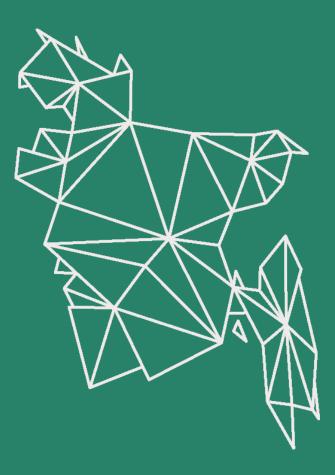
Report



Opening the policy space: the dynamics of nutrition policy making in Bangladesh

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Development Research Initiative (dRi)



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National Information Platforms for Nutrition (NIPN) is an initiative of the European Commission supported by the United Kingdom Department for International Development and the Bill & Melinda Gates Foundation. The initiative aims to strengthen national capacity to manage and analyse information and data from all sectors which have an influence on nutrition and to disseminate and use information so as to better inform the strategic decisions countries are faced with to prevent undernutrition and its consequences. A Global Support Facility has been set up by the European Commission to coordinate the NIPN initiative, managed by the Agrinatura alliance and hosted by Agropolis International.

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RECOMMENDED CITATION

Shahan, Asif Mohammad & Jahan, Ferdous. *Opening the policy space: the dynamics of nutrition policy making in Bangladesh*. Montpellier, France: Agropolis International, Global Support Facility for the National Information Platforms for Nutrition initiative. 2017.

PUBLICATION DATE

September 2017

The full report can be downloaded here: http://www.nipn-nutrition-platforms.org/IMG/pdf/nutrition-policy-making-bangladesh.pdf

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List of abbreviations

BDT	Bangladeshi Taka		
BNNC	Bangladesh National Nutrition Council		
CIDA	Canada International Development Agency		
DFID	United Kingdom Department of International Development		
DHS	Demographic and Health Survey		
FAO	Food and Agriculture Organisation		
GoB	Government of Bangladesh		
HNPSP	Health, Nutrition, Population Sector Programme		
MoHFW	Ministry of Health and Family Welfare		
NFNP	National Food and Nutrition Policy		
NGOs	Non-Governmental Organisations		
NNP	National Nutrition Policy		
NPAN	National Plan of Action for Nutrition		
UNICEF	United Nations International Children and Education Fund		
USAID	United States International Development Agency		
USD	Dollars of the United States		
WFP	World Food Programme		
WHO	World Health Organisation		



Introduction

When Bangladesh gained independence in 1971 it was considered to be one of the most chronically food-deficient countries in the world. However over the last four decades the country has achieved significant success in this regard. As of 2010, the average per capita energy intake was estimated to be 2,318 kilocalories per day, which was higher than the minimum average requirement of 2,122 kcal per day (1). At the same time, the country's performance in terms of ensuring nutritional outcomes for its population has also gradually improved. Until the mid-1990s Bangladesh was considered to be an 'Asian Enigma' because the country's "stunting rates (...) were significantly higher than in sub-Saharan Africa, where people were both poorer and less educated than in South Asia" (1). In the Bangladesh Demographic and Health Survey of 1996-97 it was recorded that 55% of children aged 0 to 5 years were stunted, while 18% were wasted and 56% were underweight (2) (the figures corrected for the new growth references are 59.7% stunted, 20.6% wasted and 52.5% underweight¹). However, in the two decades since then there has been a sustained reduction in child undernutrition so that by 2014, 36% of children were stunted, 14% were wasted and 33% were underweight (3). In a recent article, Headey et al. considered Bangladesh's success as the 'Other Asian Enigma' and noted that between 1997 and 2007 the country recorded "one of the fastest prolonged reductions in child underweight and stunting prevalence in recorded history" (4).

It is important to note that whereas reducing hunger has always been a key issue for the Government of Bangladesh (GoB), until the mid-1990s, limited attention was paid to addressing the problem of undernutrition. The country adopted its first nutrition policy in 1997, the National Food and Nutrition Policy, and developed its first comprehensive national Nutrition Plan of Action (NPAN) in order to implement the policy. If we consider the timeline, we can argue that the Government's policy formulation and focus have played a pivotal role in improving the nutritional status of children under five. As we will explain later, in line with the first nutrition policy of 1997, the Government of Bangladesh undertook a number of nutrition-specific interventions that aimed to improve the nutritional status of children and mothers. However, as studies that have attempted to analyse the success of Bangladesh have argued, this success has been achieved without any significant contribution from national nutrition Programme 1995-2004 and the subsequent National Nutrition Programme suggest, at best, a modest impact on nutrition outcomes (...) the BINP has not achieved its objective to reduce child malnutrition at a population level" (4). Instead, studies gave credit to the following factors:

- Wealth accumulated by households has been considered to be the most effective factor as this captures "the effects of economic growth, poverty reduction and improvement in food security". Wealth is an indicator of households' access to resources which, in turn, may have a positive impact on nutritional status (1,5).
- According to these studies, Bangladesh's success in terms of ensuring access to education has also played a pivotal role in improving overall nutritional outcomes. These studies argue that significant developments in mother's education and a specific focus on ensuring access to education for girls has eventually raised awareness about nutrition which, in turn, has improved overall nutritional outcomes.
- The emergence of innovative community-based service delivery has also played an important role as this approach allowed the country to achieve significant improvements "in a range of health indicators, particularly child mortality" even though public spending on health has remained low (1,6).

¹Joint Malnutrition Estimates (2016). <u>https://data.unicef.org/wp-content/uploads/2016/09/JME_August_2016.xlsx</u>



- The country has also shown remarkable improvements in access to sanitation especially due to the important role played by Non-Governmental Organisations (NGOs) in introducing campaigns such as the 'right to water and sanitation'. Whereas this particular factor has not directly improved nutrition, it has played an important role in preventing malnutrition due to diarrheal disease.
- In addition to the factors mentioned above, studies have also pointed out the impact of two other issues: rapid growth in agriculture and the increasing empowerment of women. Of these two, the latter is closely related to improved access to education which has empowered women to make decisions in households that improve nutritional outcomes.

It is important to note that whereas the Food Security and Nutrition Policy of 1997 for the first time brought the issue of nutrition to the forefront, this particular policy did not consider undernutrition as a multi-sectoral problem and specifically focussed on nutrition-specific interventions. However, as indicated above, Bangladesh's success in the issue of nutrition has become possible due to a number of factors which are not directly related to nutrition, while other policies, such as the Compulsory Primary Education Act (1990), the National Food Policy (2006), the National Agriculture Policies (1999 and 2012) and the National Women Policy (2010), have all made a significant contribution. The need for a comprehensive Nutrition Policy that captures both nutrition-specific and nutrition-sensitive interventions was thus felt to be needed from the mid-2000s and from this perspective, the National Nutrition Policy of 2015 is a step in that direction.

In this paper, we attempt to provide a historical overview of the process of nutrition policy development in Bangladesh and, while doing so, we have tried to understand:

- How the National Nutrition Policy (NNP) of 2015 is different from previous policy and programmes;
- What are the specific areas and components of the NNP, 2015?
- Why the GoB has decided to develop this particular policy at this point in time?
- What types of information, reports, documents, and scientific research have been considered in developing the NNP, 2015?
- And how inclusive the policy process was?

In other words, the paper makes an effort to analyse the process by which the NNP has been developed, formulated, and adopted. As the second National Plan of Action for Nutrition (NPAN-2) is still in progress, this paper does not make an effort to explore the success of the new policy. Rather, it has made a limited effort to understand the process by which the implementation plan is being devised. The findings are divided into two main sections. The first section describes the development of the policy process in the nutrition arena from a historical perspective. It analyses the key components of the National Food Security and Nutrition Policy of 1997; identifies the key limitations of nutrition policies and programmes; provides an overview of the new National Nutrition Policy of 2015 and identifies areas where this policy is different from the previous one. The goal of this section is to point out the changes that the GoB has adopted in the new policy and to set the stage to explore why these changes have happened. The second section develops a theoretical framework by applying Kingdon's Multiple-Stream Model to analyse in the context of Bangladesh the policy process of the NNP of 2015 (7). It then analyses the primary data collected by reviewing documents and by means of interviews in the light of this framework, and explains the process by which the NNP of 2015 and the NPAN-2 are being developed.



Methods

Desk Review

An extensive desk review exercise was carried out to understand the NNP (2015) and identify its relevance to other policies and plans. An assessment of the current governance of nutrition and the strategies for achieving policy objectives was conducted. In addition, we reviewed the cross-cutting issues related to policy, monitoring and evaluation plans, to nutrition specific programmes or interventions, and the responsibilities of the agencies involved in implementing the policy.

Key Informant Interviews

In-depth interviews with stakeholders involved with the NNP (2015) were conducted to understand how the policy was developed, how it allowed different agencies to participate, and how different types of information were incorporated in developing the policy. Twelve in-depth interviews were conducted with informants from academic institutions, development partners, and government and non-government agencies that are involved with health and nutrition research and development.

Content Analysis

Content analysis was employed to analyse and summarize the data and information collected through the desk review, and from key informant interviews. This exercise involved clustering of the information into themes to answer the research questions.



Part 1: Development of nutrition policy and programmes in Bangladesh – a historical perspective

1. Early years of the development of the nutrition policy

1.1. The National Food and Nutrition Policy, 1997

The nutrition policy of Bangladesh has been developed in four phases. The first phase started just after the independence of the country in 1971 by incorporating a provision within the 1972 constitution that declared the improvement of the nutritional status of citizens as a basic responsibility of the state. According to Article 18-1 of the constitution "the State shall regard raising the level of nutrition and improvement of public health as among its primary duties". From this perspective, the 1972 constitution of Bangladesh was the first step in the journey towards a nutrition-focused singular policy. Consequently, efforts were made to devise policies that would help the state to perform its responsibilities. In 1974, the Institute of Public Health Nutrition was set up to assist the government in "formulating policy and strategy for nutrition related activities and programmes" (8). This was followed by the establishment of the Bangladesh National Nutrition Council (BNNC) in 1975. However, during this first phase, apart from setting up the basic institutional structures, the government did not show any strong political commitment towards implementing the constitutional provision to improve nutrition.

The GoB started a number of policy interventions in the mid-1990s, the most important of which was the National Food and Nutrition policy in 1997 (9). Through this policy, the GoB's effort to improve the nutritional status of citizens entered a second phase. However, during interviews with government officials and representatives of development partners, two specific issues were identified as pivotal in developing the specific policy. First, as mentioned earlier, up to that point in time, nutrition was not a major priority for the government. However, when Bangladesh was identified as the 'Asian Enigma' because of the high prevalence of undernourished children within the country, the government was eventually forced to focus on this issue. Secondly and probably most importantly, the GoB's participation in a number of international conferences, including the first International Conference on Nutrition in 1992 and the World Food Summit of 1996, made it aware of the significance of nutrition as an issue for national development. In fact, one government official informed us that in developing the National Food Security and Nutrition Policy of 1997, the GoB's role in the International Conference on Nutrition played the most important role. According to him, "the first International Conference on Nutrition was held in 1992 and through participating in that, the representatives from the GoB not only understood the severity of the condition in Bangladesh and realized that the time had come for the government to do something about it. The 1997's policy reflected the commitment of the GoB to the global declaration of the conference". However, the key question is: what was included within the first policy? A review of the policy document and interviews with officials helped identified the following key policy components.

1. Nutrition as a problem

The National Food and Nutrition Policy (NFNP) of 1997 (9) for the first time identified undernutrition as a major developmental problem and according to the policy document: "Malnutrition is endemic in the country, with high infant, under five and maternal morbidity and mortality. About 94% of the children are malnourished and 30,000 are becoming blind from vitamin A deficiency every year. Almost the whole population suffers from micronutrient deficiencies such as iodine, iron, zinc, vitamin A, and riboflavin" (9). Our interviewees pointed out that this was indeed a major change



as, for the first time in the history of the country, the GoB decided to develop strategic action plans to deal with the problem of malnutrition.

2. Nature of the problem

The NFNP took a half-hearted approach in terms of defining the nature of the problem of malnutrition. On the one hand the policy document identified nutrition as "a critical factor in any individuals' growth and capacity to function in a society. Food, nutrition and health produce an economically productive and socially active nation", and on the other hand, it declared that "the population must have sufficient economic status to be able to buy food and sufficient sociocultural awareness to recognize the food that it requires, must preserve it, prepare it well and distribute it according to the biological need of the members of the family" (9). In other words, the policy document made an effort to identify nutrition as a stand-alone policy issue and eventually came to the conclusion that nutritional status can be improved by ensuring people's access to food. As one interviewee noted, "if you look at the name of the policy, it says it all; it was not a nutrition policy but a food security and nutrition policy. Needless to say, the GoB's focus at that time was eradication of hunger and the underlying assumption followed in that policy was: 'if you can prevent hunger, you can prevent malnourishment'. And thus, the strategic action was 'produce more food and that will solve all the problems' as through economic development people would be able to have access to the available food". Another interviewee defended the GoB position in the following way: "there is nothing wrong in this approach and in fact, if you look at the existing state of knowledge in the mid-1990s, you can come to a conclusion that nutrition problem is a food problem. We were focusing on availability and accessibility and essentially, utilization was not part of the equation".

3. Nutrition as a multi-sectoral issue

Interestingly, back in 1997, the policy document considered nutrition to be a complicated multisectoral issue. As the policy document observed: "Nutrition is a multifaceted subject. Improvement in nutrition cannot be achieved in isolation. (...) The national food and nutrition policy should incorporate all the components in various sectors to achieve the common goal of the improvement of nutrition at the national level. (...) There should also be effective coordination of food and nutrition components from various sectors to control efficiently the problems of malnutrition. The present national food and nutrition policy (1997) is intended to complement existing Government policies in Food, Agriculture, Fisheries, Livestock, Forestry, Primary Health Care, Environment, Education, Information, Industries, Commerce, and other development areas" (9).

In other words, the NFNP of 1997 emphasized a co-ordinated effort between various sectors to deal with the existing state of malnourishment. Having said that, the same policy document observed: *"There is a need to strengthen the linkage between the three important sectors concerned with the improvement of nutritional status of the people, namely agriculture, food, and health"* (9). From this perspective, the policy document of 1997, although it considered the multi-sectoral nature of nutrition, eventually focused on linking only three sectors: agriculture for food production; food for ensuring access to food; and health for ensuring the treatment of the malnourished population. In effect, it can be argued that the multi-sectoral nature of nutrition has been highlighted as a symbolic gesture whereas the government, in reality, concentrated on solutions based on food production.

During interviews with government officials and representatives of development partners it was reported that while implementing the policy and especially the NPAN-1, the GoB rarely focused on the multi-sectoral aspect of nutrition. As one government official from the Ministry of Food noted: "Whereas it is a fact that in the earlier policy (1997), the GoB talked about a concentrated and coordinated effort, in reality the understanding was that the Ministry of Health would play the key role in developing different nutrition-specific interventions that would provide necessary medical facilities for the people already suffering from malnutrition. In fact, if you look at the policy, it has talked about vitamin deficiencies, medical care, and other issues and considered it as the most



important aspect of improving nutrition. On the other hand (...) producing enough food and ensuring economic growth were considered as the key to remain healthy. Food security and nutrition from this perspective became almost synonymous". Another interviewee who worked very closely with the Ministry of Health, however had a different opinion: "You have to acknowledge, if you consider the time-line, the NFNP was an excellent policy and by acknowledging the multisectorality of nutrition, it did what a sound policy should do. The problem was in implementation. The NPAN-1 also reflected the multi-sectoral aspect but unfortunately, nothing was done to ensure coordination of the activities of different ministries or to ensure policy coherence, especially when different ministries started developing their own sectoral policy".

The discussion above indicates that back in the mid-1990s, the GoB was quite hesitant in addressing the issue of nutrition in a concerted way. As a result, the declaration of the policy document, that nutrition was a multi-sectoral issue, remained a mere political statement which lacked strong political commitment. It can be argued that this had happened mainly due to the philosophical stance adopted by the government which essentially considered malnutrition as an issue of the accessibility and availability of food. In fact, if we look at the objectives of the NFNP of 1997, this philosophical stance of the government becomes clear where it emphasizes increasing the production and availability of both staple and non-staple nutritious foods, minimizing post-harvest losses, and developing food preservation and distribution technologies at home and by industry. The issue of nutrition was highlighted later and the focus was on improving "the health and nutritional status of the people especially of children, women (adolescent girls, expectant and nursing mothers) and elderly" (9).

4. Strategic interventions

A key weakness of the NFNP of 1997 was not to develop and maintain a clear distinction between improving the nutritional status of vulnerable and marginalized groups in the population by providing primary health care, improving caring practices, and disease control, and improving the nutritional status of the rest of the population by ensuring the availability of and accessibility to food. The NFNP of 1997 failed to point out how these two needs would interact with each other. This was not necessarily surprising as the GoB at that point in time did not focus on introducing nutrition-sensitive interventions through different government programmes. At the same time, the policy document failed to highlight the specific roles to be performed by different ministries and did not explain how the actions of these ministries could be coordinated. Even though the policy introduced the idea of the Bangladesh National Nutrition Council, as we will explain later, this body eventually became ineffective.

1.2. Other programmes

In line with the NFNP, the GoB also introduced a number of initiatives. In fact, the Bangladesh Integrated National Plan came into existence in 1996, just before the policy was developed. It marked the beginning of the second phase and is considered to be the first large scale policy intervention for nutrition adopted by the government (8,10). The BINP was managed by the Ministry of Health and Family Welfare (MoHFW) and adopted an "inter-sectoral and rights-based approach" coordinated by the BNNC. Continued until 2002, the programme covered 61 upazilas of the 465 in Bangladesh and reached almost 16% of the total rural population. In the period after 2002, the GoB initiated the National Nutrition Project which was integrated into the Health, Nutrition and Population Sector Programme (HNPSP) in 2006. Between 2002 and 2011, so during the third phase of policy and programme development in the area of nutrition, the HNPSP was implemented under two Operational Programmes: the National Nutrition Programme and Micronutrient Supplementation. However, the implementation of the HNPSP suffered from a number of problems:



- Whereas the two components of the HNPSP were supposed to play different roles in order to attain a common objective, "there was evidence of lack of coordination and duplication of activities among these two operational programmes" (8).
- The government lacked adequate capacity to implement these programmes. As such the National Nutrition Programme interventions, which aimed at providing community-based services, were contracted out to a number of NGOs and the therapeutic treatment of malnutrition, especially for children with severe acute malnutrition, was significantly inadequate. As Taylor pointed out, health facilities could provide treatment for only 20% of the country's severely malnourished children (10).
- Several other ministries were also running nutrition related projects and there was no effective mechanism to coordinate or monitor their activities. The BNNC remained largely ineffective "meeting only once during the three years previous to 2011" (10).
- The implementation process was extremely costly and, according to the Annual Programme Review of HNPSP in 2009, if the government decided to continue the implementation mechanism by contracting NGOs, the cost for programme intervention would be BDT 50,000 million (equivalent to about USD 715 million based on the exchange rate of 1 USD = 70 BDT at that time).

These problems related to implementing the nutrition policies and programmes and the emphasis of the GoB in reducing the persistently high rates of maternal and child under-nutrition, resulted in the disbanding of the National Nutrition Programme in 2011. The fourth phase thus started in 2011 which concentrated on "mainstreaming the implementation of nutrition interventions into health and family planning services, scaling-up the provision of area-based community nutrition, updating the National Plan of Action on Nutrition in the light of food and nutrition policies, amongst other important priority actions".

It should be noted here that even though the government decided to 'Mainstream Nutrition' in 2011, this initiative actually started as a three-year project funded by the World Bank from 2006 to 2009. The main objective of this initiative was to move "*nutrition more into the mainstream of national policies and programmes, especially in the health sector*" (11). During its lifespan this initiative succeeded in generating a number of positive impacts. These include:

- Developing and sustaining a successful 'core policy community' comprising development partners (e.g. World Bank), United Nations agencies (e.g. UNICEF, WFP, WHO, FAO), NGOs and civil society organizations. As explained later in this paper, this core policy community played an important role in pushing the nutrition policy agenda by transforming itself into an effective 'Advocacy Coalition' in the National Nutrition Policy process (11,12).
- The initiative also brought high level government officials (especially those belonging to the Ministry of Health and Family Welfare) together with the core policy community mentioned above from which a collaborative working relationship was developed which eventually made nutrition an important policy agenda. As Pelletier *et al.* pointed out, "Agenda setting (...) has taken place mainly at the bureaucratic level (...) with media coverage and advocacy playing key roles" (11).
- Even though up to that point in time, the government departments, especially the Ministry of Health and Family Welfare, did not develop any concrete operational plans to specify actions, roles or responsibilities, during this period, the GoB started developing operational and budgetary plans.

In fact, the 2011 initiative of the GoB, which established the National Nutrition Services, incorporated the lessons learned from the Mainstreaming Nutrition Initiative. According to this new initiative, the primary national programme that deals with nutrition at present is the National Nutrition Services which was introduced in June, 2011 through the MoHFW. This programme



reflected the commitment of the GoB to "mainstream and scale-up the delivery of essential nutrition interventions into health (Directorate General of Health Services and family planning services and Directorate General of Family Planning) through the Health, Population and Nutrition Sector Development Programme" (13). In addition to mainstreaming nutrition, it has the following specific objectives:

- "To develop and strengthen coordination mechanisms with key relevant sectors (especially Ministry of Food and Disaster Management, Ministry of Agriculture, Ministry of Women and Children Affairs, Ministry of Information, Ministry of Education, Ministry of Livestock and Fisheries, Ministry of Local Government and Rural Development and Cooperative, etc.) to ensure a multi-sectoral response to malnutrition" (8).
- To enhance the capacity of people engaged at various levels of health and family planning services so that they can manage, supervise and deliver nutrition services in an effective and efficient way.
- To strengthen nutrition management information systems and operations research.

A number of services are provided through the NNS and of them, the priority activities are: National Nutrition Services mainstreaming and programme management, growth monitoring and promotion, behaviour change communication, micronutrient supplementation, control of iodine deficiency disorder, management of severe acute malnutrition and community management of acute malnutrition, training and capacity building, nutrition surveillance, etc. In order to implement these nutrition related interventions at the field level and to coordinate among different entities dealing with service delivery, three Programme Managers function under the supervision of a Line Director. According to the programme design of the National Nutrition Services, the Director of the Institute of Public Health Nutrition assumes the role of Line Director and of the three Programme Managers, one comes from the Directorate General of Family Planning, who oversees the activities of three Deputy Programme Managers; one from the Directorate General of Health Services, who is in charge of supervising five Deputy Programme Managers; while the third one is a Multi-sectoral Programme Manager, who oversees two Deputy Programme Managers. In practice, however, the Line Directors, Programme Managers and Deputy Programme Managers mainly concentrate on overseeing and coordinating, while the majority of services are provided at the "community level through the community based health workers (Community Health Care Providers, Health Assistants, and Family Welfare Assistants), with doctors and nurses at the district and upazila levels also having specific responsibilities" (14).

It is interesting to note that while it governs nutrition related interventions, the National Nutrition Services have followed two conflicting guidelines. Whereas its specific objectives emphasize the multi-sectorality of nutrition and argue strongly in favour of well-coordinated responses from each sector, one of the main principles followed by the National Nutrition Services specifically points out that when providing nutrition-related services it will primarily focus on the activities that fall within the mandate of the MoHFW and in the case of key activities that lie outside the mandate of the health sector the "National Nutrition Services will play a coordination as well as advocacy role and ensure active engagement with other the key sectors (for example, Ministries of Agriculture, Food and Disaster Management, Ministry of Industry, etc.)". In other words, even though the objective of the National Nutrition Services is to foster collaboration and strengthen coordination, in principle, coordination has become the secondary focus of the programme. This conflicting attitude regarding the significance of collaboration may be an outcome of the competition over the 'nutrition space' but as explained in the next section, it has significantly affected the implementation of nutrition service delivery.

This focus on mainstreaming nutrition eventually paved the way for the National Nutrition Policy of 2015. However, before discussing different aspects of this policy and identifying its difference from previous policies, it is helpful to have an idea of the limitations of earlier approaches.



1.3. Challenges and limitations of the earlier approaches

The challenges and limitations of policy approaches towards nutrition before 2015 can be categorized in two groups:

- Defining the problem and outlining the solution, which essentially means how the policy operationalizes the definition of malnutrition and, while doing so, what factors are being identified as the main reasons for this problem. At the same time, this particular aspect of the process also indicates the types and nature of the solutions as outlined by the government.
- Developing an implementation plan as outlined by the policy, which does not necessarily need to be detailed. In effect, this particular aspect of the policy document should reflect the basic principles to be followed in implementing the solution-sets outlined before.

In terms of defining problems and outlining solutions, in the context of Bangladesh, the following challenges can be identified.

Approach to nutrition

As explained in detail in the previous section, since the mid-1990s, the GoB has attempted to define the problem of malnutrition as a food security issue and thus argued that through economic development and better access to food (while ensuring its availability), the nutritional status of the population could be improved. This particular approach was complemented by special emphasis on providing primary health care and care services to vulnerable and marginalized groups in the population including but not limited to children, adolescent girls and pregnant women. Considering that Bangladesh had succeeded in bringing down the percentage of children aged 0 to 5 years who were stunted and underweight, from the government's perspective this approach was working quite effectively. However, several studies pointed out that as the National Nutrition Programme was covering only 30% of all households, it was not addressing the problem of malnutrition in an effective and efficient way (4,5,15-17). At the same time, these analyses also pointed out that whereas the uncoordinated efforts of different sectors including agriculture, food, livestock and fisheries, education, women and children affairs have positively affected nutritional outcomes, this is unlikely to work in the future. Osmani et al. explained it in the following way: "It is also important to recognize that the task ahead is not going to get any easier, in part because as the rate of undernutrition falls from very high to moderate levels, it indicates that the more extreme aspects of the problem (that is, the ones amenable to simpler solutions) have already been resolved and the part that remains is much harder to tackle. This means that if the interventions remain as they are, it would be difficult to maintain the present rate of progress" (1). Therefore, the previous approach to deal with the problem of undernutrition requires significant revision.

→ Lack of focus on nutrition-sensitive interventions

The NFNP of 1997 specifically focused on nutrition-specific interventions while paying little or no attention to nutrition-sensitive interventions. Whereas this partial approach did help the GoB in attaining some success, it is unlikely that without focusing on nutrition-sensitive interventions it will be possible to achieve further improvement.

→ Limited focus on new targets and challenges

Even though Bangladesh has achieved some success in the domain of nutrition, it is important to note that more than one-third of the children under five are still classified as stunted, which means that almost 5.5 million children have experienced chronic undernutrition, the effects of which may be irreversible. During the interviews, a number of officials who have worked with development partners told us that by mid-2000 it became quite clear to them that the previous approach would no longer work and that a new, improved definition of the 'problem' was required. At the same



time, the initial success that the GoB had achieved during the decade between 1997 and 2007 made the government quite ambitious and "the Health, Population and Nutrition Sector Development Programme of the GoB has set the stunting target at 25 percent, to be achieved by 2021" (1). At the same time the World Health Assembly in 2012 also set a target for its member states to reduce the number of stunted children by 40% and, according to this target, it has been estimated that Bangladesh needs to reduce the prevalence of stunted children to 21.6% by 2025 (18). However, the current trend of Bangladesh in terms of achieving nutritional outcome shows that, "the rate of improvement actually achieved so far is only about half of what is needed if national and international targets are to be met" (1).

At the same time, another key limitation of the previous policy and programmatic approaches is that they have failed to take into account the emerging problems that may very well affect the overall nutritional outcome. For instance, Bangladesh is urbanizing rapidly and due to its unplanned nature, fast urbanization is resulting in the 'urbanization of poverty'. As a result, a vast majority of the urban poor is living in slums where their nutritional status is worse than people living in rural areas. For instance, a recent WFP survey of households in urban slums showed that 44% of children were stunted (19) which is more than the current national rate of 36%; it is more than the general urban rate of 31%; and more than the rate of 38% in rural Bangladesh (3). Considering that the urbanization of poverty is likely to increase in the coming years, the previous policy instrument adopted by the GoB may be inadequate to address this emerging challenge. Furthermore, the policy instruments may also be inadequate to address nutrition-challenges related to climate change.

On the other hand, in terms of outlining implementation plans, the earlier policy approaches suffered from the following limitations.

→ Inter-Ministerial rivalry

At the national level, eight line ministries of the GoB have mandates that are relevant to human nutrition (14) and it has remained a challenge to ensure collaboration between these ministries and develop uniform policy guidelines that will be acceptable to all the sectors. In fact, studies of the administrative system in Bangladesh indicate that this is not really surprising if we consider the historical context of development in Bangladesh. The country's bureaucracy bears a colonial legacy and after becoming a part of Pakistan in 1947, it had very little opportunity to perform under democracy as the armed forces took control of power. This trend continued after its independence in 1971 and until 1990, except for a brief period of democratic experiments between 1972 and 1975, Bangladesh remained under authoritarian rule. The colonial legacy and the long history of being run by authoritarian rulers not only jeopardized the growth of democratic political institutions in the country but also established the bureaucracy as the only coherent and effective organization that knew how to govern. Consequently, the bureaucracy has become a powerful, if not the most powerful, organ in the policy making process and in general has concentrated on centralizing power. The transition to democracy has failed to change this and this tendency for centralization still exists which has allowed the bureaucracy to remain a key player in the policy making processes of the country (20,21). Along with this, the allocation of budgets determines the power of ministries, and the common understanding is that a powerful ministry has more access to financial resources and so more control. The tendency for the centralization of power and the understanding that monetary allocation determines power encourages ministries to fight for policy spaces that can allocate resources. Save the Children described the situation as follows: "Governance in Bangladesh is characterized by conflicting rivalries across ministries and directorates, inadequate targets across and within ministries/departments at national and sub-national levels, a lack of shared goals, (...) chronic absenteeism, and misuse of resources" (22). A recent report by Save the Children (23) explains these governance problems in the context of nutrition (as described later). One of the key limitations of existing policy documents in Bangladesh has been they neither acknowledged the presence of this rivalry nor outlined a detailed process of how to deal with it.



> Competition for the nutrition space leading to duplication

Duplication is basically the outcome of the competition between ministries and, as a result, multiple ministries and government agencies develop policy plans to attain the same objective. The report by Save the Children (23) identifies two major problems in nutrition policy implementation in Bangladesh: conflicting initiatives that lead to competition, and a lack of ownership and interest. The study explains that in Bangladesh "the MoHFW maintains a multi-sectoral nutrition Steering Committee as part of the Health, Population and Nutrition Sector Development Programme (2011-2016). The Ministry of Food has a Food Policy Monitoring Committee that stems from the Country Investment Plan. (...) Given that the MoHFW is recognized as the government lead on nutrition, it overlaps substantially with the Country Investment Plan, clearly representing competing initiatives that generated a rivalry for the 'nutrition space' between the Ministry of Food and the MoHFW. Neither committee has been able to effectively mobilize consistent and high level participation from other ministries accountable in delivering nutrition results" (23). It is unlikely that this situation will be resolved on its own and in fact, we have been told that in the Ministry of Food's upcoming Country Investment Plan, nutrition will be an important component, raising the question whether the Ministry of Food and MoHFW will be able to work in collaboration, especially when the MoHFW has just formulated the National Nutrition Programme and is working to develop the national plan of action for nutrition.

The BNNC: mandate without authority?

The discussion in the previous section section indicates that according to policy documents, the BNNC was established as the ultimate coordinating body for nutrition. The underlying assumption was that it would be under the control of the Prime Minister, so the coordinating body would be powerful enough to fend off opposition or inertia of powerful ministries towards achieving a common goal. However, previous studies on nutrition governance indicate that the BNNC had the following limitations:

- Taylor (10) while analysing the role of the previous BNNC states that it did not have a real focus of authority and lacked the ability to convene its members. As a result, it failed to hold regular meetings and consequently did not manage to focus exclusively on policy coordination.
- Both Taylor (10) and Knowles & Marks (14) describe the previous BNNC as a coordinating body that had 'mandate without authority'. According to them, the BNNC lacked the power to coordinate and did not succeed in devising and putting in place the implementation or monitoring and evaluation guidelines.
- A key condition for making a centralized coordinating body successful is to make it focused and include only members that have a direct stake in nutrition governance in Bangladesh. It is not clear whether creating a huge coordinating body such as the BNNC, which included 37 member organisations, would serve the purpose of coordination. A better approach would have been to conduct an analysis to identify the most relevant agencies, specifically the ministries that have a mandate for nutrition and the key divisions/directorates within those ministries, and set up the BNNC to include only those members. We will return to this issue later.

Coordination between Coordinating Bodies

At the national level, two other mechanisms exist that work to coordinate multi-sectoral nutrition, situated in different sectors. As Hussain, Talukder and Ahmed (18) show, of these two, one of them is in the health sector. Named the Multi-sectoral Steering Committee on Nutrition Initiative, this is headed by the Secretary of the MoHFW and is entrusted with the responsibility "to develop and strengthen coordination mechanisms with key relevant sectors to ensure a multi-sectoral response to malnutrition". The second mechanism is the Food Planning and Monitoring Committee which represent the ministers and secretaries of the "ministries concerned with food security" and whose main responsibility is to "monitor the implementation of the Food Policy and Plan of Action"



(18,22). The presence of these two different coordinating mechanisms maintained by two different ministries not only indicates the competition for the 'nutrition space' but also raises some critical questions: what will be the role of these coordinating mechanisms since actions have been taken to revive the BNNC? Are we witnessing too many coordinators and too much coordination?

However, the critical question is: has the National Nutrition Policy of 2015 acknowledged and attempted to address these challenges? If so, why? How they have tried to address them? What information has been used by the GoB? What is the source of this information? In the remaining sections, we will try to find answers to these questions.

2. The National Nutrition Policy of 2015 and its basic features

The fact that policies, programmes and plans developed and implemented by several ministries can have a direct or indirect impact on the nutritional status of the population indicates the multisectoral nature of nutrition. It becomes even clearer if we consider the two recent actions of the GoB: the development of National Nutrition Policy, 2015 and the revival of the Bangladesh National Nutrition Council.

2.1. National Nutrition Policy, 2015

The new National Nutrition Policy (NNP) emphasizes the following issues:

- The NNP will facilitate the improvement of the quality of life of the people by improving their overall nutritional status. While focusing especially on helping children and women, it identifies some specific key objectives including improving the nutritional status of the population in general and children, adolescent girls, pregnant and lactating women in particular; enhancing dietary diversity; scaling up nutrition-specific and nutrition-sensitive activities; and strengthening the multi-sectoral approach and coordination among relevant stakeholders.
- The NNP has also outlined the strategies to be adopted for achieving each of the objectives mentioned above. Therefore, to improve the nutritional status of the population, it aims at achieving:
 - food security, by ensuring access, availability and utilization of nutritious food, for all citizens;
 - optimal nutrition throughout the lifecycle;
 - coverage of vulnerable groups e.g. extreme poor, disaster-affected population and people suffering from chronic diseases.
- To attain dietary diversity the NNP will attempt not only to "enhance the supply of a variety of foods at the household level but also to provide information to both rural and urban populations on the importance of consuming a variety of foods and food combinations" (24).
- The strategy to scale up nutrition-specific interventions has two different dimensions: efforts will be taken to promote and ensure a sufficient intake of nutrient rich foods while also providing treatment for moderate and acute malnutrition at health facilities and in the community. At the same time, the NNP will also promote behaviour change through counselling, information, and education. On the other hand, the NNP acknowledges that the success of nutrition-sensitive interventions relies on the capacity of the workforce responsible for implementing these interventions and, as such, the NNP focuses on assessing, building, and developing the capacity of the personnel working at health facilities and in communities (24).



- In order to scale up nutrition-sensitive interventions, the NNP emphasizes the need to enhance "food security, female education and empowerment, creating livelihoods, improving social protection and safety nets, sanitation and hygiene, promoting nutrition friendly agricultural practices, etc." (24).
- To strengthen the multi-sectoral approach and its coordination, the NNP emphasizes the role played by the MoHFW and indicates that the ministry will work together and in partnership with other government ministries, NGOs, and the private sectors by instituting Public Private Partnerships and by encouraging evidence-based policy research. The NNP also points out that "a national nutrition coordination body in the Prime Minister's Office" will be institutionalized (24).

If we consider the provisions of the NNP, it is possible to develop the following conclusions:

- The NNP has indeed tried to deal with some of the key limitations of the earlier policy framework. It has moved away from the principle of contracting out and has placed emphasis on building the capacity of the public sector so that, under the leadership of the MoHFW, the public sector can be responsible for implementation.
- From a design perspective, the NNP is an improvement over the previous policy document, the National Food and Nutrition Policy of 1997 which was dubbed "outdated", as it failed to reflect the shifts that were happening in the food and nutrition situation and in the organizational arrangements of the government (14). In contrast, the NNP of 2015 captures the current concerns, including the slow and unsatisfactory pace in reducing childhood undernutrition, poor adherence to recommended infant and young child feeding practices, the problems related to the fact that one-fourth of adolescent girls are malnourished which may transfer stunting from one generation to another, deficiencies of micronutrients, etc. In addition, the NNP also describes the challenges associated with a 40% increase in the prevalence of overweight and a 50% increase in the prevalence of obesity between 2007 and 2011 and, by doing so, makes an effort to indicate the future challenges.
- Whereas the Government of Bangladesh has long acknowledged the complexity associated with improving the nutritional status of its citizens and has identified nutritional development as a multi-sectoral issue that requires a multi-sectoral approach, from a policy perspective the NNP brings this tacit acknowledgement within the domain of government decision-making processes and outlines not only the necessity of adopting a multi-sectoral approach but also proposes the development of a mechanism to coordinate the activities of different ministries.

It is not surprising that the involvement of different agencies in the public, private, and non-profit sector makes the issue of coordination an important one. Given that this is the one area in which the GoB has not been that successful in the past in the NNP, the government expressed its commitment to strengthen coordination among different agencies. However, the policy statement as reflected in the NNP is too general in nature and according to this, coordination will be ensured through the following means:

- "The Ministry of Health and Family Welfare will strengthen collaboration and coordination with relevant ministries and stakeholders including international agencies, development partners, academic and research institutions, and non-government organizations for a meaningful multi-sectoral approach to improve nutrition security, safety nets for the marginalized, hygiene and sanitation, and creation of livelihoods, etc." (24).
- "Institutionalize a national nutrition coordination body in the Prime Minister's Office; the national coordination meetings will be chaired by the honourable Prime Minister to review the nutrition situation on an annual basis and who will give necessary directives for improving nutritional status of the country's population" (24).



It is thus clear that for the issue of human nutrition, especially in implementing policy interventions, the MoHFW will be the lead agency and will facilitate collaboration and coordination among different agencies. This is again not surprising, because the NNP does not aim to alter the basic implementation process of the National Nutrition Services which relies on the operational and comparative advantage of the MoHFW to implement nutrition-centred and nutrition-sensitive interventions. At the same time, it is important to note that whereas the MoHFW will assume the role of lead agency in implementing policy, to ensure policy coordination at the national level the BNNC will be revived.

2.2. Bangladesh National Nutrition Council, 2015

In September, 2015, the Government of Bangladesh revived the Bangladesh National Nutrition Council. Consisting of 37 members, this powerful council is headed by the Prime Minister with the Minister of the MoHFW as Vice-Chairperson. The role of the Member-Secretary of the Committee will be performed by the Secretary of the MoHFW. The BNNC will play the following role:

- To provide overall direction regarding the national food and nutrition policy;
- To provide overall guidance to ministries, agencies, divisions and directorates regarding their roles in implementing interventions that could improve nutrition;
- To coordinate the activities of ministries, divisions and directorates aiming to improve the overall nutritional status of the citizens of the country;
- To monitor and evaluate the performance of different government agencies.

In other words, at the policy level, the BNNC will be the most powerful national coordinating body for nutrition and it will also ensure the accountability of government agencies by evaluating their performance. The BNNC is supposed to hold at least one meeting every six months (25).

3. A comparison between the NFNP 1997 and the NNP 2015

Up to this point, we have provided a historical overview of nutrition policy processes in Bangladesh and have analysed the policy and programmatic elements that have been carried through. In this particular section, we will compare two policies: the NFNP of 1997 and the NNP of 2015. This serves two basic purposes. First, it will provide a snapshot of the GoB's change in focus in the domain of nutrition policy and by doing so, will highlight whether the new policy has addressed the challenges that have been explained in the previous section. Second, by identifying the differences between these two policies, it will be possible to identify what the new policy is offering. This will build the foundation for the next section which analyses why and how the GoB decided to make some major shifts in the policy domain of nutrition. Table 1 provides a comparison of the two policies.

It is possible to argue from Table 1 that compared with the NFNP of 1997, the NNP of 2015 reflects the following major shifts in policy:

- Whereas in the past, reducing poverty and hunger was considered to be the major strategy to improve human nutritional status, the NNP acknowledged that a reduction in hunger and poverty alone cannot improve the nutrition situation unless and until a concerted effort is undertaken which would allow nutrition-sensitive interventions.
- A key feature of the NNP of 2015 is that, unlike past initiatives, it categorizes the nutrition-related activities into two groups, nutrition-specific and nutrition-sensitive, and highlights how a combination of these two can eventually positively influence nutritional status.



- The NNP focuses on multi-sectoral aspects of nutrition and proposes interventions that would capture this multi-sectorality.
- The NNP not only captures the new, emerging challenges facing the country that may affect the nutritional status of its citizens, but also provides a direction to address them. In effect, it points out the need for nutrition-sensitive agriculture and social protection system.

However, the key question is why did this shift happen? What were the key factors and who are the key actors that helped the GoB in developing this new Nutrition Policy?

Comparisons	Food and Nutrition Policy, 1997	National Nutrition Policy, 2015
Problem definition	The NFNP took a half-hearted approach in defining malnutrition as a separate problem and focused more on linking it with food security and food production. As a result, even though the background section of the policy document mentioned the number of malnourished people, its focus was mainly on ensuring food security	The NNP focuses from the beginning specifically on nutrition. It acknowledges the achievements that Bangladesh had made over the years in terms of improving the nutritional status of the population and then moved towards explaining the remaining challenges. Using data from the Bangladesh DHS in 2014, it points out that the percentage of stunted, wasted or underweight children under-five is quite alarming and that if the country wants to pursue its desired goal of national development, it should promote new strategic interventions to make further improvements in the nutritional domain. Furthermore, the policy also acknowledges the challenges facing the country including the high prevalence of marriage and pregnancy at a young age which negatively affect the nutritional status of the future generation, as well as obesity, diabetes, and climate change, and stated that the new policy would try to address these new challenges too.
Key consideration in devising strategies	The NFNP proposed a mixed-approach to address the problem of malnutrition and as such, it focused on primary health care for marginalized groups, and an increase in food production and income generating activities. It is interesting to note that out of the seven objectives envisioned in the NFNP, only two directly mentioned nutrition related activities (objective 2 talked about improving nutritional status and objective 5 focused on providing nutrition education). Objective 1 on the other hand talked about increasing food production and availability and objective 6 talked about undertaking all possible measures to increase income generating opportunities.	The NNP focuses specifically on nutrition related activities. Objective 2 of the NFNP became its first objective: improving the nutritional status of all citizens with a special focus on girls, pregnant women and lactating mothers. Objective 2 focuses on ensuring dietary diversity and objectives 3 and 4 on strengthening nutrition-specific and nutrition-sensitive activities respectively. Objective 5 describes adopting a multi- sectoral approach and emphasized effective coordination to this end. Needless to say, this indicates a major policy shift of the GoB as it finally came to a conclusion that economic growth, the availability and accessibility of food are not good enough on their own to ensure improved nutrition. At the same time, in developing the nutrition policy, the GoB proposed to adopt a life-cycle approach to ensure improved nutritional services at every stage of life.

Table 1. A comparison of the two main policies for nutrition in Bangladesh



Strategic interventions	In line with the issues considered in developing the strategy, the NFNP argued that the policy would focus on intervening in four specific sectors: Food, Agriculture, Fisheries, Livestock and Forestry which would emphasize <i>"increased production, proper distribution and food security"</i> ; Health, Family Welfare and Environment to provide <i>"primary health care, caring practices, care of the elderly, disease control, sanitation and hygiene"</i> ; Nutrition Education and Communication which would concentrate on raising awareness by formal and non-formal education; and, Community Development and Social Welfare to alleviate poverty and to encourage income generation and economic growth.	In contrast, the NNP proposes much more detailed and specific strategic interventions. It proposes five interventions, each of which is further divided into sub-sections. The key interventions are: improving the nutritional status of all citizens including girls, adolescent girls, pregnant and lactating mothers. It proposes a life-cycle based approach to ensure proper nutrition for pregnant and lactating mother, to ensure that each child can be breastfed up to 2 years, and focuses on non-communicable disease, and preventing early marriage and early pregnancy, etc.; promoting dietary diversity (through nutrition-sensitive agricultural practices, introducing behaviour change communication, promoting food fortification, etc.), strengthening nutrition- specific and nutrition-sensitive activities,
Policy	The NFNP did not take into consideration	with a focus on multi-sectoral coordination. In developing the NNP, extensive effort was
coherence	the policies of other ministries and agencies and so did not make any effort to ensure that the policy complemented the actions taken by other ministries.	taken to analyse different policies of other government bodies. By doing so, the NNP emphasizes the need to ensure that the policy goal of the NNP matches the policies of other ministries.
Focus on multi- sectorality	Even though the NFNP considered malnutrition as a multi-faceted problem, it failed to develop a detailed implementation plan that would capture the multi- sectorality of the concept.	The NNP from the beginning considers nutrition as a multi-sectoral issue and proposes to adopt a multi-sectoral approach. In other words, it makes a specific effort to move beyond inter-ministerial rivalry and the fight for policy space to emphasize effective coordination to make the multi-sectoral approach successful.
A centralized coordinating body	NFNP talked about establishing the BNNC.	The NNP focuses on revitalizing the BNNC and emphasizes the critical role to be played by this body (headed by the Prime Minister) in ensuring monitoring and coordination).



Part 2: Policy process analysis through a Multiple Stream Framework

1. The conceptual framework for policy process analysis

In the policy science literature, the most general framework used to analyse specific policies is the 'policy cycle' framework. Developed in 1956 by Lasswell (25), this framework became quite popular as it provides a linear description of policy development, implementation, and evaluation. In general, policy cycle can be structured in a process shown in Figure 1.

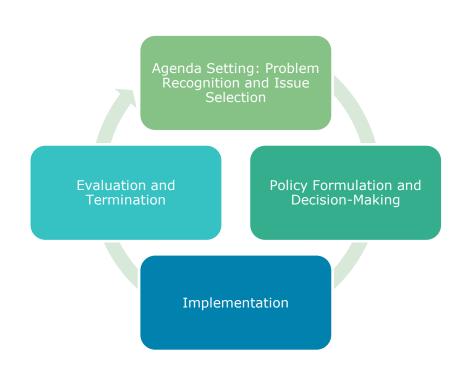


Figure 1. A conceptual diagram of the policy-making process based on Smith & Larimer (26)

According to this framework, the policy process starts with agenda setting, which begins when policy makers focus on a specific list of problems and try to prioritize them. From this perspective, agenda setting is closely related to problem identification and problem definition (27). The next stage of the policy cycle is known as policy formulation and decision making, in which the objectives, goals and intentions of the government are transformed into policy content. Most of the time policy formulation and decision making are two different stages but there is a clear and crucial relation between them. Once the policy is being formulated, it is then transformed into action plans. This stage of the policy cycle, known as implementation stage is different from the others as this is when decisions are interpreted by the government based on their understanding and preferences. The final stage is known as evaluation and termination, in which policies are evaluated by comparing the outcomes with the objectives. Sometimes policies with negative outcomes are terminated (28).

Whereas the policy cycle is a useful framework for analysing the life-span of a policy, in the context of the current paper, this will be difficult to apply for a number of reasons.

First, the policy cycle framework provides a descriptive and linear analysis of policy development and implementation. Given that the National Nutrition Policy of 2015 has only recently been



formulated and the GoB is currently working to develop the implementation plan, this paper cannot capture the entire duration of the nutrition policy and its effectiveness. In effect, the focus of this paper is only on the first two stages, i.e. agenda setting and policy formulation.

Second, an important limitation of the policy cycle model is that it "assumes a linear model of the policymaking, discounting the notion of feedback loops between different stages or different starting points for the entire process" (26). From the perspective of this paper, this is the critical limitation in terms of applying this model, as the goal of this analysis is not to provide a linear description but to understand the underlying factors that have encouraged the government to change its policy objectives. At the same time, the analysis aims to identify the critical actors who have worked with the government in developing the new policy, to understand the types of information they have used to influence government policy makers and the process they have followed to exert this influence. From this perspective, if compared with the policy cycle, the focus of this paper is narrower, as we are trying to develop an in-depth understanding of agenda-setting in the nutrition domain and how this agenda is eventually transformed into a specific policy. Following Kingdon (7), our goal is to understand how important a problem essentially becomes a part of the agenda, so how problems "came to be issues in the first place. We will try to understand why important people pay attention to one subject rather than another, how their agendas change from one time to another, how they define their choices, and how they narrow their choices from a large set of alternatives to a very few" (7).

Considering the limitation of the policy cycle approach and the specific focus of this analysis, we decided to apply the Multiple Streams framework developed by Kingdon (7). This framework essentially covers two important steps in policy formulation, namely agenda setting and alternative selection, the combination of which essentially leads to policy development. According to this approach, agenda setting means the process by which the government officials decide to focus on a specific problem from a list of problems that occupy their attention. This happens, i.e. the agenda is set, when two different streams, namely the problem and the political stream, interact with each other. Of these two, "the problem stream consists of various conditions that policy makers and citizens want addressed". Of these different conditions, some draw the attention of policy makers once they "find out about these conditions through indicators, focusing events, and feedback" (29). In other words, different studies including scientific reports and commissioned studies may provide some important insight into a 'condition' which may encourage policy makers to do something about it. However, the condition and the problem are not necessarily the same thing and, as Kingdon pointed out, policy makers will consider a condition as a problem if it violates important sociopolitical or economic values championed by political actors or if the country's performance in terms of that condition becomes worse in comparison with other countries (7).

Once a condition is transformed into a problem it does not necessarily mean that it will rise onto the government agenda and, in order to make that happen, the problem stream must interact with the politics stream. At this stage, it is important to develop a proper definition of 'agenda' and in this paper, we have depended on Kingdon's definition of the concept. Whereas the word 'agenda' has various uses in governmental policy making, we are defining this as a specific subject or problem to which "government officials, and people outside of government closely associated with those officials, is paying some serious attention at any given time" (7). In other words, this means that whereas it is possible for the political system as a whole to deal with multiple problems, not all of them draw the attention of the policy makers simultaneously. In effect, this is what policy scholars called parallel processing, where, within political systems, a number of issues "may be considered simultaneously in parallel within their respective communities of experts" (30-32). Under such a situation, different conditions may transform themselves into problems, but they continue to remain within their respective domain. However, it is possible for parallel processing of problems to break down and when a problem becomes too significant especially in an "environment of changing issue definitions and heightened attentiveness by the media and broader public", the political system starts to pay special attention to it resulting a transformation of parallel processing



into serial processing (31). As Kingdon (7) pointed out, this shift in information processing, i.e. from parallel to serial, is caused by the interaction between the problem stream and the politics stream.

According to Kingdon (7), the politics stream flows according to its "own dynamics and own rules" and the political actors within this stream will agree to push a problem into the policy agenda if "swings in national mood" force them to do so, or if it becomes part of their election agenda, or if interest groups succeed in pressing their demands effectively on government. Once any of the conditions are met, the problem rises up the agenda and, among the political actors, a group of 'visible participants' appear who draw public attention to a particular problem using the media. In other words, the agenda is being set and the political actors start looking for solution to solve the problem.

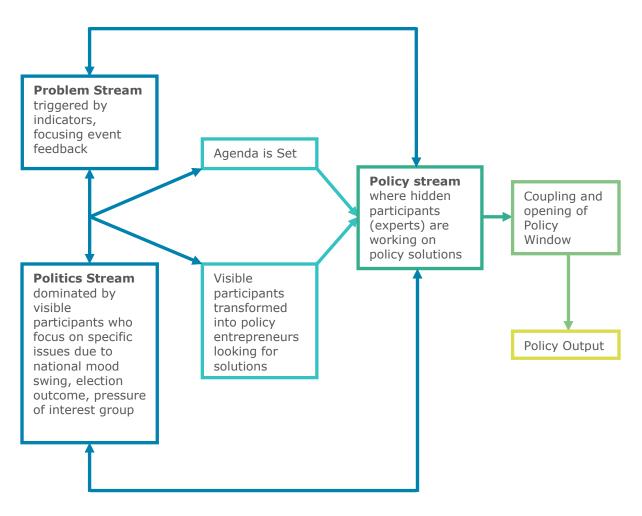
It is important to note that even when an agenda is set, there is no guarantee that it will be transformed into an effective policy. As mentioned earlier, to solve a problem, the political actors look for solutions and they need a number of alternatives to choose from. In other words, the agenda can be transformed into policy only if a number of alternatives are available to choose from, so this is where the third stream of the multiple stream model, i.e. the policy stream, becomes important. According to the Multiple Stream Framework, the policy stream functions separately, and in this stream the policy experts including "academics, researchers, consultants, career bureaucrats (...) and analysts who work for interest groups" play a leading role. In general, in the policy stream, in most of the cases, policy experts work independently to solve a given problem without taking into consideration the dynamics of the politics stream. To them, conditions have already presented the topic as a 'problem' and they work on such problems even before they draw the attention of policy makers. It is also possible that they have been pressing the political actors to take some specific actions to address a problem and their expertise was ignored in the past as the political actors were not then interested in that issue. Agenda setting opens up the opportunity for policy experts to create an impact, and when the policy stream joins the problem stream and politics stream, the 'Policy Window' finally opens up and the agenda becomes a policy output. Kingdon (7) explains it in the following way.

"The separate streams of problems, policies, and politics each have lives of their own. Problems are recognized and defined according to processes that are different from the ways policies are developed or political events unfold. Policy proposals are developed according to their own incentives and selection criteria, whether or not they are solutions to problems or responsive to political considerations. Political events flow along on their own schedule and according to their own rules, whether or not they are related to problems or proposals. But there comes a time when the three streams are joined. A pressing problem demands attention, for instance, and a policy proposal is coupled to the problem as its solution" (7). Figure 2 shows how the Multiple Stream Framework functions.

Based on the framework shown in Figure 2, we have made an effort to explain the nutrition policy process in Bangladesh. In fact, we have tried to show how 18 years after the first policy, the NFNP of 1997, nutrition entered into the problem domain; how the problem was defined and why it was defined in a particular way; how and why the problem drew the attention of political actors; how the policy experts proposed different solutions; and how the three streams mentioned above merged in 2015 to develop the new nutrition policy.



Figure 2. Multiple stream framework based on Zahariadis (29)





2. Analysing data: the NNP policy process

In analysing the policy process of the NNP, we have explored how the different streams mentioned above worked in the context of Bangladesh and how they eventually came together to develop a coherent policy.

2.1. The problem stream

In the problem stream, based on our empirical analysis, we have identified the following shifts which play a pivotal role in redefining 'nutrition' as a condition that requires new attention from policy makers.

1. A 'conceptual shift' in defining the problem

While talking to us, a number of government officials, civil society activists and representatives of development partners told us that in the mid-2000s, the focus of the GoB changed in terms of defining the problem of undernutrition. As one official from the Ministry of Food explained: "The policy priority of the government in the area of food and nutrition has always concentrated on reducing hunger. The underlying assumption behind this was if you can reduce hunger, eventually the nutrition scenario would improve. Therefore, based on this assumption, from the 1980s, the GoB's strategic interventions were directed at increasing production and helping the poor to come out of poverty. It was indeed a simple linear solution - reduce poverty through increasing employment and economic opportunities and produce more food. If we can do that, the poor will have access to the food market, and thus their nutritional status will improve". Another government official agreed with this: "This is not really surprising. If you look at the history of the country, the famine of 1974 has played an important role in determining the policy landscape in the domain of food and nutrition. An elected, popular government lost its legitimacy due to the famine and no government wanted to go back to that situation. Reducing hunger is essentially a political issue and that is why all the governments, irrespective of their ideological bent, have always concentrated on this. And, to a large extent, it was working. Stunting was coming down, underweight situation was improving, and thus it is not that nothing was working".

However, a representative of a multi-lateral development organization noted that actually this approach started to lose its value since the early 2000s: "When the current political party, the Awami League, was in power between 1996 and 2001, it made a significant effort in achieving selfsufficiency in food production and by the end of 2000, it succeeded in doing so. However, then we realized achieving self-sufficiency, i.e. reducing hunger, was not generating the desirable effect in nutrition. The overall development in the nutritional domain was slowing down and it became quite clear to us that reducing hunger alone would not deal with the problem of nutrition. Something else was needed". However, it is interesting to note that whereas independent policy experts realized the limitation of this approach and started working on this issue since the early 2000s, the GoB was slow to respond in terms of redefining the 'condition' of nutrition. The first sign of a shift in focus was observed in 2006, when the GoB developed the National Food Policy and in that policy document, in addition to availability and accessibility, the utilization of food was considered to be a major policy goal. The food policy document stated that a major policy goal of the government is "to effectively incorporate the nutrition programmes in the overall development process of the country. Utilization of food for nutrition, consumption of food rich in macronutrients (calorie, protein, fats and oils), micronutrient food supplementation and nutrition education and information transfer, particularly for the vulnerable people (poor women, children and disabled) play a significant role in the improvement of the overall nutrition situation".



It is, however, important to note that whereas different ministries, while devising their own policy documents, made an effort to include nutrition within their agenda, the MoHFW, the lead Ministry of the country for nutrition, was quite slow in incorporating the contribution of these ministries within its sectoral agenda. For instance, in addition to the Food Policy, a number of other policies, e.g. the Livestock Policy of 2007, the Education Policy of 2010, the Women Development Policy of 2011 and the Agriculture Policy of 2013, also started to concentrate on improving the nutritional status of the people and the MoHFW finally decided to embrace a comprehensive approach in 2011 by mainstreaming nutrition. In addition to providing nutrition-specific services through its existing infrastructure, it also decided to work with a number of ministries including the Ministries of Food, Agriculture, Livestock, Fisheries, Disaster Management, Women and Children Affairs, and Information. In effect, since 2011, the GoB slowly started to come to a conclusion that "national reductions in poverty and hunger alone are not sufficient to solve the problem of undernutrition" (18). In the 6th Five Year Plan of the GoB (2011-2016), this particular understanding started to take form and it identified two specific areas that required attention: "addressing the gender dimension in health and nutrition; and requirement for coordinated, multi-sectoral interventions on a sustained basis". Furthermore, under the 6th Five Year Plan, strategies for improving nutrition included: "improving maternal and infant nutrition, strengthening institutional capacity, improving overall nutrition status, treating severe acute malnutrition, behaviour change communication to promote good nutritional practice and mainstreaming gender into nutrition programming". Nutrition-sensitive interventions were largely ignored. This was not really surprising as one interviewee noted that even at that stage "though things started to change, whenever we started to talk about a stand-alone policy for nutrition or emphasized on the nutrition-sensitive interventions, the response usually was - it is not a big issue. Just make sure that they are eating enough kochu shak (amaranth) or shing mach (catfish), and everything will be alright". Things again started to change rapidly after 2012 and the GoB, after a long time of advocacy work performed by development partners including the World Bank, UNICEF, Save the Children, WFP, USAID and others, finally decided to address the problem of undernutrition in a comprehensive manner. The focus was shifted to develop a new, separate nutrition policy which would consider both nutrition-specific and nutrition-sensitive interventions and place emphasis on women's development, nutrition-sensitive agriculture and social protection, behaviour change, and the problems related to early marriage and pregnancy.

However, the most important question at this stage is why did this shift occur? Based on our interview findings, we argue that the following factors were at play.

- One of our interviewee noted: "By the end of 2007, it became quite clear that the existing approach, i.e. the focus on reducing hunger and increasing production, is failing to create further impact. Whereas up to 2007, this approach worked fine in reducing stunting and underweight, after that it was losing its value". Another interviewee agreed with this and stated: "I think the Bangladesh Demographic and Health Survey of 2011 played a key role here as it showed the limitation of this approach". In fact, our document review strongly supports this assertion. Whereas from 2004 to 2007, stunting rates declined by 8 percent (from 51 percent to 43 percent), the Bangladesh DHS of 2011 showed that, "between 2007 and 2011, these indicators have almost stagnated, the prevalence of stunting was just 2 percent lower, at 41 percent. The prevalence of underweight, the indicator used for the second target of the first Millennium Development Goad, declined from 43 percent in 2004 to 41 percent in 2007 to 36 percent in 2011" (13). It is important to note that in the nutrition policy domain of Bangladesh DHS of 2011 (33) played an important role in the National Nutrition Policy of 2015 which cited this particular survey in identifying the prevalence of undernutrition as a persistent problem in Bangladesh.
- Another key contribution of the Bangladesh DHS was that it strongly challenged the underlying assumption that reducing poverty and hunger would solve the problem of undernutrition. A policy document developed by a number of development partners known as 'The Common



Narrative' (34) explained it in the following way: "A striking finding of the Bangladesh Demographic and Health Survey 2011 data, and confirmed elsewhere, is that overall indicators of economic growth and greater household wealth are not strongly related to improved nutrition. With one in four children (26%) under 5 years old stunted and 12% wasted even in the highest household wealth quintile, clearly undernutrition is not restricted to the poor. This situation reflects the underlying causes of undernutrition including maternal education, child marriage and early first birth, sanitation and hand washing practices, access to food and health care, infant and young child feeding practices and the status of girls and women in the family and in society".

In effect, the discussion above indicates that different studies, indicators and survey findings indeed played a critical role in drawing the attention of policy makers to nutrition. At the same time, it is important to note that nutrition as a 'condition' eventually became recognized as a problem by 2012 when the studies mentioned above identified that the country was failing in fulfilling its constitutional promise to ensure improved nutrition for all.

2. Opening up of the Policy Domain

Another important shift that has taken place in the policy domain of nutrition is the gradual opening up of the policy space and the increasing reliance of government agencies on the expertise of local think-tanks and development partners. As mentioned earlier, the bureaucracy of the country excessively focused on centralizing power and as a result, policy making procedure was mostly under the control of high-level officials in government agencies. This was true for almost all the national policies and several studies have pointed out this particular characteristic of the policy process in Bangladesh (35-37). At the same time, these studies argued that due to this centralized nature of policy development, "policy making in Bangladesh has always been an isolated process" where the democratic political institutions have very limited role to play and the "public bureaucracy bears the sole responsibility of preparing major policies". Consequently, national policies have been identified as a 'wish list' which are "not effectively linked with forward looking resource management and in-depth macro-economic analysis" (35).

Recent studies, however, pointed out that the policy domain is increasingly opening up and the closed bureaucracy which used to be sceptical of incorporating outside views in developing policies are now feeling the need of the participation of experts in policy formulation and implementation. Aminuzzaman's latest study on the policy process (38) captures this changing dynamic as he shows that the current senior level bureaucrats who work at the policy level acknowledge the absence of a *"formal system or mechanism for undertaking research, analysis, and impact assessment of various policy interventions"* and this has encouraged them to rely on the technical assistance provided by development partners. At the same time, Jahan & Shahan's analysis of the food policy making process in the country (39) argues that in the case of policies that are highly technical in nature and rely on specific evidence, the role of outside experts is becoming significant. From this perspective, it can be argued that developing a nutrition policy, which requires data-driven research findings and evidence to develop policy interventions, the GoB's limitation in terms of conducting primary research is creating an opening in the policy space for local and international experts working in think-tanks and development organizations.

Our study indicates that the government agencies involved with food security and nutrition (e.g. MoHFW, Ministry of Food) have indeed started to rely on the expertise of different civil society organisations and development partners, and a collaborative working relationship has emerged in this policy area. Whereas it is difficult to identify the starting point of this shift, the government officials that we interviewed told us that they actually sought the opinion of the experts in developing the Food Security and Nutrition Policy of 1997. As one of them told us: "It is not right that the government has not worked with the experts in developing policies. In fact, while working on the policy of 1997, we held a number of consultation meetings, we heard what the experts had to say and tried to incorporate their views in the policy. We have done the same thing in case of



the current policy. So, nothing has really changed here". However, the members of civil society organizations did not completely agree with that. One of them mentioned: "It is true that consultation meetings were held in 1997 but I do not think that the government was willing to listen at that point. The fact is, the frequency and the nature of these consultation meetings and the government's receptiveness towards opinions of the experts have changed significantly over the years. For instance, in case of the current policy, the process started three to four years ago and the MoHFW held regular meetings throughout this period. The draft was shared with the development partners and local experts, they were given the opportunity to comment and suggest changes and their opinions were taken under consideration. I do not think the 1997's policy was so inclusive'. Another member of the civil society organization agreed with this: 'A change has indeed taken place. We are more vocal now and our voices add value to the overall discussion. And, most importantly, this process is continuing. For instance, I am also a member of a technical committee that is working on the NPAN-2. My organization has already submitted comments and the GoB has acknowledged our contribution".

3. A focus on coordination

As mentioned earlier, through establishing the National Nutrition Programme in 2011, the planning and implementation of nutrition related programmes underwent a shift from management by the Ministry of Health and Family Welfare under the NNP to becoming 'mainstreamed' throughout the various sectors involved in planning and implementing interventions. Though the mainstreaming of nutrition brought the issue of multi-sectoral approach in dealing with nutrition related problems to the forefront, it also indicated the necessity of developing a strong coordinating mechanism because, as Taylor argued (10), "multisectoral approach can be considered strong in that it aims to use ministries' specialist expertise, but it is dependent on effective and powerful coordinating mechanisms to align activities and monitoring of results".

It is, however, important to note that the problem regarding ensuring coordination between different ministries and agencies of the GoB to attain some common objectives is not necessarily a new one. As one government official noted: "In Bangladesh and in fact, in case of any country, ensuring coordination is not a new problem. We are facing this problem from the birth of this country and in all sectors. We did talk about this issue in 1997 and this problem did not disappear. This is precisely why the Bangladesh National Nutrition Council was created in 1975 and one of its key objectives was to monitor the progress made in implementing nutrition-related policies and programmes". He, however, admitted that the BNNC was not successful in performing its role and the focus on a multi-sectoral approach has made the need for coordination an important issue in the newly formed National Nutrition Policy of 2015.

In fact, some recent studies (10,40) show that the ineffectiveness of the BNNC actually allowed the MoHFW to assume the lead role in implementing nutrition-related programmes. This eventually created a problem in the post-mainstreaming nutrition period and in the absence of the BNNC, it was not necessarily clear how coordination would be ensured in a multi-sectoral approach. Taylor (10) explained that officials of different ministries remained "unsure of the extent to which the MoHFW was motivated to coordinate with other sectors, or to which it was empowered to do so. One described the MoHFW as 'maintaining relationships but not actually coordinating'. According to high-level officials within the MoHFW, its brief was not to coordinate other ministries, but solely to perform 'health-related nutrition' interventions: therapeutic care for severe malnutrition, along with some micronutrient provision". Therefore, it is not really surprising that there was a re-birth of concerns related to coordinating mechanism which would allow different ministries and non-state actors, including the NGOs, to collaborate effectively.



2.2. The politics stream

As mentioned earlier, policy problems may rise and fade in importance and priority and very few eventually find their place in the government's agenda. At the same time, problems may be put on the agenda only when the politics stream comes together with the problem stream. While talking to interviewees we learned that this is what happened in the domain of nutrition policy in Bangladesh and by 2013, nutrition became an important policy agenda of its own as political actors started to focus on it.

According to one interviewee: "When we are talking about Bangladesh it is important to know that policies tend to move forward very quickly if they get endorsed by the high level political leaders. Fortunately for us, in case of nutrition, the support came from the Prime Minister. As a result, whereas we had to work hard to make the government officials understand the need for a comprehensive nutrition policy without much success for almost 5 years (2007-2011), once the Prime Minister got on board, things started to move very quickly". In fact, our study shows that between 2011 and 2015, global interest regarding nutritional status was growing fast and as Hussain et al. pointed out (18), this had happened for two reasons: "First, the recognition of the relative lack of progress on nutrition in many countries compared to other development indicators and the challenges of addressing it multisectorally; and second, the growing realization and quantification of the lost economic potential due to people being undernourished".

However, the question is: why did the political actors in Bangladesh get interested in this issue, so why did they transform this problem into an agenda? Our interview findings suggest the following.

- According to one interviewee: "The earlier policy was developed in 1997, when the Awami League (the political party in power at present) came into power after a long time. In fact, in the 1996 election, the current government promised to achieve self-sufficiency in food and if you consider the 1997 policy, you will see that achieving self-sufficiency in food production has been considered as the key vehicle for improving nutrition. In my opinion, the Awami League as political party and Sheikh Hasina, as a political leader has always focused on food security and nutrition issues and that is why she has taken a keen interest in this".
- Another interviewee noted: "Ensuring food security and nutrition has been a key commitment of Bangladesh Awami League and in their election manifesto (known as Vision 2021), they placed significant importance on this. At the same time, perspective plan developed by the GoB which relied on the election Manifesto also talked about this issue. Therefore, it is not surprising that they would focus on this particular issue". Our study also indicate the significant role played by the perspective plan of the government (developed in line with the Vision 2021 of the ruling party) in bringing the issue of nutrition to the forefront (41).

It can therefore be argued that when the electoral commitment of the GoB found itself in alignment with global movement towards nutrition, it became easier for political actors to direct their political commitment towards this end. Consequently in 2012, Bangladesh signed up to World Health Assembly targets, and pledged to align nutrition in the 7th Five Year Plan and at the same time made a number of commitments based on World Health Assembly targets including (42):

- Reduce by 40% the number of children under age 5 who are stunted
- Achieve a 50% reduction in anaemia in women of reproductive age
- Achieve a 30% reduction of the number of infants born low birth weight
- Ensure that there is no increase in the number of children who are overweight
- Increase to at least 50% the rate of exclusive breastfeeding in the first six months
- Reduce and maintain childhood wasting to less than 5%



However, our interviewees told us in terms of policy development, the major impetus came from the GoB's participation in the second International Conference on Nutrition. According to one interviewee: "Bangladesh played a critical role at the second International Conference on Nutrition. The GoB made a commitment that it would develop a nutrition policy and would make sure that all the development activities carried out by the government would have a nutrition-component. Once the political leaders make such a strong commitment, it becomes quite easy to develop policies". In fact, in the nutrition policy domain, the International Conference on Nutrition has always played an important role and the first Food Security and Nutrition Policy was developed in 1997 due a commitment the government made in 1992 while participating at the first International Conference on Nutrition.

The discussion so far leads to some specific conclusions.

- First, it shows how malnutrition as a problem eventually drew the attention of policy makers and how this particular issue was embraced by political actors allowing this enter into the politics stream. Given that the political party in power was interested in this issue area and declared itself as one of its policy priorities in their election manifesto, it became easier for political actors to capture this 'problem' and helped it to rise up the government's agenda. The global movement for improving nutrition, such as the SUN ('Scaling up Nutrition'), also played a pivotal role.
- Second, one of our interviewees made an interesting observation: "Whereas it is true that role of the Prime Minister should be acknowledged, let us not forget about the role played by the development partners and civil society organizations. We have been advocating for a nutrition policy which would look beyond hunger and poverty reduction for long. We have used a number of studies, findings, research reports to make it clear to the government that something is wrong and immediate attention is required. I do not think that without this continuous push, anything could be done".
- Third, the movement of nutrition from the problem stream to the politics stream also helped to identify the policy entrepreneurs who committed themselves to develop this policy. Undoubtedly, the Prime Minister of the country can be considered as the most influential policy entrepreneur. At the same time, a number of our interviewees also talked about a few government officials (including one high level government official at MoHFW and another of the Food Policy Monitoring Unit of the Ministry of Food) who also played significant role in developing the policy.

2.3. The policy stream

Once an agenda is set, policy makers need a number of alternatives to choose from. These alternatives usually come from the policy stream where policy experts have been working on developing solutions to specific policy problems.

We have explained earlier that if we consider the NNP of 2015, we can see the inclusion of a number of new policy ideas including the shift from a reduction in hunger and poverty to mainstreaming nutrition in all ministry-level activities; the focus on nutrition-sensitive and nutrition-specific activities which was not mentioned in the 6th Five Year Plan; and the focus on a multi-sectoral approach and the need for coordination. The question is how did these specific issues find their place in the policy document? In explaining our findings on the policy stream, we have focused on answering this question. Based on our findings, we have divided the discussion on this stream into two sub-sections.



In the first section, we have mainly talked about different sources of information used by the government officials in developing the nutrition policy. However, the findings of this section have helped us in developing a few conclusions:

- We have found that a difference of perception exists between the development partners and the government officials regarding the utility and application of different sources of information. Whereas the development partners and members of the civil society organisations consider the role of outside experts (i.e. experts who are not part of the government machinery) as extremely significant in defining the problem and shaping the policy solutions, the government officials, however, although they acknowledge the role of experts, seem to place more emphasis on research reports, planning documents and policies of other relevant ministries in developing the national nutrition policy.
- It is, however, important to note that the government officials admitted the role played by outside experts in making the policy problem more focused and they have informed us in developing the possible policy interventions, the role of experts is extremely important. Nevertheless, they also mentioned that policy development process is time-consuming and the impact of expert views cannot be felt overnight.
- An important finding of this section (discussed later) is the view expressed by the government policy makers that not all information is relevant at all times. The utility and applicability of information use often depends on the political motivation and aspiration of the political actors.

The second and third findings of this sub-section have helped us to understand that information is not necessarily value-free and there is a political dimension attached to it which needs to be understood and explained. In the second sub-section, we have analysed the politics of information use.

1. Sources of information

Our analysis shows that in the context of Bangladesh, development partners have mainly been working in the policy stream since the mid-2000s, with the help of national experts. It is interesting to note that most of the representatives of development partners and civil society organizations that we interviewed are of the opinion that in the case of nutrition policy making, once the agenda was set, they played an important role in shaping the actual policy. According to one interviewee: "Once the government finally decided to work on the policy, the government official-in-charge requested some help in developing the policy on several occasions, through the identification of experts having the relevant expertise". Another interviewee told us that once the decision was made that a new policy would be developed, a working group was formed in which policy experts from different sectors relevant to nutrition were involved: "It was not just the government officials, people from the development organization, the academia, research organizations - everyone was included. Of course, we worked in different sub-groups but the important thing is the participation of the experts was ensured".

However, while discussing with the government officials, we have found that whereas they acknowledge the role played by the outside actors in shaping the policy and spelling out the specific policy interventions, they do not consider data or research findings produced by research organizations as critical. Our research indicates that in formulating the national nutrition policy, the sources used by the government can be categorized into the following groups.

→ Government Policies, Planning Documents and Surveys

While talking to us, government officials of different ministries (including MoHFW and Ministry of Food) told us that while developing nutrition policies, they have mostly depended on the national level planning and other policy documents of different ministries. As one of them noted, "You need to understand that government policies do not change overnight. It is a slow and gradual process



and before developing any policy, we need to be sure that it is in line with the electoral commitment of the ruling party and with the national planning documents". The perspective of the government sector actors is interesting for a number of reasons.

- First, it is important to note that the research studies of different national and international organizations, think-tanks and development partners do not add significant value to government level policy actors (i.e. high-level government officials) unless and until they are accepted by influential members of the ruling party and then eventually find their place in the national planning documents. According to one government official: "The conceptual shift that you are talking about, we were aware of it since the mid-2000. That is exactly why the food policy was designed in 2006. However, this shift did not become a major focus in the nutrition domain until the 6th Five Year Plan and the background paper on nutrition for the 7th Five Year Plan acknowledged this". In other words, the acceptance of works produced by experts in the policy stream has a significant political dimension. The high-level government officials who play a major role in developing the policy contents, will add value to research works only when they are accepted by the influential and powerful members of the ruling party.
- Second, we have found that the government agencies have a tendency to use information which is either produced by the research agencies of the government on its own such as the Bangladesh Bureau of Statistics, or produced through joint collaboration, such as when government agencies work in collaboration with international and national think-tanks. As we have mentioned earlier, the BDHS survey of 2011 had a significant impact on policy makers which helped them to finally come to the realization that a strategy focused only on hunger and poverty was not working. A few interviewees also talked about the 'undernutrition and poverty map' developed by the Bangladesh Bureau of Statistics and a number of development partners. One interviewee told us: *"These maps had substantive effect. Because if you look at these maps, you would see regions like Sylhet have achieved significant economic growth but this growth has failed to bring down the rate of stunting. A picture always speaks a thousand words". It is, however, important to note that in both cases, the GoB has used information and research findings that they actually own and in fact, in the policy domain, their ownership by the GoB has played an important role in choosing the source of information.*
- Another interviewee told us that while developing the nutrition policy, the policy experts have exclusively focused on ensuring policy coherence and as such they specifically analysed the national plans, planning documents and other policy documents to ensure that the NNP can effectively complement these policies. In our analysis, we have also tried to see how the NNP supports or is supported by other policies. Table 2 shows the relationship between the NNP of 2015 and policies in other sectors.

As Table 2 shows, the NNP not only acknowledges the existing policies of the country related to nutrition but also makes an effort to utilize and incorporate these policies as means to the overall end - an improvement in nutritional status. While doing so, the policy considers nutrition as a multi-sectoral concept, provides an outline by which relevant partners at the inter-ministerial level can be identified and importantly, by incorporating the private sector and the NGOs within the policy domain, indicates the policy and the government's willingness to move towards a new governance approach.

The discussion above, though indicates the reliance of the government level high officials on official government documents, raises two important questions.

First, in case of nutrition policy, even when we consider that policy makers have taken their cues from the national planning documents and policies from relevant other ministries, the question is: what is the source of information for these documents?



Second, as mentioned above, in the arena of nutrition policy, surveys and government research efforts have played an important role in shaping and re-shaping the policy problem. However, the question is: what are the sources used by the GoB officials in developing policy solutions? In other words, in case of nutrition policy, in addition to therapeutic interventions, why does the policy document concentrate on behaviour change communication, women's empowerment, etc.? What are the sources of information that the ministry used in developing these policy interventions? While answering these questions, the ministry officials have eventually acknowledged the role of research produced by different organizations.

Specific Provisions within the Policy (NNP)	Relationship with other Policies	Ministries involved
Nutrition security through ensuring adequate access to, availability of, and utilization of nutritious foods is a major factor in achieving nutritional wellbeing at individual and household level (Section 6.1)	National Food Policy, 2006	Ministry of Food (Food Policy Monitoring Unit)
Optimal Nutrition throughout the Life- Cycle (Section 6.1 and 6.2)	National Social Security Strategy of 2015 which relies on a life-cycle approach	A number of ministries but probably the most important one is Ministry of Social Welfare
Specific focus on women, adolescents, children (Section 6.2, 8.1)	National Social Security Strategy, National Women Policy, 2011	Ministry of Women and Children Affairs
Focus on vulnerable population (Section 6.3)	National Disaster Management Policy, 2015	Ministry of Disaster Management and Relief
Focus on dietary diversity (Section 7.1 and 7.2)	National Food Policy and National Agriculture Policy	Ministry of Food, Ministry of Agriculture
Scale up nutrition-specific interventions through the existing health system comprising of primary health care under the MoHFW (in rural areas), Ministry of Local Government and Rural Development (in urban areas), in collaboration with non- government organizations (Section 8.1)		Ministry of Local Government and Rural Development
Promoting Behavioural Change (Section 8.1)		Ministry of Information, Ministry of Primary and Mass Education
Scale up nutrition sensitive intervention (Section 9.1)		Ministries of Agriculture, Food, Fisheries and Livestock, Children and Women Affairs, Education, Industries, Local Government and Rural Development
Partnership with NGOs and the Private Sector (Section 8 and 10.1)		NGOs and Private Sector entities

Table 2. Relationship of policies developed by other Ministries to the National Nutrition Policy



> Reports and research published by national and international research organizations

When we asked government officials about the source of information used in major planning and policy documents which eventually played an important role in defining the policy problem, we received two different types of answers. Whereas one government official was quite clear in pointing out the role of experts from outside the government in the policy process, another government official gave us a somewhat vague answer. According to him: "The ministries do not work in isolation or within a closed space. We scan the environment and get a clear idea about what is going on. At the same time, we also do participate in a number of international workshops and conferences, where research reports and findings of different organizations are shared with us. These give us a pretty good idea about what the problem is, how the other countries are dealing with these problems and what we can do in addressing these. At the same time, you have to understand that as a part of the global community, the government makes some specific policy commitments like the one we made at the World Health Assembly and the second International Conference on Nutrition. These commitments may pretty well shape up our policy goal". Whereas in this particular case, even though the government official has not clearly spelled out the role of experts, it can be argued that research findings indeed play an important role in shaping the policy agenda.

Our study, at the same time, shows that in case of selecting specific policy interventions as solutions to policy problems, expert opinion and research findings indeed play an important role. However, this role, too, has its limitations as the political actors are unlikely to choose policy interventions which will not reward them politically. This is not necessarily surprising because policies are not developed in a value-free domain and whereas scientific research and analytical rigor can generate different viable policy options to be selected from, the choice is always made by political actors. Given that the main focus of these actors is to win election, they are likely to choose the option that will help them electorally (43-45). In the context of nutrition policy making process in Bangladesh, Taylor (10) observed the same phenomenon and explained it in the following way: "Within the MoHFW, the main institution charged with nutrition policy, there is a basic disjuncture between its preventative and therapeutic briefs, possibly due to the fact that therapeutic services are more 'visible' in terms of policy and public perception. In contrast, the growth monitoring and nutrition promotion activities that are also important, along with supplementation and complementary feeding, are less politically visible on the national or local levels. Many interviewees believed these would be neglected under the new mainstreaming policy, one commenting: 'effective programmes are invisible and is not rewarding electorally'" (10).

From this perspective, the choice of policy interventions essentially relies on the existing political dynamics, which actually means that if the political dynamics change, the choice may also change. As a result of this, a previously left out policy solution may very well re-emerge as the most viable option. This argument is largely in line with Cohen *et al.* 'garbage can simulation' (46). According to this specific model of decision-making, due to political consideration, it is possible that at a given point in time, the policy makers may throw away a solution in the garbage can. However, that does not necessarily mean that the solution is lost forever and in fact, if the situation changes, the political actors can pick up a solution from the garbage can and attach it with policy problem at hand. The fact that, contrary to Taylor's concern (10), nutrition promotion activities eventually became a major focus of the NNP 2015, indicates that between 2011 and 2015, the political dynamic had indeed changed which has made these specific types of activities important to policy makers.

In analysing the source of information used by the policy makers in case of developing nutrition policy, developing an in-depth understanding of the politics of information use is important because it shows that the political value of information eventually determines whether, why and how that



information can be used by the political actors. In fact, in the context of nutrition policy making in Bangladesh, a number of interviewees have given credit to The Lancet Nutrition Series of 2013 in bringing nutrition-sensitive interventions in the forefront. Whereas the conclusion drawn by The Lancet series, i.e. "acceleration of progress in nutrition will require effective, large-scale nutrition-sensitive programmes that address key underlying determinants of nutrition and enhance the coverage and effectiveness of nutrition-specific or direct nutrition interventions" has, of course played an important role, few of our other interviewees actually pointed out that if we consider the research findings of different development organizations that have been produced since the mid-2000, it would be clear that these organizations have been talking about these specific types of interventions for a long time. It can, therefore, be argued that whereas in the political dynamics of the mid-2000s, these findings were not important, they became significant in the post-2011 period. However, the question is: what were the major changes in the political domain that caused a shift in value of previously ignored information? Whereas it is not really possible to identify the specific factors that might have caused the shift, based on our study, we argue that the following issues were possibly at play.

- As mentioned above, while talking to us, a number of government officials mentioned their participation in different international workshops and procedures. It is possible that this participation and access to literature on comparative nutritional status helped the government to understand that, from a global perspective, the nutritional status of the country was not good and if the party in power failed to adopt new policy interventions to address this, their political opposition could use it against them. This is exactly what Conlan et al. (45) called the 'shaming effect', where "expert ideas gain compelling political status" because "the disclosure of problems by experts can prompt members to shift positions and at least appear to embrace findings and recommendations, due to the potential exploitation of these issues by prospective opponents".
- It is also possible that the strong political commitment expressed by the Prime Minister of the GoB regarding nutrition and her willingness to play a leadership role on a global stage have played a role in making the issue politically important, which encouraged policy makers to look for policy solutions. One government official explained it in the following way: "If you want to talk about triggering event, I will say that the election of 2008 was the triggering event because it brought the Awami League into power which made a strong electoral commitment to improve the nutritional status of people. The Prime Minister herself made it clear after assuming power that improved nutrition would be a key goal of the her government and henceforth became politically significant".
- The opening up of a policy space (described earlier), which allowed a number of national and international research organizations to work effectively in collaboration with the government could also have played an important role which allowed government officials to find comprehensive policy solutions that would incorporate both nutrition-specific and nutritionsensitive interventions.
- At the same time, it is important to note that unlike a number of development areas, in the domain of nutrition, development partners managed to work together in pursuing common goals. This collaborative effort not only brought together a significant amount of institutional knowledge but also succeeded in creating enough pressure on the government to introduce policy changes in the area of nutrition. As one interviewee told us: "The most important document that shaped the policy domain was 'Undernutrition in Bangladesh: A Common Narrative' (34). Prepared jointly by a number of development partners (UNICEF, WFP, FAO, WHO, the World Bank, DFID, USAID, CIDA, the European Union) this not only reflected the current situation and identified the problems, it also suggested some specific solutions. In fact, if you look into the final policy document, you will find that almost all of them have been adopted". In this paper, we have made an effort to compare the policy solutions suggested by the 'Common Narrative' with the National Nutrition Policy. Table 3 shows how the suggestions of the 'Common Narrative' were adopted.



The discussion so far indicates that whereas there are two major sources of information used by the government actors in developing national nutrition policy, these two sources have served two different purposes. The internal sources (i.e. national planning documents, policies of relevant ministries, statistical research) have helped the government in understanding the nature and extent of policy problems and the indicators supplied through these internal sources (i.e. expert opinion, research by actors outside the government), on the other hand, served two purposes: whereas in the case of problem definition, it has played a supportive role, its primary role in case of this specific policy domain has been in developing the specific policy interventions from which the political actors can choose the most acceptable ones. This value laden aspect of the policy stream has eventually generated a 'Politics of Information Use'.

Table 3. A comparison between suggestions of 'Undernutrition in Bangladesh: a common narrative'(34) and the provisions of the National Nutrition Policy 2015

Suggestion of the Common Narrative	Adopted (Yes, No or Partial)	Specific Section/Provision of the NNP
Reductions in poverty and hunger alone are not sufficient to solve undernutrition	Yes	Acknowledged in the background paper of 7 th Five Year Plan and the NNP reflects this
The empowerment of girls and women is crucial for scaling up nutrition	Yes	Section 6.4.3
Scientific evidence shows that a combination of curative and preventive interventions reduce undernutrition	Yes	Sections 5.3 and 5.4 (in-detail analysis in section 6.3 and 6.4)
Two essential pre-requisites are high- level political leadership and multi- sectoral coordination	Partial	Political leadership is not mentioned but multi-sectoral coordination became a major policy objective (section 5.5)
Chronic undernutrition (measured by stunting) is the recommended priority indicator	No	
The Government should embed equity and rights-based analysis into monitoring and reporting systems	No	
Social and behavioural change to build an enabling environment for nutrition through the life cycle	Yes	Sections 6.2 and 6.1.2

2. The politics of information use

The significance of the role played by experts in the policy process is well-recognized within the existing literature and our study also supports this claim. Our discussion so far shows that the opening up of the policy space, the need for expertise on the part of government agencies, and the search for specific policy solutions have allowed experts to play an important role in the nutrition policy process of Bangladesh. Existing literature also shows that the role of experts can be divided into four groups (45).



- Enlightenment role: when research is used for "shaping and redefining the policy agenda".
- Interactive role: when experts become a part of an issue network and the government actively seeks the opinion and assistance of that particular network. However, in this case, "research alone does not dictate results, but is considered in concert with experience, political insight, pressure and judgments".
- Political role: where "research serves as ammunition for actors whose positions have hardened. While policymakers are not receptive to research that would cause them to change their view, they are avid users of research that supports their predetermined positions".
- Tactical role: when research is used as "an instrument of agenda denial".

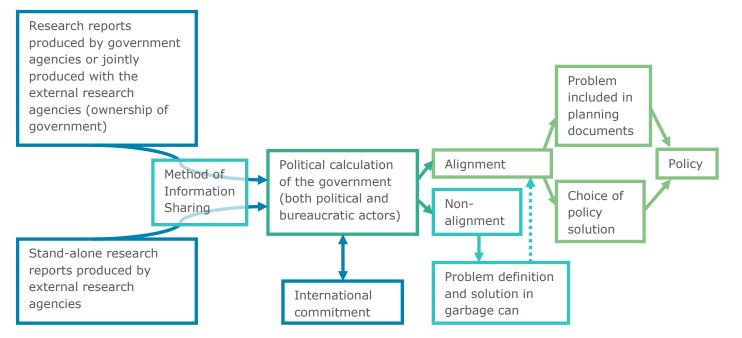
Based on this classification and our research findings, we argue that in the context of nutrition policy making process in Bangladesh, we have found no evidence that experts have played a political or tactical role. Whereas to some extent, experts have played an important role in making the policy problem more defined and causing a conceptual shift in the problem domain, so they have performed, to some extent, an enlightenment role, in the nutrition policy domain, the experts have mainly performed an interactive role. As we have explained earlier, in this specific policy domain, the development partners succeeded in developing a 'common narrative' and they used this narrative to advocate for policy changes. It is, however, important to note this narrative is actually an outcome or compilation of research produced by national and international experts on the nutrition scenario in Bangladesh. In other words, the experts were indeed a part of an advocacy coalition framework (12) whose ideas and opinions were sought by the government officials.

As we have mentioned earlier, the necessity and availability of information do not make it acceptable to the political actors. Given that the political actors functioning within the policy domain are rational actors, who focus on developing and maintaining a winning coalition, they tend to be more receptive to the information that can help them in attaining their political goals. However, this does not necessarily mean that the government officials will ignore objective research reports or information. Rather, they are more likely to choose the objective information which is politically useful.

Figure 3 shows a model of how information may be used. Whereas experts can try to affect the policy process through producing research reports without having any prior interaction with the government (stand-alone research reports in Figure 3), our study indicates that these types of reports are very unlikely to create an effect. In contrast, research that is or can be owned by the government has a better chance of getting the attention of government officials. As we have explained above, research studies and data collected by government agencies or studies that are produced through a joint collaboration between the government agencies and research agencies have a better chance of finding their place in the hands of the policy makers. At the same time, we have also found that in a number of cases, development partners have tried to build the government ownership of a research project by sharing information with government agencies. In this case, the development partner that is conducting the research usually meets the government officials before the project starts and explains to them the goal, objective and even the method of the project. The development partners maintain regular contact with the government agencies, keep them updated on the progress of the research, and share the reports with the officials before publishing them. Usually in these cases, the development partners pay close attention to the comments supplied by the government agencies and try to address them as best as they can. Our research findings show that research reports produced in this way also have a fair chance of getting the attention of the government officials.



Figure 3. The politics of information use



Our interviewees also pointed out a very interesting issue. In addition to the type of information produced by national and international research organizations, the method through which information is shared with high level officials is also important. As one interviewee noted: "You can prepare a research report and send it to the government offices but the truth is, there is a strong possibility that the report will never be read. The best option is to have face-to-face meeting with the officials and explain to them the major findings. This will not only make sure that they have got the message but also will increase your credibility to the government. And in a government set-up of Bangladesh, building credibility is important". Another interviewee pointed out another interesting issue: "In your report or while talking to them, you should never be overtly critical. You should always acknowledge their success, and should talk about the problems or weaknesses as areas where they need to work on to continue their development. The government will be willing to work with you only if you acknowledge their significance".

However, gaining the attention of the government is not enough and the information should be useful for the ruling party's political motive. This issue will become clear if we look at Table 2 and consider the issues that have been ignored by the government. As the table shows, development partners and other civil society organizations were pushing the GoB to adopt a rights-based approach to developing and implementing the nutrition policy. However, a number of representatives of the development organizations told us that they knew that this would not be adopted, because according to one of them: "It would be politically risky for the government, if they adopted a right based approach, they had to make a number of other commitments and had to confront a number of other problems and clearly, the government was not interested in doing that". Another important issue where the government did not consider the input of development partners was revitalizing the BNNC as the key coordinating body in a multi-sectoral arrangement. Whereas the government officials are of the opinion that a BNNC headed by the Prime Minister would solve most of the coordination problem and ensure the commitment of ministries, the development partners are not that sure. To them, the BNNC can very well be 'old wine in new bottle' and as one of our interviewee noted: "What guarantee is there that the BNNC which did not work in the past would work now? If the reason is the current Prime Minister and her commitment to nutrition, then this is not a sustainable solution because BNNC would then become ineffective if power changes".



In this paper, we argue that ensuring coordination under the national nutrition policy is a critical challenge and that the government should have concentrated much of its effort (or requested the development partners for suggestions) in developing an effective coordination mechanism. It is possible that the GoB is having difficulties in coordinating within a given governance structure. The fact that improving nutritional status requires a multi-sectoral approach, the government is forced to make a transformation from a government to a governance approach, i.e. to work in collaboration with different government agencies and other non-state actors. The problem is, working through the governance approach essentially means following an organizational structure which is somewhat different from the traditional hierarchy. In fact, recent studies on governance indicates that in this particular approach, a hierarchy should be replaced with a network, which is defined as: "Structures involving multiple nodes – agencies and organizations – with multiple linkages. A public management network thus includes agencies involved in a public policy making and administrative structure through which public goods and services are planned, designed, produced, and delivered (and any or all of the activities). Such network structures can be formal or informal, and they are typically inter-sectoral, intergovernmental, and based functionally in a specific policy or policy area. That is, officials from government organizations and agencies at federal, state, and local levels operate in structures of exchange and production with representatives from profit making and not-for-profit organizations" (47).

The definition indicates that the shift from government to governance essentially means shifting attention from hierarchic agencies towards organizational networks where emphasis is placed on establishing interdependencies between public agencies and a number of non-state actors. This interdependency is the key in case of network governance as instead of working separately towards achieving some common objectives, in a network governance, the government agencies are forced to continuously interact with each other to develop a collaborative relationship "rooted in reciprocity and trust and subject to rules negotiated by network partners". Consequently, command and control that guides the process of coordination between hierarchic agencies no longer applies as "trust becomes the central coordinating mechanism" (48-50). In other words, the management of a network is not about sharing information while acting separately or establishing a command and control structure to ensure compliance, rather, it is about:

- Working together, so adopting a multi-sectoral approach towards attaining a common goal
- Collaborating with each other
- Sharing resources and risks while engaging in a relationship of reciprocity and trust
- Subjecting the management of the network to specific rules negotiated by the network actors

If we compare the definition above with the nutrition governance approach in Bangladesh, it can be argued that the GoB is, in effect, emphasizing the development of a network for improving the nutritional status of its citizens without realizing that this actually means adopting a new managerial approach and coordination mechanism. In other words, the government is instructing the "officials from government organizations and agencies" to work with each other and with "representatives from profit making and not for profit organization", while ignoring that the hierarchical structure followed by the bureaucracy of Bangladesh is not adequate enough to support such an arrangement. In fact, whereas a hierarchy is only one of the possible 'institutional glues' congealing networked ties, there are other options available including "authority bonds, exchange relations, and coalitions based on common interest, all within a single multi-unit structure" (51). Therefore, coordination within a network is different and as such, simply establishing a centralizing body consisting of almost all the ministries to coordinate the policy goals will not solve the implementation problem. This is precisely why the now-defunct BNNC did not succeed and there is every possibility that if the new BNNC follows the same route, it too may embrace the same fate.

It is important to note that in revitalizing the BNNC, the GoB has not taken under consideration these factors and in fact, did not seek the opinion of the expert groups regarding an alternative organizational framework. It is possible that the GoB's inertia to look for an alternative



arrangement has been driven by the fact that the ruling party has no intention of losing control of the policy implementation process and that the BNNC can be the ideal framework for exercising this control as the Prime Minister will be in charge.

The discussion so far indicates that in the case of 'the politics of information use', the information available in the policy stream has to pass two critical tests. The first test deals with the issue of 'ownership' and as mentioned earlier, in case of nutrition policy, objective research findings that were owned by the GoB had a better chance of passing the first test and moving to the next level. The second test deals with the political calculation of the ruling parties (political actors) and at this stage efforts are taken to explore whether information is in alignment with the political calculation of policy actors. Only if this alignment exists, information will be allowed to pass through to the national level planning documents and be included within the policy solutions within policies. At the same time, in case of non-alignment, information (i.e. the policy solutions that have not been accepted) will be thrown into the garbage can. It should be noted here that if the information is thrown away to the garbage can, this does not necessarily mean that a particular information or policy solution is lost forever. If the political calculation changes, the policy solution will be picked up from the garbage can and attached to the problem.

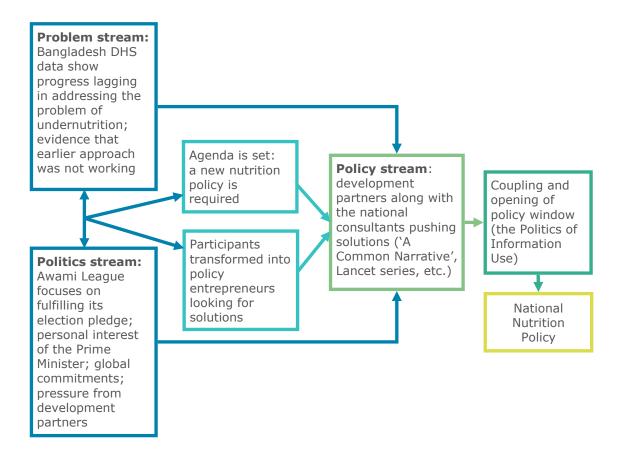
2.4. Bringing it together: coupling policy window and policy development

Up to this point, we have explained how nutrition becomes a problem that draws the attention of policy makers; how it becomes an item on the policy agenda once it enters into the politics stream; how 'the problem' receives a set of solutions from the policy stream; and how the politics of information use eventually determines what the final policy will look like. In effect, it shows that in the policy domain of Bangladesh, these three streams have moved separately.

- The redefinition of nutrition as a 'condition' started in the mid-2000s and did not become a problem until 2011. The Bangladesh DHS of 2011 played a pivotal role in transforming this condition into a 'problem' as it then clearly reflected that the progress made in the domain of nutrition had halted and the situation was not improving.
- Even though improving the nutritional status of the population had been a key political commitment of the Awami League in its election manifesto of 2008, the issue did not enter into the politics stream until 2012. At that stage the global movement for nutrition and the GoB's participation in a number of international conferences encouraged political actors to take the 'problem' and raise it to the agenda level. The GoB then started to look for solutions to the problems.
- In the presence of a policy entrepreneur and significant political commitment, the policy window started to open by 2013. However, it would not have been possible to develop a nutrition policy through this window of opportunity if policy solutions were not in place by then. Fortunately, in the context of Bangladesh, the policy experts had been working on the solution since the mid-2000s and as the policy window opened and an opportunity was created for them to participate, they started working with policy makers and the political actors. Consequently, a number of policy options were made available to the political actors from which they made a choice while taking into consideration their political aspirations. The outcome of this was the National Nutrition Policy of 2015. Figure 4 illustrates the process by which this happened.









Conclusion

Until recently the existing literature has argued that the policy arena in Bangladesh is centralized and closed, and that external actors have very limited to no access to shaping policy. However, studies of the policy process, including environmental policy (36), drug policy (52), health policy (37) and food policy (39), indicate that the policy domain is opening up, which, in turn, is creating opportunities for external actors to participate in the policy process including development partners, national and international NGOs, business organizations, civil society organizations and think-tanks. This analysis of the process of developing nutrition policy indicates that, in this particular domain, in addition to government agencies, experts belonging to development partners, including the World Bank, United Nations Organizations, the European Union and DFID, and to national and international research organizations, have played a critical role in shaping the problem and identifying solutions. Research findings and reports have indeed shaped the policy content, and it can be argued that the policy processes of Bangladesh has slowly but steadily moved from a closed to a more open pathway in which external actors have been given a seat at the policy table to work with the government. For experts - who want policies to be developed based on objective data, scientific research and analytical rigor - this is good news and it is possible that in other policy domains which are highly technical in nature, the lack of expertise in the GoB will force it to rely on technical assistance provided by the experts. However, this analysis of the nutrition policy process in Bangladesh shows that whereas external actors should continue to focus on producing objective, scientific information, they should keep in mind that this is not the only criterion to make their information count for political actors. Based on our study on the nutrition policy process, it is possible to argue that, at least in case of technical policies, external groups may consider the following strategic issues:

- Policy change or developing new policies will take time, and the members of external agencies should exercise patience if they want to establish themselves as a credible agents;
- The objectivity of research is extremely important and is key to gaining and maintaining credibility;
- While conducting policy-oriented research, the best approach for external agents is to work with the GoB from the outset; in fact the GoB should be involved in research design, data collection and information dissemination;
- Research findings must be shared with the agencies of the GoB and both formal and informal discussion about research findings can be an important source of information;
- External agencies should continuously scan and monitor the external environment. This will allow them to identify any possible shift in the political domain that may make their previously ignored research findings relevant.



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Summary

This review was commissioned by the Global Support Facility for the National Information Platform for Nutrition in order to better understand the process of nutrition policy making in Bangladesh. Based on a combination of desk review, key informant interviews and content analysis, the authors provide a historical overview of the process of nutrition policy development in Bangladesh, shedding light on the following questions: How is the National Nutrition Policy of 2015 different from previous policies and programmes? What are its specific areas and components? Why has this particular policy been developed at this point in time? What types of information have been considered in developing this policy? How inclusive has the policy process been? In other words, the paper makes an effort to analyse the process by which the National Nutrition Policy has been developed, formulated and adopted.

National Information Platforms for Nutrition is an initiative of the European Commission's Directorate General for Cooperation and Development, also supported by the United Kingdom Department for International Development and the Bill & Melinda Gates Foundation.



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