



Ministry of Education and Youth



NATIONAL SCHOOL NUTRITION POLICY

Health and Wellness, Getting it Right from the Start





Ministry of Education and Youth

School Feeding Unit

Caenwood Centre

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Jamaica, West Indies

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FOREWORD

The National School Nutrition Policy is a significant milestone, achieved by the Government of Jamaica through the Ministry of Education and Youth in association with collaborating Ministries/agencies in guiding the process for the provision of good nutrition coupled with wellness especially for the most vulnerable students in our society. This policy will seek to ensure that children entering our educational facilities are exposed to good nutrition and healthy lifestyles. Good nutrition is the lifeblood of any generation. Without proper nutrition and physical activity, we are destroying our present generation, leaving little or no hope for the next. Over the past seven years, Jamaica has seen an alarming increase in the rate of obesity among our school-age population inclusive of both our boys and girls. The Ministry of Education and Youth believes that while it is important for us to educate our children, modelling good eating behaviours and practices are as equally beneficial.

This policy sets the framework for school administrators to execute or deploy the means and measures in providing healthy and nutritious meals to students as well as to provide the avenue where students can enjoy a holistic wellness programme that involves both nutrition and physical exercise.

The National School Feeding Programme in Jamaica, is the oldest and largest component of the government's social protection programmes, dating back to 1939, is one of the major initiatives that warrant the formulation of a National School Nutrition Policy. Through the Ministry of Education and Youth, the National School Feeding programme gradually became a fundamental part of the Ministry's welfare programme comprising two components: the traditional cooked lunch component and the snacks component. The traditional cooked lunch component of the programme provides meals to over 225,000 students and over 18,732 students are catered for in the snack component. The Ministry of Education and Youth now provides lunches five (5) days per week to students on the school feeding programme and will continue its effort to provide students within our educational system, from early childhood to the secondary level island-wide with wholesome nutritious meals.

However, despite the longevity of this programme and the efforts made to target not only the most vulnerable, but all school children ages 3-18 in all Jamaican schools there has been an 'unevenness' in the approach to implementation of the National School Feeding Programme that has over the years, raised concerns about whether the programme is satisfying the imperative of quality nutrition in all the targeted schools. Additionally, the Ministry of Education and Youth has been challenged in its capacity to provide adequate resources to support and monitor the programme in a manner to ensure that all children are given at least one nutritious meal per day and that the

programme is void of stigma and discrimination. These perennial issues which have plagued the School Feeding Programme could arguably be linked to the fact that the programme is not rooted in or driven by a clear policy that ensures standardisation and regularisation in meeting the physical and social needs of Jamaican school children.

The Government of Jamaica's vision is to sustain a school feeding programme free from stigma and discrimination which upholds the dignity and rights of each child and his/her family. The National School Nutrition Policy has provided the enabling environment and has set the premise for this vision to become a reality as we seek to provide a robust school feeding programme that promotes the mental, emotional, social and physical welfare of all our students and bolster their ability to attain high academic standards.

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ACRONYMNS/ABBREVIATIONS

| | |
|------------------|----------------------------------------------------------------------|
| DPAS | Global Strategy for Diet, Physical Activity and Health |
| ECC | Early Childhood Commission |
| FAO | Food and Agriculture Organisation of the United Nations |
| FGD | Focus Group Discussion |
| GOJ | Government of Jamaica |
| HPS | Health Promoting Schools |
| JADEP | Jamaica Drugs for the Elderly Programme |
| M & E | Monitoring and Evaluation |
| MAF | Ministry of Agriculture and Fisheries |
| MICAF | Ministry of Industry, Commerce, Agriculture and Fisheries (formerly) |
| MOHW | Ministry of Health and Wellness |
| MoEY | Ministry of Education and Youth |
| NCDs | Non-Communicable Diseases |
| NFITF | National Food Industry Task Force |
| NHF | National Health Fund |
| NSFP | National School Feeding Programme |
| NSNP | National School Nutrition Policy |
| PAHO | Pan American Health Organisation |
| PATH | Programme for Advancement Through Health and Education |

| | |
|-------------|------------------------------------------|
| PE | Physical Education |
| RADA | Rural Agricultural Development Authority |
| UN | United Nations |
| WHO | World Health Organisation |

GLOSSARY

| | |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Beneficiaries | Students who are provided with a meal through the school feeding programme; the cost of which is borne by the Government of Jamaica. |
| Curriculum | The lesson and academic content taught in a school or in a specific course or programme. |
| Food Services Environment | The food services environment in schools consists of food offered in school canteens, school Tuck Shops, and by vendors operating from or within 200 metres of the school gate. |
| Food Security | Food Security exist when all people at all times, have physical, social and economic access to sufficient, safe and nutrient dense foods which meets their dietary needs and food preferences for an active and healthy life (World Food Summit, 1996). |
| Local Produce | Food groups include: fruits, vegetables, staple foods, legumes, food from animals, fats and oils produced locally. |
| Marketing | Marketing refers to any form of commercial communication or message that is designed to, or has the effect of increasing the recognition, appeal and/or consumption of particular products and services. It comprises anything that acts to advertise or otherwise promote a product or service (WHO, 2010). |
| Non-communicable Diseases | Non-communicable diseases (NCDs), also known as chronic diseases, tend to be of long duration and are the result of a combination of genetic, physiological, environmental and behavioural factors. They are not contagious. |
| Nutrition | The process of providing or obtaining the food necessary for health and growth. |
| Nutritional Status | The condition of the body influenced by diet. |
| Obesity/Overweight | Abnormal or excessive fat accumulation that may impair health. |

| | |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| Physical Activity | Any bodily movement produced by skeletal muscles that requires energy expenditure. |
| Recommended Daily Allowance | The estimated amount of nutrient or calories per day considered sufficient for 97.5% of healthy individuals of a particular age range or sex. |
| School vendors | School vendors refer to persons in proximity to the school compound who sell their goods to members of the school community. |
| Stunting | Height below that which is recommended as normal for a particular age, as assessed using approved growth standards. |

EXECUTIVE SUMMARY

The Government of Jamaica through the Ministry of Education and Youth developed a draft National School Feeding Policy in 2015, through the assistance of the Inter-American Development Bank (IDB). Subsequently, the MoEY has seen the need to integrate this policy into a National School Nutrition Policy (NSNP). This in keeping with the policy directives of the MoEY in addressing and establishing a National framework for the nutritional standards and physical wellness of our students within the school-aged population of our education facilities. This is in alignment with the Sustainable Development Goals and Vision 2030.

Purpose and Scope

In keeping with the Sustainable Development Goals 2030, the main purpose of the NSNP is to provide a National framework that promotes and facilitates healthy eating habits and a physically active lifestyle among students in Jamaica. This will foster the physical, social and cognitive development of children and contribute to the reduction in malnutrition. The Policy will target students particularly those between the ages of 3 to 18 years. Additionally, the policy aims to reduce the increasing rates of obesity by increasing physical activity and balanced eating among the student population by 2030. This Policy will encompass the school environment and vendors within 200m of the school perimeter.

The policy will encompass, but will not be limited to: -

1. the development of standards and guidelines for the nutritional assessment and monitoring of students, and for the provision of safe and nutritionally adequate meals to the school-age population.
2. providing measures that will help to improve the nutritional status of all school children and support alleviation of short-term hunger, with special focus on poor and vulnerable Jamaican students.
3. establishing partnerships with local producers and small farmers to provide a sustainable source of locally produced foods to support the National School Feeding Programme.
4. encouraging schools to develop school gardens that help to support the National School Feeding programme
5. promoting the principles of food security, nutritional health and equity through the provision of free, subsidised or full-cost meals for all children according to assessed needs.
6. facilitating improvements in the management and monitoring of the School Feeding Programme (SFP).
7. contributing to improvements in the nutritional knowledge of children and their families.

The policy will be executed under five (5) priority areas namely: the food services environment, provision of meals, the physical activity environment, health promotion and lifestyle habits development, and curriculum development. Nutrition training should be at all levels to encompass

the principals/teachers at the highest level and cooks/food providers who implement and control food provision.

A joint partnership is established with key Government Ministries, Departments and Agencies (MDAs) and other stakeholders for the successful implementation and administration of the policy. The legislative framework is to be fully developed and implemented. The monitoring and evaluation techniques will be reenergized and strengthened to ensure the viability and sustainability of the policy.

The policy will be reviewed after five years.

RATIONALE

The United Nations (UN) Sustainable Development Goal (SDG) Goal 2 seeks to

End hunger, achieve food security and improved nutrition and promote sustainable agriculture and by 2030, end hunger and ensure access by all people, in particular the poor and people in vulnerable situations, including infants, to safe, nutritious and sufficient food all year round. By 2030, end all forms of malnutrition, including achieving, by 2025, the internationally agreed targets on stunting and wasting in children under 5 years of age, and address the nutritional needs of adolescent girls, pregnant and lactating women and older persons (p26).

The Vision 2030 Jamaica - National Development Plan states “Jamaica, the place of choice to live work, raise families and do business” (chap1. p.15). Goal #1 of the National Development Plan speaks to Jamaicans being empowered to achieve their fullest potential which can be realised through a healthy and stable population (chap 2. p.19). The MoEY has been given the mandate to ensure that proper nutrition is established within the School Feeding Programme.

The World Health Organisation (WHO) has identified four main behavioural risk factors associated with most of the major Non Communicable Diseases (NCDs). These are unhealthy diet, physical inactivity, harmful use of alcohol and tobacco. These risks which account for 70% of deaths worldwide (WHO, 2017) are considered modifiable risks. In Jamaica, it is reported that 79% of all deaths are due to non-communicable diseases (WHO 2014a). The most practical way in controlling this epidemic is by taking precautionary measures in reducing them.

Obesity, overweight and high cholesterol have been identified as major outcomes of unhealthy diets and physical inactivity, and are biological risk factors for NCDs globally. Obesity and overweight rates in children have increased significantly in the last thirty years (WHO). In fact, since 1980 the rate of obesity has reportedly more than doubled globally. The WHO has classified obesity as one of the most dire public health issues affecting children in the 21st Century. A study conducted by the WHO revealed that in 2013, a total of 42 million children under the age of 5 were either obese or overweight while in the year following, greater than 1.9 billion adults from the age of eighteen and above were reported to be overweight. Of this amount, a total of 600 million people were obese (WHO 2015.p1). Among the targets established to be achieved by 2030

by the WHO for infant and young child nutrition, is a “halt in the level of childhood overweight globally” (WHO, 2018). This target is achievable by implementing restrictions concerning the marketing of foods and beverages in the school environment which are considered high in sugar, salt and fats.

It is widely accepted that good nutrition practices in schools can improve cognitive and academic performance, depending on the type of food provided, the size of food rations and the programme duration (Adelman, Gilligan & Lehrer 2008). It is also acknowledged that in order to improve children’s nutritional status, regular meals that significantly address the nutritional deficiencies in children’s diets must be addressed. As noted in the National Operational Action Plan for the Prevention and Control of Obesity in Children (MOH, 2016):

“...childhood obesity is associated with a higher chance of obesity, premature death and disability in adulthood. In addition to increased future risks, obese children experience breathing difficulties, increased risk of fractures, hypertension, early markers of cardiovascular disease, insulin resistance and psychological effects” (WHO 2015, p2).

The narrative of the plan goes on to caution that, ‘the high prevalence of overweight and obesity among children should therefore be a cause of concern to policy makers and health professionals as it has implications for the health care system and the economic productivity of the countries affected’ (ibid). Citing studies done in the Caribbean, the Plan points out that treating the co-morbidities of obesity will be a huge economic cost for the region, and will become unsustainable. According to Dobbs & Manyika, 2015, obesity accounts for 2-7% of health cost globally.

This policy is a part of a national response to improving the nutritional status of children in Jamaica. The Government of Jamaica has taken significant policy and programmatic steps to address the threats faced by Jamaicans as a result of unhealthy diet and physical inactivity.

These include inter alia:

1. the School Feeding Programme since 1939.
2. the National Food Industry Task Force (NFITF) established by the MOHW in 2016 to develop and implement strategies to improve the nutritional status of Jamaicans and reduce the economic burden of NCDs. The formation of the Task Force supports the Ministry of Health and Wellness’ National Strategic and Action Plan for the Prevention and Control of Non-Communicable Diseases (NCDs) 2013-2018, which was developed in response to the high mortality rates linked to NCDs in Jamaica, and the growing socio-economic burdens of treating a rapidly growing unhealthy population.
3. Jamaica Moves in Schools, a collaborative effort between Ministry of Education and Youth and the Ministry of Health and Wellness is the latest initiative that focuses on physical activity, healthy eating and age appropriate health checks.
4. the Food and Agriculture Organisation of the United Nations (FAO) with the permission of the MoEY piloted the Sustainable School Gardening Project in selected schools, designed to strengthen the link between the School Feeding Programme and the Agricultural Sector, especially farmers in the school community.

SITUATIONAL ANALYSIS

It is well established that nutritional factors affect the cognitive development of children and their school achievement (Lawson, 2012). Some of these effects of impaired cognitive development are absenteeism, low motivation and cognitive function, lack of concentration and tardiness.

Children with impaired cognitive development perform less in school, are more likely to drop out and have higher rates of absenteeism than other children (Del Rosso, 1999). While more pronounced in children who are chronically hungry and malnourished, these effects are also seen in children who suffer short-term hunger, as they have difficulty concentrating and performing complex tasks. Additionally, clinical trials show a critical link between learning and school children's health and nutrition, suggesting a substantial gain in educational effectiveness from improving children's nutrition and health (Del Rosso, 1999).

The WHO reported that, "overweight in children is reaching alarming proportions in many countries and poses an urgent and serious challenge. The prevalence of overweight among children is rapidly increasing even in many low- and middle-income countries. In 2016, at least 40.6 million children less than 5 years of age were overweight or obese, and most of them live in low and middle-income countries".

The Global School-based Student Health Survey (GSHS), 2017 report on students in Jamaica revealed that 23.3 per cent of students aged 13-17 years were overweight and 9.2 per cent were obese. It also found that over two-thirds (69.1%) of students had at least one carbonated beverage each day (WHO, 2017a). The level of physical activity among adolescents 13-17 years was low. Fewer than one in four (23.2%) students were engaged in some type of physical activity for at least 60 minutes each day, while 56.4 per cent spent three or more hours in sedentary activities such as watching television and playing computer games each day.

According to the World Health Organisation (WHO), "Children and youth aged 5–17 should accumulate at least 60 minutes of moderate- to vigorous-intensity physical activity daily". However, in many schools in Jamaica, mandatory participation in Physical Education ends at age 14 for schools that have such a programme. The then Ministry of Health conducted a Health Promoting School Survey in 2011, which concluded that the school was the primary source of lunches and snacks for children. More than three-quarters of the students get their lunch from the school (canteen, tuckshop, vendors), while less than twenty-five percent take lunch from home (MOH 2011, p23).

NCDs have been the leading cause of deaths in Jamaica for over 50 years. The projected total losses associated with NCDs and mental health conditions over the period 2015-2030 is US\$18.45 Billion for Jamaica. (Bloom et al, 2018, p4). The GOJ recognizes that changes in long established dietary and physical activity patterns require the partnership of multiple sectors including health, agriculture, transportation, education, sports and entertainment among others, such as food retail and processing, and urban planning.

Poor dietary practices and inadequate physical activity among the general populace are noted as the underlying causes for growing obesity and overweight rates. In fact, obesity and overweight

have been identified as the main causes of NCDs and deaths in Jamaica (National NCD Plan, 2013-2018/Cabinet approved) and are recognized as the primary public health threats impacting and costing Jamaicans. It is estimated that the Government of Jamaica (GOJ), spends annually, more than US \$170 million to treat NCDs (Dr. Ferguson 2012).

It is now imperative that a greater effort in promoting good nutritional practices be made in our schools to achieve our national goal. This will require a “whole of Government” approach, for effective and sustainable achievement.

NUTRITIONAL STATUS OF JAMAICAN CHILDREN

Inappropriate child feeding practices are identified as one of the main contributing factors to poor nutritional habits in Jamaica. These practices, it is noted, begin in children from infancy and carry over into adulthood. Indeed, eating practices during pregnancy and before birth can affect brain development during the critical period of growth up to two (2) years and this determines learning capacity for life. Research has even shown that the effects of poor eating habits can be passed from one generation to the next as epi-genetic pre-disposition and contribute to the child’s potential for chronic disorders. A high percentage of the country’s population is classified as obese/overweight and between 2008 and 2016, the percentage of adults identified as obese increased by 33 percent (Pan American Health Organisation, 2016).

Information available on the health and nutrition status and lifestyle behaviours of school children in Jamaica, points to the following as areas of concern:

- i. Between 25 per cent and 33 per cent of the school age population in Jamaica arrives at school hungry or without having eaten anything on a given school day (Fox & Gordon-Strachan, 2007).
- ii. Short-term hunger (understood as lack of food intake before arriving to school on any given day) co-exists with poor eating habits, such as an overconsumption of high sugar drinks and snacks of low nutrient density critical for growth, in the school age population (Walker, Chang & Grantham-McGregor, 1996; Powell, Walker & Chang, 1998; Fox & Gordon-Strachan, 2007).
- iii. Overweight and obesity are twice as common as underweight in the school age population and overweight and obesity increase rapidly with age during the school years; (FAO 2003; CFNI 1997; Fox & Gordon-Strachan, 2007). Of note however, is that previously malnourished and underweight children, poorly fed, are more likely to develop obesity in adulthood than normal weight, properly fed children.
- iv. Iron Deficiency anaemia is a serious nutritional problem among the school age population (Walker, Powell, Hutchinson, Chang & Grantham-McGregor, 1997; FAO 2003), especially in adolescence and young females.

IMPROVING NUTRITIONAL STATUS USING THE SCHOOL ENVIRONMENT

The WHO and FAO have long advocated for the use of the school environment to promote healthy eating habits and lifestyles. The appeal to tackle nutritional status through schools lies in the fact that schools provide a ready environment for reaching large groups of children and the school community. According to WHO, scientific evidence has long established the effectiveness of school-based interventions to changing eating behaviour and preventing overweight and obesity (PAHO, 2014).

In 2004, the World Health Assembly adopted the “Global Strategy on Diet, Physical Activity and Health (DPAS). The DPAS was one of the first comprehensive strategies that advocated for countries to develop and implement school policies and programmes that promote healthy diets and increased levels of physical activity, as part of global efforts to curb obesity. The strategy recognised schools as conducive environments to tackle issues related to childhood obesity, due to the length of time children spend daily in this setting. In 2008, the WHO developed the DPAS School Policy Framework as a guide for policy-makers to develop and implement “*policies that promote healthy eating and physical activity in the school setting through changes in environment, behaviour and education.*”

Since 2008, several countries have taken steps to develop school nutritional policies based on the Framework of the WHO. There are, however, a few countries, e.g. Canada, that initiated the development and implementation of nutritional school policies, a few years prior to the publishing of the DPAS School Policy Framework.

In Canada, where policies have been in place since 2005, the decline in childhood obesity rates over a 10-year period suggests nutritional policies may be having the intended effect. A rapid review of their School Nutritional Policies shows that equal emphasis is placed on the food environment, physical activities and the curriculum to support improved nutritional status.

The World Health Organization School Policy Framework (2008) has been used as the main guide to develop the National School Nutrition Policy for Jamaica. The framework guides countries on how to develop and implement school policies and programmes that promote healthy diets and increased level of physical activity. Additionally, the preparation of the National School Nutrition Policy for Jamaica was guided by the established rules for policy development, including the Consultation Code, which have been set by the Cabinet Office. These rules recognise that an effective policy framework must have the inputs of the multiple stakeholders who are positioned to contribute to its implementation. This includes public sector organisations, as well as civil society organisations that may be able to provide nutrition and physical activity services to supplement those offered by the GOJ. In keeping with these principles, policy makers, school leaders, parent organisations, nutrition professionals, and students provided inputs into the policy.

When implemented, the Policy will support the aims and objectives of the National Operational Action Plan for The Prevention and Control of Obesity in Children and Adolescents 2016-2020. It will also complement the strategies to reduce the prevalence of NCDs, which are outlined in the National Strategic and Action Plan for the Control of Non-Communicable Diseases, which targets the general population. Although covering a wider range of issues related to nutrition in the school

environment, this policy is aligned to the goals and objectives of the draft National School Feeding Policy.

LINKAGES WITH OTHER POLICIES AND PROGRAMMES

The National School Nutrition Policy has linkages across multiple sectors. In addition to the impact on health, wellness and education, discussed above, it is understood that once implemented, the National School Nutrition Policy will both compliment, as well as be supportive of, various national policies, programmes and plans that influence or affect food and beverage consumption in Jamaica. This includes in the areas of agriculture, food processing and manufacturing, and poverty alleviation. Key elements of the policy framework are provided below and discussed as appropriate.

- (a) **Vision 2030 Jamaica – National Development Plan** Goal #1 of the National Development Plan speaks to Jamaicans being empowered to achieve their fullest potential which can be realised through a healthy and stable population.
- (b) **National Food and Nutrition Security Policy (MICAF & MOHW, 2013):** The Nutrition Security Policy provides the guiding framework within which Jamaica’s agriculture and food systems can deliver adequate quality and nutritionally appropriate quantities of food and food imports to increase the availability of good quality-nutritious foods in Jamaica. The National School Nutrition Policy both reinforces and is supported by the Nutrition Security Policy, creating an enabling environment for the mutual and beneficial pursuit of the respective goals and objectives.
- (c) **National Food Safety Plan 2012-17 (MICAF):** The Food Safety Policy aims to implement programmes that promote high standards of food hygiene and maintain systems of surveillance and control to ensure compliance with those standards and is complimentary to the goals and objectives of the National School Nutrition Policy and its focus on the food service environment.
- (d) **Jamaica National Health Policy (MOHW, 2006-2015)**
- (e) **National Infant and Young Child Feed Policy (MOHW, 2018)**
- (f) **National Food Based Dietary Guidelines for Jamaica (MOHW, 2015)**
- (g) **Adolescents in Jamaica 2016-2020 National Operational Action Plan for the Prevention and Control of Obesity in Children (MOHW)**
- (h) **National Strategic and Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2018**
- (i) **“Jamaica moves in Schools” (MOHW, MoEY):** a collaborative effort focussing on physical activity, healthy eating and age appropriate health checks.
- (j) **The School Feeding Programme**
- (k) **Sustainable School Feed Project (Food and Agriculture Organisation “FOA”, MoEY)**

The FAO with the permission of the Ministry piloted the Sustainable School Feeding Project in selected schools, which is designed to strengthen the link between the School Feeding Programme and the Agricultural Sector, especially farmers in the school community

- (l) **The Operations and Procedures Manual for the School Feeding Programme (MoEY, 2017)**
- (m) **Jamaica Nutritional Guidelines for Children and Youth (MoEY)**
- (n) **Standard Bidding Documents for Canteen Concessionaries (MoEY)**
- (o) **Guidelines for the Engagement of Canteen Concessionaries (MoEY)**

GUIDING PRINCIPLES

The successful implementation of the National School Nutrition Policy will be guided by the following principles:

1. **The Rights of the Child:** This policy is rooted in the Child Rights perspective and is focused at all times on the fair treatment and best interest of the child in accordance with Articles 2 and 3 of the Convention on the Rights of the Child (CRC). It also responds to CRC Article 4, in which the GOJ committed to taking all available measures to safeguard the rights of children, including assessing our social services and funding for these services to ensure that children are protected, and Article 5, which gives governments the responsibility to assist parents in fulfilling their role as nurturers. More specifically, the Convention (Article 24) provides children with the right to nutritious foods and information to help them stay healthy as part of the right to health and health care.

These rights have been reiterated by the 2013 General Comments of the Committee for Rights of the Child (CRC, 2013) which calls on governments to put in place policies and programmes that address the underlying determinants of child health, nutrition being one such ‘underlying determinant’. The Committee requires that special attention be paid to children in disadvantaged circumstances and underserved areas and notes that school feeding is desirable to ensure all pupils have access to a full meal every day, as this can enhance children’s attention for learning and increase school enrolment. The Committee further recommends that this be combined with nutrition and health education, including setting up school gardens and training teachers, food providers and parents/caregivers to improve children’s nutrition and healthy eating habits (para. 46).

2. **Right to good nutrition:** The Government of Jamaica (GOJ) considers the protection of the health and nutrition of all children as integral to its overall responsibility to safeguard the life of Jamaican children. It recognizes that health and nutrition are integral to the positive development of children and important to their cognitive and psychosocial

development.

3. **Equality and Equity:** The policy requires that every vulnerable child in Jamaica should have equal access to the school feeding provisions regardless of location, gender, type of school attended and age.
4. **Good Governance:** To provide an environment of transparency and accountability.
5. **Multi-Sectoral and Community Empowerment:** The implementation and sustainability of this policy will require partnership and coordination primarily among the Ministries of Education, Youth and Information, Health and Wellness, Agriculture and Fisheries, their Departments and Agencies, Local Government and Rural Development, Municipal Corporations and other relevant stakeholders in the service and delivery of nutritional guidance and support. The Policy will facilitate the implementation of school based health initiative such as '*Jamaica Moves in Schools*'.

ABOUT THE NATIONAL SCHOOL NUTRITION POLICY

Good Nutrition! Physical Wellness! Healthy Living!

VISION STATEMENT

An equitable and sustainable nutrition and wellness programme that upholds the dignity and rights of each child.

MISSION STATEMENT

To promote quality and cost effective nutritional and wellness services to all children in our educational facilities in order to improve learning and well-being.

POLICY GOAL

To provide a national framework that promotes and facilitates healthy eating habits and a physically active lifestyle among students in Jamaica in keeping with the Sustainable Development Goals (SDGs 2030).

POLICY OBJECTIVES

The policy aims to: -

1. provide and implement nutritional standards and guidelines.
2. optimise the nutritional status of children in order to improve and sustain the physical, social and mental well-being of children in Jamaica.
3. create an environment in schools in which a variety of healthy food options from the six food groups are available and promoted.
4. increase to 85 per cent by 2030, the number of schools that provide dietary choices to complement meals in order to meet the nutritional needs of students.
5. increase to 85 per cent by 2025, the number of schools which provide mandatory opportunities for physical activity to students at all grade levels.

THE POLICY AREAS

The policy focuses on five overarching priority areas, which together cover the key aspects of nutrition and wellness in the school environment.

These areas are:

1. The Food Services Environment and Education
2. Provision of Meals to meet Nutrition Standards
3. The Physical Activity Environment
4. Health Promotion and Lifestyle Habits Development
5. Curriculum Development

FOOD SERVICES ENVIRONMENT

Policy statement:

The Government of Jamaica through the MoEY in collaboration with other Ministries, Departments and or agencies shall provide an adequate, safe and healthy food service environment to support the growth and development of children in Jamaican schools.

Food Service Environment Descriptors: -

- i. The food services environment consists of canteens, tuck shops, canteen concessionaires and vendors at the school gate, or within 200 metres of the school gate (premises). This environment will be governed by the standards, regulations and policy guidelines of the feeding programme.
- ii. Food establishments and community shops outside of the immediate vicinity of the school do not fall within the scope of this Policy.

This will be accomplished using the following strategies:

- 1) The development of regulations to guide the operations of school vendors in the vicinity of the school.
- 2) The provision and utilization of an appropriate institutional framework including training to support the implementation of the nutrition standards.
- 3) Increase the use of more locally grown produce and minimize the amount of processed food and snacks offered by the school.

The majority of Jamaican students buy meals and snacks at school during the school day, and only a small percentage of students take their lunches and snacks to school from home. Observance of the Nutritional Standards, which accompany this Policy, is therefore expected to lead to increased consumption of meals and snacks with appropriate nutritional value in schools.

PROVISION OF MEALS

Policy statement:

The Government of Jamaica shall ensure the provision/availability, and accessibility of healthy and nutritious meals to all students.

This will be accomplished using the following strategies:

- i. The promulgation of Food Based Dietary Guidelines and the National School Nutrition Standards for Jamaica to regulate the provision and consumption of food by students in schools.

- ii. The provision of at least one nutritious meal per day providing $\frac{1}{4}$ to $\frac{1}{3}$ of daily nutritional requirements according to the beneficiaries on the School Feeding Programme (SFP) from early childhood to the secondary level.
- iii. The utilization of manuals with menus and recipes standardized for different levels from early childhood, primary and secondary schools, which incorporate the use of local produce.
- iv. Enhancement and expansion of school gardens, where feasible to provide food for meal preparation within schools.
- v. Increase the variety and volume of locally grown fruits available in schools.
- vi. Increase the linkages between the agricultural sector and the schools for locally produced foods to be made available in schools.
- vii. Regulate the marketing of foods and beverages in and around the school environment.
- viii. Limit students' access to "empty calorie" snacks and beverages.

The list of students benefiting from the School Feeding Programme (SFP) is provided by the Ministry of Labour and Social Security (PATH Programme), while other welfare programmes are initiated by schools. This policy is premised on the understanding that the school nutrition and feeding interventions play important roles in supporting the local agricultural sector. At least **10 percent** of raw materials for the National School Feeding Programme (NSFP) should be produced by and sourced from school gardens/farms and local producers in the agricultural sector.

The SFP is designed to enhance student's growth and development, to maximize learning and bolster human capacity while contributing to national development through the use of locally produced inputs.

PHYSICAL ACTIVITY ENVIRONMENT

Policy Statement:

The Government of Jamaica through the Ministry of Education and Youth shall provide a school environment with safe age-appropriate facilities and equipment and provide opportunities for sufficient physical activity that will contribute to the growth and development of the students.

This will be accomplished using the following strategies:

- i. physical activities for children from early childhood to Grade 13.

- ii. three five-minute physical activity breaks per day
- iii. a minimum of one hour of physical activity per week
- iv. physical education in schools as guided by the curriculum.
- v. a safe, secure and suitable play area for all students.

Physical activity and health education in schools have been recognised as important strategies in addressing obesity in children and youth. Physical Activity and Physical Education/Health Education policies, programmes and initiatives are generally combined with food and beverage focused policies to promote overall health and wellness. This policy seeks to increase opportunities for students to be engaged in physical activities.

The school environment should have safe and age-appropriate facilities and equipment that will contribute to the growth and development of the students.

HEALTH PROMOTION

Policy Statement:

The Government of Jamaica through the MoEY and the MOHW shall promote the benefits of good nutrition, physical activity and their relationship to the growth and development of children in educational facilities.

This will be accomplished using the following strategies:

1. Encourage and promote food and drink appropriate to the target group in order to enhance and sustain their physical, social and mental well-being.
 - Nutrition, health and education manuals and practices standardized at all levels of the school system.
 - Providing services to assess **Recommended Dietary Allowance (RDA)** for students.
 - Promote the consumption of local agricultural produce.
 - Promote intake of water and fresh fruit days.

2. Promote food safety principles to ensure the provision of food that has been stored, prepared and served in a safe and hygienic manner.

Ensure:

 - Adequate supply of clean and safe water is available at all schools.
 - Appropriate and sanitary health facilities are available.

- Promote proper handwashing principles and encourage proper hygiene before handling food or eating.
 - Ensure food handling staff are adequately trained and possess the requisite certification.
3. Promote and maintain the health status of students through the initiation of effective health promoting activities
- The MoEY and/MoHW will ensure that there is regular medical examination and nutrition assessments and a referral system in place for all schools.
 - Nutritional Guidance and nutrition counselling services available and accessible to all students Guidance and social/emotional counselling services available and accessible to all students.
 - Increase the level of physical activity at the pre-primary to secondary levels.
3. Improve collaboration with other Ministries, Departments and Agencies in the planning and implementation of NSNP interventions to include: -
- Jamaica Moves in Schools' initiative
 - Nutrition Guidelines for Schools
 - Increasing the use of local produce in schools
5. Provide health and nutrition education and promotion of activities up to the secondary level of the education system.

The MoEY will:

- Ensure the delivery of health education at the early childhood, primary and secondary levels through the Health and Family Life Education curriculum.
- Promote the integration of wellness and nutrition concepts into all school activities.
- Promote and sustain a safe and healthy learning environment.
- Ensure capacity building among stakeholders.
- Provide appropriate guidelines for nutritional standards to tuckshops and vendors in and around the school environment.

- Educate all persons at all levels of the food chain from ‘farm to fork’ including local farmers about menus and products to be utilized in the School Feeding Programme.
- Ensure that all schools provide opportunities for physical activity to students at all grade levels.

Additionally, the MoEY will: -

- i. Promote and implement health awareness activities through the Health and Family Life Education Programme (HFLE).
- ii. Encourage schools to incorporate/integrate healthy lifestyle practices in various lessons and out of class activities.
- iii. Develop and disseminate educational materials to schools and parents.
- iv. Develop a culture of healthy lifestyle practices.
- v. Introduce healthy lifestyle competitions and provide incentives.

The MOHW in collaboration with the MoEY will commit to health promotion such as:

- i. Develop and coordinate educational seminars on nutrition and physical activity in conjunction with the National Parenting Support Commission.
- ii. Provide access to information, education and communication (IEC) materials on nutrition and physical activity through Parent Teachers’ Associations, the NPSC, Parents Places, schools, faith based and community based organisations, Non-Governmental Organizations (NGOs), as well as other civil society groupings across the island.
- iii. Engage the media to help disseminate approved nutrition and physical activity related information to parents and caregivers.
- iv. Encourage private schools to adopt the standards developed for the NSNP.
- v. Partner with private sector, International Development Partners and civil society to fund a variety of educational opportunities for nutrition and physical activity using materials approved by the MoEY and the MOHW.
- vi. Encourage and support the formation of active groups in schools, which are geared towards the promotion of healthy eating and physical activity e.g. healthy lifestyle clubs and 4H clubs.
- vii. Provide opportunities for schools to participate in National, Regional or parish level health-based events and special days.

A key strategic action to be pursued under this policy is the promotion of nutrition and physical activity among children and their families through collaboration with relevant agencies and ministries. School nutrition and physical activity programmes are most effective when they form

part of a comprehensive package of interventions, which support the main objectives of the programme. This policy recognises that the school environment is only one of the environments in which students access food and engage in physical activity.

Students and school administration should be empowered to advocate for healthy lifestyles in schools. This would assist in promoting healthy lifestyles at home.

CURRICULUM DEVELOPMENT

Policy Statement:

The Government of Jamaica through the MoEY shall promulgate in the curriculum, information on nutrition and wellness that will inform students in making healthy choices.

This will be accomplished using the following strategies:

- i. Coordinating nutrition education to students from early childhood to secondary as presented by level and using the Health and Family Life Education (HFLE) curriculum. Ensure curriculum content already covered in the other subject areas complement each other such as physical education and home economics, as well as:
 - a. Foster an awareness of healthy eating habits and encourage physical activity through practical learning experiences.
 - b. Encourage children to participate in “hands on” food preparation activities.
 - c. Increase the awareness of non-communicable diseases and their impact on a healthy lifestyle.
 - d. Provide opportunities for students to practice healthy eating, physical activity and food safety principles to improve their health and well-being.
 - e. Providing the tools and resources in methodology delivery for effective integration of nutrition and healthy lifestyle information by teachers into broad curricula areas and within and across subject areas involving nutrition education. This includes developing exemplar lessons plans, and appropriate teaching materials to guide teachers on effective methods of including nutrition education in their teaching.
- ii. Providing training in updated concepts for teachers at each level of the education system to improve their own eating behaviours and act as role models.

Integrating nutrition and wellness concepts into the curriculum from the pre-primary to the secondary level will give students a better understanding of the tools and benefits from good nutrition and wellness practices.

THE DEVELOPMENT OF REGULATIONS TO MONITOR VENDORS IN THE VICINITY OF THE SCHOOL

Street vendors and the food they offer for sale in the school environment forms an integral part of the school nutrition support in Jamaica. The activities of these vendors must therefore align with the policy goals of the Government of Jamaica. To ensure this, options will be explored with the Ministry of Local Government and Rural Development and the Municipal Corporations for the monitoring and regulation of vendors and vending areas in the proximity of the school.

LEGISLATIVE FRAMEWORK

The policy is consistent with existing legal, procedural and policy frameworks at the national and international levels as outlined in the table below. It is also recognised that to ensure enhanced compliance, amendments and alignment to other legislation might be advisable.

Table Showing Existing Legal, Procedural and Policy Frameworks at the National and International Levels

| Category 1: Sector | |
|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Law | Examples |
| <i>Education Act and Education Regulations, 1980</i> | <ul style="list-style-type: none"> • paragraph (g) of subsection (1) of section 4 (1) empowers the Minister, subject to such conditions as may be prescribed, to render assistance to students to enable them to take full advantage of the education facilities available to them. • paragraphs (a), (b) (c) and (d) of subsection (1) of section 43 empowers the Minister to make regulations concerning, respectively, the management and conduct of public educational institutions; the powers and duties of boards of management of public educational institutions; the standards to which the premises of educational institutions shall conform; and the purposes for which the premises may be used. |
| <i>The Early Childhood Act, 2007 and Early Childhood Commission Act, 2003</i> | <ul style="list-style-type: none"> • subsection (2) of section 23 of the <i>Early Childhood Act</i> empowers the Minister, subject to affirmative resolution, to make regulations prescribing the guidelines for the nutrition programmes to be implemented in early childhood institutions. These include basic schools and day care centres. |
| <i>Child Care and Protection Act (CCPA), 2004</i> | <ul style="list-style-type: none"> • subsection (1) of section 28 mandates that every person having custody, charge, or care of a child between the ages of 4 and 16 years has a duty to ensure that the child is enrolled and attends school. • paragraph (a) of subsection (1) of section 40 imposes a duty on the owner or operator of an establishment that |

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| | sells or serves intoxicating liquor to ensure that no intoxicating liquor is sold or served by the establishment to any child. |
| Category 2: National | |
| Law | Examples |
| <i>Hawkers and Peddlers Act, 1867</i> | <ul style="list-style-type: none"> • This Act makes provision for the licensing of persons who go from place to place to sell goods. |
| <i>Licenses on Trades and Business, 1908</i> | <ul style="list-style-type: none"> • subsection (1) of section 3 provides that every person carrying on a trade or business specified in the relevant schedule shall take out a licence. This includes the business of a retailer, as that term is defined by the Act, with an annual turnover of at least \$5000. Under section 2, the definition of “retailer” includes any person occupying a “fixed stand” who buys and sells in small quantities by retail to those who consume the goods. The requirement for licensing does not apply to someone who operates their stall in a market |
| <i>The Processed Foods Act</i> | <ul style="list-style-type: none"> • under paragraph (c) of subsection (1) of section 13, the Minister may prescribe grades or standards of purity, composition, quality, quantity, weight or other property in respect of any food (including drink) manufactured, prepared or processed for export or for sale, known as “prescribed food” for the purposes of the Act. • under section 7, it is prohibited to label or pack a prescribed food or its container in a manner that is false, misleading or deceptive as to its character, contents, value, composition, merit etc, or its compliance with any relevant standard. • paragraph (b) of subsection (1) of section 13 empowers the Minister to make regulations, concerning a prescribed food, in respect of the use of any substance as an ingredient in that food, the specification of containers of that food and the labelling and advertising of that food, “to prevent the consumer or purchaser thereof from being deceived or misled as to the character, contents, value, quality, weight, composition, grade, merit or purity” of any prescribed food; or to “prevent injury to the health of the consumer or purchaser thereof”. A consultative approach is mandated for the development of such regulations, for instance, under subsection (2) of section 13; and subsection (1) of section 14. • <i>The Processed Food (General Regulations), 1959; the Processed Food (Grades and Standards) Regulations, 1964; and the Processed Food (Prepared Syrups)</i> |

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| | <p><i>Regulations 1974</i> are made under the authority of this Act.</p> |
| <p><i>The Standards Act, 1974</i></p> | <ul style="list-style-type: none"> • subsection (1) of section 7 confers on the Bureau of Standards (“BOS”) the responsibility to formulate specification for commodities (i.e. any article, product, or thing the subject of trade or commerce) etc. as requested by the Minister. Under subsection (2) of section 7, subject to the Minister’s consent, the Bureau may declare the specification developed to be a standard specification. Subsection (3) provides that where another enactment (law) prescribes the grade, standard or other characteristic of a commodity etc., before the Minister can give consent for the declaration of Page 4 of 8 a standard specification for that commodity etc., he must first obtain the approval of the Minister with portfolio responsibility for administering the relevant enactment. Under subsection (7) of section 7, where it appears to the Minister to be necessary or desirable in the public interest, the Minister may by order declare a standard specification to be a compulsory standard specification. • paragraph (d) of subsection (1) of section 11 empowers the Minister to make regulations with respect to the packaging, labelling, description and advertising of any commodity for which a standard specification has been declared. • under the <i>Standards (Labelling of Processed Food) Regulations, 1974</i>, regulation 3, it is a requirement for every container into which processed food is packed to bear a label that complies with the regulations. This includes the listing of all ingredients in decreasing order of proportion; however, provision of nutritional information is optional. There is also the <i>Compulsory Standard Specification (Labelling of Commodities) (General) Order, 1971</i>, among other orders. |
| <p><i>The Public Health Act, 1985</i></p> | <ul style="list-style-type: none"> • subsection (1) of section 14 confers the power on the Minister to make regulations in relation to “<i>the importation, preparation and distribution of food and drink intended for human consumption, in so far as it concerns public health</i>”. • under regulation 2 of the <i>Public Health (Food Handling) Regulations, 1998</i>, a ‘food-handling establishment’ is defined to mean a place where food is prepared or sold for human consumption and includes the categories of retail and food service premises set in in the relevant |

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|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>schedule to the Act, viz. “<i>food service operations within institutions</i>” including schools and “<i>itinerant vendors, snack shops and food shops</i>”. By virtue of regulation 3 (1), every person who is desirous of operating a food-handling establishment shall apply to the Medical Officer (Health) in the parish for a licence (valid for 1 year) to operate such establishment. Before granting the application, the Medical Officer must determine whether certain minimum requirements are met.</p> |
| <p><i>Local Governance Act, 2016</i></p> | <ul style="list-style-type: none"> • section 51 (2), and (3) (m), (vi) and (x), of the <i>Local Governance Act</i> confers powers on a Council of a Municipal Corporation or City Corporation, to the extent not governed by any other enactment, to make regulations governing respectively, prohibiting or removing encroachments and nuisances in any thoroughfare or public place; and prohibiting or regulating the exposing of goods for sale in any thoroughfare or public place. |
| <p>Category 3: International</p> | |
| <p>Law</p> | <p>Examples</p> |
| <p><i>Conventions on the Rights of the Child, 1989</i></p> | <ul style="list-style-type: none"> • The Policy is rooted in the Child Rights perspective and is focused at all times on the fair treatment and best interest of the child in accordance with Articles 2 and 3 of the Convention on the Rights of the Child (CRC). It also responds to CRC Article 4, in which the GOJ committed to taking all Page 5 of 8 available measures to safeguard the rights of children, including assessing our social services and funding for these services to ensure that children are protected, and Article 5, which gives governments the responsibility to assist parents in fulfilling their role as nurturers. More specifically, the Convention (Article 24) provides children with the right to nutritious foods and information to help them stay healthy as part of the right to health and health care. |

Assessing the Adequacy of the Current Framework

Jamaica’s public-school system is characterized by a decentralized model of school management, which may sometimes create challenges to the implementation and monitoring of national policies in the absence of local ownership by school communities. It is recalled that every public educational institution is administered by a Board of Management (“Board”) (s. 9 of the *Education Act*) comprised of nominated or elected representatives of the school community responsible for “**the conduct, supervision and efficient operation of the institution**” (*Education Regulations 1980*, r. 89 (1) (a)). There are approximately 950 public educational institutions in Jamaica, with

as many Boards. The *Education Regulations, 1980* stipulates that during school hours, the premises of a public educational institution shall only be used for the purposes of the institution, and thereafter only for purposes as may be approved by the Board (regulation 15 (1)). The principal and teachers of a public educational institution are employed to the Board (not the Ministry). The principal is responsible as professional head and chief executive officer of the Board to *inter alia*, **“plan and administer the day-to-day educational programme and support services of the institution and to carry out such policy decisions as the Board may delegate for the efficient and orderly conduct of the day-to-day administration of the institution”** (*Education Regulations 1980*, r. 43, 44, Schedule D, paragraph 4). From the foregoing, the cooperation of school leadership is essential to ensure uptake by school communities. Legislation to compel adherence to policy guidelines remains an available option for influencing the necessary behaviour change.

Under section 17 of the *Education Act*, it is provided *inter alia*, that every public educational institution shall be conducted in accordance with regulations made in respect thereto (see s. 17 (1) (a) and (d)). The power conferred on the Minister to make regulations, subject to negative resolution, is contained in section 43 of the *Education Act* and extends to such matters as the management and conduct of public educational institution; the powers and duties of boards of public educational institutions; the standards to which the premises of an educational institution should conform; and the purposes for Page 6 of 8 which the premises of an educational institution may be used. The principal is also required to undertake additional duties and responsibilities as may be prescribed by the Minister.

To ensure enhanced compliance with the Policy, amendments and alignment to other legislation is advisable. It is noted that some countries have opted to enact new or amending legislation to deal with the issue of nutrition in schools. Examples include:

- France: In 2005, a controversial law was introduced prohibiting vending machines in schools.
- United States: The *Healthy, Hunger-Free Kids Act, 2010* authorized funding and set policy for the United States Department of Agriculture's core child nutrition programs including the National School Lunch Program and the School Breakfast Program creating the opportunity to make real reforms to the school lunch and breakfast programs by improving the critical nutrition and hunger safety net for millions of children.
- Canada: The *Healthy Food for Healthy Schools Act, 2008* addresses healthy eating in schools, including dropping trans-fat from food and beverages sold in schools and establishing mandatory nutrition standards for food and beverages sold in schools. The Act serves to amend the Education Act to introduce requirements on school boards to conform to the relevant standards and is supported by a School Food and Beverage Policy and Trans Fat Regulations.

Other countries, such as New Zealand, opted to introduce non-statutory guidance to schools. The Heathy Food and Drink Guidance to Schools (Ministry of Health and Wellness, 2019) “helps schools develop a policy to promote and provide healthy food and drink” and is intended to provide “a consistent message that the whole school practices nutrition education that is part of the curriculum” and helps to create “supportive environments for children where healthy choices are easy”. The Guidelines exclude food and drink brought to school be children and staff to eat. The policy uses a simple, colour-coded classification system (green, amber, red) to identify “healthy” and “less healthy” food and beverage choices. It discourages association by schools with products and brands that belong in the “red” category that are high in saturated fat, sugars, and salt with poor nutritional values. Toolkits are provided to support schools to use the information in the Guidance to adopt and implement their own polices. Complimentary to the guidelines is a Health Star Rating Page 7 of 8 (one-half stars to five stars) which is a front-of-pack labelling system that rates nutritional profile of packaged foods within food groups. Additionally, a two-year pilot programme is under way to offer free, nutritious school lunches to all students funded by the Ministry of Education and Youth but managed at the school level.

Recommendations for enactment of new of amending legislation

| POLICY STRATEGY | LEGISLATIVE GAP | RECOMMENDATION |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FOOD SERVICE ENVIRONMENT | | |
| The development of regulations to guide the operations of school vendors in the vicinity of the school (food service environment defined to include canteens, tuck shops, canteen concessionaries, venders at the school gate or within 200 meters of the school gate). | A school, like any other property owner or occupier, may regulate the food service environment on its premises but has no jurisdiction to do so beyond its boundary. The legislative authority to regulate vending in any thoroughfare or public place resides with local government subject to any public health requirements. | New regulations to be developed under the <i>Education Act</i> to govern vending on school premises. New regulations proposed to be developed under the <i>Local Governance Act</i> in respect of vending within 200 m of any educational institution. |
| PROVISION OF MEALS | | |
| The Promulgation of Food Based Dietary Guidelines and the National School Nutrition Standards for Jamaica to regulate the provision and consumption of food by students in schools. | The Minister may make regulations prescribing the guidelines for the nutrition programme in Early Childhood Institutions. In contrast, there is no express power under the <i>Education Act</i> to make regulations | Enactment of legislation to amend the <i>Education Act</i> to empower the Minister to make regulations governing the nutritional requirements of food and drink provided or sold on school premises; and |

| POLICY STRATEGY | LEGISLATIVE GAP | RECOMMENDATION |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>governing the food and drink sold on school premises, although the power could be implied. To avoid leaving the matter to interpretation, express provisions could be enacted. The technical input for formulating such guidelines and standards should come from the Ministry of Health and Wellness.</p> <p>It is noted that the absence of a requirement to include nutritional information on the labels for processed foods will negatively impact the ability to implement the Policy.</p> | <p>new regulations made pursuant to that power.</p> <p>New regulations under the <i>Early Childhood Act</i> to prescribe the guidelines for the nutrition programme in Early Childhood Institutions.</p> <p>New regulations to require inclusion of nutritional information on labels for (some) processed food and drink made under legislation administered by the Ministry of Industry, Investment and Commerce, and its agencies.</p> |
| <p>The provision of at least one nutritious meal per day providing one quarter to one third daily nutritional requirements according to the beneficiaries on the School Feeding Programme from early childhood to the secondary level.</p> | <p>The Minister may prescribe conditions in respect of any assistance provided to students under the <i>Education Act</i>. This would include the School Feeding Programmes at the pre-primary, primary and secondary schools. There is also power to make regulations prescribing the guidelines for the nutrition programme of an early childhood institution under the <i>Early Childhood Act</i>.</p> | <p>New regulations to be made under the <i>Early Childhood Act</i> and <i>Education Act</i> prescribing the guidelines for the government funded School Feeding Programme in pre-primary, primary and secondary schools.</p> |
| <p>Regulate the marketing of foods and beverages in and around the school environment.</p> | <p>It is within the purview of the Board to grant access to the school for the purpose of food and beverage marketing campaigns. Given limited resources, schools often rely on commercial sponsors to host school extracurricular and sporting events, or personal development programmes for students. If a</p> | <p>New regulations proposed under the <i>Education Act</i> to govern the duty of the school board in respect of sponsorship, advertising, and marketing on school premises, or for/at school events and activities.</p> |

| POLICY STRATEGY | LEGISLATIVE GAP | RECOMMENDATION |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| | standardized approach to such matter is required, regulations could be developed within the scope of the existing <i>Education Act</i> . However, the legislative authority for regulating advertising outside the boundaries of a school is vested in local government | |
| Limit students' access to 'empty calorie' snacks and beverages. | Whereas regulations may govern what a school sells or provides, it is unlikely that mandatory requirements could be made to apply to food and drink brought from home by students unless same was in breach of a public health enactment. | Students and staff should be encouraged to adopt healthy eating practices; supported by restrictions on what the school sells, provides and promotes. |

GENDER CONSIDERATIONS

The eating habits and proper nutrition requirements of both males and females in the school system were taken into consideration in the development of the Policy. These areas will be adequately addressed through the use of the National School Nutrition Standards (MOHW 2019) Operations and Procedures Manual for the School Feeding Programme (2017) and the School Feeding Programme Recipe Manual (2015) which have been developed to streamline the requirements for the dietary needs of each distinct group of students. The Ministry will engage the services of nutritionists to provide guidance to schools in meeting the daily dietary needs of the students.

The Caribbean Food and Nutrition Institute (CFNI) Recommended Dietary Allowances (1994) for the Caribbean was also used to determine the dietary provisions for girls versus boys as depicted in the table below:

| Energy and nutrients | Energy (kcal) | Fat (g) | Carbohydrate (g) | Protein (g) | Vitamin C (mg) | Iron (mg) | Calcium (mg) |
|---------------------------------|--------------------------|-------------------|------------------|-----------------------|----------------|------------|--------------|
| Nutrient-based standards | 30% total daily calories | Not more than 30% | Up to 75% | Not less than 30% RDA | 40% of RDA | 40% of RDA | 30% of RDA |
| 4-6 yrs Males | 540 | 18 | 101 | 7 | 24 | 4 | 150 |
| 4-6 yrs Females | 488 | 16 | 92 | 6 | 24 | 4 | 150 |
| 7-9 yrs Males | 621 | 21 | 116 | 8 | 24 | 4 | 180 |
| 7-9 yrs Females | 548 | 18 | 103 | 8 | 24 | 4 | 180 |
| 10-14 yrs Males | 735 | 25 | 138 | 14 | 24 | 5 | 210 |
| 10-14 yrs Females | 620 | 21 | 116 | 14 | 24 | 6 | 210 |
| 15-18 yrs Males | 816 | 27 | 153 | 17 | 24 | 5 | 270 |
| 15-18 yrs Females | 657 | 22 | 123 | 16 | 24 | 6 | 270 |

Recommended Daily Allowance (RDA) is the average daily dietary intake level that is sufficient to meet the nutrient requirements of nearly all (approximately 98 percent) healthy individuals. If people get more than this amount they will almost certainly be getting enough.

Students participating in various agricultural or home management exercises could be discriminated against due to their gender. This could adversely affect student's participating in agricultural science as home grown gardens could be seen as male dominated while home management could be viewed as female dominated.

The teaching of agricultural science and home management should be infused in the curriculum from Grade 1 making it mandatory for both males and females to participate in these activities up to the secondary level. Efforts should be made to remove the stigma associated with tasks that are considered male or female dominated. This should be supported through HFLE classes, curriculum support and practical experience in the school environment by both male and female students.

RURAL VERUS URBAN AREAS

The Government of Jamaica is cognizant of the possible challenges that schools encounter with accessing provisions for healthy meals due to their location. Schools in the rural areas may be better able to receive ground provisions readily due to their close proximity to farming communities and markets at a reduced cost, while this may not necessarily be the case for those in the urban areas. The Government of Jamaica through the MoEY will seek to ensure that "no school is left behind". Consequently, fixed term contracts with farmers to ensure the availability and sustainability of locally grown produce to the feeding programme will be executed and measures put in place to account for deficiencies in the short, medium and long term.

Some schools, primarily those in the rural areas are at a greater advantage than those in the urban areas due to several factors. These schools have adequate land space, exposure to the farming communities and consequently benefit from established school gardens and are producing more than required. The Ministry will seek to implement a sustainable school garden programme to allow these schools in the rural areas to supply excess produce to other schools particularly those in the urban areas at a reduced cost. Schools in rural areas are also more privileged as they are able

to purchase agricultural provisions at a much lesser cost since most of these schools are in the farming communities. For those in the urban areas, schools will be encouraged to use the limited land space to promote school gardens and as far as possible greenhouse farming through the assistance of the Ministry of Agriculture and Fisheries, RADA and the Jamaica 4H Clubs.

A Memorandum of Understanding was signed in 2016 between the Rural Agriculture Development Authority (RADA) and the MoEY as the Ministry seeks to promote the establishment of new school gardens, resuscitate dormant ones and improve on those existing hence cultivating in the minds of the students the need to grow the food they eat. This initiative will continue in association with the Jamaica 4H Clubs.

The Ministry of Agriculture and Fisheries (MAF) will play a dominant role in partnership with the MoEY in ensuring that agricultural provisions are made available to the schools whether they in the rural or urban areas and will work with key stakeholders to this end as the MoEY seeks to promote Jamaica's mantra, "eat what we grow and grow what we eat". Instilling these values in the students at this level is of utmost importance. Whether rural or urban all students will be treated with equity and will be provided with the proper nutrition as set out in the National School Nutrition Standards developed by the MOHW (June 2019).

The need for these students to be engaged in physical activity is also important however the MoEY is aware of the issues faced by some schools due to the limited space which is available for physical activities especially those in the urban areas. The MoEY will therefore seek to increase the number of feeding days currently allotted from the pre-primary to the secondary levels.

KEY STAKEHOLDERS ROLES AND RESPONSIBILITIES

The MoEY shall have primary responsibility for governance of the National School Nutrition Policy, however, a number of Ministries and Department/Agencies (MDAs) are critical to its successful implementation. The following stakeholders shall be involved in the implementation of the policy:

The Government of Jamaica through the MoEY shall:

1. Implement nutritional standards, in conjunction with the MOHW, for all meals provided by or through schools. These standards will apply to all meals provided to children in schools, whether or not wholly or partially financed by the Government of Jamaica.
2. Implement measures to ensure improvement in the nutritional status of all school children
3. Facilitates the development of standards and guidelines for the provision of safe and nutritionally adequate meals to the school age population.
4. Facilitate the preparation, formulation and management of menus from local foods.
5. Establish Home Grown School Feeding Programme which will ensure a sustainable market for locally produced food.

6. Develop educational programmes for incorporating nutrition education in the curriculum
7. Support the development/strengthening of curricula at the pre-school, primary and secondary levels to include nutrition in science and Family Life Education (HFLE).

The development and implementation, in collaboration with the relevant Ministries, Departments and Agencies, of a behavioural change modification programme aimed at shifting eating patterns to healthier and preferably, locally produced foods, including fruits and vegetables.

The School Feeding Unit

The School Feeding Unit is the section within MoEY which is responsible for the monitoring and evaluation of the Policy within the institutions to ensure that standards are being met and menus utilized.

The Ministry of Health and Wellness

The MOHW will:

- Facilitate the development of standards and guidelines to ensure that dietary requirements of school-aged children are met.
- Provide guidance and build capacity in the monitoring of Standards.
- Provide technical support to critical FNS activities related to nutrition and physical activity.
- Collaborate in the development of a national social marketing campaign to encourage nutritious food choices in schools.
- Encourage and support an environment conducive to increased physical activity in schools in compliance with national guidelines.
- Promote foods in line with the Food Based Dietary Guidelines for Jamaica.

The Ministry Agriculture and Fisheries (MAF) will:

- Facilitate the provision of local produce for school meals production parameters to satisfy volume of produce required.
- Provide technical assistance in areas related to production and marketing-related initiatives of School Feeding Programme.
- Develop and support mechanisms for smaller holder farmers to participate in school feeding public purchases.

The Ministry of Local Government and Rural Development will:

- Facilitate meeting with representatives of the Municipal Corporation and the MoEY to discuss vending in schools
- Assist in the development of a framework to guide the operations

Additionally:

- **Jamaica Association of Professionals in Nutrition and Dietetics (JAPINAD)** – Support services.
- **National Parenting Support Commission and the National Parent-Teachers Association of Jamaica** – partnership in the quest for good eating habits and practices, and increased parental involvement in achieving the goals and objectives of this policy.
- **Jamaica Teachers’ Association** – endorsement of the government initiative to improve nutrition and physical activity in schools.
- **Jamaica Association of Principals of Secondary Schools/Association of Principals and Vice Principals** - leadership of the government initiative to improve nutrition and physical activity at the school level.
- **National School Nurse Association** – assist with assessment of students and the completion of BMI reports.
- **The National Secondary Students’ Council/Jamaica Prefect Association** – mobilize student population to practice and promote health and wellness.
- **School Vendors/Concessionaires** – partnership in supporting the initiatives of the government and complying with policies, regulations and guidelines.
- **Private Sector** - Partnership and support in keeping with the required health related standards, policies and regulations.
- **Non-Governmental Organisations** - partnership and support.

POLICY IMPLEMENTATION MECHANISMS

The MoEY has direct responsibility for the implementation of the National School Nutrition Policy. Improvements in the school nutrition environment must take place within the context of broad, national school reform programmes. Though aligned to education policy, the provision of nutritious food in schools is an integral part of the country’s social protection system and, therefore, its success is contingent on the involvement of several stakeholders.

Key stakeholders which will play an integral role in the execution and sustainability of the policy include:

- i. **Public Sector Organisations:** The MoEY will collaborate with other public sector organisations to provide the necessary resources to effect the successful implementation and sustainability of the NSNP.
- ii. **Families:** The families will promote and reinforce healthy lifestyle practices and continue the nutritional fortification provided in schools.

- iii. **The Community:** The community to include vendors should support the school and family in sustaining the practices established in this National School Nutrition Policy (NSNP).
- iv. **The Private Sector:** This sector should adhere to the standards and regulations stipulated by the Government in the marketing and production of their products for sale to the public school system.

HUMAN RESOURCES REQUIREMENT

For the policy to be fully implemented the human resource requirement will be critical to its successful implementation. An assessment was conducted under the Modernization of the School Feeding Programme which identified a staff deficiency in the School Feeding Unit. The policy is therefore seeking to address this need through the engagement of additional staffing. The engagement of consultancy services will also serve as an effective tool in providing training of canteen staff, assessing the progress of the NSNP which will serve as an instrument in helping senior management to make informed decisions concerning the successful implementation of the policy.

MONITORING AND EVALUATION (M&E)

The design of an implementation plan will specify details of targets to be reached in the short, medium and long terms and evaluation tools will specify quantitative and qualitative indicators with time frames, which will assist in tracking progress on the achievement of the policy objectives. The implementing partners will use these tools in their internal monitoring and evaluation process. Emphasis will be on assessing relevance, performance, challenges, successes and the impact of various recommended policy actions.

The Government of Jamaica (GOJ), will reactivate and strengthen the School Health Enhancement Committee (SHEC) which was established to guide the Health Promoting Schools Programme. This Committee, will monitor the implementation of the NSNP to provide oversight for the efforts to improve nutrition in the school environment and supported by the Programme Monitoring and Evaluation Unit in the Planning and Development Division of the MoEY. The leadership of the SHEC will be rotated every 3 years.

The school feeding administrative mechanism will serve as the Sub-Committee Secretariat, and have responsibility for the engagement and coordination of Committee activities. The Educational Services Division of the MOEY will oversee the work of the Secretariat.

Key stakeholders should be fully responsive to the requirements pertaining to the implementation of the agreed policy actions. Roles should be clarified and defined to ensure they complement each other and reduce duplication and inefficient ways of working across sectors. Monitoring and evaluation of the NSNP will be guided by a Monitoring and Evaluation Framework to be developed.

The Sub-Committee membership should at a minimum include representatives from:

- ❖ The Ministry of Education and Youth
- ❖ The Ministry of Health and Wellness
- ❖ The Ministry of Agriculture and Fisheries
- ❖ The Ministry of Local Government and Rural Development
- ❖ Jamaica Association of Professionals in Nutrition and Dietetics
- ❖ National Parent Teachers’ Association of Jamaica
- ❖ National Parenting Support Commission
- ❖ Early Childhood Commission.
- ❖ Jamaica Teachers’ Association
- ❖ Jamaica Association of Principals of Secondary Schools/Association of Principals and Vice Principals
- ❖ National School Nurse Association
- ❖ The National Secondary Students Council/Jamaica Prefect Association

The details including timeframe for implementation, will be elaborated in the Plan of Action upon adoption of this policy. The implementation of the Plan of Action will be administered by the Monitoring and Evaluation Committee once appointed. The buy-in of schools is pivotal to the success of this policy. Schools operate in a variety of contexts, and the GOJ recognises that resources vary among schools. Implementation of this policy should reflect the social and resource context within which the schools operate.

Successful M&E requires that capacity be built to execute it meaningfully. The M&E team must move to have this deficiency addressed. This involves government making the appropriate allocations, enlisting the required skilled human resources and taking action to ensure appropriate institutional enablement. Monitoring and evaluation of the NSNP will be guided by the National Monitoring and Evaluation Framework.

FINANCIAL RESOURCES

It will cost the government approximately \$3.3B to implement the National School Nutrition Policy.

| SUMMARY IMPLEMENTATION BUDGET FOR THE NATIONAL SCHOOL NUTRITION POLICY | TOTAL REQUIRED (\$) |
|-------------------------------------------------------------------------------|----------------------------|
| Amount required for Policy Implementation (Short Term) | 492,600,000 |

| SUMMARY IMPLEMENTATION BUDGET FOR THE NATIONAL SCHOOL NUTRITION POLICY | TOTAL REQUIRED (\$) |
|-------------------------------------------------------------------------------|----------------------------|
| The Food Service Environment and the Provision of Meals | 342,300,000 |
| Health Promotions | 48,000,000 |
| Physical Activity Environment | 41,000,000 |
| Curriculum Development | 57,000,000 |
| Administrative Support | 4,300,000 |
| Medium Term Requirement | 1,925,200,000 |
| The Food Service Environment and the Provision of Meals | 1,310,500,000 |
| Health Promotions | 163,000,000 |
| Physical Activity Environment | 44,200,000 |
| Curriculum Development | 264,500,000 |
| Administrative Support | 143,000,000 |
| | |
| Long Term Requirement | 866,200,000 |
| The Food Service Environment and the Provision of Meals | 567,700,000 |

| SUMMARY IMPLEMENTATION BUDGET FOR THE NATIONAL SCHOOL NUTRITION POLICY | TOTAL REQUIRED (\$) |
|-------------------------------------------------------------------------------|----------------------------|
| | |
| Health Promotions | 80,000,000 |
| Physical Activity Environment | 11,000,000 |
| Curriculum Development | 82,000,000 |
| Administrative Support | 125,500,000 |
| Grand Total | 3,284,000,000 |

RISK TO POLICY IMPLEMENTATION

The main risks to the successful implementation of the policy are:

- i. Economic constraints: Financial constraints by the Government could derail implementation.
- ii. Increase in poverty: Increase in the number of beneficiaries on the programme could due to poverty will require more students in need of nutritional support. This could hamper the ability of the programme to provide for all identified poor and vulnerable may be threatened.
- iii. Internal Organisational Weaknesses: This pose a risk to the successful execution of the policy. Strengthening this capacity is of utmost importance.
- iv. Lack of Coordination between the policymaking and the programme implementation arms of school feeding pose a significant risk to the policy’s effectiveness.
- v. Vagaries of agriculture sector output: The policy requires that at least 10% of meal inputs be from locally produced items. This may be threatened when there are downturns in local agriculture production. This target may also be compromised if the distribution channels for produce are underdeveloped, resulting in inconsistencies in the availability of local inputs.

IMPLEMENTATION PLAN

It will take approximately five (5) years for the policy to be fully implemented.

POLICY REVIEW

The Policy shall be reviewed after five (5) years. The Schools Operations and Schools Improvement Units of the MoEY with support from the Planning and Development Division, and the School Feeding Unit along with other key stakeholders will be responsible for the review of the Policy.

CONCLUSION

The overarching goal of the National School Nutrition Policy is to improve the health and wellness of children in our educational facilities. Notwithstanding the risks stated before, with the implementation of effective monitoring and coordinating systems, allocation of appropriate human resources and consolidation of available financial and technical resources, the policy can be successfully implemented.

The successful implementation of the policy is dependent on the commitment of the schools and other key stakeholders. When all the necessary measures are implemented, Jamaica will see an improvement in the nutritional status of our children towards Vision 2030 Outcome # 1 of a healthy and stable population



MINISTRY OF EDUCATION AND YOUTH
RISK MANAGEMENT MATRIX FOR THE NATIONAL SCHOOL NUTRITION POLICY 2020-2025

KEY:

- High
- Medium
- Low

PROBABILITY: 1-5, with 5 being the highest. 1-2 not likely; 3-4 likely; 5 most likely

| POLICY FOCUS | RISKS | IMPACT | PROBABILITY | MITIGATING MEASURES | DESCRIPTION OF MITIGATING MEASURES/RESPONSIBILITIES |
|---------------------------------------------|-------|--------|-------------|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ECONOMIC CONSTRAINTS | | | 5 | International Donors | Seek funding from donors |
| INCREASE IN POVERTY | | | 4 | Reduction in allocation | Cut some areas in approved estimates to offset shortfall |
| INTERNAL ORGANISATIONAL WEAKNESSES | | | 3 | Strengthening of internal capacity | Training of staff |
| INFRASTRUCTURE DEVELOPMENT | | | 4 | None | |
| LACK OF COORDINATION AMONG KEY STAKEHOLDERS | | | 3 | MoUs Stakeholders consultations sessions | <ul style="list-style-type: none"> Establishment of intersectoral committees with key Government Ministries/Departments and Agencies. Memorandum of Understanding between key stakeholders such as; MICAFA, MOHW and FAO. |
| VAGARIES OF ARGRICULTURE SECTOR OUTPUT | | | 3 | Substitute | Allow for the substitution of alternative produce during period of shortages. |

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