

(Ontario, NGO Coordinator). The organization was working with those schools to develop a distribution program that would reduce the transportation costs for these schools; however, they are still at a disadvantage compared to their counterparts in the urban areas of the district.

Concerns regarding transportation and distribution of food were noted in Manitoba as well. While the participant who informed this research of this issue in her province was not representing a specific school division, she was aware of the challenges of accessing food faced by the rural communities. Specifically, she noted schools in remote areas do not have the same affordable access to the same variety of products as the urban schools in the area, which makes it more challenging to promote healthy eating among young people in those areas (Manitoba, dietitian). This emphasizes the need to include affordability as well as geography when developing regulatory levers pertaining to food and nutrition. Schools in rural and remote locations have challenges procuring sufficient nutritious foods for their internal food environments.

The distribution and transportation problems in the food system have an impact on institutions as well as households, making it difficult for programs which aid food insecure households to do so. Populations that are already vulnerable to food insecurity due to transportation and distribution issues in the food system are unable to find reprieve during the school day when these same issues impact the breakfast/snack/lunch programs meant to alleviate them at the household level. The school nutrition regulations are meant to provide directives and tools to school administrators for improving the nutritional quality of the foods and beverages being sold in schools, however if schools are unable to supply them, or students are unable to purchase them, the regulations are not addressing the problems of nutrition, health, and learning that they recognize as important.

Barrier: Oversight and Enforcement

The shift from pseudo foods to more healthful foods has not been easy for all schools and some continue to struggle, even if procurement of healthful foods is not the problem because the preference for less nutritious fare persists. The interviews revealed individuals have had to negotiate dual roles as nutrition champions and policy enforcers. Those who have implemented nutrition regulations with more success have had support from staff, not only for oversight and monitoring of the implementation of regulations, but also by role modeling healthy behaviours for students. Even where school staff has been supportive of the nutrition regulations, there are students who still resist the changes and the staff do not want to become the food police to enforce them.

Food police or cafeteria police were terms that were mentioned by several interview participants as a way to describe the role of enforcer of nutrition requirements, especially when the requirements were being met with resistance (Alberta, school district official, New Brunswick, school district official, Newfoundland and Labrador, 2 provincial officials, Saskatchewan, cafeteria manager). In one instance, it was mentioned that the province did not want to be the cafeteria police but rather wanted to encourage school cafeterias and canteens to comply with the policy (New Brunswick, provincial official). Alberta does not require schools or school districts to have a nutrition policy, thus those that do, do so voluntarily. Having the option however, means that there is reluctance among those districts that might be interested because enforcing a policy can be an onerous task. In one Alberta district that did implement a nutrition policy, one of the challenges “with high school cafeterias though is that, it was pretty well left to the school principal to police the cafeteria and what was provided, which is a challenge because school principals have many more roles than that in the school” (Alberta, school district official). When the nutrition

policy is being met with resistance, enforcement is a challenge when other responsibilities are competing.

A participant with a background in nutrition was willing to take on the cause of improving the nutritional quality of the foods and beverages available for young people; however, confronting the violations of the nutrition guidelines, like serving hot dogs at a basketball tournament being held at school, was frustrating and she “doesn’t want to be the food police” (Newfoundland and Labrador, 2 provincial officials). In Saskatchewan, where school divisions are supposed to develop their own nutrition policies, one division wrote an intentionally vague policy, so they would not have to police it (Saskatchewan, dietitian). Enforcing policy is viewed as an onerous task when the internal support for it is not there, even if the benefits are clear. There is a fine line between food police and health champion, and a key part of changing the dialogue is to have all of the people who work in schools support the efforts being made to change the menus in schools and not rely on individuals to enforce the rules.

Those responsible for oversight and implementation of these regulations appreciate the enthusiasm and, in some cases, additional efforts taken by these school food champions because their enthusiasm for healthy eating supports students in adjusting to the changes. One respondent mentioned that champions are crucial to improving the eating habits of students. If “a volunteer or champion doesn’t pick up the cause within the school... it’s a dead issue. There’s definitely a need for somebody to champion it” (Ontario NGO coordinator). In Alberta, where having a school district level policy is optional, a champion is required to initiate the development of one (Alberta, provincial official). Without a champion, policies do not get developed or implemented and the potential benefits do not reach the students.

The difficulty of making the necessary changes to the foods and beverages sold in schools is increased when teachers and staff find opportunities to treat or reward students. Seven of the eleven subnational jurisdictions make some reference to discouraging using food as a reward or make suggestions for alternative rewards (**Table 2**). The interview participants suggest that food as reward, or “treats”, is still pervasive in schools (Alberta, school district official; Manitoba, provincial official; Newfoundland and Labrador, 2 provincial officials; Saskatchewan, dietitian; Saskatchewan, cafeteria manager). Because regulations only apply to foods and beverages sold on school property, they do not have to be applied to class rewards, birthdays, and other special events where the food is given away, though this is often encouraged. There is a perception that the occasional nature makes it okay to serve treat foods, however, “if you have five or six teachers giving it out once a week then a student is getting it every day” (Alberta, school district official). Another participant shared:

it comes down to the school cafeteria supervisor [laughs]. You know, in reality, many of these folks have been in the job for a long time and they cook and produce the way that they’ve always cooked and produced...they want to provide the kids with the...large sugar cookie ‘cause that’s the thing that would please the kid” (New Brunswick, school district official)

In spite of the nutrition regulations, there are still people who are encouraging students to eat or facilitating the consumption of foods with low nutritional value while at school. The idea that young people can have treats has persisted. This notion, in conjunction with the lack of oversight or enforcement mechanisms in the regulations, as well the reliance on individuals to champion the necessary changes is a barrier to successfully implementing the school nutrition regulations.

Barrier: The External School Food Environment

Participants indicated that the market-based nature of the school food environment and reliance on fundraising for school related materials make regulation challenging. The content analysis of the nutrition regulations revealed each of the school nutrition regulations included at least one reference to Revenue Generation, typically with reference to fundraising, ensuring that fundraising activities no longer include bake sales or chocolate sales (**Table 2**).

With the exception of Quebec (MELS 2007), the documents do not address the costs of food services. The experiences of interview participants with school food service providers with regards to the nutrition regulations have varied. Some school boards/districts/divisions have found food service providers willing and able to provide them with food and beverage options that fit the nutrition requirements outlined by the relevant regulatory document (New Brunswick, school district official; Ontario, school board official), while others have expressed difficulty receiving the same level of compliance at an affordable price (Alberta, provincial official; Alberta, school district official; Manitoba, dietitian; Ontario, school board official). When creating compliant, cost-effective menus is no longer possible, providers leave and schools lose their food and beverage services, or they are reluctant to implement nutrition requirements at all (Alberta, provincial official; Newfoundland and Labrador, 2 provincial officials; Ontario, NGO coordinator). In both cases, students lose the exposure to the healthful foods and beverages the subnational regulations are meant to provide access to. While the regulation of the internal school food environment can be beneficial, the outcomes of the regulations must reach the intended group to be effective.

Schools are not obligated to provide food and beverage vending facilities, thus any services must be cost-effective to remain. For some schools, the facilities are run entirely by the school or school board/district/division in that they hire their own food service staff, purchase food and supplies, and prepare on site. In these cases, the foods and beverages need only to meet costs and additional money can be put back into the school (New Brunswick, school district official; Ontario, school district official; Saskatchewan, cafeteria manager). For others, food services are contracted out to catering companies. If a for-profit provider is not profitable in the school food environment they are in, they stop service. This concern about revenue, in conjunction with prevalence of and preference for pseudo foods has resulted in exceptions to the rules being put into the policies (**Table 2**). This allows for nutrient-poor items to be sold occasionally, while treats for special occasions can still be given to students as long as there is no cost. To remain in schools, some catering companies have modified their menus to meet the needs of the schools and the nutrition regulations. Some school boards, like one in New Brunswick, have had the opportunity to change the menu to ask for locally produced products in addition to the nutrition criteria as well as to find ways to incorporate the school food environment in educational opportunities (New Brunswick, provincial official). Caterers oblige as long as they can both make their costs and their profits. It is worth noting however, that in at least one case, these larger food companies offer a form of profit sharing with the school so they may benefit from the sales as well (New Brunswick, school district official).

If, regardless of who is making the food, students decide they do not want to eat the healthier menu items, they do not have to. Many students beyond elementary school age are allowed to “vote with their feet” (British Columbia, school district official) and purchase foods and beverages from the external school food environment or bring food from home. These foods

and beverages are not covered by the nutrition regulations. Many participants found implementing the school nutrition regulations difficult due to competition from the external food environment:

The second school, they had, there was more difficulty with them because they were finding the need to provide unhealthy choices more because they were in close proximity to some of the convenience stores and so the kids would go to the convenience store and then come back and sit in the cafeteria with the unhealthy food. (Alberta, school district official).

The participant from British Columbia mentioned a golf course that is accessible to middle school students and a “mini mart” that is accessible to a high school in her district (British Columbia, school district official). A&W, McDonalds, and Ruckers are accessible to the students in a Saskatchewan high school (Saskatchewan, cafeteria manager). These sites give students access to the restaurants and convenience stores that are not regulated by the subnational jurisdictional regulations and continue to sell the pseudo foods that had previously been sold throughout the internal school food environment. As a consequence of decreased sales, some schools have experienced a loss in their revenue. As the internal food services are no longer generating the same amount of income, those that have agreements with food service providers are not receiving the same amount of revenue from those agreements, and in several cases, reducing the services or closing the facility (British Columbia, school district official, Ontario, school board official, Ontario, NGO coordinator, New Brunswick, provincial official). As the participants from Newfoundland and Labrador stated: “The free market’s going to kill us” (Newfoundland and Labrador, 2 provincial officials), meaning competition for food and beverage vendors located off school property is going to put the school-based enterprises out of business.

When internal school food facilities close because they are not economically viable, students lose the availability of healthful options while maintaining access to the less healthful options from the unregulated external school food environment. One participant shared that his school board was working with the local health unit to encourage local business to also support the nutrition policy (Ontario, school board official). Businesses are under no obligation to support such an initiative, nor are they likely to be regulated in such a way only because they are within close proximity to a school. The cafeteria manager who informed this research of the Safe School Zone in his school board is skeptical of the effectiveness of such an initiative because he “would assume that this man, who’s, in the business of being profitable would not want to lose those things in his store or on his menu that brings in the kids” (Ontario, school board official). While public health units may reach out to the external school food environment, there is no obligation for them to comply. While sales of lottery, tobacco, and alcohol are age regulated, it is unlikely that restrictions will be extended to pseudo foods and beverages. As a result, the attempts to provide healthier offerings in the internal school food environment are undermined, and the maintenance of such a space is jeopardized, leaving students with only the external, unregulated school food environment to purchase from.

DISCUSSION

To summarize, each of the subnational jurisdictions has at least one regulatory document that acknowledges the link between nutrition and health and most subnational jurisdictions further recognize that being healthy makes it easier for students to learn. Many interview participants discussed improving access to healthful foods and beverages as an objective of the regulatory

documents. The subnational jurisdictions take different approaches to incorporating pieces of nutrition guidance into their regulations to achieve these objectives.

The barriers to successful implementation of these regulations revealed by the interview participants are tied to the market-based nature of the internal school food environment, including obtaining healthful foods and encouraging consumption of the nutritious foods so students receive the health and developmental benefits of nutritious eating. The nutrition regulations of the Canadian provinces and Yukon Territory recognize the importance of nutrition in the health and wellbeing of children as they pertain to education. Each also recognizes foods and beverages are popular choices for fundraising events for the school, and also recognize that food and beverages sold at school must at least recover their costs if not generate revenue for the school. Nutrition promotion and revenue generation are not necessarily compatible but negotiating these two aspects of the school food environment is the reality for Canadian schools and can impede the efforts to improve the health of the school food environment.

There are several barriers in the current regulatory framework to successfully implementing the regulations. Access to sufficient compliant foods and beverages, especially in rural and remote areas, and having adequate support for enforcement of the regulations are among those barriers. One of the key barriers for the regulations addressing nutrition and health of students during the school day is the options for students to eat that are beyond the scope of the regulations, including food brought from home and the external school food environment, both of which provide ample opportunities for students to continue to consume foods and beverages that are not healthful and do not contribute to the desired outcomes of the regulatory documents. If the reason for regulating the school food environment is to address the link between nutrition and health, then it is necessary to ensure students are consuming healthful foods and beverages. These regulations do not accomplish this. In some cases, the nutritious foods brought on to school property to be sold to students go uneaten, and these operations close, unable to compete with the unregulated products brought from home or nearby restaurants and convenience stores, removing the nutritious foods off of school property entirely.

The national scope of this research has contributed to a larger discussion of school nutrition regulation in Canada, which has previously focused primarily on individual provinces (Mullaly, et al., 2010; Taylor, et al., 2011; Fung, et al., 2013; McIsaac, et al., 2015; Vine and Elliott, 2014) highlighting the similarities in approaches to regulation, as well as the shared barriers. This research also adds to the international discussion of school meals by creating an overview of Canada school food as a whole that is situated within a growing body of international research on this subject (Vernon, 2005; Harper, et. al., 2008) Levine, 2008; Morgan and Sonnino, 2008; Nelson et al., 2007; Poppendieck, 2010).

In the absence of a state-funded school meal, the ability to intervene in a way to accomplish the desired outcomes is hindered by the neoliberal regulatory framework of Canadian school food environments. Without a public plate (Morgan and Sonnino, 2008) schools have few foods and beverages to which to apply the regulations. Those products the regulations are applied to still need to compete for the student dollar with unregulated food from home and from the external school food environment (Winson, 2008; Winson et al., 2012; Vine and Elliott, 2014). Without an institutionalized, state-funded school meal, Canadian school children do not have increased access to nutritious foods, nor do they have the links between nutrition, health, and learning addressed.

This situation is a stark contrast to the United States, and the United Kingdom, which offer food during the school day, including low and no-cost options to those in need (Vernon, 2005;

Levine 2008; Nelson et al., 2007; Poppendieck, 2010). Without glorifying these cases, as they are not without their problems, Canada, and its subnational jurisdictions by not providing such a meal during mandatory education, appears to lag in this aspect of welfare provision.

There are limitations to this investigation. Where this research attempted to be national in scope, there is more work to be done in this area. First of all, interviews with those developing and implementing school nutrition regulations in the provinces of Nova Scotia, PEI, and Quebec would have enriched this investigation. Additionally, as this researched only looked at documents from English-speaking Canada and included interviews with Anglophone Canadians, the exclusion of Quebec, Canada's officially Francophone province, New Brunswick, Canada's officially bilingual province, and Francophone communities across Canada and their school food environments are absent, limiting the ability to generalize the results of this research into those communities.

CONCLUSION

Regulating the market-based school food environment is ineffective for achieving the nutrition and health outcomes desired by the provincial and territorial governments that developed them. Offering a Canada-wide perspective on the regulation of school food environments, this investigation found school food environments are incongruent with the approach to the provision of education, making these spaces difficult to regulate effectively. If the objective of the school nutrition regulations is to encourage students to have access to nutritious foods and beverages during the school day, and the market indicates the demand for these products is not there, then it is necessary to reduce the role of the market in school food provision. De-commodifying the school food environment would align this aspect of public school with the already de-commodified public school system and give the subnational jurisdictional governments a public plate to regulate to achieve the outcome of providing students access to nutritious foods during the school day.

Some schools struggle to find suppliers of compliant products, and competition with unregulated spaces to which students have access means that the regulations are difficult to enforce. At present these regulations have made the school food environment no longer part of the problem, but it is difficult with a market-based internal school food environment for them to be part of the solution. Future research should examine the state-funded program in the province of Alberta to understand its impacts on the students who participate in the program, and the school food environment itself, as well as look into Francophone school food environments in Canada.

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