A conversation with Scott Montgomery, March 2, 2016

Participants

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Note: These notes were compiled by GiveWell and give an overview of the major points made by Scott Montgomery.

Summary

GiveWell spoke with Mr. Montgomery of FFI as part of its investigation of charities working on micronutrient fortification. Conversation topics included FFI's process for identifying countries to work in and the steps involved in setting up fortification programs, examples of FFI's work, and FFI's transparency with regard to resources it has gathered (e.g., fortification records, tools, research, and monitoring data).

FFI's process

Strategy diagnostics

FFI has performed detailed strategy diagnostics in each of its major regions. FFI started this process by gathering fortification data for all of Africa and creating profiles for each country, which included:

- Compiling facts about each country, including the relevant history that led to the country's current political and social situation.
- Tracking every fortification partner (to FFI’s knowledge) working in Africa by country.
- Tracking disease burden by country.
- Tracking consumption of cereal grains by country.
- Examining the industrial milling complex in the country (which FFI sees as an essential component of sustainable fortification solutions).

FFI has also done strategy research in Asia and Eastern Europe. In India, FFI did a more comprehensive study that included mapping the wheat and rice supply chains of the major states and identifying possible opportunities both by state and by market channel.

Based on its strategy research, FFI has created a "priority matrix" of countries and Indian states, which takes into account the potential impact of fortification, the best cereal grain vehicle (e.g., wheat, rice, maize) to target, and how easy or difficult implementation is likely to be. This process allowed FFI to understand the opportunities in each country and determine where to direct its focus.

FFI produces regional work plans, based on a strategy document developed using its diagnostic data, which outline the types of fortification activities it aims to support and/or
accelerate in each country.

**Deciding to enter a country**

*Analyzing consumption patterns*

In determining whether to enter a country, FFI’s first step is to understand the country’s pattern of wheat, maize, and/or rice availability. A useful preliminary litmus test is that if per capita availability of cereal-based grains is over 75 grams per day, effective fortification is likely possible. If it is significantly lower than this, FFI needs a more detailed understanding of consumption patterns to determine whether fortification is feasible, because the amount of vitamins and minerals that can be added to cereal grains without affecting sensory properties, e.g., the color of bread, etc., is limited.

*Industrial milling complex*

FFI next examines the country’s industrial milling complex, which it sees as essential to effective fortification practices. For example, although maize availability in Africa is high in terms of grams per day, in many African countries maize flour is produced primarily by mortar and pestle or by local village mills, approaches that are not conducive to sustainable or cost-effective fortification.

*Focus on cereal grains*

FFI focuses on cereal grains and does not work with other vehicles. If a country’s government wants to fortify a different vehicle (e.g. salt, oil), FFI does not have the relevant expertise itself but would likely be able to connect the government to other groups that do work with the desired vehicle.

*Funding*

Which activities FFI conducts in a particular country depends on several factors, including how much funding it has available and how many other organizations are supporting fortification in that country. FFI’s activities in a particular country could range from supporting all aspects of fortification on its own (including hiring on-the-ground employees to assist governments and producers) to supporting one aspect of fortification (e.g., drafting legislation, advocacy) while other organizations and partners support most of the other aspects of the program.

*Gaining political support*

Once FFI has determined that a country offers a good opportunity for a fortification program, the next important step is gaining political support. FFI aims to create a political coalition by connecting with the Ministry of Health (MOH) and, ideally, other government departments (e.g. the Ministry of Finance, Ministry of Agriculture, etc.). FFI also attempts to get the support of the highest level of local government (e.g. the Chief Minister in Indian states). In particular, FFI aims to identify and partner with capable individuals in the government that are passionate about improving nutrition.
FFI also works closely with the government to understand its mechanisms (as the ideal fortification program structure can change significantly depending on how a particular country’s government is set up).

**Forming a national committee**

FFI next brings together a food fortification national committee, which is a cross-sector team that works collaboratively to design the fortification program. FFI aims to involve public, private, and civic sector representatives from the beginning of each program in order to ensure that the goals of all parties are aligned and that the systems that are ultimately implemented are within the capabilities of each sector.

Members of the fortification national committee might include:

- Representatives from supportive non-governmental organizations (NGOs), if no interested partners exist in country FFI can be the representative on the committee
- Government representatives, such as the country’s Minister of Health (as well as, ideally, ministers of other departments)
- Private sector representatives
- Consumer groups
- Representatives from the World Health Organization (WHO), World Food Program (WFP) and/or UNICEF

FFI supports this committee through, e.g., technical support, training, etc. In some cases, FFI provides these services directly. In other cases, FFI works with a partner organization that serves as an on-the-ground presence while FFI provides broader technical support.

FFI personnel who might support this committee include its:

- Senior nutrition scientist
- Senior expert on consumption patterns, proper fortificants, best practices, etc.
- Communications coordinator, who may help put together advocacy materials

FFI’s regional staff may also support implementation in a variety of ways.

FFI is currently undergoing a major strategy review (as its first major strategy diagnostic happened in 2010). Occasionally FFI may find that filling fortification gaps requires an on-the-ground presence who serves as part of the fortification national committee and may sit with the MOH. The best approach varies by country.

**Legislation and implementation**

Once political support and partners are in place, FFI’s next step is to support the design of legislation. This includes specifying technical implementation and setting up ongoing monitoring. Ideally regulatory monitoring of mills is embedded in the government’s existing food control process, and a system is in place to track long-term effects on the population.
FFI advocates for governments to legislate mandatory fortification, which FFI views as the only sustainable approach for achieving the desired health outcomes of fortification. (FFI does collect mapping data on voluntary fortification efforts, but has only found evidence of voluntary fortification effectiveness in two or three countries.) FFI is able to help governments formulate best in class legislation and ensure that WHO guidelines are followed (e.g., using the correct vitamins and minerals in the proper types and amounts).

**Examples of FFI's work by region**

**Africa**

FFI has 15 total African countries on its work plan, across which its activities vary.

In 7 or 8 of these countries, FFI is providing relatively narrow, targeted support. For example, South Africa already has fortification legislation and monitoring in place, but currently fortifies wheat flour with a non-bioavailable type of iron that has no public health impact. FFI is helping South Africa switch to the correct iron compound, which is a difficult process. Countries like South Africa that use the wrong iron compound may be doing so due to outdated advice, or possibly in an attempt to save money (a non-bioavailable iron compound is often slightly cheaper than the correct compound).

*Training workshop to increase fortification technical support capacity*

Because fortification is a small field with relatively few organizations, there is not a wide base of expertise. Fortification organizations rely on a small number of specialized consultants for technical assistance and advice. This is expensive and makes organizations dependent on these experts’ schedules.

USAID has given FFI funding to run a regional workshop to train additional fortification technical capacity for West Africa, with the intent of broadening the base of expertise in the area and reducing reliance on the current small number of global experts. FFI will train workshop participants to use an online quality assurance and quality control (QA/QC), internal/external monitoring tool that it recently developed with support from the Global Alliance for Improved Nutrition.

FFI may also do this kind of training in other regions where it is needed.

*Partnership with Project Healthy Children (PHC)*

FFI has partnered with PHC in three or four countries in Africa to provide QA/QC training, share advocacy materials, help design legislation, and set up monitoring.

*FFI's impact*

Mr. Montgomery thinks FFI’s work in Africa offers particularly good examples of its impact. For example, with funding from the Dutch government, FFI helped to form Smarter Futures, a network of partners that have made significant progress advancing the fortification agenda in Africa. FFI was not solely responsible for Smarter Futures’ successes,
but Mr. Montgomery would argue that FFI’s work was a very important factor. (FFI had set a goal of getting mandatory fortification laws passed throughout Africa.)

**The Solomon Islands**

FFI is currently in the final stages of a project in the Solomon Islands funded by a grant from the Australian government’s Department of Foreign Affairs and Trade. FFI hired someone to assist the Solomon Islands’ Minister of Health for a year to implement mandatory fortification (including, e.g., forming a fortification committee and signing the necessary memorandums of understanding). FFI’s global staff and regional staff in Asia provided technical support for advocacy, communications, QA/QC, and monitoring. FFI also did monthly check-ins, involving its senior scientist and relevant experts, to get status updates on the program and see whether any additional technical support was needed.

Although the Solomon Islands is a small country and was not previously a priority country for FFI, FFI decided to work there for two main reasons:

1. At the recommendation of the WHO regional office, Australia approached FFI to ask it to lead a mandatory fortification program in the Solomon Islands, and FFI wanted to develop a relationship with, and demonstrate its effectiveness to, the Australian government.
2. The project provided an opportunity for FFI staff to gain experience. FFI developed a better understanding of the challenges and barriers involved in this sort of program, and improved as a team.

During the Solomon Islands program, FFI developed a spot-check test for proper iron fortification of rice, which will likely become a useful tool as rice fortification is brought to scale globally.

**Latin America**

Latin America has not been one of FFI’s priority regions, because fortification has been mandatory in Latin American countries for a relatively long time. However, many Latin American countries created their fortification legislation and standards prior to the 2008 workshop (convened by FFI) that culminated in the current WHO guidelines for wheat and maize fortification, and before more recent scientific evidence was available. FFI’s work plans include supporting Latin American governments to make changes to bring their fortification standards up-to-date (e.g., Venezuela needs to add folic acid, and Brazil currently uses an incorrect type of iron).

**Vietnam**

Following FFI’s work in the country (in partnership with UNICEF), Vietnam has passed mandatory wheat flour fortification legislation. FFI will continue to support the government in establishing proper standards and lend technical support as needed.

**Transparency and recordkeeping**
FFI shares its data, records, and tools transparently to a degree that it believes is unusual in the field, and is especially willing to collaborate with other groups. (For example, FFI suggested to the Micronutrient Initiative (MI) to use its tools and materials for a program in Pakistan for which MI recently received a large grant.)

FFI’s global recordkeeping includes country-level and regional monitoring to check, for example:

- Whether fortification is mandatory or voluntary
- The percent of industrially milled wheat flour, maize flour, and rice that is being fortified in each country
- What formulation is being used
- That proper QA/QC is being performed

FFI also serves as a global repository for best practices, including, as of recently, for rice fortification in particular (which is becoming more globally prominent).

FFI also keeps and shares advocacy materials, including a large and up-to-date repository of relevant research and data supporting the benefits of fortification (which governments and other actors will often ask to see).

Other global groups have recognized FFI’s recordkeeping of fortification data as a valuable tool. A Technical Advisory Group, including representation from the Gates Foundation, was formed to support a Global Summit on Food Fortification in 2015. This group determined that a priority is developing a global repository of fortification data, and FFI’s database was often noted as an example in discussions. FFI along with the Iodine Global Network and the Global Alliance for Improved Nutrition (GAIN) are leading the concept development for such a global repository.

FFI has developed processes and monitoring systems in this area that are recognized as the best in the field.

**Other groups**

- MI is funded primarily by the Canadian government. When GAIN was formed, the Canadian government anticipated that GAIN would cover most of the essential work in fortification of staple foods, so it shifted MI’s focus to other areas (e.g. supplements, Vitamin A, iodine). MI is now moving back into food fortification.
- The Tata Trusts in India are starting to focus on nutrition.
- The World Food Programme is interested in rice fortification, mainly supporting technical development and integration of fortification into social safety net programs
- UNICEF

**Partnering with UNICEF**

UNICEF is a strong partner of FFI globally. However, because of UNICEF’s broad range of priorities, in many regions and countries grain fortification is not one of its primary focus
areas. In some countries, FFI has leveraged its partnership with UNICEF to facilitate meetings with government officials. In general, however, UNICEF is unlikely to do detailed in-country grain fortification work itself, so FFI assesses the situation, determines what areas need support, and aims to fill those gaps either itself or through another partner NGO.

In other regions where UNICEF has historically had strong grain fortification priorities (e.g. Eastern Europe), FFI assists with advocacy and provides technical support, such as industry analysis, QA/QC training, etc.

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