



Civil Society Budget Advocacy Group

# CSO POSITION PAPER ON NUTRITION IN RESPONSE TO THE MINISTERIAL POLICY STATEMENT FY 2025/26



Presented to the Uganda Parliament Committees of Health, Education, and  
Agro-industrialisation March 2025



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## ACKNOWLEDGMENT

We commend the government of Uganda for adhering to the provisions of the Public Finance Management Act 2015 and the Constitution of Uganda to accord space to Civil Society to maximumly engage and contribute to the National Budget process every financial year, as a way of ensuring that budgets are inclusive and reflective of the aspirations of the poor and marginalized groups in Uganda.

The development of this Civil Society Organization (CSO) position paper on Nutrition in response to the Ministerial Policy Statement FY 2025/26 was conducted through an extensive participatory process involving numerous partners. These include World Vision, Caritas-Uganda, The Hunger Project Uganda, Food Rights Alliance, CARE, Action Against Hunger, Nutrition Society of Uganda Consent, with support from Right2Grow, and stewardship from the CSBAG secretariat.

# 1. ABOUT CSBAG

Civil Society Budget Advocacy Group (CSBAG) is a coalition formed in 2004 to bring together civil society actors at national and district levels to influence public resource allocation and accountability. Since 2004 CSBAG engages Uganda's budget process to incorporate the views of the marginalized people in the national budget. In line with this, CSBAG annually produces CSO positions on the proposed public expenditure layout for each upcoming fiscal year in response to the national budget. This paper examines nutrition targets for FY2025/26 and proposed alternative budget proposals for government to consider when approving the national budget for FY2025/26.

## 2. INTRODUCTION

According to the 2022 Global Nutrition Report, the world is facing a global nutrition crisis greater than that before COVID-19, with worrying trends across every form of malnutrition, from hunger to obesity. People affected by hunger worldwide increased by 150 million since the COVID-19 outbreak, from 618 million in 2019 to 768 million in 2021, while those unable to afford a healthy diet rose by 112 million to 3.1 billion in 2020 alone.

Whereas Uganda has made tremendous progress in tackling malnutrition, especially stunting among children under 5, currently standing at 26% from 29% in 2016, which is lower than the average for the Africa region (30.7%) , the country still faces severe cases of food insecurity. According to the recently released 2024 census results, 4 in every 10 (46%) of households in Uganda are moderately or severely food insecure, however this exacerbates at regional level. 6 in every 10 households (63%) from Karamoja sub-region are severely food insecure with the insecurity peaking up to 88% of households from Nabilatuk district in Karamoja Sub region.

The Uganda Vision 2040 embraces investment in nutrition as one of the cornerstones for ensuring a high-quality standard of living for its population (NPA, 2010), and this has been integrated across several government plans. However, commitment to address malnutrition both at the national and local government level remains minimal and quite untraceable.

### QUICK FACTS ON NUTRITION IN UGANDA

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Stunting among children under 5, currently standing at 26% from 29% in 2016

National Census Report, UBOS 2024

### 3. PROGRESS MADE

Uganda has made considerable progress aimed at improving child nutrition outcomes, including, Under the NDPIV, the government prioritized promoting nutrition through a strategic objective of “Better Nutrition for All,” which is expected to be delivered through the Human Capital Development and Agro-Industrialization Programmes. This will be instrumental in tracking nutrition-related interventions throughout the implementation of the National Development Plan (NDP) IV.

As a member of the School Meals Coalition, in 2024, Uganda committed to establishing a dedicated budget line, allocating funds for the national school feeding program starting from the 2025/2026 financial year to ensure continuity and expansion of school feeding initiatives, which is also reflected in the NDP IV however, this is yet to be realized. The Government of Uganda committed to Develop and approve the National School Feeding Policy by 2025. This policy will guide the planning, implementation, and monitoring of school feeding programmes nationwide, ensuring the provision of nutritious meals to students.

The School Meals Coalition is Government-led coalition that drives actions to urgently improve and scale up school meal programmes to ensure that every child has the opportunity to receive a healthy, nutritious meal in school by 2030.

“As a member of the School Meals Coalition, Uganda committed to establishing a dedicated budget line, allocating funds for the national school feeding program starting FY2025/26.”



## **4. CSO concerns for Nutrition in FY2025/26**

## 4.1. Funding gap for Nutrition Commodities

According to the Nutrition Secretariat, Office of the Prime Minister report on Essential medicines and health supplies, if no action is taken by the year 2025, Uganda will lose 1,061,000 lives of children under the age of 5 from treatable malnutrition cases, 568,000 related to stunting, 272,000 related to wasting, and 221,000 related to vitamin A deficiency. An additional 363,000 children under the age of two years will die from poor breastfeeding practices. This situation is worsened by the shortage and inadequate funding for Nutrition commodities used in preventing and managing malnutrition, which are largely donor-funded which is also facing a decline.

In 2024, Nutrition commodities need stood at \$35,695,860, however, only \$11,346,091 was committed, leaving a 68.21% funding gap. The non-availability or stock-outs of medical supplies in public health facilities threaten the survival of children in Uganda.

**Table 1: Funding Requirement for Nutrition Commodities in Uganda**

Commodity Category	Procurement needs	Commitments Available	Funding gap	%age Funding gap
Nutrition Commodities	\$35,695,860	\$11,346,091	\$24,349,769	68.21%
NCD Commodities	\$138,914,923	\$542,133	\$138,372,790	99.61%
Vaccines and associated supplies	\$78,322,629	\$56,180,641	\$22,141,988	28.27%

Source: Integrated Quantification Report for Essential Medicines and Health Supplies FY 2023/24- 2025/26

### Recommendation(s):

- The government should prioritize filling all the funding gaps for nutrition commodities and close the gap left by the closure of key donor partners like USAID to curb Moderate Acute and Severe Acute Malnutrition cases in the country.

## 4.2. Inadequate prioritization of nutrition activities under the DDEG.

Malnutrition is a cross-cutting issue of public health concern requiring multisectoral investments as stipulated under Uganda Nutrition Action Plan (UNAP) II. Under UNAP II (2020/21-2024/25), the Ministry of Health, and Education among other Ministries, Departments and Agencies and Local Governments are mandated to support the strengthening of nutrition coordination and partnerships at all levels, strengthening nutrition advocacy, communication, and social mobilization for nutrition, and strengthening coherent policy, legal, and institutional frameworks for nutrition strategies.

Whereas, under paragraph 64 and 96 in the first and second budget call circular, respectively for FY2025/26 call upon all accounting officers to ensure that support is directed towards immunization programs, child nutrition, health services, and child protection efforts to prevent abuse, exploitation, and neglect, this does not directly indicate the percentage that must be committed by all local governments towards mainstreaming nutrition services unlike the directive for HIV/AIDS which mandates them to allocate 0.1% of their budgets towards HIV/AIDS mainstreaming.

### Recommendation

Parliament, should direct the Ministry of Local Government for the directive to allocate 2% of the Discretionary Development Equalization Grant (DDEG) grants towards nutrition coordination at the local government level.

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## 4.3 Lack of a sustainable school feeding program

**Only 60% of government primary schools in urban settings provided learners with lunch at school, compared to 44 % in rural areas.**

Access to school meals for many school-going children, especially those in Public Schools, remains a big challenge. According to statistics from the state of school feeding worldwide, 2022 indicated that on average, only 11.4% of school-going children in Uganda receive school meals when compared to 23% in Burundi. Similarly, only 60% of government primary schools in urban settings provided learners with lunch at school, compared to 44 % in rural areas. Secondly, in one out of five government primary schools in rural areas (20%), learners did not have lunch compared to 8% in urban areas.

This implies that many children study on an empty stomach. Underfed children are susceptible to malnutrition, reduced cognitive growth, and poor academic performance, which threatens their economic progression towards enhanced income and gained opportunities in life. The situation is worse for refugee communities where implementation of school feeding programmes is low; for example, in Kiryandongo, only 59 percent of the primary schools were found to have school feeding programmes.<sup>4</sup>

Additionally, on the Human Capital Index (HCI) 2020, Uganda's score was 0.38, indicating that a child born today will reach only 38 percent of what her /his lifetime productivity had she/he received a complete education and been in full health. (World Bank, June 2024). Thus, the lack of a well-coordinated school program remains a major hindrance to the achievement of education outcomes.

### **Recommendation(s):**

- The Ministry of Health, Agriculture and Education are mandated to support policy, legal, and institutional frameworks for nutrition and thus should prioritize supporting the legislative regulatory and normative policy framework to support school feeding. For instance, fast-track the adoption and implementation of the school feeding policy and guidelines to support manageable and sustainable school feeding programs as stipulated in the NDPV.
- Support the implementation of Uganda's commitments to improving school feeding under the School Meals Coalition<sup>[1]</sup> which included the development of a National School Feeding Policy by 2025, a dedicated budget for national school feeding, development & operationalization of a digitalized National School Feeding Data Collection and Management System and establishment of a National Multi-sectoral School Feeding Coordination Committee.

<https://schoolmealscoalition.org/commitments/#Uganda>

[1] UBOS National Service Delivery Report 2021

[2] Second Education Response Plan for Refugees and Host Communities in Uganda 2021/22 - 2024/25 Page 1

[3] IPC ACUTE MALNUTRITION ANALYSIS, July 2021

[4] Second Education Response Plan for Refugees and Host Communities 2021/22- 2023/24 Page 24.

## 4.4. Delayed finalization of the Food and Nutrition Bill and the review of the 2003 Policy.

**Only 20% of indicators under the Uganda Nutrition Action Plan (UNAP) plan were achieved. (UNAP II Midterm review)**

The Food and Nutrition Policy 2003 recognizes the role of food security in promoting good Nutrition and ensuring the overall health and the socio-economic well-being of a population. Although its review is currently underway, it has also lagged for so long.

The mid term review of UNAP II revealed that only 20% of indicators under the plan were achieved, and this poor performance was attributed to discrepancies between nutrition indicators in the plan and the Program Implementation Action Plan under National Development Plan (NDP) III. Despite this, efforts to draft a new nutrition plan are minimal and outside the planning time framework, which continues to threaten progress in enforcing an enabling environment for achieving food security and nutrition outcomes

### **Recommendation(s):**

- The government needs to fast-track the finalization of the review of the Food and Nutrition Policy, 2003, to provide a policy framework that will guide and shape nutrition interventions in Uganda.
- The Ministry of Health, together with MAAIF, OPM, and Ministry of Education, should conduct a review of UNAP and draft a new action plan related in tandem to the NDPIV and the new strategic direction.
- Parliament needs to prioritize the enactment of the Food and Nutrition Bill into a law to enable a mechanism that supports the implementation of the food and nutrition policy.

## 4.5 The Ministerial Policy Statement inadequately addresses nutrition-related concerns .

The Ministry of Agriculture Ministerial Policy Statement inadequately addresses nutrition-related concerns and priorities. Nutrition-sensitive budgeting reflects a significant shift from a narrow focus on agriculture-led growth to an agri-food systems approach. This shift is informed by understanding the complex interplay between agriculture, nutrition, and economic development and other sectors. Under Comprehensive African Agriculture Development Programme (CAADP), a continental policy framework for agricultural transformation, wealth creation, food security, nutrition, economic growth, and prosperit, the government of Uganda committed to achieving zero hunger and reducing stunting, wasting, and overweight by 25%. To achieve these, there is a need to deliberately plan for and budget for nutrition-specific interventions under Agro-industrialisation.

### **Recommendations (s)**

- ☑ Encourage diversification of Agricultural production and consumption of nutritious traditional and indigenous African Crops
- ☑ Encourage the cultivation of diverse nutrient-dense crops, including the adoption of Biofortified crops varieties, and strengthen the value chain
- ☑ Enhance extension services and mainstream nutrition education
- ☑ Strengthen Nutrition Policies and programs, nutrition education, and consumer education

**“Under CAADP, the government of Uganda committed to achieving zero hunger and reducing stunting, wasting, and overweight by 25%.”**

## 4.6. Weak Coordination of Nutrition-related Interventions

**Weak coordination frameworks at both national and sub-national levels have been identified as a major barrier to effectively addressing malnutrition**

Good nutrition governance entails making adequate policy decisions in a timely manner and committing the necessary financial and organizational resources to their effective implementation, i.e., ensuring that benefits reach most of the population, preferably the most vulnerable. It also entails a sustained political commitment to ensure that nutrition programs and policies can withstand threats and constraints from changes in district leadership, and political and socio-economic upheavals. At the sub-national level, District Nutrition Coordination Committees (DNCCs) have the mandate to coordinate multispectral nutrition efforts within districts, including managing nutrition governance at a decentralized level. However, the majority of the DNCCs are underfunded and poorly coordinated to support nutrition interventions.

### Recommendations (s)

- The Ministry of Health needs to strengthen the coordination of DNCCs to deliver on their mandate.
- The government is urged to allocate funds towards the operationalization of the DNCCs to support the implementation of nutrition activities within the different districts.

## 5. Conclusion

We applaud the government's efforts to end hunger and malnutrition in Uganda amidst the limited resource envelope. As good nutrition is the backbone of a healthy population, we implore the government to prioritize issues surrounding nutrition to assure sustainable development and participation of all citizens for socio-economic transformation.

## 6. REFERENCES

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Ministry of Education and Sports (2025) *Ministerial Policy Statement for Ministry of Health FY2025/26.*

Ministry of Education and Sports (2025) *Ministerial Policy Statement for Ministry of Agriculture, Animal and Industrial Fisheries FY2025/26.*

National Planning Authority (2025) *Fourth National Development Plan (NDPIV) 2025/26 - 2029/30.*

Ministry of Finance, Planning and Economic Development (2025) *The Second Budget Call Circular on FY2025/26*

## **Vision**

A Uganda with a people centered budget that dignifies humanity.

## **Mission**

Working towards ensuring that resource mobilization, allocation and utilization is inclusive for a transformed Uganda.

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