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SUBMISSION ON THE DRAFT NATIONAL FOOD AND NUTRITION SECURITY PLAN (NFNSP) 2027 – 2037

EXECUTIVE SUMMARY

The Pietermaritzburg Economic Justice & Dignity Group (PMBEJD) welcomes the Draft National Food and Nutrition Security Plan and the accompanying Results Framework. (PMBEJD, 2026)

PMBEJD strongly supports the Plan's food systems approach and its recognition that food insecurity in South Africa is driven not only by production challenges, but also by poverty, inequality, inadequate incomes, weak local food systems, food price volatility, and inadequate access to nutritious diets.

The central argument of this submission is: **South Africa's food crisis is fundamentally an affordability crisis.**

South Africa is broadly food secure at national level, yet millions of households cannot afford sufficient nutritious food. This submission argues that the country's food crisis is therefore fundamentally an affordability crisis: wages, social grants and household incomes are inadequate relative to the combined cost of food and other essential expenditures.

PMBEJD's August 2026 Household Affordability Index shows: (PMBEJD, 2026)

- Household Food Basket: **R5,479.80 (PMBEJD, 2026)**
- Basic Nutritional Food Basket: **R6,597.25 (PMBEJD, 2026)**
- National Minimum Wage: **R4,836.80 (PMBEJD, 2026)**

After paying for transport and electricity (R3183,45) workers are left with R1653,35. After paying R3,183.45 for transport and electricity, a minimum-wage worker earning R4,836.80 is left with R1,653.35. Compared with the nutritional food basket for the worker's family used in this calculation, costing R3,774.21, this leaves a food shortfall of R2,120.86, or 56.2%. (PMBEJD, 2026)

If all the remaining money (R1653,35) went to buy food, then for a family of 4, it would provide R413,34 per person per month. This is 52.4% below the National Food Poverty Line of R868 per person per month. We note that the Food Poverty Line is a monetary-based threshold below which a person cannot consume enough food to meet their minimum daily energy requirements. (Statistics South Africa, 2026)

Within this broader household affordability crisis, children often bear a disproportionate burden. PMBEJD's August 2026 data show that the average monthly cost of feeding a child a basic nutritious diet is **R961.96**. The Child Support Grant of R580 is 33.2% below the Food Poverty Line of R868 and 40% below the average cost of securing a basic nutritious diet for a child. (Statistics South Africa, 2026) (PMBEJD, 2026)

This indicates that the official threshold for extreme poverty falls below the actual cost of securing adequate nutrition for a child. The implication is significant: a household can be classified as living at or marginally above the Food Poverty Line while still being unable to afford the food necessary to meet their nutritional requirements. (Statistics South Africa, 2026)

Household Food insecurity increasingly results from a widening gap between:

- Household income;
- Social grant values;
- Wage purchasing power; and
- The real cost of a nutritious diet.

The success of the NFNSP should therefore be measured not merely by food production, food availability, or poverty line thresholds, but by whether households can afford a nutritious diet with dignity.

KEY RECOMMENDATIONS

PMBEJD respectfully submits that the following recommendations would substantially strengthen the NFNSP, improve alignment between the Draft Plan and the Results Framework, and ensure that household food affordability becomes a measurable and actionable policy outcome.

No.	Recommendation	Proposed Change	Expected Benefit
1	Adopt Household Food Affordability as a Cross-Cutting National Outcome	Position household food affordability as a central outcome across all Goals, Strategic Outcomes and MELIA processes.	Aligns food production, social protection, nutrition, and local food systems around the practical question of whether households can afford a nutritious diet.
2	Introduce a National Household Food Affordability Indicator	Include a headline indicator measuring the percentage of households able to afford a nutritious diet after paying essential household costs.	Provides a direct measure of food security outcomes rather than relying solely on food availability or poverty measures.
3	Strengthen the Results Framework with Affordability Metrics	Add indicators on household food basket costs, nutritional basket costs, wage purchasing power, social grant purchasing power, nutrition affordability gaps and child nutrition affordability gaps.	Allows government to monitor whether policies improve real household access to food.
4	Move Beyond Poverty-Line Measures Alone	Complement Food Poverty Line reporting with measures of nutritional affordability and household purchasing power. (Statistics South Africa, 2026)	Recognises that households may be above poverty thresholds yet remain unable to afford a nutritious diet.
5	Benchmark Social Protection Against Nutritional Adequacy	Regularly compare grant values with the actual cost of feeding a child and the cost of a nutritious diet.	Improves the effectiveness of social protection in reducing hunger, malnutrition and child food insecurity.
6	Adopt a Whole-of-Household Affordability Framework (PMBEJD, 2026)	Assess food affordability in relation to transport, electricity, housing, education, healthcare and other essential expenditures. (PMBEJD, 2026)	Recognises that food competes with other unavoidable household costs.
7	Recognise Local Food Systems as Affordability Interventions	Evaluate local produce markets, agri-hubs, informal traders, spaza shops and smallholder support programmes according to	Ensures local food system investments deliver meaningful affordability benefits for consumers as well as producers.

		their impact on food affordability.	
8	Strengthen Child Nutrition Affordability Monitoring	Introduce a Child Nutrition Affordability Indicator comparing the Child Support Grant with the actual cost of feeding a child adequately.	Improves policy focus on child nutrition, stunting and developmental outcomes.
9	Introduce a Strategic Outcome on Reducing the Household Food Affordability Gap	Add a dedicated strategic outcome focused on reducing the gap between household income and the cost of a nutritious diet by 2037.	Creates explicit accountability for affordability outcomes.
10	Integrate Civil Society Affordability Monitoring into MELIA	Recognise CSO affordability datasets within monitoring and evaluation processes.	Strengthens evidence-based decision-making and provides early-warning indicators on food insecurity trends.
11	Link Behaviour Change Programmes to Affordability Measures	Evaluate nutrition education and behaviour change interventions alongside measures that improve access to affordable healthy foods.	Recognises that healthier food choices depend on affordability as well as knowledge.
12	Use Household Food Affordability as a Core Measure of NFNSP Success	Assess overall NFNSP performance according to whether households are increasingly able to afford nutritious diets with dignity.	Provides a clear, citizen-centred measure of policy success.

The Central Argument of this Submission

The Draft NFNSP correctly recognises that national food sufficiency coexists with widespread household hunger and malnutrition. PMBEJD submits that this contradiction is principally explained by the growing gap between household incomes and the cost of a nutritious diet. Food may be available, but millions of households cannot afford adequate nutrition after paying for transport, electricity, housing, education, healthcare and other essential needs. (PMBEJD, 2026)

The defining policy question for the next decade should therefore be: **Can South African households afford a nutritious diet after meeting their other essential needs?**

The success of the NFNSP should ultimately be measured against this question.

Food Affordability must become the Plan's Central Outcome

PMBEJD strongly endorses the Plan's transition from a narrowly agricultural approach towards a food systems approach. This reflects international best practice and aligns with South Africa's commitment to treating food security as a multidimensional challenge.

The submission particularly supports:

- Goal 2: Equitable and dignified access to nutritious, safe, affordable and healthy food;
- Recognition of food affordability as a major determinant of food security;
- Support for local food systems;
- Stronger nutrition outcomes;
- Enhanced social protection;
- The MELIA framework and evidence-based policymaking.

However, affordability should not be treated as only one intervention under Goal 2. Affordability should be adopted as the central lens through which all interventions are evaluated. Food production and food availability are necessary conditions for food security. They are not sufficient conditions. Food security is only achieved when households can afford to obtain a nutritious diet.

Strengthening the Results Framework

PMBEJD welcomes the inclusion of affordability within Goal 2 of the Results Framework. However, affordability remains insufficiently represented in the proposed indicators.

The current framework measures:

- Food prices;
- VAT reforms;
- Food basket access;
- Numbers of markets;
- Social protection coverage.

These indicators are useful and necessary, but they do not adequately answer the most important question: **Are households increasingly able to afford a nutritious diet?**

PMBEJD recommends the incorporation of the following indicators.

Recommended Indicator	Purpose
Household Food Basket Cost	Monitor affordability pressures
Basic Nutritional Food Basket Cost	Monitor nutritional affordability
Household Food Affordability Ratio	Measure purchasing power
Child Nutrition Affordability Gap	Monitor child food security
Purchasing Power of Wages	Track real access to food
Purchasing Power of Social Grants	Track adequacy of support

Percentage of Households Able to Afford a Nutritious Diet	Measure actual food security outcomes
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These indicators would substantially strengthen the Monitoring, Evaluation, Learning and Impact Assessment (MELIA) framework and improve accountability.

For implementation purposes, the percentage of households able to afford a nutritious diet should be defined as the share of households whose disposable income, after essential non-food expenditure, equals or exceeds the cost of a nationally specified nutritious food basket adjusted for household size and composition.

PMBEJD therefore requests that the Secretariat incorporate household food affordability as a cross-cutting national outcome, adopt the proposed affordability indicators in the Results Framework, and include a dedicated strategic outcome on reducing the household food affordability gap by 2037.

1. THE HOUSEHOLD FOOD AFFORDABILITY AND THE COST-OF-LIVING CRISIS

Recent PMBEJD evidence highlights the severity of South Africa's affordability crisis.

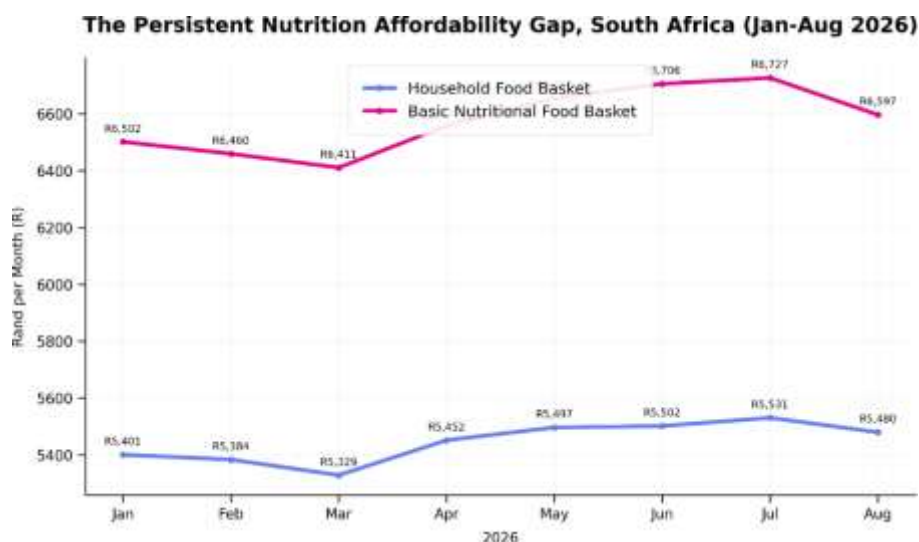
In August 2026:

- Household Food Basket = **R5,479.80**
- Basic Nutritional Food Basket = **R6,597.25**. (PMBEJD, 2026)

The gap between what households typically spend on food and what they need to spend to achieve nutritional adequacy remains persistent and substantial.

This affordability gap helps explain:

- Continuing high levels of child stunting;
- Limited dietary diversity;
- Reliance on lower-cost energy-dense foods;
- Persistent nutrition insecurity despite adequate food availability nationally.



GRAPH 1: Household Food Basket versus Basic Nutritional Food Basket. Source (PMBEJD, 2026)

Measure	August 2026 value
Household Food Basket	R5,479.80
Basic Nutritional Food Basket (PMBEJD, 2026)	R6,597.25
Difference	R1,117.45

2. HOUSEHOLD FOOD AFFORDABILITY REQUIRES A WHOLE-OF-HOUSEHOLD PERSPECTIVE

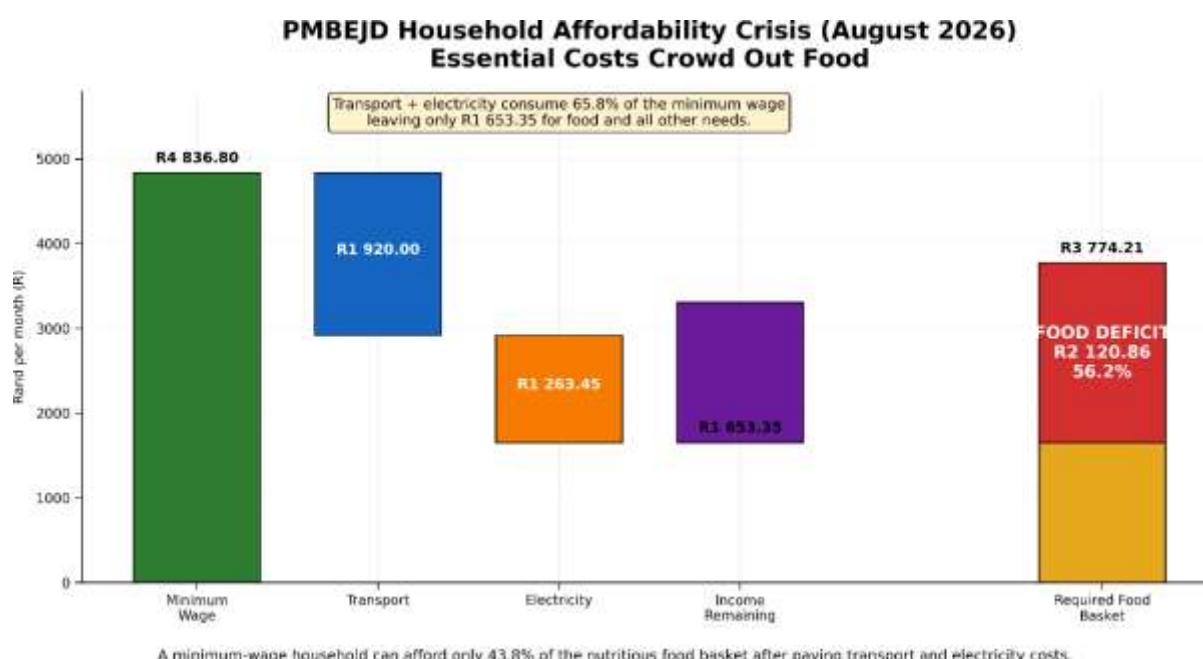
Food purchasing decisions are not made in isolation. Households must first pay for:

- Transport;
- Electricity;
- Housing;
- Debt obligations and municipal services.

PMBEJD's affordability analysis demonstrates that transport and electricity costs alone consume the majority of the disposable income of minimum wage households. After these expenses are paid, insufficient income remains to purchase even the basic household food basket. (PMBEJD, 2026)

This finding has major policy implications. Rising electricity tariffs, transport costs and municipal service charges directly affect food security because they reduce households' ability to purchase food.

Food policy cannot therefore be separated from transport policy, energy policy, municipal tariff decisions and broader anti-poverty measures.



GRAPH 2: Costs of Basic Household Needs Reduce Income Available for Food.
Source (PMBEJD, 2026)

Measure	August 2026 value
National Minimum Wage (PMBEJD, 2026)	R4,836.80
Transport and electricity (PMBEJD, 2026)	R3,183.45
Income remaining for food and other needs	R1,653.35

3. NUTRITION OUTCOMES DEPEND ON AFFORDABILITY

PMBEJD strongly supports the Plan's emphasis on nutrition, dietary diversity, healthy eating and behaviour change. However, poor nutrition outcomes cannot be understood solely as a consequence of individual decision-making. The evidence consistently demonstrates a gap between:

- What households should eat; and
- What households can afford to eat.

Healthy diets become achievable only when healthy foods are affordable. For this reason, nutrition interventions, food environment reforms and behaviour change programmes should be evaluated through an affordability lens. Knowledge alone cannot substitute for affordability.

4. SOCIAL PROTECTION MUST BE BENCHMARKED AGAINST NUTRITIONAL ADEQUACY

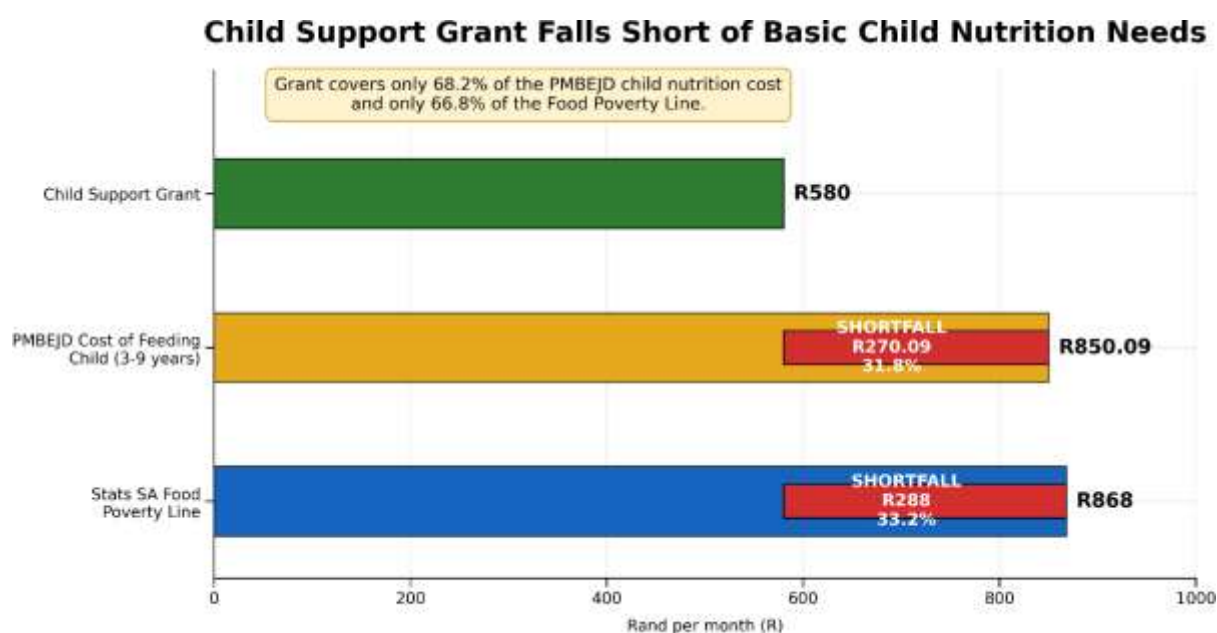
PMBEJD strongly welcomes the NFNSP's recognition that existing social protection measures are insufficient to address nutritional insecurity fully. Particular attention should be given to:

- Child Support Grant;
- Maternal nutrition interventions;
- ECD nutrition programmes;
- School feeding programmes;
- Community nutrition support programmes.

PMBEJD's August 2026 data shows:

- Child Support Grant = **R580**
- Cost to feed a child a nutritious diet = **R961.96** (PMBEJD, 2026)

This leaves an affordability gap of **R381.96 per child per month**. The implication is clear: social protection interventions intended to address child food insecurity should be benchmarked against the actual cost of securing adequate nutrition.



Source: PMBEJD Child Nutrition Basket (R850.09), Stats SA Food Poverty Line (R868), Child Support Grant (R580).

GRAPH 3: Child Support Grant versus Cost of Feeding a Child versus Food Poverty Line. Sources: PMBEJD (2026) for the Child Support Grant and cost of feeding a child; Statistics South Africa (2026) for the Food Poverty Line.

Measure	August 2026 value
Child Support Grant	R580
Food Poverty Line (Statistics South Africa, 2026)	R868 per person per month (Statistics South Africa, 2026)

Cost of feeding a child a basic nutritious diet	R961.96
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Explanatory note: Statistics South Africa's 2026 Food Poverty Line is R868 per person per month (Statistics South Africa, 2026). An amount of R413.34 per person is therefore R454.66 below this threshold—a shortfall of 52.4%, calculated as $(R868 - R413.34) \div R868 \times 100$. The Child Support Grant of R580 is R288 below the threshold—a shortfall of 33.2%, calculated as $(R868 - R580) \div R868 \times 100$. All percentages are rounded to one decimal place. The separate 40% shortfall compares the R580 Child Support Grant with PMBEJD's estimated monthly cost of R961.96 for feeding a child a basic nutritious diet; it is not calculated against the Food Poverty Line.

5. LOCAL FOOD SYSTEMS MUST IMPROVE AFFORDABILITY

PMBEJD strongly supports Goal 1 of the NFNSP and the Results Framework's focus on:

- Local food value chains;
- Produce markets;
- Smallholder producers;
- Public procurement;
- Informal food systems;
- Urban agriculture.

These interventions are essential not only because they support livelihoods and local economic development. Their success should also be measured by whether they improve household food affordability.

Local food systems should:

- Increase access to affordable fresh produce;
- Reduce food system costs;
- Shorten supply chains;
- Improve nutritional access for low-income households.

Food system transformation that does not improve affordability will have limited impact on food insecurity.

6. INFORMAL FOOD ECONOMIES ARE STRATEGIC FOOD SECURITY INFRASTRUCTURE

PMBEJD strongly supports the NFNSP's recognition of:

- Street traders;
- Informal traders;
- Spaza shops

as critical components of South Africa's food system. For many communities, informal food retailers provide:

- Convenient access;
- Flexible purchasing;
- Affordable food;
- Local employment opportunities.

Supporting these actors should therefore be recognised as a food affordability and food security intervention.

7. PROPOSED ADDITIONAL STRATEGIC OUTCOME

PMBEJD proposes the following strategic outcome for inclusion into the final NFNSP.

Strategic Outcome 6: Reduction in the Household Food Affordability Gap

By 2037:

- Increasing numbers of households are able to afford a nutritious diet;
- Social grants maintain purchasing power;
- Real wages support nutritional security;
- Child nutrition affordability improves;
- Household exposure to food price shocks declines.

8. CIVIL SOCIETY DATA SHOULD STRENGTHEN MELIA

PMBEJD strongly supports the NFNSP's commitment to evidence-based monitoring and learning. The Plan already recognises the value of alternative food basket methodologies.

PMBEJD recommends that civil society affordability monitoring systems be recognised and if useful integrated into MELIA processes.

The PMBEJD Household Affordability Index provides ongoing data on:

- Food basket costs;
- Nutritional affordability;
- Child nutrition affordability;
- Grant adequacy;
- Wage purchasing power;
- Household affordability trends.

Such monitoring can strengthen transparency, accountability and responsiveness.

CONCLUSION

The Draft 2.2 National Food and Nutrition Security Plan provides the strongest foundation yet developed for addressing food insecurity through an integrated food systems approach. The Plan correctly recognises that food insecurity is driven by

poverty, inequality, inadequate incomes and barriers to access rather than food shortages alone.

PMBEJD's evidence demonstrates that these challenges increasingly manifest through a deepening household affordability crisis. Millions of households are unable to secure nutritious diets because food must compete with transport, electricity and other unavoidable household expenses. Children bear a particularly heavy burden. (PMBEJD, 2026)

The defining policy question for the next decade is not simply whether food is available, but whether **South African households** can **afford a nutritious diet with dignity**.

PMBEJD respectfully submits that household food affordability should become the central organising principle of the NFNSP and a primary outcome against which progress is measured through the Results Framework and MELIA processes.

If the Plan succeeds in reducing the household food affordability gap, it will simultaneously advance:

- Food security;
- Child nutrition;
- Educational attainment;
- Public health;
- Social protection effectiveness;
- Economic inclusion; and
- Human dignity.

Ultimately, South Africa will not overcome hunger simply by producing more food. South Africa will overcome hunger when every household has the means to consistently afford a nutritious diet.

Yours sincerely



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