

## **UN-Nutrition input to the Special Rapporteur on the right to food report on “Concentration of corporate power in global food systems and its implications for the realization of the right to food”.**

The upcoming thematic report of the Special Rapporteur on right to food to the United Nations General Assembly (October 2025) will focus on the *concentration of corporate power in global food systems and its implications for the realization of the right to food*.

The UN-Nutrition Steering Committee members<sup>1</sup> offer the following input of 2’902 words (excluding footnotes), organized around the set of questions posed by the Special Rapporteur in his [call for input](#). Questions, originally formulated for civil society, have been adapted to the UN context. This collective input does not preclude or supersede any other input provided by the individual agencies.

### **1. *How does the concentration of power affect the right to food?***

The global food system is shaped by important power asymmetries determining who has access to resources, who makes decisions, and ultimately, who benefits, compromising the progressive realization of the right to adequate food.<sup>2 3</sup>

The [WHO 2025 World Report on Social Determinants of Health Equity](#) emphasizes that access to power, money, and resources—including control over food systems—is a fundamental determinant of health and calls for policy coherence across sectors to dismantle the systemic barriers that perpetuate power imbalances. The [2024 WHO Europe report](#) on the

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<sup>1</sup> Nutrition heads from the Food and Agriculture Organization of the United Nations, the International Atomic Energy Agency, the International Fund for Agricultural Development, the United Nations Children’s Fund, the World Food Programme, the World Health Organization and the CGIAR System Organization. UN-Habitat also contributed to this input.

<sup>2</sup> Note to the SR: as “adequate food” refers to foods that are safe, nutritious and meet the local preferences, please consider unpacking the terminology in the report to be clearer. If not possible as this is agreed HR language, we suggest adding a footnote when first used.

<sup>3</sup> realized when every man, woman and child, alone or in community with others, has physical and economic access at all times to adequate food or means for its procurement.

Commercial Determinants of Noncommunicable Diseases (NCDs) reveals that corporate practices—especially in industries like tobacco, alcohol, ultra-processed foods, and fossil fuels—are responsible for nearly 7,500 deaths daily in the region. It highlights how these industries use lobbying, marketing, and misinformation to undermine public health policies and delay regulation.

Such imbalances of power are deeply entrenched in political and institutional systems, they are fluid and complex across a range of contexts, including sociocultural and urban-rural and significantly hinder the access of millions of people to safe and nutritious food as part of healthy diets, leading to malnutrition in all its forms and contributing to food insecurity, particularly for vulnerable populations. They compromise the achievement of the [global nutrition targets](#) and [NCD targets](#).

At the heart of these asymmetries is the concentration of power in the hands of a few multinational corporations that influence how agriculture land is owned and used and control large segments of the agricultural value chain—from seeds and inputs to food processing, distribution, marketing and retail.

For example, there is increasing evidence on the powerful role of the global ultra-processed food<sup>4</sup> industry in the global food systems (Baker et al., [2020](#); Moodie et al., [2021](#); Swinburn et al., [2019](#)), and on their increasing market concentration (Wood et al., [2023](#)), negatively shaping the food environment where people, in urban as well as rural communities, make their food choices.

Most ultra-processed foods use a limited ingredient-base, often being made of products obtained from just a few high-yielding plant species (sugar cane, wheat, corn, soy) and milk (Wood et al., [2023](#)), which can lead to monocropping and biodiversity loss (Monteiro et al., [2022](#)). Ultra-processed foods contain a wide range of additives (preservatives, emulsifiers, sweeteners, artificial colors and flavors) with increasing evidence of their association with gut disease (Whelan et al. [2024](#)). According to a recent [WHO/FAO statement on what is a healthy diet](#) a large and growing body of evidence suggests that consumption of ultra-processed foods is associated with negative health impacts.

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<sup>4</sup> As described by the [NOVA classification](#) scheme as Group 4

The share of ultra-processed foods in diets varies among countries reaching 50% in the United States and the UK (Touvier et al., [2023](#)). Worryingly, the sales of ultra-processed foods have either steadily increased over recent decades, particularly in low- and middle-income countries, or stayed high (Wood et al., [2023](#)).

Corporate political activities and lobbying<sup>5</sup>, global trade policies (including market concentration, lack of anti-trust laws, foreign direct investments, subsidies), scarcity of natural resources, land ownership, water rights and gender inequalities are ways in which the concentration of power is established and maintained preventing the realization of the right to adequate food. Subsidies provided to farmers in industrialized countries distort global food prices and threaten the livelihoods of smallholder farmers, who are often unable to compete (Amaglobeli et al., [2024](#)). Large-scale land acquisitions, or "land grabs," have led to the displacement of indigenous people's communities and rural farmers in several countries (Kennedy et al. [2023](#)).

Gender and youth-related inequalities further compound these issues. The rural youth are not often involved in decision-making processes: a missed opportunity to enhance production, foster innovation, and promote professionalization. Women, who make up a significant portion of the agricultural workforce, frequently face discrimination not only in access to land, credit, education, and decision-making power, violating their right to food (FAO, [2023](#)) but also their access to health care and food, violating their right to health ([WHO, 2024](#) and [World Bank, 2024](#)).

Understanding and addressing power disparities is essential to build trust and enable meaningful multistakeholder collaboration to more inclusive, transparent, and accountable food systems governance that includes the voices of those most affected and contribute to the realization of the right to adequate food.

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<sup>5</sup> A recent example of strong lobbying influencing UK policy can be found [here](#)

There are good private sector practices to learn from and build on. Companies that are promoting more equal and sustainable food systems for healthy diets need to be brought into the conversation to support addressing power asymmetries and inclusivity deficits. The human rights lens provides very important tools to hold states and corporations accountable for bridging these power gaps.

## ***2. What is being promoted by the UN that are alternatives to corporate-controlled food systems?***

The UN agencies support numerous programmes, initiatives and guidelines, to be tailored to local contexts, that promote structural, policy and legal changes for an enabling environment to strengthen resilience, self-sufficiency, sustainability, fairer trade and development towards improving capacity, regulations, adherence to and understanding of international human rights standards across food systems, including within the right to food framework<sup>6</sup>.

***Healthy food environments:*** WHO supports countries to contribute to increase access to healthy diets for all and as such counteract corporate controlled food systems through improving food environments with policy guidance, surveillance, capacity building, advocacy and technical and legal support. For details, see question 4.

***Agroecology:*** FAO, in partnership with IFAD, WFP, WHO, UNDP, UNEP and the Convention on Biological Diversity, launched the Scaling up Agroecology Initiative in the Second International Symposium on Agroecology in 2018 in Rome, developing the 10 Elements of Agroecology framework and the Tool for Agroecology Performance Evaluation (TAPE). The tool is now being refined to review metrics and incorporate advanced digital features (TAPE+). Access to dietary diversity at household and individual level has been incorporated. The [CFS Policy Recommendations on Agroecological and Other Innovative Approaches](#) are also key for promoting agroecology.

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<sup>6</sup> More details of such work can be found in FAO, 2024: [Realizing the Right to Food in a Changing World – The Right to Food Guidelines 20 years on and beyond](#).

***Urban and peri-urban agriculture:*** FAO leads on various initiatives, including the [Urban Food Agenda](#), the [Green Cities Initiative](#), and the [City Region Food Systems](#) (CFRS) Programme. The FAO series [on urban and peri-urban governance through dialogue on the right to food](#), examine the importance of local governments to sustainable, efficient, inclusive, just and rights-based food systems. WHO supports [good urban governance](#) and strong regulatory frameworks for healthy, safe and sustainable urban diets which are important to support urban agriculture. UN-Habitat, through its [Urban-Rural Linkages programme](#), promotes territorial approaches that integrate urban and rural planning to strengthen resilient, inclusive food and market system governance, while addressing disparities and power imbalances across levels of governance.

***Local and Regional Food Systems:*** Noteworthy initiatives include, among others: WFP, FAO and WHO support to governments for including locally produced and healthy foods in school meals, including integration of rights-based [nutrition guidelines and standards and effective food education and healthy food environment](#); WFP supports the promotion of locally produced fortified foods into social protection programs and the generation of evidence and technical assistance in conducting analyses, such as for example through [Enhance](#), to promote healthy diets while also reducing impact on climate; IFAD provides financial and technical support to smallholder farmers in nutrition sensitive agriculture to diversify and increase their production and income; the [UN Capital Development Fund \(UNCDF\)](#) supports the development of local food systems through the F4F (Food for Future) program; UNICEF's [First Foods Africa](#) initiative incentivizes the local production and consumption of nutritious, safe, affordable and sustainable foods for young children; FAO, IFAD, and WFP are collaborating on a multi-stakeholder initiative<sup>7</sup>, aimed at harnessing locally available, nutrient-dense foods, particularly for young children and pregnant or breastfeeding women, and girls in fragile contexts. This initiative leverages traditional knowledge, local biodiversity, and nutrient-rich foods. It supports climate-smart agriculture and self-reliant local food systems, reducing dependency on imports, building resilience, mitigating environmental impacts, and boosting local economies.

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<sup>7</sup> The Local Nutritious Food Solutions for Combating Acute Malnutrition and Promoting Healthy Diets.

***Food cooperatives and community food enterprises:*** The UN General Assembly proclaimed 2025 as the "[International Year of Cooperatives](#)". IFAD provides financial, training and technical support to cooperatives, improving the income and food security of poor rural households. The [International Cooperative Alliance](#) (ICA) collaborates with the FAO, especially in Latin America and the Caribbean. In West Africa, WFP partners with small and medium-scale food enterprises, offering technical support to strengthen their capacity to produce and deliver nutritious foods to vulnerable communities.

***Food sovereignty:*** In 2007 the UN General Assembly adopted the United Nations [Declaration on the Rights of Indigenous Peoples](#), and in 2018 , the [United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas](#).<sup>8</sup>

In its updated Policy on [Engagement with Indigenous Peoples](#) (2022) IFAD included a new principle of engagement on Food sovereignty, food security and nutrition.

The [WHO 2025 World Report on Social Determinants of Health Equity](#) emphasizes food sovereignty and agroecological practices that are often sidelined by dominant corporate-controlled food production models.

### ***3. What barriers or threats do these alternatives face?***

Large agribusinesses, food and beverage companies and input suppliers dominate food systems and influence policymaking. Their influence can hinder the allocation of resources to alternative approaches that are trying to counterbalance power dynamics. Important barriers include:

***Strong lobbying:*** Multinationals engage in lobbying that shape trade policies and subsidies that prioritize export-oriented, industrial agriculture (monocropping) over local food systems. This also undermines the capacity of rural communities to assert their rights and build resilient, equitable, and nutrition-oriented food systems. Transnational food and beverage companies, for example, feel threatened by WHO's policy package for healthy food environments<sup>9</sup> because it

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<sup>8</sup> A special procedure to monitor and support its implementation through the Working Group on the rights of peasants and other people working in rural areas was established in 2023 by Human Rights Council through resolution A/HRC/RES/54/9 for a period of 3 years.

<sup>9</sup> <https://iris.who.int/bitstream/handle/10665/259232/WHO-NMH-NVI-17.9-eng.pdf>

directly challenges their business models, profit margins, and market influence. Taxes on sugary drinks, bans on trans fats, and restrictions on marketing to children—can significantly reduce sales of high-margin, unhealthy, ultra-processed products. These products often form the core of many companies' portfolios, and therefore many corporations strongly oppose and create barriers to the adoption of such laws and regulations.

***Policy and economic constraints:*** Inadequate institutional support and regulatory environments make it difficult for farmers to adopt alternative practices. Incentives are lacking for local food solutions and for neglected and under-utilized species with high nutritional value and resilient to climate change. Adopting alternative production systems often involves a transition period where yields may initially drop. Without financial assistance or safety nets, smallholder producers may find the shift economically risky.

***Knowledge gaps:*** Agricultural extension services and education systems are often geared toward conventional corporate-controlled food production methods. A lack of training, research, and locally adapted knowledge limits farmers' capacity to implement and benefit from alternative practices.

#### ***4. What kind of legislation is needed to limit the growing corporate concentration and power in food systems?***

To rebalance power in food systems, governments should enact several types of legislation with robust enforcement mechanisms, counting on the support from civil society, private sector and UN agencies. The UN builds capacity and promotes the implementation of a combination of policies, laws, and regulations. They should be tailored to local contexts and designed to avoid, identify and manage potential and actual conflicts of interest.

- ***Evidence-informed regulatory measures supporting healthy food environments:*** FAO advocates a right to food and human rights-based approach, which demonstrates the importance of participation, accountability, non-discrimination, transparency, human dignity, empowerment, and the rule of law. It emphasizes the universality and interconnectedness of

human rights, including the intrinsic link between the right to food and the right to health<sup>10</sup>. WHO emphasizes a "health-in-all-policies" approach, encouraging governments to align food, trade, and fiscal policies with public health goals. WHO's global normative mandate lends legitimacy to national regulations, making it harder for companies to argue against them. This can lead to a domino effect of countries adopting similar regulations, shrinking markets for unhealthy products. WHO's emphasis on transparency and conflict-of-interest safeguards in policymaking can limit the ability of corporations to lobby governments or participate in policy discussions, reducing their influence over food system governance. Some specific regulations and policies include:

- ✓ Front-of-pack labeling and marketing restrictions reduce the effectiveness of branding and marketing strategies, especially those targeting children and low-income populations.
  - ✓ Taxes on sugary drinks; Subsidies for fruits, vegetables, legumes, and whole grains.
  - ✓ National school meal standards aligned with dietary guidelines and local purchases; Nutrition education regulations to integrate food literacy into schools; Ban on marketing ultra-processed foods in schools and public institutions.
  - ✓ Public food procurement laws requiring schools, hospitals, and government offices to purchase nutritious, locally produced food.
  - ✓ Zoning restrictions on fast food outlets near schools; Support for urban agriculture and community gardens; Regulations promoting farmers' markets and local food systems in urban areas.
  - ✓ Regulation of contaminants (e.g., pesticides, heavy metals) in food; Standards for processed and packaged food composition, such as salt and trans-fat limits; Certification systems for organic and sustainably produced foods.
- ***Corporate accountability and human rights due diligence laws:*** Mandatory human rights and environmental due diligence law ([mHREDD](#)) as outlined in the [UN Guiding Principles on Business and Human Rights](#) (UNGPs).

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<sup>10</sup> Further details of FAO work in support of legislation and policy for the right to food can be found at [FAO Right to Food](#) and in FAO, 2024: [Realizing the Right to Food in a Changing World – The Right to Food Guidelines 20 years on and beyond](#).



- ***Rural finance regulation:*** supporting smallholder access to markets and land and enabling local food enterprises to thrive.
- ***Antitrust laws:*** e.g., in seed, fertilizer, and food retail sectors.
- ***Transparency laws:*** Mandatory disclosure of supply chain data; public registries of corporate ownership to reveal lobbying, tax avoidance, and influence.
- ***Resource governance laws, including land:*** Land rights protections for Indigenous peoples, pastoralists, and smallholders; restrictions on foreign and corporate land ownership; seed sovereignty laws.
- ***Alternative systems supporting laws:*** Public procurement laws prioritizing agroecological and local production; funding for alternative food systems research and extension; and legal recognition of food sovereignty as a policy principle and a right of peoples.
- ***International legal instruments and treaties:*** Support for the UN Binding Treaty on Transnational Corporations and Human Rights; trade agreements that include enforceable environmental and human rights standards. Reflections exist on a possible [human rights based convention on Healthy Diets](#).

## ***5. How is the UN addressing corporate power issues.***

The UN has been taking various steps to address the concentration of corporate power in global food systems. Some examples include, among others:

The UN's ***Sustainable Development Goals (SDGs)***, call for supporting sustainable food production and fair trade, reducing market distortions caused by monopolistic practices and increasing transparency and accountability in the global food system, among others.

Particularly Goal 2 (Zero Hunger) and Goal 12 (Responsible Consumption and Production), emphasize the importance of creating food systems that are more sustainable.

***UN Committee on World Food Security (CFS):*** highlighted concerns about monopolies and oligopolies in agrifood undermining fair competition and reducing income for small-scale producers. In 2021, CFS adopted [Voluntary Guidelines on Food Systems and Nutrition](#), which

includes calls for reducing the power of large corporations and strengthening the rights of small-scale farmers and communities. The [Right to Food Guidelines](#), the [Land Tenure Guidelines](#), the [Principles for responsible investment in agriculture and food systems](#), and the [Guidelines on Gender Equality and Women's Empowerment](#) all provide essential guidance to build fairer, more inclusive and rights-based food systems for realization of the right to adequate food for all.

***The UN Decade of Action on Nutrition (2016 – 2025), now extended to 2030:*** The Nutrition Decade provides an enabling environment such that national, regional and international policies and programmes respect, protect and fulfil the right to adequate food (see additional background information for details).

***The seventh global meeting of the Indigenous Peoples' Forum at IFAD:*** held in February 2025 focused on [Indigenous Peoples' right to self-determination: a pathway for food security and sovereignty](#). Governments are called upon to ensure support for food sovereignty and security in partnership with Indigenous Peoples, supporting Indigenous Peoples' markets and exchanges, livelihoods and the revitalization of traditional food systems, agriculture and non-food commodities, while ensuring that Indigenous Peoples' health and dietary needs are respected and guaranteed.

***UN Food Systems Summit (2021):*** The summit highlighted that reducing corporate concentration should be a priority. However, some critics argued that the involvement of corporations in the summit diluted its impact.<sup>11 12</sup> Follow up processes led by the UNFS Hub included the ongoing development of a [framework for corporate accountability for food system transformation](#).

***Capacity building:*** [The Food and Power Initiative](#) (FPI) is led by UNDP aiming to support countries and stakeholders to better understand, navigate and address the power dynamics of food systems transformation. A collaborative project between the International Development Law Organization (IDLO) and WHO was set up: the [Global Regulatory and Fiscal Capacity Building Programme \(Global RECAP\)](#) to support governments in create enabling environments

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<sup>11</sup> <https://www.csm4cfs.org/fr/processus-politiques/defier-le-sommet-sur-les-systemes-alimentaires/>

<sup>12</sup> <https://www.sciencedirect.com/science/article/pii/S146290112300254X>  
<https://www.sciencedirect.com/science/article/pii/S146290112300254X#bbib19>



for healthier choices through food environment laws. FAO works to build the capacity of governments and all stakeholders on the right to adequate food, including its adequacy, availability, accessibility, and sustainability. The [FAO open access E-learning course on the Right to Food](#) was launched in 2025.

**Research:** The United Nations Conference on Trade and Development (UNCTAD) track trends in global markets. For example, [UNCTAD's Trade and Development Report](#) frequently highlights how increasing corporate power and market concentration in key sectors, like agricultural commodities, are exacerbating global inequalities and undermining fair trading.

In all the above, the UN works closely with civil society, including women and youth, indigenous peoples, smallholder farmer groups, private small and medium enterprises, and grassroots organizations to amplify their voices and to advocate for inclusive policies that limit corporate dominance in national food systems. Despite all these efforts, significant challenges remain to address power asymmetries in support of the progressive realization of the right to adequate food. It is important to raise the knowledge and capacity of corporations in relation to the international human rights framework and system. Continued and strengthened UN policy coherence and joint action are required.

### **Additional background information to support the input:**

**WHO programme on urban governance for health and well-being:** WHO is collaborating with the Swiss Agency for Development and Cooperation (SDC) to promote good local urban governance for health and well-being through civic engagement and multisectoral coordination within the Initiative on Urban Governance for Health and Well-being (2020–2028). In the first phase of the Initiative, WHO is working with six cities: Bogota (Colombia), Douala (Cameroon),

Mexico City (Mexico), Khulna (Bangladesh), Pasig City (Philippines), and Tunis (Tunisia). The mayors of these six cities have committed themselves to increasing current mechanisms for participatory urban governance to address priorities, such as through stronger multisectoral collaboration, community engagement, and promotion of social innovations and dialogue at local levels. This effort is connected to the [WHO Healthy Cities](#) programme.

WHO Director of Nutrition and Food Systems co-authored with Lundberg et al ([2025](#)) a paper arguing that a key challenge is to acknowledge the role of power at the intersection of urban areas, food and health dynamics. Since 70% of all food produced goes to urban centers, changes in food consumption in urban areas are an important driver to the production of more nutritious and sustainable foods that benefit broader populations. Urban areas, particularly cities, are critical sites for addressing global sustainability and health challenges. They are essential to transforming current food systems, developing innovations, and enacting changes to ensure a livable planet to address future crises. What action will be taken depends on the governance of cities which differ in powers and capacities across the globe and are shaped by actors operating at multiple scales. Private economic interests at all levels have a great power to shape urban food systems dynamics. A clear example is the expansion of international food retailers and the ‘super marketisation’ of urban food supply which is increasingly concentrating the control of the food chain in a few powerful corporations. Investment funds and housing companies are also shaping cities and their food systems at large, by contributing to processes of gentrification and ‘touristification’ involving increases in housing prices, displacement of the local population and transformation of food retail environments. Power struggles present challenges to public health as powerful corporations (such as transnational food and beverage corporations) use their economic power to prevent or favorably shape political action to improve food systems and diets (through lobbying and other means). Adopting an integrated, transparent, and participatory approach to policymaking—one that actively involves civil society and those most affected while preventing conflicts of interest—is essential to addressing these challenges.

***Social determinants of health*** : The [WHO 2025 World Report on Social Determinants of Health Equity](#) directly addresses how power imbalances in food systems contribute to health inequities and outlines strategies to tackle them. The report emphasizes that access to power, money, and resources—including control over food systems—is a fundamental determinant of

health. It states that inequitable food systems are shaped by political and economic structures that favor large agribusinesses and marginalize small-scale producers and consumers. It highlights the need to restructure food governance to ensure that local communities, especially women and indigenous groups, have a voice in decision-making processes. This includes promoting food sovereignty and supporting agroecological practices that are often sidelined by dominant industrial models. WHO calls for policy coherence across sectors—linking health, agriculture, trade, and environment—to dismantle the systemic barriers that perpetuate power imbalances. For example, it critiques subsidies and trade policies that benefit large corporations at the expense of local food security.

***Commercial determinants of Health:*** WHO's work on Economic and Commercial Determinants of Health (CED) is based in the Department of Social Determinants. It addresses the economic and commercial determinants of health (CDoH) across public health priorities, health-impacting industries, and different populations. It aims to support countries in leveraging the co-benefits of working in partnership with the private sector on common health goals, whilst addressing and preventing harm from conflicts of interest. It takes a social determinants approach in promoting research and action on economic and commercial determinants as structural drivers of health inequities. The programme explores the role of the private sector in determining health and health outcomes, and the roles and responsibilities of the public sector, the private sector and civil society in strengthening accountability for CDoH. WHO is preparing the first [WHO Global Report](#) (hereafter Global Report) on the Commercial Determinants of Health. A follow-up to the World report on social determinants of health equity and its recommendations on analyzing and addressing the commercial determinants of health, the aim of the Global Report is to clarify commercial determinants of health concepts and terminology, present the case for action, synthesize existing global evidence, and support countries with evidence-informed policy recommendations. When released in 2025, the Global Report will help WHO Member States to protect public health and safeguard against conflicts of interest while leveraging the potential of the business community. The [2024 WHO Europe report](#) on the Commercial Determinants of Noncommunicable Diseases (NCDs) reveals that corporate practices—especially in industries like tobacco, alcohol, ultra-processed foods, and fossil fuels—are responsible for nearly 7,500 deaths daily in the region. It highlights how these industries use lobbying, marketing, and

misinformation to undermine public health policies and delay regulation. The report calls for stronger governance, transparency, and public health capacity to counteract corporate influence, and urges the formation of coalitions rooted in equity and sustainability to promote healthier, more resilient societies.

**The UN Decade of Action on Nutrition (2016 – 2025), now extended to 2030:** The Nutrition Decade provides an enabling environment such that national, regional and international policies and programmes respect, protect and fulfil “the right of everyone to have access to safe, sufficient, and nutritious food, consistent with the right to adequate food and the fundamental right of everyone to be free from hunger consistent with the International Covenant on Economic, Social and Cultural Rights and other relevant United Nations instruments.” The Nutrition Decade fosters national, regional and global policy dialogue to facilitate and enhance local action, which in turn aims to maximize impact at all levels. A localized approach that involves civil society is important in order: to ensure Member State ownership of initiatives and policies; to adjust to the different political structures and environments in which nutrition initiatives need to be taken; to address the vast geographic and socio-economic differences within a given society; and to ensure that solutions are equitable, inclusive, people-centred and “leave no one behind”. Action Area 4 of the Nutrition Decade is on trade and investment for improved nutrition. The Nutrition Decade [Work Programme](#) paragraph 40 states that “Coherence between trade and nutrition policies is vital. Trade policies and agreements should support implementation of nutrition policies and programmes and should not negatively impact the right to adequate food in other countries ».

***Corporate accountability:*** Corporations should be independently monitored for ensuring accountability. There are good examples, such as the Food and Agriculture Corporate Transparency ([FACT](#)) index<sup>13</sup>, a tracking tool designed to analyse and monitor the political

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<sup>13</sup> FACT index was developed by Feed the Truth, in collaboration with Corporate Accountably, an NGO in official relations with WHO.

activities of major food corporations<sup>14</sup>. One finding from the FACT is that the same company may have differing levels of accountability in different countries that need to be considered and analysed. Other good examples are the Access to Nutrition Initiative (ATNI) and the World Benchmarking Alliance (WBA). ATNI periodically analyses healthiness of food and beverage companies' portfolios and their business practices regarding compliance to the code of marketing of breastmilk substitutes and marketing of foods to children. The WBA assesses the world's most influential companies on their contributions to the SDGs.

The UN-Nutrition members are also working on evidence-informed principles of engagement with the private sector to be tailored to the different types and reasons for engagement and applied to different fora. One first example were the [principles of engagement established for the 2025 Nutrition for Growth \(N4G\) Paris](#), facilitated the UN-Nutrition.

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<sup>14</sup> Political activities monitored by FACT index include corporate spending to affect electoral outcomes; lobbying to influence decisions of officials, legislators, or regulatory agencies; spending to influence scientific studies and institutions; and donating to charitable organizations to gain favor from potential critics. Companies that are engaging in these activities and publicly disclosing them receive better scores on the index because they are at least demonstrating a commitment to transparency.