinion, what should be done to ensure that the mills continue fortifying wheat flour and edible oil/ghee once the FFP programme ends? What are the opportunities to ensure sustainability of wheat flour and edible oil/ghee fortification in Pakistan? What are potential threats to it and how can they be averted?

Consultation guide for Provincial Fortification Alliance

1. Identification Particulars	
1.1	Name of Province
1.2	Name of respondent
1.3	Name of Organization
1.4	Designation
2. Interview	
2.1	What is your role and responsibilities in NFA/PFA?
2.2	What is the mandate of NFA/PFA? What are the current activities of NFA/PFA to achieve its objectives?

2.3	Are you aware of the Food Fortification Programme Pakistan? How has NFA/PFA supported FFP programme or its objectives?
2.4	Who are the members of NFA and PFA? How frequently NFA and PFA meet? What issues related to food fortification and more specifically to wheat flour and edible oil/ghee fortification discussed at NFA/PFA? Are solutions to these issues proposed, and commitments from member departments (public and private sector) sought and whether action points agreed are followed up in the future meetings? Are PFMA/PVMA members of NFA/PFA? If not, why not?
2.5	In your opinion, what are the key factors that will ensure the sustainability of food fortification (Wheat flour and edible oil/ghee) in Pakistan?
2.6	In your opinion, what steps should be taken to expedite the enactment of mandatory legislation of wheat flour fortification in Pakistan?
2.7	In your opinion, what are the hurdles that need to be overcome to ensure enactment of mandatory legislation of wheat flour fortification in Pakistan?
2.8	In your opinion, how can the food department/authority play its role in bringing the PFMA on-board and address their reservations (if any) on the mandatory wheat flour fortification in your province?
2.9	In your opinion, what role can FFP play in addressing the apprehensions of PFMA regarding food fortification?
2.10	As part of engagement, what were the initial apprehensions of the private sector actors (PFMA, PVMA, Mills) regarding the programme? How were they addressed? Are you aware of the current status of trust between FFP, Govt and private sector? In your opinion, will dealing with the apprehensions of private sector (e.g. an understanding between FFP program and Mills, not to share the Mills production data, with Govt.) affect the transition to Govt. after the programme ends? In your opinion, how should FFP further bridge the trust gap between the private sector and the Govt. departments? If yes, elaborate? Were there any bottlenecks? How can they be overcome?
2.11	In your opinion, will the wheat flour fortification sustain without legislation mandatory wheat flour fortification in your province?
2.12	In your opinion, how important is the role of monitoring and enforcement in ensuring adequate food fortification?
2.13	In your opinion, can govt department monitor and effectively enforce compliance with standards without the mandatory wheat flour fortification in place?
2.14	In your opinion, why is it important to delineate the roles of food department and food authorities for effective public sector management of wheat flour fortification in Punjab? How can it be done?
2.15	Has federal and provincial Govts. regularly provided funds to NFA and PFAs respectively, to carry cross-sectoral coordination activities? If yes, were the funds sufficient enough to undertake these activities effectively? If no, why not?

2.16	<p>In your opinion, how important it is to have public awareness and advocacy for food fortification to sustain it in the long term? And why? Are you aware, how has the FFP programme sustainably linked the public awareness activities to existing government programmes? If yes, elaborate?</p> <p>Are the education and health departments committed to continue to disseminate the food fortification messages to the communities through SHNSs and LHSs after the FFP programme ends? What are the needs of the two departments in this regard?</p>
2.17	<p>In your opinion, a broad based public awareness strategy through mass media campaigns would support the supply and demand side of the food fortification? If yes, how? If no, why?</p>
2.18	<p>Which government departments in your opinion, should be handed over following components of FFP programmes public awareness and advocacy intervention?</p> <ul style="list-style-type: none"> • Mass media campaigns (National and Provincial) • Community outreach through LHSs and LHWs • Localized advocacy events, awareness of traders, retailers
	<p>In your opinion, how important it is to have the support of the district government in taking forward the food fortification? What in your opinion should be done to strengthen the district government commitment for food fortification?</p>
	<p>Is there any formal mechanism of communication and coordination between PFA and DMACs in Punjab? If yes, What is it?</p> <p>What role has FFP played in building/improving the communication and coordination between PFA and DMACs? What more could FFP do? Who is going to take that role after the program ends?</p>
	<p>Has the Govt. allocated funds for operations at public labs? If No, Why not? If Yes, are they adequate?</p>
	<p>Are you aware of FortIS (Fortification Information System)? If yes, was the platform of NFA/PFA used to engage the Govt. and other stakeholders in conceptualizing and development of this information system? Do you feel the need to have an information system on food fortification within the govt? If no, why? If yes, what are the key elements of information you propose to gather through that system? Will the govt. be willing to host this information system? What capacity needs for the govt. do you foresee in this regard? Would you prefer integrating fortification information system into govts' current information system (if available)? If yes, how and what are the bottlenecks? If No, why not?</p>
2.19	<p>What is the commitment of the FBR with regards to tax exemptions and duty rebate on equipment and premix? In your opinion, the tax exemptions would continue after the programme ends?</p> <p>Who will advocate / coordinate with FBR in this regard after the programme ends? Is NFA willing to take this role?</p>
2.20	<p>Is the PFMA/PVMA and the Mill owners satisfied with the tapering premix subsidy? If No, why not? Will they continue buying the premix after the subsidy? If no, why not?</p>
2.21	<p>In your opinion, in order for mills to fortify the wheat flour, how important is it to shift the cost of fortification from mills? What do you recommend in this regard (probe for the two options: Govt. providing subsidy on premix or the cost of premix being shifted to consumers? How important will be the enforcement of mandatory fortification legislation in this scenario?</p>

2.22	If I may ask you, in your opinion what key elements should be in place to ensure that the wheat flour and edible oil/ghee fortification continues after the FFP programme ends? What could be the potential enablers of FFP programmes sustainability? What could be potential threats to sustainability of FFP program?
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Consultation guide for Planning and Development department

1. Identification Particulars	
1.1	Name of Province
1.2	Name of respondent
1.3	Name of Organization
1.4	Designation
2. Consultation	
2.1	What is your role and responsibilities in Planning and development department?
2.2	Are you aware of the FFP programme? If yes, has FFP programme engaged with your department?
2.3	What is the allocation mechanism of development budget by Planning and Development department?
2.4	Is there any support for food department / food authority in the Annual Development Programme 2019-20?
2.5	In your opinion, does the development budget of the forthcoming year has the fiscal space to accommodate a development project/programme for food department / food authority?
2.6	What is the mechanism if the food department / food authority plans to have development project in the Annual Development Programme? How long does the process take? What can food department / food authority do to ensure a share in the development budget?

Consultation guide for Education and Health Department

1. Identification Particulars	
1.1	Name of Province
1.2	Name of respondent
1.3	Name of Organization
1.4	Designation
2. Interview	
2.1	What is your role and responsibilities in your current position?

2.2	Are you aware of the FFP programme? Can you briefly inform how has FFP programme provided you support?
2.3	Why do you think wheat flour and edible oil/ ghee fortification is important for health of the population?
2.4	Was your department consulted by FFP for developing its public awareness and advocacy strategy? If yes, did you provide any suggestions? What were they? What are the key elements of FFPs advocacy and awareness strategy? How does it envisage to ensure the sustainability of public awareness interventions? How does it reflect to hand over the FFPs public awareness interventions to Govt.?
2.5	Were your LHSs/LHWs/SHNSs trained on the wheat flour and edible oil/ghee fortification public awareness communication? If yes, how was the training? How did it help them communicate the fortification messages to the communities? Were these LHSs/LHWs/SHNs provided trainees guide for reference after the training?
2.6	Were the fortification related messages included in the LHWs/SHNSs curriculum? If yes, how has been the effectiveness of these messages in the communities? What is your perception, did it lead to increased awareness within communities?
2.7	What strategy would you propose regarding public awareness activities to ensure that the messages disseminated to communities lead to a sustainable change? What was learnt during these public awareness activities with communities? Did that contribute to revision of approach to ensure sustained change in consumer behavior? If yes, what revisions were made?
2.8	Are the education and health departments committed to continue to disseminate the food fortification messages to the communities through SHNSs and LHSs after the FFP programme ends? What are the needs of the two departments in this regard (financial, technical, human resource)?
2.9	Which government departments in your opinion, should be handed over following components of FFP programmes public awareness and advocacy intervention? <ul style="list-style-type: none"> ▪ Mass media campaigns (National and Provincial) ▪ Community outreach through LHSs and LHWs ▪ Localized advocacy events, awareness of traders, retailers
2.10	Are the current staff engaged by health and education department in public awareness have sufficient time to perform this additional messaging effectively? Will these two departments be willing to conduct refresher sessions with their staff on food fortification on their own? Do they have resources for that?
2.11	In the end, if I may ask what would be the critical factors that would lead to sustainable change in communities behaviour regarding use fortified wheat flour and edible oil/ghee? What role do you see of legislation and its implementation for mandatory fortification? Do you think consumer behaviour can change without enforcement of mandatory fortification?

Consultation guide for Finance Department

1. Identification Particulars	
1.1	Name of Province
1.2	Name of respondent
1.3	Name of Organization
1.4	Designation
2. Consultation	
2.1	What is your role and responsibilities in Planning and development department?
2.2	Are you aware of the FFP programme? If yes, has FFP programme engaged with your department?
2.3	What is the mechanism of ascertaining the annual budget of a department? Is it on historical basis? Can a department increase the annual budget compared to previous fiscal year?
2.4	In your opinion, does the total annual budget of your province for the forthcoming year has the fiscal space to accommodate an increase in the annual budget for food department / food authority?
2.5	What is the mechanism if the food department / food authority plans to include new budget heads and increase annual budget for their department? How long does the process take? What can food department / food authority do to ensure the required increase in their annual budget?

Annex 6: Consultation with FFP staff and stakeholders

The consultative process was conducted with FFP national and provincial key stakeholders (Provincial Fortification Managers) for their inputs to the proposed key areas and the approaches to exit strategy. The consultation with FFP staff also sought their inputs regarding approach to consultation with external stakeholders. The following key FFP staff were consulted:

1. Diane Northway - Project Director FFP programme
2. Stuart King - FFP Team Leader
3. Dr. Tausif Akhter Janjua - Technical Director
4. Mr. Munawar Hussain - National Fortification Manager Wheat Flour
5. Mr. Zameer Haider - National Fortification Manager edible Oil/Ghee
6. Ms Laila Rubab - Advocacy and awareness manager
7. Mr. Javed Iqbal - Monitoring and Evaluation Manager
8. Dr. Amber Elahi - Punjab Fortification Manager (Wheat Flour)
9. Dr. Bisma Imran - Punjab Fortification Manager (Edible oil/ghee)
10. Dr. Naveed Sarwar Bhutto - Sindh Fortification Manager (Wheat Flour)
11. Dr. Abid Jalaluddin Shaikh - Sindh Fortification Manager (Edible oil/ghee)
12. Dr. Safia Begum - Khyber Pakhtunkhwa Fortification Manager (Wheat Flour)
13. Khyber Pakhtunkhwa Fortification Manager (Edible oil/ghee)

The external stakeholders that are partners of the FFP programme were consulted to ensure approaches and activities under the exit strategy bear the intended results. The external stakeholders that were consulted in the three provinces (Punjab, KP and Sindh) included:

1. National Fortification Alliance (NFA)
2. Provincial Fortification Alliances
3. Pakistan Flour Mill Association (PFMA)
4. Pakistan Vanaspati Manufacturers Association (PVMA)
5. Food authorities
6. Food department
7. Planning and Development department
8. Health department
9. Education department
10. Finance Department

