

Measuring accountability for human rights and social equity actions in food systems policy in Cambodia and Ethiopia

Jody Harris, Neha Singh Bias, Melale Girma Hailu, Casey Tokeshi, Amarachi Nkata, and Christophe Bene

Contact: j.harris@associate.ids.ac.uk

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Disclaimer

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Executive summary

The vesting of responsibility for a right to food, and rights in food systems, with the state establishes a duty of care in the state, holding it accountable for the experiences and outcomes of its nationals. Accountability is a dynamic concept and should be conceived in various forms including legal, political, social, financial and administrative – but few studies explicitly study accountability for rights. We aimed to examine, through a structured review of key food systems policies, how key human rights and social equity principles have been considered in existing policies related to food systems in two countries, and to identify opportunities where they could be considered more strongly or completely.

Our research question is: How have established human rights and social equity principles been considered in food systems policy in Cambodia and Ethiopia, and where are the gaps? To do this, we sampled five policy and programme documents per country, and compared their content to consideration of 9 key rights and equity principles derived from established literature: 1) Empowerment and Agency; 2) Human Dignity, Participation and Representation; 3) Non-Discrimination and Recognition; 4) Transparency; 5) Accountability; 6) Rule of Law and Remediation; 7) Redistribution; 8) Specific food system rights; 9) Sustainability. We used a scoring system in a novel Excel tool that is also a public output of the project.

Overall, no policy scored 3 points (fully considered) for any of 9 established rights and equity principles. Principle 4 (transparency) was not considered in 3 policies; principle 6 (rule of law) was not considered in 2 policies; and principle 3 (non-discrimination) was not considered in 1 policy. All other principles in all other policies were either partially or adequately considered. Reference to specific food system rights (principle 8, such as land rights, right to food, workers' rights) were most consistently considered at an adequate level, followed by principle 1 (empowerment and agency) and principle 7 (redistribution).

Ethiopia had slightly more policies scoring 'not considered' for one or more principles, but both countries considered most principles to a limited extent. Ethiopia considered principle 6 (rule of law) and principle 4 (transparency) slightly less; and Cambodia considered principle 3 (non-discrimination) slightly less. Cambodia's 2050 vision strategy and Ethiopia's productive safety net programme most fully considered the full set of rights and equity principles in the documents available. Overall, this suggests that the full set of rights and equity principles are either implicitly or explicitly on the radars of those constructing food system-related policy, but that there is more that could be done to strengthen accountability for these in policy in all cases.

We find that many key rights and equity principles have been partially or adequately considered in food system-related policies and programmes in Ethiopia and Cambodia, but that there is room for more accountability for these in every policy and for every principle; and that different principles are better considered in different countries. Accountability mechanisms should stipulate: to whom is the accountability to be delivered; who are the actors or stakeholders to be held accountable; and what is the nature of the accountability arrangement and enforcement. Assessments such as this can contribute to increased accountability through systematic and transparent understanding of how rights and equity principles are being translated into policy.

Introduction: Accountability for a rights-based food system

The Right to Food

The discussion on a rights-based approach to adequate food is nested in the conception of the fundamental human rights as per article 25 in the universal declaration of human rights of 1948. The continued discourse led by international communities and civic leaders has seen the conception of human rights grow and the mechanisms through which states maintain their obligation to respect, protect, promote, and fulfil these dignities expand. The process through which the right to food must be maintained and protected officially vests responsibility for upholding rights in the state (Fagundes et al. 2022).

The vesting of responsibility within the state establishes a duty of care with the state, holding it accountable for the experiences and outcomes of its nationals. This duty of care is not an unfamiliar function for states. However, in LMICs for example, the nature, maturity and independence of legislative, political, civil, financial and administrative systems can impact commitment to human rights in general, and the right to food in particular, and ability to maintain accountability. From the literature we find that accountability systems must be anchored in varied systemic structures in order to truly have impact, as the state commitment to the right to food must go beyond simply ratifying treaties to sustain legislative capacity, political-will, civic agency and international collaboration (Claude 2009).

Defining accountability

Accountability has been shown to have several different theoretical underpinnings and meanings across many disciplines, including international relations; trade and development; global governance for health and human rights; business, finance and social accounting; social psychology and behavioural economics; and public health policy and law (Mulgan 2003). Despite these various origins and interpretations, one can identify some common principles across all those disciplines (Kraak et al. 2014).

The first –and probably most important– of these principles is about monitoring performance in relation to some form of commitment. Accountability has traditionally entailed gathering information, monitoring and measuring (financial or institutional) delivery against voluntary or mandatory standards, and using information to improve performance.

Beyond this central function, other accountability principles that are found across existing literature involve: (i) trust, inclusivity, and transparency; (ii) government leadership and good governance; (iii) public deliberations to respond to stakeholders' interests and concerns; (iv) establishment or strengthening of independent bodies (e.g. ombudsman or adjudicator); (v) empowering regulatory agencies and using judicial systems to ensure fair and independent assessments; (vi) recognizing compliance and performance achievements with incentives (e.g. carrots) and addressing misconduct or non-performance with disincentives (e.g. sticks); and (vii) taking remedial actions to improve institutional performance and accountability systems.

Despite these definitions, *“accountability is one of those golden concepts that no one can be against. It is increasingly used in political discourse and policy documents because it conveys an image of transparency and trustworthiness. However, its evocative powers make it also a very elusive concept because it can mean many different things to different people”* (Bovens 2007: p.448). As this quote suggests, accountability appears as a concept that, in theory, can be incredibly powerful and useful, yet seems also to suffer from being vague, hard to define and difficult to operationalize. Accountability in this broad sense is an essentially contested and contestable concept because there is no general consensus about the standards for accountable behaviour, and because they differ from role to role, time to time, place to place and from speaker to speaker (Fisher 2004).

In sum, accountability often serves as a conceptual umbrella that covers various other distinct concepts, such as transparency, equity, democracy, efficiency, responsiveness, responsibility and integrity (Mulgan 2003). But the overarching idea is one where accountability entails individuals or stakeholders answering to others (empowered with authority or not) to assess how well they have achieved specific tasks or goals and to enforce policies, standards or laws to improve desirable actions and outcomes.

Forms of accountability required in a rights-based approach to food

Yamin (2008) notes that accountability is a dynamic concept and must be conceived in various forms including legal, political, social, financial and administrative.

Regarding the legal form, the literature makes it clear to differentiate the roles and capacities of international and national legislative systems. It is through the international legislative systems that the UN commissions establish and anchor commitments within national legislative policies (Ayala and Meier 2017). It is within national legislative systems that policies are able to be contextualised for effective implementation, governments are able to establish post-constitutional commitments, corporate actors are regulated, and nationals are able to demand for effective implementation of their right to food. In instances where legislative capacity is impeded, or elite capture has occurred, we find governments unable to effectively uphold commitments to the right to food, and communities unable to access change and hold states accountable through legislative pipelines (Anderson 2008).

The second mechanism is political, this encompasses themes of political will required to uphold the right to food. The responsibility for the right to food (and indeed other human rights) first must be acknowledged through the ratification of treaties. This initial commitment to the assigned duty is a non-trivial commitment that signals the dedication of the state to upholding the rights of the people, in this case a right to food (Claude 2009). It also creates leverage from which the government can be held accountable. The absence of political will impact funding, establishment of appropriate administrative systems, integration into legislative structures, and complementary policy to uphold rights. According to Bournoville (2011), chronic hunger persists because the political will to eliminate it and the lack of political will creates loop holes for political actors both nationally and internationally displacing accountability and maintaining the violation of the right to food.

The third theme highlighted in the literature is civic agency, an aspect of social accountability. The concept of civic agency encompasses a community's knowledge of their right to food, and capacity to mobilise to demand the right to food. It is the lack of community agency and internalised knowledge of their right to food that leads to weak accountability, and limited political will (Musembi and Scott-Villiers 2015; Ayala and Meier 2017). Anderson (2008) finds that, in communities with high 'civic agency', that is high community involvement, through either an active civil society or deep communal understanding of the right to food, societies were able to establish a strong moral economy to influence the establishment of policies complementary to the right to food. This is seen in Brazil, where civil societies are integral parts of the development of the human right approach to food being implemented within the country (Ayala and Meier 2017). This is in contrast to Zambia, where the lack of a community-internalised value of a 'right to food' has contributed to low accountability (Harris 2019).

Fourth (and also related to social accountability), international communities' cooperation is crucial in facilitating the accountability of countries and communities. The international institutions FAO and WFP are global lighthouses for food policy and have leverage in and capacity to guide governments in local policy development, which may be rights-based (Ayala and Meier 2017). Strong national-global working relationships can reinforce growing rights architecture and facilitate continued accountability – though these institutions can be similarly biased away from rights-based approaches, and are afflicted by similar lack of accountability as states (Claude 2009). Nevertheless, there are opportunities to leverage

international communities' knowledge and capacity to reinforce right to food commitments and pursue extraterritorial obligations.

Lastly, from Narula (2006) we learn that the regulator mechanism implemented in management of public and private administrative systems is critical to a nation's accountability commitments, as these are the means through which food and food related interventions reach the community. Public systems require clear guidelines of operations and structures to ensure they are able to service the commitments of the government, including budgetary transparency. In the case of Brazil, several rights-based local food system interventions were able to succeed when there were guidelines of operation, supportive policy, adequate capacity, and accountability mechanisms to respond to community needs and authority to revise operating memorandums (Ayala and Meier 2017).

The literature also flags the need for transparency and regulation of the private sector in order to protect a commitment to the right to food, where private sector interests are not in alignment with the rights commitments of governments or with the established principles of human rights. Governments must pursue regulatory action to preserve key principles in the right to food, such as affordability, quality, cultural acceptability and the upholding of other human rights particularly in production processes (Anderson 2008; Swinburn et al. 2015). The concept of businesses as duty-bearers for rights is established in principle (Wolfsteller and Li 2022), but accountability of businesses in practice becomes particularly tricky with transnational corporations, which are outside of national legal jurisdictions, necessitating increased international collaboration (Narula 2006).

It is these thematic factors and their interaction that influence the capacity for nations to establish accountability mechanisms towards the delivery of the right to food, and further, to establish equitable food systems. However, there are few studies that actually describe and analyze how aspects of these play out in practice.

Approach

Research aims and questions

Our premise is that without strong and independent accountability structures for human rights and social equity, governments and other powerful actors involved in local or national food systems are unlikely to implement actions to address the power imbalances and inequalities that occur in food systems and in related policy setting and governance processes.

In order to support strengthened accountability for rights and equity, we aimed to examine, through a structured review of key food systems policies, how key rights and equity principles have been considered in existing policies related to food systems, and to identify gaps where they could be considered more strongly. Our research question is: How have established human rights and social equity principles been considered in food systems policy, and where are the gaps?

Development of assessment criteria

The approach used to develop the final assessment criteria involved the following key steps:

- 1. Foundation on Existing Principles:*

We began by identifying and understanding the existing established principles of rights (PANTHER principles) and equity (3-Rs) (Table 1). These principles provided the theoretical foundation for the assessment criteria, ensuring that it was rooted in established human rights and equity frameworks.

Table 1: Established rights and equity principles

| Rights principles ¹ | | Equity principles ² | |
|--------------------------------|---|--------------------------------|--|
| Dimension | Description | Dimension | Description |
| Empowerment | Education on human rights, policy & legal systems | Agency (autonomy) | Capacity of individuals or groups to make their own decisions and engage meaningfully in processes |
| Non discrimination | Recognition of marginalization in context Affirmative actions in policy | Recognition | of the social attributes that makes people marginalized |
| Human dignity | Strengthening long-term capabilities Ensuring acceptability of assistance | Representation | of marginalized groups in making decisions that affect them. |
| Participation | Representation of marginalized groups Inclusion of civil society Inclusive knowledge Inclusive dialogue Informed consent | | |
| Transparency | Open policy spaces Transparent budgets Disaggregated data | | |
| Accountability | Clear monitoring Meaningful sanctions | | |
| Rule of law | Accession to covenants Rights in constitutions Rights-based legislation Strategic litigation Access to justice, due process | | |
| | | Redistribution | of resources and opportunities to achieve a good life, favoring the marginalized. Achieve fair distribution of benefits, costs, opportunities and resources, via recognition and representation. |

¹ **FAO PANTHER principles.** *FAO 2013: The human right to adequate food in the global strategic framework for food security and nutrition A Global Consensus*

² **HLPE equity principles.** *CFS 2023: HLPE #18: REDUCING INEQUALITIES FOR FOOD SECURITY AND NUTRITION*

2. Document Review:

We conducted a [thorough review](#) of twelve global reports that discussed the rights-based approach or equity considerations across various sectors. The purpose was to gather practical examples of how the existing principles could be applied and to standardize best practices and approaches.

These documents were sourced through google searches, focusing on documents that demonstrated the implementation of rights-based or equity-based principles in sectors such as health, education, food security, and governance.

3. Identification of Examples:

As we reviewed the documents, we systematically identified and extracted examples that illustrated the practical application of the existing principles.

We identified where similar examples were given across multiple documents, and where examples were given multiple times these were prioritized in the final list for examples for each principle – though occurring multiple times was not the only reason for an example to be included, if clear or innovative examples were mentioned only once.

Where examples covering the rights and equity principles were similar in terms of their practical actions, these were noted to be overlapping principles. This was true for several sets of principles, so for practical purposes these were combined in the list (for instance human dignity, empowerment and agency; or participation and representation).

4. *Expansion of Principles:*

During the document review, we recognized that certain crucial aspects of rights and equity were not fully covered by the initial set of principles, and that practical actions suggested additional categories that might be needed. Specifically, we identified two additional dimensions that were consistently emphasized across multiple documents:

- Food systems-specific human rights in terms of concrete actions in the food system, such as land rights
- Sustainability, in terms of change or continuation of aspects of rights over time

5. *Consolidation of Examples and Criteria:*

Finally, we consolidated the examples and identified themes into a structured list of assessment criteria. This list was designed to be specific, actionable, and reflective of both the theoretical principles and practical applications observed in our document review.

The final output consists of the following nine dimensions (principles) including the two newly identified:

- 1) Empowerment and Agency
- 2) Human Dignity, Participation and Representation
- 3) Non-Discrimination and Recognition
- 4) Transparency
- 5) Accountability
- 6) Rule of Law and Remediation
- 7) Redistribution
- 8) Specific food system rights
- 9) Sustainability

Each dimension is accompanied by specific examples that illustrate how it can be effectively implemented when assessing the Ministerial M&E frameworks. The accompanying [Excel file contains these examples](#).

Sampling of food system policy documents

This report presents findings and analysis from a comprehensive review of five key national documents from Cambodia and Ethiopia. Each document was selected as it is central to the foundation of each country's food systems transformation efforts. Below is a list of the five documents sampled for Cambodia and Ethiopia.

CAMBODIA

1. Cambodia's Roadmap for Food Systems for Sustainable Development 2030 | [Report Access Link](#)
2. National Multisectoral Action Plan For The Prevention And Control Of Noncommunicable Diseases 2018- 2027 | [Report Access Link](#)
3. Pentagonal Strategy-Phase I (Cambodia Vision 2050) | [Report Access Link](#)
4. National Social Protection Policy Framework 2016-2025 | [Report Access Link](#)
5. Third National Strategy for Food Security and Nutrition 2024-2028 (draft) | [Report Access Link](#)

ETHIOPIA

1. National Nutrition Program II | [Report Access Link](#)
2. Seqota Declaration Implementation Plan 2016-2030 | [Report Access Link](#)
3. Vision 2030 Transforming Ethiopian Food Systems | [Report Access Link](#)
4. Productive Safety Net Program Phase IV | [Report Access Link](#)
5. National Social Protection Policy of Ethiopia | [Report Access Link](#)

Assessment of policy documents, and synthesis of findings

1. Rights and Equity Assessment Methodology

Building on the assessment criteria outlined above, we developed a comprehensive *Rights and Equity Assessment Tool* in MS Excel. This tool was used to evaluate each report against the nine dimensions outlined above, with each dimension containing illustrative examples framed as measurable questions. For instance, under the dimension *Empowerment and Agency*, we included an example of *Dissemination of Information and Communication*—defined as actions such as disseminating studies and experiences to civil society organizations (CSOs) and new audiences, building trust and relationships, and ensuring clear and frequent communication. In total, the tool consisted of 70 measure questions across the nine dimensions. The template of the tool can be accessed [here](#).

2. Evaluation Process

All the reports listed above were systematically analyzed and coded using this tool. The coding process included the following steps:

- a) **Initial Validation:**
Each measure question was answered with a simple "Yes" or "No," indicating whether the document explicitly or implicitly considered the measure.
- b) **Detailed Assessment:**
If the answer was "Yes," the measure was further analyzed using a predefined scoring system listed below to evaluate the extent to which the question was addressed. The evaluation process was conducted collaboratively by two researchers using the Rights and Equity Accountability Assessment Framework. Each researcher initially reviewed and analyzed the documents independently, systematically assessing the inclusion of measure examples under each criterion as described above. After this individual coding phase, the researchers met to discuss their findings, confirm alignment, and resolve any discrepancies. These discussions occurred first at the level of individual measure examples and then at the broader criterion level.

| Scoring System | |
|----------------|--|
| 0 | Not Considered: The document does not mention or address this principle at all |
| 1 | Partially Considered: The document mentions this principle but lacks sufficient detail. The principle is superficially addressed with no translations into specific actions or mechanisms for meaningful integration. |
| 2 | Adequately Considered: The document provides details but there are areas for improvement. Principles are integrated throughout the document, strategies and objectives, actions & indicators are present but lack thoroughness and specificity, and mechanisms for integration are present. Still, the approach is general, not comprehensive, or not fully developed. |
| 3 | Fully Considered: The document comprehensively addresses the principle with clear detail. The principle is embedded into core processes and practices with ongoing compliance mechanisms. Well-defined, targeted, and nuanced actions/indicators are outlined. |

c) **Evidence Collection:**

For each analysis, evidence was documented in a designated column, ensuring transparency and traceability of the evaluation process. Throughout the process, there was largely agreement across the five documents. throughout the coding of the documents. However, disagreements occasionally occurred regarding whether certain measures should be scored as "Partially Considered" or "Adequately Considered." These differences often stemmed from varying interpretations of the criteria and debates over whether implicit references in the documents provided sufficient evidence for higher scores. The evidence section of the tool played a critical role in resolving the discrepancy in analysis between the two researchers through discussion and going back to the evidence.

d) **Principle Scoring:**

After all measure questions within a dimension were answered, the overall principle was scored using the same predefined scorecard. This scoring considered both qualitative assessments and the aggregate performance across all measure questions, answering the overarching question for each dimension which is detailed in Table 2. These scores were determined by synthesizing the measure example scores within each section. The process of assigning overall scores required careful deliberation, as it was not always straightforward to encapsulate the complexity of individual measure scores into a single summary score. For instance, when measure examples were evenly split between two different scores—such as two “Not Considered” and two “Partially Considered”—the researchers had to assess the relative weight and significance of each measure to determine the final score for the criterion. Conversely, some criteria with individual measure examples scored as "Adequately Considered" or even "Fully Considered" were assigned an overall score of "Partially Considered" due to the predominance of lower scores within the section. This approach ensures that overall scores accurately reflect the relative strengths and weaknesses of each criterion as a whole. Criteria scored as "Not Considered" uniformly included measure examples that were all scored as "Not Considered."

e) **Principle Summarization:**

A concise summary of the findings was prepared for each principle, providing an overview of its coverage and depth

f) **Document-Level Assessment:**

Once all nine dimensions were coded, a summary for the entire document was created. This included a short assessment of whether the document explicitly referenced human rights and equity principles. By combining systematic individual evaluations with collaborative deliberation, this methodology ensured a rigorous, nuanced, and transparent assessment of the policy documents.

Table 2: Key guiding questions for each principle

| Rights and Equity Dimension | Key Guiding Question |
|--|--|
| Empowerment and Agency | To what extent are initiatives assessed on their effectiveness in strengthening long-term capabilities and rights knowledge, and enhancing the capacity of individuals or groups to make autonomous decisions? |
| Human Dignity, Participation, and Representation | To what extent are initiatives assessed on recognizing, measuring, and monitoring marginalization in context, including understanding all forms of inequality and assessing barriers that prevent marginalized and vulnerable groups from accessing their rights? |
| Non-Discrimination and Recognition | To what extent are initiatives assessed on openly communicating decision-making processes, and providing accessible and transparent information regarding objectives, outputs, and activities that enable all stakeholders to understand, participate in, and evaluate their effectiveness and fairness? |
| Transparency | To what extent are initiatives assessed on ensuring duty-bearers are held accountable if they fail to respect/protect/fulfill rights, or their responsibilities to rights-holders? |
| Accountability | To what extent are initiatives assessed on addressing (avoiding, reducing, restoring, and remediating) negative human rights impacts through legal and other channels, with priority given to the most severe consequences? |
| Rule of Law and Remediation | To what extent are initiatives assessed on ensuring the acceptability of assistance, and facilitating meaningful participation, inclusion, and informed engagement of rights holders, including marginalized groups and their representatives? |
| Redistribution | To what extent are initiatives assessed on the extent to which they address redistribution of material, cultural, and social resources, and opportunities, prioritizing the most marginalized groups, and addressing the social and political drivers of inequitable distribution? |
| Food system criteria | To what extent do initiatives explicitly address the key aspects of food systems? |
| Sustainability of rights | To what extent do initiatives identify potential longer-term changes, negative impacts, and intergenerational/legacy issues (sustainability)? |

Study limitations

We were only able to sample a sub-set of policies related to food systems, and although the sampling process was systematic, this can only give a snapshot of existing policy. Findings on limitations in addressing rights and equity principles in different documents may be due to the type and structure of the document considered. Some documents that we analysed are at a 'higher level' (strategy and framework level) and others more detailed implementation guides which may have had the space to be more detailed. The length of document may have implications as to how many measure examples could be addressed in writing. However, this does not necessarily imply that the shorter documents would have addressed more measure examples if they had the opportunity to be more detailed, and we contend that rights and equity should be noted in these documents if and where they are priorities.

Findings

Table 3: Summary of findings

| Policy | C1 1 | C2 2 | C3 3 | C4 4 | C5 5 | C6 6 | C7 7 | C8 8 | C9 9 |
|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Cambodia | | | | | | | | | |
| Pentagonal Strategy-Phase I (Cambodia Vision 2050) | Green | Yellow | Green | Yellow | Green | Green | Green | Green | Green |
| Cambodia's Roadmap for Food Systems for Sustainable Development 2030 | Yellow | Green | Yellow | Yellow | Yellow | Yellow | Yellow | Yellow | Yellow |
| Third National Strategy for Food Security and Nutrition 2024-2028 (draft) | Green | Yellow | Yellow | Red | Yellow | Yellow | Green | Green | Yellow |
| National Multisectoral Action Plan For the Prevention And Control of Non-Communicable Diseases | Yellow | Yellow | Red | Yellow | Yellow | Green | Yellow | Yellow | Yellow |
| National Social Protection Policy Framework 2016-2025 | Green | Green | Yellow | Yellow | Green | Green | Yellow | Green | Yellow |
| Ethiopia | | | | | | | | | |
| Vision 2030 Transforming Ethiopian Food Systems | Yellow | Yellow | Yellow | Red | Yellow | Yellow | Yellow | Green | Yellow |
| National Nutrition Program II | Green | Yellow | Green | Yellow | Yellow | Red | Yellow | Green | Yellow |
| Seqota [nutrition] Declaration Implementation Plan 2016-2030 | Yellow | Yellow | Yellow | Yellow | Yellow | Red | Yellow | Green | Yellow |
| Productive Safety Net Program Phase IV | Green | Green | Yellow | Green | Green | Green | Green | Green | Yellow |
| National Social Protection Policy of Ethiopia | Green | Yellow | Yellow | Red | Yellow | Yellow | Green | Green | Yellow |

Legend:

| | | | |
|--------------------------|--------------------------------|---------------------------------|----------------------------|
| Not considered (score 0) | Partially considered (score 1) | Adequately considered (score 2) | Fully considered (score 3) |
|--------------------------|--------------------------------|---------------------------------|----------------------------|

- ¹ Empowerment and Agency
- ² Human Dignity, Participation, and Representation
- ³ Non-Discrimination & Recognition
- ⁴ Transparency
- ⁵ Accountability
- ⁶ Rule of law & Remediation
- ⁷ Redistribution
- ⁸ Food System Criteria
- ⁹ Sustainability of Rights

Overview

Table 2 shows a summary of findings across all policies in each country (rows), by rights and equity principle (columns). In Cambodia, the most relevant policies for review were deemed to be the overarching development vision strategy, the food systems roadmap, the food security and nutrition strategy, the non-communicable disease policy, and the social protection policy. In Ethiopia, the most relevant policies for review were deemed to be the food systems roadmap, two national nutrition programmes, and two national social protection programmes. This reveals the different ways that different policies and programmes are used to address food system issues in different countries.

Overall, no policy scored 3 (fully considered) for any principle. Principle 4 (transparency) was not considered in 3 policies; principle 6 (rule of law) was not considered in 2 policies; and principle 3 (non-discrimination) was not considered in 1 policy. All other principles in all other policies were either partially or adequately considered. Reference to specific food system rights (principle 8, such as land rights, right to food, workers' rights) were most consistently considered at an adequate level, followed by principle 1 (empowerment and agency) and principle 7 (redistribution). Overall, this suggests that the full set of rights and equity principles are either implicitly or explicitly on the radars of those constructing food system-related policy, but that there is more that could be done to strengthen these in all cases.

Ethiopia had slightly more policies scoring 'not considered' for one or more principles, but both countries largely considered most principles to some extent. Ethiopia considered principle 6 (rule of law) and principle 4 (transparency) slightly less; and Cambodia considered principle 3 (non-discrimination) slightly less. Cambodia's 2050 vision strategy and Ethiopia's productive safety net programme most fully considered the full set of rights and equity principles in the documents available.

Cambodia

In Cambodia, all the reviewed documents have noticeable efforts on constructing frameworks surrounding empowerment and agency; human dignity, participation, and representation; rule of law and mediation; and food system criteria. Whereas areas that highlight larger gaps are within the sustainability of rights, accountability, transparency, and non-discrimination and recognition.

Within sustainability of rights and accountability, the gaps surround the provision of grievance mechanisms, legal mechanisms, and support, and the preparation for both right holders and duty bearers to handle withdrawal of support as well as identifications of risk assessments which then reflects accountability in governance. These gaps then also translate towards the guarantee of one's civil and political rights which were not mentioned as much in all of the five documents. Moreover, although most policies and strategies have been inclusive, there are still some vulnerable groups and marginalized groups left out of the equation as well as a lack of representation and consultation with the general public which causes an imbalance of proper identification across national documents which was most evident in the National Multisectoral Action Plan for the Prevention and Control of Non-Communicable Diseases. Lastly, transparency should reflect budget allocations and clear roles and responsibilities; however, despite efforts to be as detailed as possible, there are still limitations as to how much budget is allocated for certain activities and what can right holders claim for in a case where these activities were not implemented.

However, despite these gaps, there were key strengths across multiple documents especially when it comes to empowerment agency and human dignity as well as the rule of law where the government has made efforts to strengthen their laws, policies, and intervention as much as they can. It is crucial to note that among the five documents, the National Social Protection Policy Framework was the most transparent when it comes to research data influencing their decision-making and budget allocation as

well as their ongoing plan, challenges, and future solutions to address these problems. Moreover, this document has included all of the vulnerable, marginalized, and hidden groups and identifies what they may need to guarantee their social protection and what can the government do to address these as well as why they have not provided the results yet. The Pentagonal Strategy-Phase I is an example of a document that adequately highlights and considers most aspects of the principles including the food system criteria and a long-term vision but can be enhanced further by increasing transparency, institutional accountability, and long-term sustainability measures to improve its effectiveness in achieving equitable and rights-based outcomes.

For a full assessment of each policy, please see Annex 2.

Ethiopia

In Ethiopia, all the reviewed documents have noticeable efforts on constructing frameworks surrounding empowerment and agency; human dignity, participation, and representation; non-discrimination and recognition; accountability; redistribution; specific food system rights; and sustainability of rights. Whereas areas that highlight larger gaps are within transparency; and rule of law and remediation.

Overall the documents demonstrated a relatively strong commitment to empowerment and agency, particularly for marginalized groups. There is a clear focus on enhancing capabilities of women, youth, smallholder farmers, and vulnerable populations through skill-building, financial literacy, and access to resources. Policies like the UNFSS Vision 2030 and the Social Protection Policy explicitly promote women's leadership and community decision-making initiatives. There is also strong consideration for many of the food systems specific rights outlined, specifically the right to nutritious & accessible food, right to health, right to agricultural technologies/inputs, and social protection. On the other hand, there is limited focus on food workers' rights, indigenous rights, and land related rights. Another key strength across the documents was their emphasis on equity and redistribution. The policies and programs consistently identified priority groups—including women, children, people with disabilities, pastoralist communities, and the rural poor—and outlined targeted interventions to reduce inequalities through social safety nets, livelihood programs, and access to basic services. It is crucial to note that out of the five documents analyzed for Ethiopia, the PSNP document was the most comprehensive and operationalized policy with nearly all measure examples at least 'partially considered'. It has the potential to demonstrate what human rights and equity considerations can positively look like in a policy-related document. For example, the PSNP Phase IV addresses accountability including grievance mechanisms for remediation of the interventions; no other document that was analyzed in this report details this so explicitly. This may be a distinct feature of the PSNP that cannot be attributed to the length nor type of document, and demonstrates the potential for accountability mechanisms within Ethiopian policy documents.

With respect to cross-policy gaps, transparency stands out as a critical challenge, with inconsistent or absent frameworks for public access to information, including budget allocations, program outcomes, and decision-making processes. In the same vein Accountability and Rule of Law Mechanisms were weak: grievance mechanisms and legal recourse channels for rights-holders to address systemic issues were inadequate or not considered at all and there is limited clarity on how duty-bearers are held accountable, with no clear penalties for non-compliance or failure to meet policy/program commitments. Additionally, the sustainability of rights is largely overlooked when it comes to most measure examples. Often exit strategies and data/evidence-based decision making and program scaling is how policies/programs addressed sustainability with limited consideration of intergenerational equity, risk assessments, etc. Lastly, while representation was definitely considered consistently, it was more often than not at a superficial level. While the documents acknowledged the importance of community engagement, and aimed to address barriers to community participation, measures lacked depth and

there was an over reliance on initial consultations without concrete strategies to ensure sustained community engagement throughout the policy lifecycle. Comparatively, the Seqota Declaration document scored relatively lower than the rest of the documents in this report, with more gaps than strengths and significantly more instances of 'No' answers for consideration of measure examples across all nine dimensions.

For a full assessment of each policy, please see Annex 2.

Discussion

This study has analysed how established human rights and social equity principles have been considered in food systems policy in two low-income countries, and where there are remaining gaps. It finds that many key rights and equity principles have been partially or adequately considered in food system-related policies and programmes in Ethiopia and Cambodia, but that there is room for more accountability for these in every policy and for every principle; and it has found that different principles are better considered in different countries.

The literature shows various accountability perspectives for institutions or organizations in the food system, depending on their purposes/missions. In particular, institutions or organizations that aim at raising awareness, setting standards and advocating (e.g. UN development agencies) usually emphasize compliance with rules and regulations, financial accountability and working towards specific missions. On the other hand, organizations intended for self-regulation (e.g. the private sector actors) emphasize transparency and performance achievements in relation to standards and engagements, while actors used to generate information (e.g. World Action on Salt for Health) emphasize impartiality through professional independence, accuracy and quality (Steets 2010).

This means that, depending on which institutions we are talking about, the accountability mechanisms reflect different perspectives and priorities, focus on different processes and key-actors, and will take different forms. One of the first tasks for those seeking to enhance accountability, therefore, is to consider the following questions:

To whom is the account to be delivered?

- *Political accountability* (e.g. elected officials, political parties, voters and the media). This is clearly one dimension that should be explored: how to make governments accountable for the official documents (e.g. international agreements and treaties) they signed. Note however that the UN already created a set of accountability mechanisms and incentives for governments to follow through on respecting, protecting and fulfilling human rights. These include: treaty bodies, which are expert committees appointed to interpret a particular treaty and receive reports from states that have ratified a treaty, in order to make recommendations toward greater compliance; special rapporteurs, who explain the application of specific human rights and visit countries to assess compliance; and periodic review of the human rights record of all UN member countries by the Human Rights Council.
- *Legal accountability* (e.g. courts). Legal accountability is probably one of the most powerful accountability mechanisms to ensure compliance with international and/or domestic laws and regulations (e.g. [the German government sued over 'failure' to meet climate goals](#)). This assumes however that national court systems are strong and sufficiently independent to bring their own country's governments to justice, implying a transparent governance system. Bringing other big actors to justice is more common - at least in some parts of the world (see e.g. [Apple](#)

[sued by the US federal government for monopolizing smart phones](#)). In essence, this accountability mechanism exists already even if it is not necessarily very common in low- and middle-income countries.

- *Administrative accountability* (e.g. auditors, inspector and controllers). Like the legal accountability mechanisms above, to be effective, administrative accountability requires a strong and transparent governance system in relation to public and private sector's liability – something that is generally more difficult to establish in low- and middle-income countries.
- *Social accountability* (e.g. interest groups, watchdog NGOs). This is closely linked to the political accountability discussed above and does rely on similar mechanisms: pressure from CSOs, NGOs, interest groups or even UN agencies, through lobbying and public media (TV, radio, news media) targeted at elected officials or public personalities; information and awareness raising campaigns, etc. Ultimately, holding actors to account for the accepted social norms of the public.

Who are the actors or stakeholders to be held accountable?

- *Corporate accountability*. When it comes to economic activities related to food system (i.e. agriculture, access to and exploitation of natural resources, food production, distribution and consumption), the private sector is recognized to play a central role and have large responsibility in the situation as we observe it today. Corporate accountability is therefore a critical entry point for addressing inequality and other (human right or right to food) related issues. The challenge of course is that, often, private sector actors are closely linked to official authorities. It is indeed not uncommon that the two spheres (public authority and (large) private sector) overlap and that large corporations, through their lobbying and influence power, interfere with or control public policy agenda.
- *Hierarchical accountability* (one for all). Hierarchical accountability refers basically to the accountability at the top, i.e. essentially (but not exclusively¹⁰) accountability of the government. In democracy, this accountability is expected to be embedded essentially in the election process. Without transparent elections, the accountability of government is severely weakened. Other accountability mechanisms in this category include public audits, and use of independent bodies (e.g. ombudsman or adjudicator, etc.).
- *Collective accountability* (all for one). Collective accountability is obviously very important in relation to societal issues such as climate change, domestic violence or even inequality – although one could argue that it is probably the most difficult form of accountability to enforce. In that context, collective *responsibility* may be more appropriate as it refers to commitments and obligations based on social or moral standards – as opposed to policies, regulations or laws.
- *Individual accountability* (each person for himself or herself). Part of our collective accountability emerges from individual accountability. In that regard the nuance made between accountability and responsibility does apply to the individual level.

¹⁰ Within big organizations hierarchical accountability refers to the accountability of the director/executive management team

What is the nature of the accountability arrangement?

- *Vertical accountability.* This type of accountability can go both ways: top-down and bottom-up. In one direction, a formal authority uses its power to keep some lower-level agents accountable for their actions – typically the central government/ministries holding decentralized authorities or their own decentralized/local staff accountable. In that case, accountability is often inherently embedded in the hierarchical relationship: I can hold you accountable for your action because I have authority, power (and often resources) over you. In the other direction, local agents hold the higher, centralized, authority accountability for their decision/actions. In that case, however the mechanism(s) to hold the central authority accountable need to be clearly identified, operational and effective.
- *Horizontal accountability.* This refers to situations where actors at the same level hold each other accountable. For instance, different ministries, or different NGOs, holding each other mutually accountable. Here again the mechanisms used to establish and maintain accountability need to be clearly identified, even though they can be more or less informal.

A full accountability framework on human rights and equity in relation to food systems would probably have to include three key interconnected processes – *monitor, review and act* – the same way that for instance WHO had proposed to structure accountability frameworks on women and children’s health at country level (World Health Organization 2011). In such a full framework, *monitor* refers to providing critical and valid information on what is happening, where and to whom (results) and how much is spent, where, on what and on whom (resources) in each country. *Review* means analyzing data to determine whether human rights and equity considerations in relation to food system have improved over time, and whether pledges, promises and commitments by different actors of the food systems have been kept. *Act* means using the information and evidence that would emerge from the review process and do what would be deemed necessary to accelerate progress towards improving human right and equity outcomes, meeting commitments, and reallocating resources for maximum benefits.

In the current situation, however, adopting a one-step-at-a-time approach and holding discussions on how to initiate the establishment of the monitoring process seems a good start. Review and act could be envisaged later, once the monitoring is well established.

Conclusion

This study is a contribution to the academic literature on the implementation of human rights-based and social equity-based approaches for food systems through policy; and a contribution to efforts on the ground to strengthen rights- and equity-based policy for food systems. Assessments such as this can contribute to increased accountability through systematic and transparent understanding of how rights and equity principles are being translated into policy.

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Annex 1: Rights and Equity Principle Criteria

1. Empowerment and Agency

Question to ask of the reviewed documents:

To what extent are initiatives assessed on their effectiveness in strengthening long-term capabilities and rights knowledge, and enhancing the capacity of individuals or groups to make autonomous decisions?

Examples:

- Making information accessible to all rights-holders, particularly marginalized groups
- Dissemination of Information and Communication (Disseminate studies and experiences to CSOs and new audiences, Build trust and relationships, Communicate clearly and often)
- Capacity Building for Rights-Holders (Efforts in capacity building especially for individuals and groups at risk of vulnerability or marginalization)
- Capacity Building of Duty-Bearers (training sessions and improvements in knowledge and skills)
- Access to Support and Advice (Availability of independent and competent legal, technical, and other advice for rights-holders)
- Sufficient Time for Capacity Building (measurement of duration and scheduling of capacity-building activities, participant readiness, and involvement levels)
- Comprehensive Rights Coverage (activities should include civil, political, economic, social, and cultural rights)
- Awareness and Exercise of Rights (awareness for marginalized groups like women which also includes sensitization of men and boys)

2. Human Dignity, Participation and Representation

Question to ask of the reviewed documents:

To what extent are initiatives assessed on ensuring the acceptability of assistance, and facilitating meaningful participation, inclusion, and informed engagement of rights holders, including marginalized groups and their representatives?

Examples:

- Establishment of shared priorities, values, vision, and clear articulation of needs and expectations
- Enabling Meaningful Contributions (Opportunities for people to contribute meaningfully)
- Facilitating the organization of disadvantaged stakeholders and building inclusive institutions and partnerships to improve representation.
- Evidence of consultations and dialogue processes during the preparation and design phases
- Engagement of a broad range of rights-holders and an inclusive participatory process that values different perspectives

- Adopting an inclusive approach to program planning, implementation, and evaluation (a. Involving rights-holders in designing impact mitigation measures & evaluating their effectiveness b. Collecting data from different stakeholders for equitable decision-making c. Continued engagement with relevant stakeholders and clear efforts to ensure participation of individuals at heightened risk of vulnerability/marginalization)
- Recognition that all individuals are rights-holders not mere beneficiaries
- Ensuring the voices of community groups and CSOs are represented in initiatives at the national level and designing exit strategies that ensure the continuity of involvement of local municipalities and CSOs.
- Implementation of inclusive and gender-responsive engagement and consultation processes and use of guiding questions to ensure comprehensive and culturally appropriate engagement.
- Checks on the accessibility of services for groups with particular needs

3. Non-Discrimination and Recognition

Question to ask of the reviewed documents:

To what extent are initiatives assessed on recognizing, measuring and monitoring marginalization in context, including understanding all forms of inequality and assessing barriers that prevent marginalized and vulnerable groups from accessing their rights?

Examples:

- Recognition of various stakeholders differing relationships to power and clear ways to mitigate existing power imbalances
- Thorough identification of marginalization (a. intersectional marginalization identification & measures to address the needs of hidden groups b. understanding of the profile of marginalized groups & the factors contributing to their marginalization (group profiling))
- Mechanisms to identify the impact of activities on protected characteristics.
- Measurement disaggregated by characteristics making certain groups marginalized by context.

4. Transparency

Question to ask of the reviewed documents:

To what extent are initiatives assessed on openly communicating decision-making processes, and providing accessible and transparent information regarding objectives, outputs, and activities that enables all stakeholders to understand, participate in, and evaluate their effectiveness and fairness?

Examples:

- Evidence of transparent decision-making processes, including clear communication and documentation
- Ensuring any impact assessment process is transparent to engage affected or potentially affected rights-holders without risking security, and publicly communicating impact assessment

findings and appropriately sharing information with participants/stakeholders at relevant intervals

- Publicly analyzing budget allocations and expenditures to reflect political commitments and policy goals, particularly regarding human rights obligations.
- Supporting monitoring mechanisms to disaggregate data by various categories (gender, age, disability, etc.) to reveal excluded groups, and making monitoring information widely available to allow public judgment on service performance.

5. Accountability

Question to ask of the reviewed documents:

To what extent are initiatives assessed on ensuring duty-bearers are held accountable if they fail to respect/protect/fulfil rights, or their responsibilities to rights-holders?

Examples:

- Evidence of strengthened dialogue processes and promotion of social accountability mechanisms, and implementation of capacity-building initiatives for social accountability tools
- Clear identification of roles and responsibilities among stakeholders/duty-bearers
- Using detailed and disaggregated community-level data to challenge national statistics and hold duty-bearers accountable.
- Establishment of transparent accountability mechanisms to ensure all actions and decisions are traceable and justifiable
- Continuous monitoring and evaluation of initiatives with rights & equity specific indicators/benchmarks
- Clear alignment with relevant international standards and accountability and impact assessment measures guided by these standards
- Institutional mechanisms in place that support the enforcement of rights and hold relevant duty-bearers accountable

6. Rule of Law and Remediation

Question to ask of the reviewed documents:

To what extent are initiatives assessed on addressing (avoiding, reducing, restoring, and remediating) negative human rights impacts through legal and other channels, with priority given to the most severe consequences?

Examples:

- Efforts made to first avoid negative impacts, and if not possible, to reduce, mitigate, and remediate them

- The presence of effective remedies and due diligence (operational-level grievance mechanisms, etc)
- Access to Justice Programming (for eg: Justice institutions should adhere to CEDAW GR 33 principles: justiciability, availability, accessibility, good quality, provision of remedies, and accountability.)
- Strengthening governance through sound legal and regulatory frameworks and effective institutions

7. Redistribution

Question to ask of the reviewed documents:

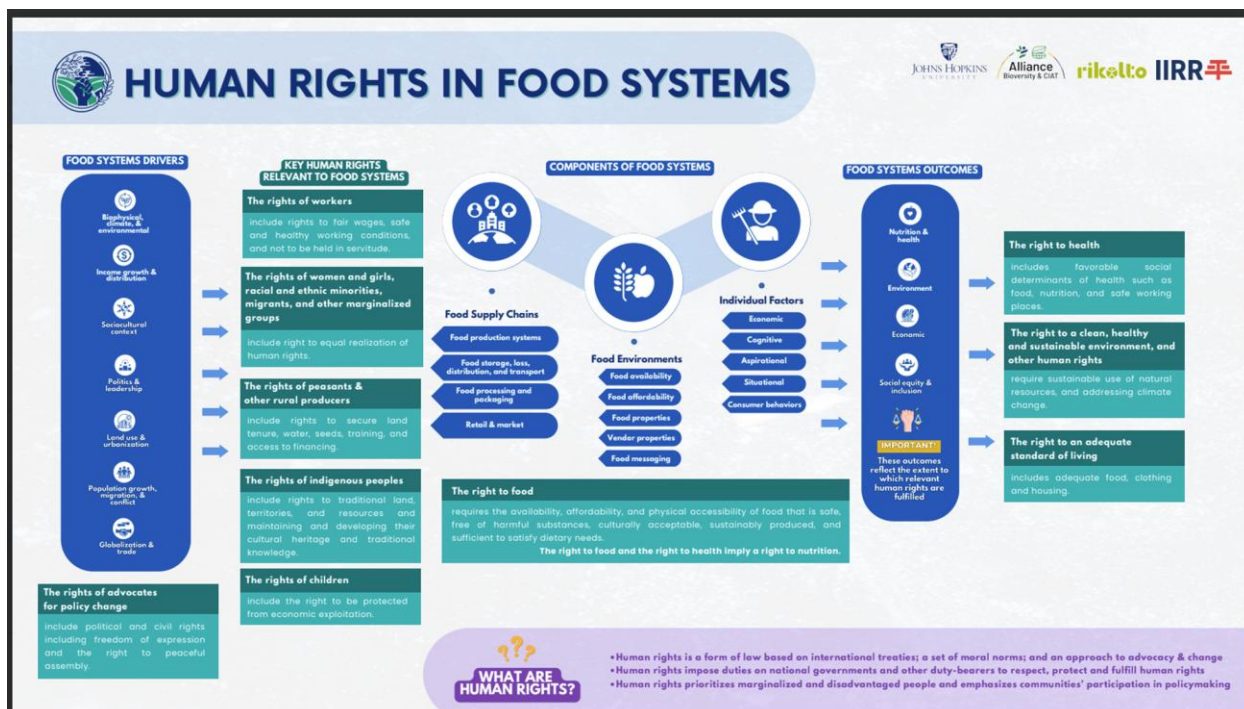
To what extent are initiatives assessed on the extent to which they address redistribution of material, cultural, and social resources and opportunities, prioritizing the most marginalized groups, and addressing the social and political drivers of inequitable distribution?

Examples:

- Clearly defined objectives related to equity and redistribution. Evidence of embedding equity principles into policy.
- Resources and opportunities distributed equitably amongst different groups especially within communities intended as beneficiaries and mechanism are in place to monitor fairness of distribution
- Making equity-sensitive investments in food supply/value chains and in disadvantaged areas.
- Monitoring and regulating, as appropriate, corporate power asymmetries in food systems governance and decision-making.
- Leveraging and adopting SDG 10, Reduce inequalities.
- Evidence of initiatives for reallocation of current public expenditures, extension of social security contributions like schemes for workers of the informal economy in rural and urban areas, and social assistance measures such as disability benefits, single-parent allowances, and social pensions
- Prioritized populations most affected by climate change, conflict, and other contemporary global crises in targeting policy and allocating resources.

Food system criteria

Beyond rights and equity, there are some key practical areas that food systems transformation processes should address. The framework below maps key rights onto a food systems framework. In addition, the sustainability of these processes within a rights framework should be considered.



Source: Human rights in food systems, PCFS project

8. Key food system rights

Question to ask of the reviewed documents:

To what extent do initiatives explicitly address the following key aspects of food systems?

- Land rights / freedom from land grabs
- Right to seed /water (agricultural inputs & technologies)
- Right to a sustainable environment
- Rights of Indigenous groups (peasants, rural producers, pastoralists, etc)
- (Food) workers' rights / freedom from exploitation
- Rights of women (and children) working in food / freedom from exploitation
- Right to social protection / welfare
- Right to health
- Right to safe and nutritious food
- Right to accessible and affordable food
- Right to culturally acceptable food
- Right to financial and extension services

9. Sustainability of rights

Question to ask of the reviewed documents:

To what extent do initiatives identify potential longer-term changes, negative impacts and intergenerational/legacy issues (sustainability)?

Examples:

- Recognition of the interdependence and interrelation of all human rights.
- Utilization of evidence to inform actions.
- Inclusion of risk assessment through social, economic, and environmental dimensions.
- Determination of impact severity based on scope, scale, irremediability, and interrelatedness.
- Consideration of positive and negative, primary and secondary long-term effects, both direct and indirect, intended and unintended.
- Evaluation of the likelihood that the intervention's impact on the worst-off groups will continue after external support is withdrawn.
- Assessing the severity of impacts based on their human rights consequences, such as scope, scale, and irremediability while considering the perspectives of rights-holders.
- Assessment of whether inequities between best-off and worst-off groups will increase, remain stable, or decrease when external support is withdrawn.
- Consideration of scaling-up or exit strategies to determine the likelihood that the strategy will be widely replicated or adapted.
- Considering expenditures on all of the above

Annex 2: Full assessment of each policy

All the coded reports from Cambodia can be found [here](#)

All the coded reports from Ethiopia can be found [here](#)

Cambodia

Roadmap for Food Systems for Sustainable Development

The analysis highlights notable gaps in key principles, including Sustainability of Rights, Rule of Law and Remediation, Accountability, and Transparency, which lack actionable frameworks for grievance mechanisms, risk assessments, and robust accountability measures. These shortcomings limit the roadmap's capacity to achieve sustainable governance. Conversely, Empowerment and Agency and Human Dignity, Participation, and Representation show stronger commitments, particularly in inclusivity, social protection, and stakeholder engagement. However, these strengths require more detailed and specific operational strategies to fully realize their potential in advancing human rights and equity within Cambodia's food systems.

Cambodia's roadmap reflects a significant effort to promote equity and inclusivity in its food systems framework. Nonetheless, critical gaps in accountability, transparency, and long-term sustainability hinder its ability to comprehensively address systemic challenges. By incorporating actionable strategies, enforceable frameworks, and effective monitoring systems, the roadmap has the potential to become a transformative blueprint for sustainable and equitable food systems.

Key Strengths

Empowerment and Agency

Efforts to build the capacity of marginalized groups and train duty-bearers are evident, reflecting a strong foundation for empowerment. However, the roadmap could improve by specifying timelines, intervals for engagement, and detailed strategies for disseminating information, ensuring meaningful agency for rights-holders.

Human Dignity, Participation, and Representation

The roadmap includes initiatives for gender-responsive consultations and post-summit dialogues, showcasing a commitment to inclusivity. Despite these strengths, the absence of exit strategies and culturally sensitive engagement frameworks limits the ability to sustain long-term participation.

Redistribution

Social assistance programs like school feeding initiatives and clean water access demonstrate a commitment to equitable resource distribution. Expanding these efforts to address corporate power asymmetries and prioritizing disadvantaged groups in food supply chains would further strengthen redistribution goals.

Food System Criteria

Key aspects like nutrition and food safety are adequately considered, but the roadmap does not detail critical areas such as land rights, culturally acceptable food, or protections for food workers. Indigenous groups are acknowledged but without actionable measures to safeguard their specific rights within food systems.

Critical Gaps

Sustainability of Rights

The roadmap does not adequately plan for the long-term continuation of programs after external support is withdrawn. Critical areas such as risk assessments, scaling-up strategies, and intergenerational equity considerations are missing. This lack of foresight makes the sustainability of interventions uncertain, limiting the roadmap's ability to deliver lasting results for rights-holders.

Transparency

While some stakeholder dialogues are highlighted, the roadmap lacks a focus on making data publicly accessible or providing detailed budget allocations for initiatives. The absence of social accountability mechanisms undermines public trust and stakeholder engagement. Greater transparency in decision-making, budgetary processes, and public monitoring would strengthen its governance structure.

Accountability

Roles and responsibilities are partially defined, but the roadmap does not outline enforcement mechanisms or specify consequences for non-compliance. Additionally, the potential of grassroots data to hold duty-bearers accountable is not fully utilized. Accountability measures need to be backed by participatory monitoring tools and enforceable penalties for failing to meet commitments.

Rule of Law and Remediation

The roadmap addresses technical compliance with food safety regulations but does not include comprehensive grievance mechanisms or legal accountability frameworks. Without these, rights-holders lack recourse when systemic issues arise, leaving gaps in justice and remediation..

National Multisectoral Action Plan For The Prevention And Control Of Noncommunicable Diseases 2018- 2027

The action plan prioritizes combating non-communicable diseases through education, counseling, and enforcement measures. While it demonstrates a strong commitment to addressing public health challenges, significant gaps in inclusivity, transparency, and accountability limit its broader impact. Marginalized groups beyond women and children receive minimal attention, and the absence of grievance mechanisms, redistribution strategies, and sustainable budgeting further undermines its equity focus. Broadening stakeholder engagement, integrating comprehensive social protection measures, and strengthening accountability and sustainability mechanisms would enhance the plan's inclusivity and long-term effectiveness, aligning it more closely with equity and human rights principles.

Key Strengths

Rule of Law and Remediation

The plan demonstrates progress in enforcement mechanisms to tackle non-communicable diseases, particularly in regulating harmful substances like alcohol and tobacco. Provisions for quality assurance and enforcement signal a structured approach to addressing these challenges. While grievance mechanisms and access to justice are not fully developed, the document's emphasis on regulatory action provides a solid foundation. Further strengthening of these mechanisms would ensure more comprehensive support for affected populations.

Accountability (Partial Strength)

The document excels in clearly defining roles and responsibilities for ministries and departments, ensuring that institutional frameworks are in place. While enforceable measures to hold duty-bearers accountable are absent, the clarity in delineating roles provides a starting point for building stronger accountability systems. Expanding this framework to include enforceable consequences for non-compliance would enhance the plan's governance.

Empowerment and Agency (Partial Strength)

Though the plan lacks a broad focus on marginalized groups, it addresses economic and social rights such as access to education and health services. These efforts, while limited, highlight the potential for empowerment through targeted initiatives. Building on these foundations by engaging civil society organizations and providing legal advice to rights-holders would create a more inclusive approach to empowerment.

Transparency (Partial Strength)

The plan mentions engagement through education and counseling services, which reflects a limited effort toward transparency. However, public access to monitoring information and detailed budget reporting is missing. Improving transparency in these areas by including mechanisms for social accountability and publicly accessible data would significantly bolster public trust and oversight.

Critical Gaps

Empowerment and Agency

The document fails to adequately focus on marginalized groups beyond women and children, with limited acknowledgment of their rights. Civil and political rights are absent, and there is no evidence of targeted engagement with CSOs to support diverse populations. Moreover, the lack of legal advice or technical support for rights-holders diminishes the ability of vulnerable groups to claim their rights. Addressing these omissions would strengthen the principle significantly.

Human Dignity, Participation, and Representation

Consultation processes with rights-holders are notably absent, leaving marginalized groups and other stakeholders like CSOs and the private sector out of the decision-making process. While duty-bearers' perspectives are well-represented, the lack of inclusive dialogue weakens participation efforts. Furthermore, there are no exit strategies to maintain engagement beyond 2027, which undermines the sustainability of participation. Comprehensive consultation frameworks are essential to address these gaps.

Non-Discrimination and Recognition

Non-discrimination is entirely absent from the document. Marginalized populations other than women and children are not acknowledged, and there is no focus on addressing systemic barriers or intersectional vulnerabilities. The omission of other vulnerable groups, such as Indigenous populations or people with disabilities, highlights a lack of equity focus. Incorporating mechanisms to identify and address these groups' needs would align the plan with human rights principles.

Transparency

Budget allocations for interventions are vague, and the absence of detailed financial transparency weakens trust in the plan's implementation. While there is some engagement through education and counseling, these efforts do not extend to public consultations or data transparency. The lack of mechanisms to address system inefficiencies or monitor social accountability further undermines transparency. Addressing these gaps would improve governance and accountability.

Accountability

Despite the clear delineation of roles and responsibilities, the absence of enforceable mechanisms to hold duty-bearers accountable is a significant gap. Rights-holders lack avenues to challenge authorities or seek redress for rights violations. Incorporating mechanisms for grievance redress and enforceable consequences for non-compliance would enhance accountability significantly.

Redistribution

Redistributive measures are inadequately detailed and fail to address systemic inequalities. The plan broadly categorizes populations but does not delve into specific challenges faced by marginalized groups. Without a more detailed approach to redistribution, including targeting systemic inequities and power imbalances, the plan cannot achieve equitable outcomes.

Food System Criteria

The document primarily focuses on the regulation of alcohol and tobacco but overlooks broader food system criteria such as nutrition, affordability, and accessibility. Critical aspects like culturally appropriate food, food security, and affordability are missing. Expanding the scope to address these dimensions would provide a more comprehensive and holistic approach to public health.

Sustainability of Rights

The plan lacks clarity on long-term sustainability strategies, including funding mechanisms and planning for systemic risks. While it mentions budget allocations, there is no clear indication of how these funds will be sustained or allocated equitably. The absence of interrelated human rights assessments and strategies for mitigating the withdrawal of support further weakens this principle. Strengthening these areas is essential for long-term effectiveness.

Pentagonal Strategy-Phase I (Cambodia Vision 2050)

The Pentagonal Strategy showcases Cambodia's commitment to inclusivity and equity, with notable strengths in promoting Empowerment and Agency, Accountability, Rule of Law and Remediation, Human Dignity, Participation, and Representation, and Food System Criteria. These elements emphasize progress in fostering social protection and equitable development, particularly through capacity-building, institutional accountability, and inclusive governance mechanisms. However, significant gaps persist in Non-Discrimination and Recognition, Transparency, Redistribution, and Sustainability of Rights. The absence of actionable frameworks for these principles hinders the strategy's transformative potential. By addressing these critical gaps with detailed operational measures and aligning with global human rights standards, the strategy can serve as an effective roadmap for equitable and sustainable development.

Key Strengths

Food System Criteria

The strategy demonstrates a strong commitment to social protection, healthcare access, and sustainability within food systems. These priorities reflect a comprehensive approach to ensuring nutrition, safety, and accessibility for vulnerable populations. While not explicitly detailed in every dimension, the emphasis on these key components highlights the strategy's recognition of food systems as a central pillar for inclusive development.

Accountability

A notable strength of the strategy lies in its clear delineation of roles and responsibilities among stakeholders. Institutional frameworks for accountability provide a robust foundation, ensuring that

duties are allocated efficiently and transparently. However, while mechanisms are defined, the strategy's success depends on their effective implementation and enforceability, which remains an area to be bolstered in future efforts.

Rule of Law and Remediation

The Pentagonal Strategy highlights institutional strengthening and enforcement frameworks, particularly in the regulation of social protection and food systems. These efforts demonstrate a commitment to maintaining the rule of law. While grievance mechanisms are underdeveloped, the framework's focus on institutional accountability and legal compliance reflects progress in establishing equitable governance structures.

Empowerment and Agency

The strategy promotes capacity-building for marginalized groups and provides training for duty-bearers to ensure inclusive participation. These efforts foster trust and collaboration among stakeholders, enabling meaningful empowerment. However, to achieve full potential, the strategy would benefit from more detailed operational plans that address specific cultural and political rights for diverse populations.

Human Dignity, Participation, and Representation

The strategy emphasizes gender-responsive engagement and collaboration with civil society organizations (CSOs), fostering inclusive representation for vulnerable groups. By prioritizing access to essential services and equitable participation, it underscores its commitment to human dignity. However, sustained engagement mechanisms, such as exit strategies and culturally appropriate guidelines, would further enhance this principle's impact.

Critical Gaps

Non-Discrimination and Recognition

Despite identifying some marginalized groups, the strategy lacks a comprehensive approach to addressing intersectional discrimination. Power imbalances and systemic barriers are not fully explored, limiting its ability to create equitable opportunities for vulnerable populations. Incorporating mechanisms to address these disparities and ensuring diverse representation across all social strata would strengthen this principle.

Transparency

The strategy highlights some transparency initiatives, such as stakeholder dialogues and data collection. However, public access to monitoring information and budget allocations remains vague. Social accountability mechanisms are mentioned but lack actionable frameworks. To ensure trust and inclusivity, the strategy needs to incorporate more robust transparency measures, including publicly accessible financial reporting and participatory monitoring processes.

Redistribution

While the strategy aligns broadly with SDG 10 through its commitment to reducing disparities, it lacks actionable measures to address systemic inequalities. Corporate power asymmetries and inequitable resource allocation in food systems governance are not sufficiently addressed. Detailed redistribution mechanisms, including investments targeting disadvantaged groups, would strengthen the strategy's focus on equity.

Sustainability of Rights

Although the strategy considers evidence-based policymaking and long-term impacts, it falls short in planning for sustainability after external support is withdrawn. Key elements such as scaling-up mechanisms, intergenerational equity, and financial sustainability are inadequately addressed. Strengthening these aspects with detailed risk assessments and comprehensive planning would ensure long-term resilience and impact.

National Social Protection Policy Framework (NSSPF) 2016-2025

The NSSPF presents a forward-looking approach to reducing inequalities and supporting vulnerable groups through economic empowerment initiatives like vocational training, cash transfers, and health equity funds. While the framework underscores long-term economic opportunities, it deprioritized immediate systemic protections for marginalized groups and lacks explicit references to human rights frameworks. This limits its alignment with global human rights and equity standards. Enhancing transparency, grievance mechanisms, and detailed implementation strategies would significantly improve the framework's inclusivity, accountability, and overall effectiveness in creating a more equitable social protection system.

Key Strengths

Empowerment and Agency

The NSSPF demonstrates strong commitments to addressing the economic and social challenges faced by vulnerable groups. Initiatives such as vocational training and capacity-building aim to equip marginalized populations with the tools needed for long-term empowerment. The inclusive nature of the framework ensures that various groups, such as women and the elderly, are considered. However, Indigenous peoples remain underrepresented, which slightly limits its scope. Detailed operational plans for communication and sustained capacity-building efforts would further enhance its impact.

Non-Discrimination and Recognition

The framework provides a thorough analysis of marginalized groups, supported by data that highlights socio-economic disparities. Its recognition of systemic barriers and commitment to targeted interventions showcase a strong focus on equity. By addressing gender, age, and income inequities, the NSSPF reflects an intent to reduce discrimination. However, intersectionality and structural power imbalances could be explored further to strengthen its equity focus.

Accountability

The NSSPF clearly delineates roles and responsibilities among ministries and stakeholders, ensuring structured implementation. Its institutional frameworks provide a foundation for monitoring and evaluation. However, enforceable mechanisms for non-compliance are limited, and grievance mechanisms remain absent. Including robust accountability frameworks with consequences for duty-bearers would elevate this principle to its full potential.

Rule of Law and Remediation

The NSSPF outlines legal provisions and enforcement mechanisms to address social inequalities and ensure the implementation of policies. Specific measures such as health equity funds and cash transfers illustrate its focus on mitigating economic disparities. While grievance systems and access-to-justice pathways are not fully developed, the existing legal framework demonstrates adequate progress. Strengthening access-to-justice measures and ensuring adherence to broader human rights principles would enhance its impact.

Redistribution

The framework highlights its commitment to equitable redistribution through programs like social equity funds, vocational training, and targeted cash transfers. By addressing economic barriers and improving access to resources for marginalized groups, the NSSPF promotes equity and social justice. However, more actionable details on redistributive mechanisms and their implementation timelines would ensure that these efforts are effective in reducing systemic inequalities.

Food System Criteria

While the NSSPF primarily focuses on social protection, it indirectly addresses food systems through interventions aimed at improving nutrition and reducing vulnerabilities. Efforts to support affordability and accessibility of food reflect an implicit commitment to food security. Expanding the framework to explicitly include food system rights such as culturally appropriate food and land rights would make it more comprehensive.

Sustainability of Rights

The NSSPF incorporates sustainability through risk assessments and planning for long-term socio-economic impacts. Efforts to build resilience among marginalized groups and ensure consistent funding streams demonstrate a commitment to sustaining social protection programs. However, more explicit details on scaling successful interventions and intergenerational equity would strengthen its focus on sustainability.

Critical Gaps

Transparency

While the NSSPF mentions plans to improve transparency, including monitoring systems and budget allocations, the current mechanisms are vague. Public access to financial details and progress reports remains limited, and references to consultations lack clarity regarding which groups were engaged or how feedback influenced policy decisions. Improving transparency with detailed public reports, accessible data, and participatory monitoring mechanisms would strengthen trust and accountability.

Human Dignity, Participation, and Representation

The NSSPF identifies key vulnerable groups such as women, children, and the elderly, but it fails to engage rights-holders in the design and decision-making processes. Evidence of stakeholder consultations, feedback systems, or mechanisms for continuous engagement is absent. This lack of participatory governance weakens the inclusivity of the framework. Incorporating meaningful consultation processes and ensuring sustained representation of marginalized voices would significantly enhance its impact.

Third National Strategy for Food Security and Nutrition 2024-2028

Cambodia's Third National Strategy for Food Security and Nutrition (in its draft form as reviewed) demonstrates a commitment to equity and human rights, particularly through its focus on empowerment, agency, and equitable resource distribution. However, it falls short in critical areas like transparency, accountability, and legal remediation. The lack of open decision-making processes, accessible public monitoring, and mechanisms to challenge power imbalances limits its inclusivity and

effectiveness. Strengthening these dimensions with enforceable frameworks and actionable strategies would ensure a more impactful and sustainable approach to achieving Cambodia's development goals.

Key Strengths

Empowerment and Agency

The draft of the third national strategy demonstrates strong commitments to empowerment and agency, but there are some areas where more explicit details would improve clarity and impact. While communication and meetings are considered, the strategy could explicitly mention the intervals or time frames for these engagements, ensuring continuous dialogue with rightsholders. Additionally, while policies and laws are set to be disseminated, it would be beneficial to clarify to whom this information is targeted, as it currently seems limited to a high-level audience and does not explicitly address broader information dissemination. Capacity-building efforts and training are well-considered, but the document does not provide clear details on how often or for how long these will be conducted, which could impact the effectiveness of these programs. Finally, improving the capacity and abilities of duty-bearers to fully support and empower marginalized groups could strengthen the strategy's overall approach to human rights and equity.

Human Dignity, Participation, and Representation

The strategy highlights key measures, such as ensuring inclusive consultation processes and building the agency of vulnerable groups, as seen in its emphasis on women, youth, and marginalized populations. However, several areas require further attention. Notably, there is insufficient focus on helping disadvantaged groups organize to build inclusive institutions and partnerships to enhance their representation. Additionally, the absence of comprehensive measures to involve rights-holders in the design and evaluation of impact mitigation strategies, combined with a lack of evidence showcasing continued engagement with these stakeholders (such as participation reports), signals a gap. While the strategy seeks to address private sector engagement, it misses the opportunity to holistically include other actors across the food system. This limits the full potential for meaningful representation and informed engagement in decision-making processes, which could have benefited from more robust, inclusive participation frameworks.

Redistribution

Strategies make strong commitments to addressing redistribution, particularly through initiatives aimed at promoting equitable access to resources and opportunities for marginalized populations. The strategy document emphasizes reducing barriers to food access and nutrition by strengthening markets, creating employment opportunities, and expanding social protection programs, with clear alignment to SDG 10 (Reduce Inequalities). However, it falls short in considering mechanisms to regulate corporate power asymmetries in food systems governance, which would be crucial for ensuring a more equitable distribution of resources across the entire supply chain. Additionally, while the strategy outlines initiatives to empower disadvantaged groups in decision-making processes, it lacks a focus on social protection laws that could institutionalize these efforts and ensure long-term impact. Strengthening the strategy by addressing these gaps, particularly through the inclusion of more explicit mechanisms to manage power imbalances and legislative frameworks to support redistribution, would further its potential to drive systemic change and create more equitable food systems.

Rule of Law and Remediation

Strategies show a commitment to addressing some legal aspects, particularly in terms of food safety laws and the regulation of food environments, with clear provisions for the enforcement of these laws. However, the strategies fall short in addressing broader issues related to human rights impacts and the

rule of law. While the strategy outlines mechanisms to reduce food loss, manage risks, and improve nutrient absorption through improved hygiene and sanitation, it lacks comprehensive measures to ensure that effective remedies and grievance mechanisms are in place for rights-holders. There is little consideration for ensuring that Access to Justice adheres to principles such as justiciability, availability, accessibility, quality, and accountability. Furthermore, while institutions are held accountable for food safety, other key areas of law relevant to food security, nutrition, and human rights impacts are not mentioned, limiting the strategy's ability to provide a holistic approach to remediation. Strengthening these dimensions by including clear mechanisms for legal recourse, grievance systems, and adherence to broader human rights principles would significantly enhance the strategy's ability to prevent, mitigate, and remediate negative human rights impacts, especially for the most vulnerable.

Critical Gaps

Accountability

The strategies delineate roles and responsibilities among stakeholders, with detailed descriptions of activities and target outcomes. However, the strategy falls short in establishing robust mechanisms for holding duty-bearers accountable if they fail to meet their obligations. While responsibilities are outlined, there is a notable absence of enforceable measures, such as consequences, in the event of non-compliance. Furthermore, the strategy does not consider the use of community-level data to challenge national statistics, a key tool for grassroots accountability. Nor does it provide mechanisms to ensure that duty-bearers are held accountable according to global best practices or guidelines. Without these accountability frameworks, there is a risk that the outlined roles remain nominal without sufficient checks and balances to ensure adherence to the responsibilities.

Strengthening this dimension by incorporating clear, enforceable accountability measures, alongside community-driven data assessments, would enhance the strategy's capacity to protect and fulfill the rights of marginalized groups.

Transparency

The 2024-2028 Cambodia National Nutrition Strategies demonstrate some effort towards transparency, particularly through the use of digitalization to enhance data collection, analysis, and communication efficiency in food control systems. However, the strategy lacks sufficient focus on ensuring transparent decision-making processes, particularly regarding budget allocations and expenditures that reflect political commitments and human rights obligations. While there is partial consideration for transparent and inclusive impact assessments, such as engaging affected rights-holders, there is minimal emphasis on making monitoring information accessible to the public or ensuring disaggregated data is used to highlight excluded groups. Moreover, by having such transparency, it also aligns with how duty bearers or stakeholders involved can be held accountable and at what mechanism can they be held accountable for with regards to their work. Additionally, there are missed opportunities to strengthen transparency through social accountability mechanisms and dialogue processes, which would enable rights-holders to understand and evaluate the effectiveness and fairness of the initiatives. To ensure fairness and inclusivity, the strategy could benefit from more robust participatory processes that involve marginalized groups and provide clear mechanisms for communicating objectives and outcomes to all stakeholders.

Non-Discrimination and Recognition

The document addresses the non-discrimination and recognition of marginalized groups, particularly through a focus on women, youth, Indigenous populations, and those with vulnerabilities such as infants, pregnant women, and adolescent girls. The strategy aims to reduce barriers to equitable access

to nutritious foods and recognizes the need for targeted interventions, such as promoting employment, improving market access, and enhancing social protection systems. However, gaps remain in fully understanding and addressing the systemic power imbalances that impact these groups. While the strategy acknowledges the diverse needs of marginalized populations, it does not sufficiently consider the varying relationships stakeholders have with power, nor does it provide clear measures to mitigate these imbalances. Furthermore, the document needs strategies that will enable a comprehensive assessment of the profiles of marginalized groups and the root causes of their exclusion. Strategies could benefit from more explicit measures to ensure that power dynamics and structural inequalities are systematically addressed and monitored.

Food System Criteria

The criteria broadly addresses all food system rights with most areas adequately considered. However, improvements are needed in detailing specific steps, processes, and indicators for implementation, as the current language needs more clarity on how goals will be achieved. The "right to seed" was not thoroughly addressed, and while children's rights are mentioned, the focus leans more toward women and youth, leaving other marginalized population rights in food systems less detailed. Strengthening these elements would provide a clearer path toward inclusive and sustainable food systems.

Sustainability of rights

The review highlights several strengths, particularly in evidence-based decision-making and risk assessment. However, more explicit attention needs to be paid to long-term human rights and equity concerns, especially for vulnerable groups. While the strategy implicitly touches on some key aspects related to sustainability and equity, a more explicit and detailed articulation would strengthen its focus on human rights impacts and long-term sustainability. Establishing and building this long-term efficiency and considering the sustainability of rights, not only allows right holders to exercise their rights more confidently with full trust towards duty bearers but also allows duty bearers to fully analyze and plan out the next 5-10 years of governance and how these rights will not be infringed or affected which also contributes to Cambodia's development as a whole.

Lastly, Cambodia has made significant strides in creating food systems centered on people, and these tweaks can make them unique and ensure long-term success.

Ethiopia

Vision 2030: Transforming Ethiopian Food Systems - UNFSS Game Changing Solutions

The Ethiopian UNFSS Game-Changing Solutions Vision 2030 is a comprehensive framework aimed at transforming Ethiopia's food systems towards achieving the UNFSS action areas by 2030. The strategy is structured around 7 core Game Changer Clusters. Within each Cluster, the Vision identifies 22 game-changing solutions (later amended to 24 game-changing solutions) intended to address challenges and bottlenecks specific to Ethiopia's food system.

Key Strengths

Empowerment and Agency

Vision 2030 demonstrates strengths in addressing empowerment and agency particularly in its prioritization of activities that enhance the capabilities of marginalized groups, particularly women,

youth, and smallholder farmers. This criteria is supported through targeted efforts in building technical capacity, financial literacy, and agricultural business development. For example, the strategy outlines a general commitment to promote women's leadership within food systems and explicitly links empowerment initiatives to improved decision-making at the household and community levels. Specific measures include the introduction of financial services tailored to smallholder farmers and nutrition literacy campaigns, particularly for women and children. The policy also emphasizes skill-building programs for pastoralist communities, linking them to agribusiness opportunities. These initiatives demonstrate a recognition of the need to equip marginalized populations with the knowledge and resources necessary for autonomous decision-making. Information-accessibility for rights holders.

Redistribution & Equity

Vision 2030's consideration of redistribution and equity is relatively apparent. The policy addresses inequalities by prioritizing investments in disadvantaged groups, such as landless populations, women, and youth, and aligning these investments with broader goals of equitable economic growth and agricultural outcomes. For example, its focus on the establishment of an inclusive agricultural financing system, which seeks to bridge the gap between marginalized actors and traditional financial institutions. This initiative is paired with the development of agribusiness partnerships designed to foster equitable participation in value chains. Redistribution and fostering equity is a key consideration across the strategy, evinced by Action Track 4, the theory of change, and cluster 2 and 5 in particular. Targeted interventions such as financial literacy training and access to insurance services for rural producers reflect a focus on creating sustainable and inclusive economic opportunities. These measures are particularly significant in the Ethiopian context, where rural populations often face barriers to market access and financial inclusion. The alignment with SDG 10 is evident in the policy's commitment to reducing inequalities through improved access to markets, market information, infrastructure, specialization, and nutritious diets (cluster 5). Overall the policy reflects a clear recognition of the immediate barriers faced by some of the country's vulnerable and marginalized groups and considers some measures to reduce these barriers in an effort to promote more equitable distribution of resources, opportunities, access, etc.

Food System Rights

Vision 2030's multidimensional approach and comprehensive consideration of key aspects of food systems is a notable strength. The right to safe and nutritious food is comparatively the most robustly integrated into the strategy, with strong focus on nutrient-dense food production and fortification initiatives as well as the development of national dietary guidelines and nutrition literacy campaigns. These measures are specifically designed to enhance the availability of nutritious foods for vulnerable groups, emphasizing women and children. Additionally, the strategy addresses land rights explicitly, emphasizing secure land tenure for smallholder farmers and outlining integrated policy-making measures that focus on equitable land reform and increasing the participation of marginalized groups in land use planning and governance. The right to a sustainable environment is also strongly reflected in the report particularly through its emphasis on climate-smart agricultural practices and the adoption of environmentally friendly production methods. Clusters 1 and 3 explicitly reference the importance of preserving soil health, reducing deforestation, and promoting regenerative agricultural practices to secure this right for future generations. Other notably mentioned criteria include the right to agricultural inputs and technologies and the right to financial and extension services; both are mentioned throughout the document as necessary for a sustainable future. Nearly all food systems rights (with the exception of (food) workers' rights/freedom from exploitation) are implicitly addressed, integrated throughout the report. It is important to note that none of these food system rights are framed in the policy explicitly as 'rights' i.e the people having unequivocal right to these aspects of the food system.

Critical Gaps

Transparency

Transparency emerged as the most significant gap in the Vision 2030 policy with all five transparency criteria not considered at all throughout the document. The strategy does not provide clear mechanisms for ensuring public access to critical information, including the policy's impact assessment process. For example, while the document mentions stakeholder consultations in the development of game-changing solutions (p. 5), it fails to specify how the outcomes of these consultations were incorporated into the final strategy or whether marginalized groups were adequately represented let alone considering security protocols of consultation processes. There is no indication of publicly available monitoring data or performance indicators that would allow stakeholders to evaluate the policy's implementation. For instance, the Monitoring and Evaluation (M&E) framework, which is a critical component for transparency, is described as "currently under development". Without a completed M&E framework, there is no clear pathway for stakeholders to access disaggregated data (e.g., by gender, ethnicity, or geographic location) or hold duty-bearers accountable for inequitable outcomes – though this could be re-evaluated when the M&E framework is publicly available. Additionally, the strategy does not outline how financial resources allocated to various game-changing solutions will be tracked and reported, consequently undermining the policies ability to generate trust, transparency, or accountability.

Rule of Law & Remediation

The absence of frameworks and mechanisms to enforce rights, address grievances and negative human rights impacts, is a critical gap in the Vision 2030 framework. Aside from considerations regarding impact mitigation as it relates to duster-risk management, the strategy does not provide actionable steps to protect rights-holders against potential violations and impacts of/during implementation. For instance, there are no grievance mechanisms outlined to address disputes over land rights, market access, or employment conditions, despite the policy's focus on these areas. The document does not include a framework for ensuring that stakeholders, particularly duty-bearers, comply with the commitments outlined in the game-changing solutions. While in Ethiopia any grievance is addressed through ombudsman offices at federal and region level and at woreda level under municipality office, or administered by local administration (kebele), these are not rights-based. There is no reference to penalties for non-compliance or measures to ensure accountability at both local and national levels. The absence of these enforcement mechanisms leaves marginalized populations vulnerable to exploitation or exclusion, particularly in cases where land or resource allocation is contested. The strategy's failure to address access to justice further weakens its commitment to equity. While it discusses the need for integrated policy-making and improved institutional support, it does not address how individuals or communities can seek remediation for rights violations. This omission is particularly concerning in the Ethiopian context, where systemic barriers to justice disproportionately affect rural and marginalized populations—thereby reducing the productivity of the strategy's initiatives to advance equity.

Sustainability of Rights

Overall consideration of sustainability is weak across the document. Risk-assessments are explicitly mentioned only as they relate to disaster-risk management (through plans to implement Index Based Crop and Livestock Insurance for households against crop and livestock losses). The emphasis on climate-smart agriculture and regenerative farming practices in clusters 1 and 3 demonstrates an intent to address environmental sustainability and intergenerational issues, but there is no consideration of addressing sustainability beyond that. The strategy does not sufficiently account the long-term human rights impacts of interventions on target populations. A comprehensive analysis of outcomes (good, bad,

expected, unexpected, long/short term) on various stakeholders (economy, society, environment, etc) is absent throughout the document. Key measures, such as assessing the severity of consequences or the equity of outcomes between the best-off and worst-off groups, are notably absent. For instance, there is no discussion on how the policy will address inequities that may persist or worsen once external support is withdrawn. Additionally, while the framework mentions scaling up best practices, it does not provide clear strategies for replication or adaptation, nor does it outline exit strategies that ensure the sustainability of outcomes without ongoing external intervention.

National Social Protection Policy of Ethiopia

The Ethiopian Social Protection Policy (SPP), developed under the Ministry of Labour and Social Affairs, is a framework aimed at addressing poverty, vulnerability, and social exclusion. As a foundational policy for social protection in Ethiopia, it incorporates policy measures and strategies across four focus areas: 1. Social Safety Net 2. Livelihoods and Employment Schemes 3. Social Insurance 4. Addressing inequalities of access to basic services.

Key Strengths

Empowerment and Agency

Empowerment is a clear strength of the SPP, reflected in its full consideration of two critical measure examples and adequate consideration of two other measures. The policy emphasizes providing vulnerable groups, particularly rural populations, women, people with disabilities, and unemployed persons, with access to skill development, investment into household enterprises, and microfinance services. Additionally, these initiatives aim to enable them to engage in income-generating activities and build resilience against economic shocks. For example, the policy outlines specific plans to support women through targeted financial literacy programs and vocational training (p. 18). This aligns with the promotive dimension of social protection, as it seeks to move vulnerable populations from dependency to self-reliance. The policy also explicitly addresses the importance of strengthening the capacities of government and institutional actors responsible for delivering social protection services. Training programs for the social welfare workforce and resource allocations are detailed as strategies to ensure duty-bearers are equipped to fulfill their obligations effectively. This dual focus on both rights-holders and duty-bearers demonstrates the policy's commitment to empowering all stakeholders within the social protection framework. There is a clear identification of a communication gap between federal/regional structures and people-centered institutions due to weak and fragmented communication channels. However, provisions to mitigate this are not clearly established.

Equity & Recognition

The policy recognizes a relatively expansive list of vulnerable groups such as pregnant and lactating women, youth, persons with disabilities (physically challenged, special needs, etc), pastoralist and rural communities, unemployed persons, youth, victims of social problems, people living with diseases, as priority 'beneficiaries'. Protective, preventative, and transformative interventions are outlined to expand access to basic services and fulfill the constitutional requirement of social protection for all people, with explicit emphasis on specifically addressing the unique needs of particular groups with heightened vulnerability (Focus Area 4). For example, the policy highlights the importance of directing/allocating resources toward underserved groups prioritizing targeted investments in healthcare and education services and direct transfers—underscoring the policy's redistributive intent. Overall, equity and recognition of vulnerability of groups is evident throughout the SSP policy—most if not all objectives address financial, infrastructural, and capacity-building disparities and aim to create

equity by addressing these disparities in social protection access and outcomes, and uplifting vulnerable and disadvantaged populations.

Critical Gaps

Transparency

Transparency is a critical weakness of the policy—practically not considered. Despite having a section for Monitoring & Evaluation System, it lacks clear mechanisms to ensure public accountability and accessibility of information. There is no detailed framework for ensuring that financial allocations, program outcomes, and decision-making processes are made publicly accessible. The policy's monitoring and evaluation (M&E) section is evidence of the development of information systems to track social protection interventions including key information from stakeholders and expenditure related data, but it falls short of ensuring that this data is disseminated in a transparent and accessible manner. Disaggregated data—critical for understanding disparities across gender, disability, geographic location, and other factors otherwise explicitly mentioned across the document—is not explicitly considered in the M&E system. There is no mention of mechanisms to ensure public participation in monitoring processes or how feedback from communities will be integrated into program adjustments. Furthermore, while the policy emphasizes the importance of institutional coordination, it does not outline how data from different agencies will be integrated into a cohesive system for inclusive, participatory, and transparent decision-making.

Human Dignity, Participation, and Representation

While the Social Protection Policy (SPP) identifies the importance of rights-holder participation, consultation, and engagement, it critically lacks the depth and operational detail necessary to translate these principles into actionable frameworks. The policy acknowledges that inclusive and participatory approaches are essential for fostering equity and accountability, yet falls significantly short in outlining concrete mechanisms to ensure meaningful engagement of the readily mentioned vulnerable groups in the design, implementation, and evaluation of social protection programs. This is particularly an area for improvement because the policy outlines very clear implementing strategies to address the supposed needs of a wide range of vulnerable groups without considering clear strategies to empower these groups as active contributors with agency and ownership over the programs designed for their benefit. This is further reinforced by the policy's frequent use of the word 'beneficiaries' rather than 'rights-holders' to describe these groups. Moreover, the lack of mechanisms to sustain engagement throughout the policy lifecycle further diminishes its potential for participatory governance. While initial consultation workshops are mentioned, there are no provisions for continuous rights-holder involvement during implementation or monitoring or detailed feedback mechanisms.

Sustainability

The policy's approach to sustainability is insufficiently, if at all, developed. While the policy outlines promotive and transformative measures to break cycles of poverty and vulnerability, it fails to provide detailed strategies to sustain these outcomes. There is an absence of risk assessment frameworks to identify and mitigate potential unintended consequences of the policy's interventions. While the SPP references the importance of resilience, it does not account for the environmental, social, or economic risks that could emerge from the policies objectives and implementation strategies.

National Nutrition Program

The National Nutrition Program II (NNP II), the subsequent implementation phase of NNP I, aims to significantly reduce malnutrition in Ethiopia by focusing on nutrition-specific and nutrition-sensitive interventions. Highlighting optimal breastfeeding, optimal complementary feeding, mitigation and prevention of micro-nutrient deficiencies, WASH, deworming, food fortification and management of acute malnutrition. The program is strategically built on the lessons learned from NNP I.

Key Strengths

Empowerment and Agency

The NNP II demonstrates a strong commitment to empowering both rights-holders and duty-bearers through capacity-building initiatives. For rights-holders, the program includes targeted interventions such as life skills training for adolescents and counseling services for pregnant and lactating women. Additionally, the policy includes provisions to enhance the capacity of healthcare providers, community health workers, relevant organizations/associations, and administrative bodies from regional to woreda/kebele level, ensuring that they are well-equipped to deliver quality nutrition services across multiple proposed interventions. The policy also does a relatively notable job in ensuring the accessibility of information and dissemination of findings to relevant stakeholders. It emphasizes raising awareness about the importance of adolescent nutrition and the long-term consequences of malnutrition, for example through ensuring access to reproductive health information and services for both boys and girls. It prioritizes the accessibility and dissemination of nutrition communication and advocacy materials for improved service delivery, dietetics frameworks, and nutrition-sensitive agricultural strategies. These efforts aim to equip vulnerable populations with the knowledge and tools to make informed, autonomous decisions about their health and nutrition.

Non discrimination & Equity

The NNP initiative has a strong emphasis on non-discrimination and equity, demonstrated most explicitly through its consideration of vulnerable and marginalized groups in intervention design and implementation. The policy incorporates measures to address the unique needs of populations such as women, children under five (and particularly children in more precarious situations i.e refugee camps, orphanages, etc), adolescents, rural or pastoralist communities, etc. For instance, it ensures that pregnant and lactating women are prioritized in safety net programs and exempt from physically demanding labor requirements in cash-for-work initiatives. The policy contextualizes marginalization by identifying barriers faced by vulnerable groups and tailoring interventions to address these challenges, albeit without significant detail and robust strategies. For example, the NNP II recognizes the necessity of providing fee-waiver schemes to manage acute malnutrition, expanding preventative nutrition services in pastoralist regions and other underserved areas, and ensuring that vulnerable households affected by malnutrition and/or nutrition emergencies are adequately targeted by safety net initiatives. Additionally, gender-sensitive programming is integrated throughout the policy, with provisions for promoting women's decision-making power and access to resources, thereby considering structural inequities.

Critical Gaps

Rule of Law & Remediation

Though the NNP policy outlines a wide range of nutrition-related interventions and initiatives, they are not assessed on their consideration of negative human rights impacts and implementation of legal channels to mitigate those impacts. The policy lacks both explicit and implicit consideration of mechanisms to address violations of rights or ensure access to justice for marginalized groups excluded from its interventions. While feedback mechanisms to facilitate multisectoral nutrition implementation

is mentioned, it does not outline specific accountability mechanisms to hold duty-bearers responsible for delivering on the program's detailed commitments. There are no provisions for grievance mechanisms or legal remedies for individuals or communities who may experience harm or exclusion due to program implementation shortcomings. The absence of enforceable legal frameworks for nutrition rights weakens the program's ability to ensure equitable access to services, disproportionately impacting the vulnerable populations the policy aims to prioritize.

Sustainability

Sustainability is another critical weakness in NNP II. While there is effort to ensure sustainability by mentioning client graduation through forging linkages to other services, the policy does not provide a comprehensive framework to ensure the long-term viability of its interventions. Though the policy itself identifies inadequate budget allocation, resource shortages, weak financial mobiliza-

tion and low utilization as key challenges in sustaining the program and successfully implementing Phase 1, it fails to provide or consider any actionable steps to address these sustainability obstacles and potential uncertainties. Additionally, risk mitigation both as it relates to the specific initiatives, particularly nutrition-sensitive interventions, outlined as well as the large funding gap is not considered at all. Sustainability is solely considered in the policy as it relates to the adequate and 'harmonized' use of data for informed planning and decision-making.

Human Dignity, Participation, & Representation

Though community engagement and multisectoral coordination is an initial explicit consideration of the NNP implementation strategy, the policy does little to adequately operationalize this commitment. NNP acknowledges the importance of involving communities, civil society, and marginalized groups in nutrition governance but dangerously fails to outline detailed mechanisms or structured processes to ensure meaningful participation that actively involve rights-holders, particularly the vulnerable communities it persistently recognizes. For example, while the policy references the role of community engagement in promoting nutrition practices, it does not specify how these groups will contribute to program design, implementation, or monitoring. This omission limits the ability of marginalized populations in shaping programs that address their unique needs.

Productive Safety Net Programme (PSNP) Phase IV

PSNP is a long running program in Ethiopia that aims to provide a safety net for vulnerable populations experiencing chronic food insecurity. The Phase IV PIM was written as a comprehensive guide for PSNP activities between 2014-2020 to achieve the program's objectives. The Phase IV PIM is split into six parts: 1. Introduction, 2. Planning and Preparatory Activities, 3. Implementation, 4. Resource Management, 5. Monitoring and Evaluation, and 6. Institutional Arrangements. Each section describes its objectives, activities, technical attributes, target populations, and involved implementation parties to name a few. In terms of program implementation, PSNP covers transfers, public works, livelihood, nutrition, and social services.

Key Strengths

Empowerment and Agency

The document demonstrates strong commitment to building relationships with both rights-holders and duty-bearers. This includes PSNP's aim to make information accessible to all rights-holders in forms like consistent report postings in kebeles and woredas and regular public meetings with information read

aloud and discussed. Training duty-bearers to build knowledge and skills at woreda, regional, and federal levels is underlined throughout the document as a key aspect of increasing livelihoods and resilience. The document also emphasizes tailored training targeted at rights-holders with guidance on training materials and technical guidelines for different types of needs. There are also capacity-building efforts focused on duty-bearers to better facilitate programming. There is one mention supporting a sensitization effort for men that explains how community-based behavior change requires the involvement of women and men in terms of access and use of information regarding nutrition and caring practices of pregnant women and young children in order to change overall societal norms. The document encourages the implementers to encourage women to exercise their rights like encouraging active participation and women in leadership positions in planning phases.

Human Dignity, Participation, and Representation

PSNP, to an adequate extent, looks to facilitate meaningful participation and inclusion of diverse rights-holders, especially those from vulnerable groups. The document outlines opportunities for people to contribute to the process of the programming. For example, during the planning phase, the community creates a plan that is approved and consolidated at kebele level, and further submitted upwards to the federal level which summarizes plans across the program. When this process is finished, each plan is distributed back down to the community to make all participants aware of final decisions. Regular communication of priorities, values, and expectations of rights-holders and duty-bearers. Continued engagement with relevant stakeholders is fully considered. To illustrate, there is strong evidence regarding consultation and dialogue of diverse groups during preparation and design phases within the document. For example, in planning livelihood interventions, there are annual community consultations to provide participants with the opportunity to provide input on the interventions. The document lays out who the community consultations should involve, what information the consultation will provide, as well as how the consultations are performed. The document is able to show to what extent it is able to consider the needs and expectations of stakeholders, especially participants, in detailing these consultation processes. Additionally, there is evidence of regular engagement with rights-holders in the form of quarterly reports on livelihoods to track participants' participation, as well as quarterly reports on participant uptake of the programs related to social services and public works. One unique aspect of this document is that there is one mention of culturally appropriate ways to phrase questions such as reframing 'rich' and 'poor' to discussing asset ownership and other aspects of socio-economics in order to avoid biased answers. This is mentioned once when identifying households to graduate from the program, but is not mentioned at any other point in the document.

Transparency

One of PSNP's principles is fair and transparent client selection through community-based targeting with appeal mechanisms. This is underlined in its description of program entry and exit, explaining that communities and households should be informed about the program's selection criteria as well as those involved. Furthermore, the document states that the system for graduation from the program must be transparent to donors and governments, as well as participants. The document also discusses impact assessments and is transparent in its target indicators and disaggregated groups. The disaggregation is not described for the purpose of revealing excluded groups. It does mention that impact assessments will be in consultation with local leaders and relevant people, but does not specify how participants will interact with the findings. On the other hand, budget allocations and expenditures are described to be publicly announced. For example, the woredas will post their budget and plan annually in a public location in both woreda center and each kebele center. However, it is unclear whether the public is given space to analyze the budgets and make comments or recommendations. The document clearly specifies dialogue processes, social accountability mechanisms, and capacity-building effort.

Accountability

Roles and responsibilities for the involvement of nearly all stakeholders, considering both rights-holders and duty bearers, are clearly defined throughout the document. This document has accountability described throughout the document especially in the implementation phase. It looks to hold the implementing parties accountable, but it is unclear to what extent or whether specific people who are implementing will be held accountable. Regarding participant accountability, the document describes the development of 'livelihood checklists' in which outline the support to what each client is entitled and which they must complete prior to preparing further business plans. This checklist acts as an accountability tool to ensure participants comprehend livelihood prior to obtaining financial investment from the PSNP. The document used for this report ends before Chapter 10 which covers awareness raising, grievance redress, and social accountability and their roles and responsibilities as well as processes.

Rule of Law and Remediation

In some parts of the planning, especially in the Environmental and Social Management Framework section, the document describes the need to identify potential risks and possible mitigating measures. These mitigation possibilities and efforts would be a supplemental aspect of the project's implementation that are to be monitored throughout the project. Another highlight of the PSNP is that grievance mechanisms are considered throughout the document. The program uses grievance redress mechanisms as a safeguard for general activities, program entry and exit, payments, and livelihood interventions. For example, PSNP participants can make appeals during quarterly Kebele meetings to contest wrongful exclusion or inclusion errors. The designated Kebele committee will then review and make recommendations on how to resolve these issues. PSNP does not explicitly state that its program focuses on access to justice, but it is implied for participants within its accountability and grievance mechanisms. However, it is unclear whether these mechanisms within the program have legal remediation mechanisms themselves. The document lists that one of its main outputs will be effective management and operational processes including accountable management, budgeting, food management, procurement, and asset management systems. These are outlined in Chapters 12-17 which are not in the document this report analyzed.

Redistribution

The PSNP's general programming prioritizes its investments towards vulnerable and chronically or suddenly food insecure households and communities, with further focus on poor and vulnerable pregnant and lactating women, people with chronic illness or disability, and elderly. Additionally, its livelihood transfer programming focuses on targeting the very poor, female-headed households, or landless youth. These vulnerable groups are clearly described throughout the document as targets for improving overall household and community resilience through livelihoods, nutrition, and food security programming. The only aspect of redistribution that is not considered are any mechanisms to regulate corporate power asymmetries in governance.

Food System Rights

The document emphasizes land rights primarily for pastoral communities, focusing on climate resilience and resource management, with limited mention of private land and public works for women landowners. It addresses access to inputs and water through watershed development and water infrastructure but lacks detail on mitigation measures for environmental harm. While workers' rights are indirectly mentioned through labor rules and gender equity initiatives, explicit discussions on exploitation and workers' freedom are absent. Social protection is a central objective, aiming to enhance health, nutrition, and food security through cash and food transfers, financial literacy, and livelihood

support. However, the right to safe food is minimally addressed, with a stronger focus on accessible and affordable food. Culturally acceptable food is partially considered in livelihood interventions tailored to pastoralists' socio-cultural needs.

Critical Gaps

Non-Discrimination and Recognition

The document outlines ways in which rights-holders can participate in social accountability of the program through grievance mechanisms. This implies there may be some measures in place to attempt to mitigate power imbalances, or at least power abuses. It is important to note that the available document that this report analyzed cuts off at the end of Chapter 9 on Livelihoods, and does not include Chapter 10 on Accountability. However, throughout the document, sections refer to Chapter 10 as the accountability mechanism for the program in which information regarding accountability is stated. The document only partially addresses identifying forms of marginalization and does not state that it intends to use this information to assess the needs of hidden groups. Additionally, the document does not gather data to understand factors contributing to the marginalization of groups. The data is only described to be used for impact evaluation purposes of known groups. Of the known groups like women or people with disabilities, data is broken down to see how these groups are impacted by planned interventions.

Sustainability of Rights

The document fully considers using data to guide decision-making and actions within the program to use for its scaling-up strategies. The program will also use data for households' exit from the program while allowing for contestation and reevaluation of participant exits. This is further supported by risk assessments of participants including their households and greater community. The program explains what activities will and will not be covered, explaining the assumed breakdown of budgets at woreda, regional, and federal levels as expenditures of the PSNP budget. However, it does not explicitly say the total costs for each of these expenditures, and only has an estimated total contribution from funding parties. Other aspects of the sustainability of rights criteria are mentioned but not as thoroughly defined. For example, impact severity is only described based on scope and scale, and not based on irremediability and interrelatedness. Additionally, the impact of the intervention on inequalities between best and worst-off groups is only partially considered, with the document making assumptions that worst-off groups may file for reconsideration for re-entering the program if they are not ready for support withdrawal. Lastly, risk assessment is not mentioned in the document and is implicitly mentioned when the document assumes risk management activities. The processes for risk management are not clearly defined in the document. The document does outline Chapter 11 for Risk Management including its framework, roles and responsibilities, activities, and implementation, but the document that was analyzed here finishes at Chapter 9.

Seqota [nutrition] Declaration Implementation Plan (2016-2030)

The Seqota Declaration looks to enhance pre-existing policies and strategies that support nutrition interventions. Managed under NNP II, the Seqota Declaration aims to end child under-nutrition by 2030 with targets to reduce stunting, increase access to food, increase productivity, reduce post-harvest loss, innovate towards climate-smart food systems, improve safe water, increase education especially of women, and reduce poverty of vulnerable groups.

Key Strengths

Food System Rights

The Seqota Declaration demonstrates a strong commitment to advancing food systems rights, often explicitly. As its central focus is to end child undernutrition, it particularly demonstrates a commitment to fulfilling the right to nutritious food. The policy document also recognizes the right to accessible food by linking its nutrition-sensitive agriculture programs to improved dietary diversity. It does not mention aspects of safety or affordability in relation to food. It explicitly targets vulnerable groups, including children under five, pregnant and lactating women, and marginalized rural communities. Additionally, the document underlines access to safe drinking water and water resources. This is in connection to its mention of a right to a sustainable environment in terms of reduction of open defecation to protect the environment and clean water access. The document does not mention land rights, workers rights, rights to culturally acceptable food, or rights to financial and extension services.

Accountability

The structure of the document includes what programs the Seqota Declaration will be supporting, naming the supervisory stakeholder responsible to carry out its linked roles. For example, in the monitoring and evaluation section, the document states the various ministries and institutions who will be implementing specific components of the Seqota Declaration's implementation plan. In this same section, the document briefly covers its accountability mechanism. The Seqota Declaration will be adapting the National Nutrition Program's (NNP's) accountability and results matrix to reflect its proposed interventions. The document does not appear to explicitly state that it will hold duty-bearers accountable, although it may be assumed through its accountability mechanism.

Redistribution

The document somewhat focuses on equity and redistribution as well as somewhat prioritizing investments that help disadvantaged groups, with focus on especially women. To exemplify, one of the main goals of the Seqota Declaration is to increase education of women, especially rural women, and focus on poverty reduction and resilience through predictable cash transfers to vulnerable groups. SDG 10 (Reduce Inequalities) is understandably a focus within the Seqota Declaration. One of the programs, called the Ethiopian National School Feeding Programme (ESFP), that the Seqota Declaration looks to scale up specifically names one of its main goals as to reduce gender and social inequalities by targeting the most vulnerable groups in Ethiopia, especially pre-primary and primary school children. That being said, the document does not explicitly mention equitable distribution of resources and opportunities, nor mechanisms to regulate power asymmetries in food system governance.

Critical Gaps

Empowerment and Agency

Empowerment and agency is not aptly considered in this document as it gives insubstantial space to enhancing autonomous capacity of rights-holders or strengthening rights knowledge. Information accessibility and regular communication to all rights-holders is marginally assumed when the document mentions dissemination of monitoring information through reports and workshops on a quarterly, semi-annual, and annual basis. The document does imply it encourages women to exercise their rights, especially in relation to accessible food. There is a mention of efforts for sensitization for men in nutrition interventions to help address their practical needs. Other aspects of empowerment and agency, like trust and relationship building or knowledge and capacity building activities, are absent from the document.

Human Dignity, Participation, and Representation

This criteria is largely absent from the document. To exemplify, the main stakeholders described within this document are the implementing programs and their institutions with their expectations are summarily defined. Other stakeholders and their needs and expectations are not clearly considered in the document. The document mentions an opportunity for people to participate, specifically in their approach through a concept called Community Labs. One of the goals of the Community Lab is to ensure a greater stake in interventions through community participation in designing solutions. However, the statement is relatively superficial and other participatory processes like dialogue or feedback reports are not mentioned. There are some gender-responsive engagements planned including pregnant and lactating women's accessibility to cash transfer and other nutrition interventions, reproductive services, and promoting education to name a few. However, the document does not describe ensuring the acceptability and informed engagement of these rights-holders nor their representatives.

Non-discrimination and Recognition

This criteria is largely not considered throughout the document. The document does not recognize stakeholders' differing relation to power, identify forms of marginalization to assess hidden needs, assess impact on different groups, nor look to understand the profile of marginalized groups. The document only mentions looking to disaggregate nutrition data based on sex and age in its monitoring and evaluation to consider for their interventions.

Transparency

The monitoring and evaluation information of the Seqota Declaration's interventions will be available for the public to access. It will be disseminated on regular intervals, mainly through reports and workshops. The document does not further explain its processes as to whether these communication methods are transparent and inclusive. Additionally, it does not assert that the public will be able to use this information to assess service performance. There are some capacity-building efforts outlined in the document, but it will only be for implementing agencies and institutes for data collection and decision-making. There are no dialogue processes or further social accountability mechanisms indicated. Also, it does not state whether its budget will be publicly analyzed, and it does not express that the disaggregation of its monitoring data will be used to reveal excluded groups.

Rule of Law and Remediation

The document does not address any measure examples in the rule of law and remediation section. The Seqota Declaration is missing any assessment of negative human rights impacts through legal and other channels. This is the only criteria that was completely missing within the document.

Sustainability of Rights

The document lightly touches on the sustainability of rights, largely disregarding identifying long-term changes, negative impacts, and intergenerational issues. The document does not consider the interrelation of human rights, risk assessment, impact severity, all possible outcomes, or withdrawal impact. The document partially considers using data to guide decisions and actions. However, it is not thoroughly explained, instead opting for a summary list of how data will be involved such as information triangulation for involved sectors, and general assessment and review of data for decision-making. Scaling up strategies for widespread replication is partially considered. Mainly, the document assumes after a piloting period, the program will use lessons learned to expand to other areas. It does not specify how it will scale the program but assumes eventual nation-wide replication. There are preliminary cost estimates for the various plans throughout the report but there are no specific expenditure lists. It is not

over-generous to conclude that these costs will be going towards aspects of sustainability of rights like research and scaling-up strategies.