Visions for a Robust Canadian National School Lunch Policy: Lessons from Brazil

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ABSTRACT

What can Canada learn from Brazil's *Programa Nacional de Alimentação Escolar* (PNAE) to build a stronger, more equitable National School Food Program (NSFP)? This paper argues that well-intentioned national programs can still reproduce colonial and inequitable logics if they aren't designed with care. Using a threefold theoretical framework – policy transfer and lesson-drawing theory (Dolowitz & Marsh, 2000; Rose, 1991) and food sovereignty theory (Wittman, Desmarais, & Wiebe, 2010; Holt-Giménez et al., 2012; Coté, 2016), held throughout by a decolonial critique of extractive knowledge transfer (Rivera Cusicanqui, 2012) – this paper compares Brazil's PNAE, a decades-long, rights-based, and universally accessible program, with Canada's newly emerging NSFP. PNAE is treated here not as a blueprint but as a source of transferable design principles, deliberately reversing the usual assumption that policy expertise flows from the Global North to the Global South. Drawing on semi-structured interviews with nine food policy advocates, dietitians, educators, and researchers across five Canadian provinces, along with a comparative literature review, this study identifies eight recurring themes – funding, governance and accountability, universality, procurement, cultural relevance, community authority, food literacy, and political durability – that shape both the promise and the limits of Canada's program as it stands. The findings suggest the NSFP currently reflects a politics of aspiration rather than obligation, and that PNAE's most instructive lessons aren't technical but structural: legal enshrinement of the right to food, mandated local procurement, community governance with real authority, and integration with broader social protection. This paper contributes to a still developing literature on Global South-to-North policy learning in school food systems.

Keywords: School food policy; food sovereignty; policy transfer and lesson-drawing; Global-South-North policy learning; decolonial critique

FOREWORD

I am a cis-woman and second-generation settler in what is now known as Canada with roots and heritage in what is now known as El Salvador. My worldview in the realm of food is inherently shaped by food insecurity experienced by my family when first arriving in Canada in the 1990s. My positionality is also rooted as a firm believer in food as a tool for practicing and learning about one's culture, and I'm also heavily influenced by a continued fascination and curiosity about food movements and activism in Latin America. I'm a feminist, and strive daily to be more intersectional on this front - I acknowledge the very active role of women in food movements, advocacy, and activism – not only across Canada, but across Latin America. I especially want to acknowledge and honour the Indigenous presence in the land Canada currently stands on, and maintain that Indigenous cultures very much live on and are taking needed space on this land, and that actualizing the objectives of the Land Back movement would do wonders in so many aspects including the world of food justice.

I have a never-ending passion for local food initiatives. I completed my undergraduate degree in Environmental Studies at York University with a focus in Arts and Culture, and I'm currently completing my second year on the Toronto Youth Food Policy Council (TYFPC) as Co-Lead of Advocacy and Education where with other council members I help to build a just and sustainable food system by working with Toronto's diverse young communities.

This project sits at the intersection of everything I've described above and taking this topic on feels more inevitable than a choice, as the topics I studied in my MES program kept pointing to school meal programs, the one emerging in Canada and those abroad. In my view, school food is so many of my commitments come together: the right to food, the role of food in culture and dignity as well as the recognition that no child should have to learn on an empty stomach whilst adults discuss funding models. Seeing the violence of food insecurity close to me taught me early that hunger in a wealthy country is a policy failure rather than an individual one. Comparing Canada's emerging programming to Brazil's PNAE felt like a necessary and optimistic exercise, to find ways to feed children by analyzing models that have been done

elsewhere. Professionally, this is also where I see my career heading – I wanted to spend my major research studying a topic I could see myself returning to for years to come.

I am also conscious, following Rivera Cusicanqui (2012), that comparative research like mine can unintentionally repeat an old extractive pattern: treating the Global South as a quarry of raw material to be shipped north, refined, and re-presented through the language of Northern academia, often stripped of the political struggle that gave it meaning in the first place. I hold this tension throughout the paper that follows, and try, wherever I can, to keep Brazil's PNAE anchored in the political history that produced it rather than flattening it into a checklist of best practices for Canada to adopt.

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I am beyond thankful for the opportunity to have experienced the MES Program, so firstly I thank the Faculty of Environmental and Urban Change for providing me with the opportunity to return to York to study, as originally planned, "all things food related." This journey took me through endless adventures and rabbit holes, from experiencing community building at Maloca Garden and within the student community, prepping and serving many *pupusas* on campus, all the way to immersing myself in food sovereignty lessons at the *Las Nubes* campus in Costa Rica.

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As a second-generation settler to these lands with roots in *Cuscatlán*/El Salvador, I acknowledge that this research was conducted on the Toronto purchase Treaty No. 13 lands and

territory of the Mississaugas of the Credit First Nation, and on the traditional territory of the Huron-Wendat and Haudenosaunee – I hold myself accountable to writing about food policy here and in Brazil as an act of contribution rather than extraction.

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INTRODUCTION

The focus of my MES program has entailed a critical look at food systems. I have analyzed and interrogated current challenges in the industrial food system, like food access within racial capitalist structures; the prevalence of food apartheid; and food insecurity, mostly experienced by racialized and vulnerable communities. Notably in this regard, a 2023 Statistics Canada report unveiled that Black Canadians had the highest rate of food insecurity, with nearly 38% of this population reporting as being food insecure (Statistics Canada, 2023).

Canada's National School Lunch Policy became of particular interest given its recent traction, establishment, and under today's rapid-moving political landscape. Amid growing national commitments to address school food insecurity, my research on strengthening the National School Food Policy (NSFP) is particularly timely, as mobilization efforts that secured the now confirmed and permanent National School Lunch Program turn toward leveraging and expanding its success. Food access efforts in Canada are currently growing, thankfully: as outlined in a recent report from PROOF (Food Insecurity Policy Research), (PROOF, 2025). The NSFP itself, for example, stems from the federal government's broader Food Policy for Canada, announced in 2019, aiming for more sustainable food systems in the country (Agriculture and Agri-Food Canada, 2025). The NSFP also contributes to the goals of Canada's First Poverty Reduction Strategy, a policy launched in 2018 that set out a plan to tackle increased poverty in the nation, aligning with the United Nations Sustainable Development Goals (Government of Canada, 2025).

Long before the National School Food Program's current form, there were several efforts made in Canada and near-attempts at establishing such a policy. From the early 1900s through the beginning of World War II, there were subsidized lunch programs offered in Ontario for example in rural schools, with similar programs being delivered in British Columbia, Manitoba, and Saskatchewan (Mosby, 2014). During World War II, circa 1939, school food programs were present in Montreal, Toronto, and Vancouver, though these were specifically designed to assist the agricultural sector rather than address hunger directly (Mosby, 2014). A proposal for a national program followed in 1944 but was not adopted by the federal government; officially, it was rejected because trial evaluations did not reveal any "dramatic improvements", but Mosby (2014) found the opposition to be largely political, tied to federal efforts to integrate newer social

programs and have women "return to the household" post-World War II. Related to these efforts, the "Family Allowance Program" began in 1945 as Canada's first universal welfare program, granting benefits without reference to family income (Guest et al., 2006) – a structure notably different from today's program, which increasingly targets lower- and middle-income families.

Between 1945 to 1992, the Family Allowance Program continued while no national lunch program was put forth, until it was replaced in 1992 by the Child Tax Benefit, which targeted low- and moderate-income households rather than all families with children under eighteen (Falvo, 2017). As Haines and Ruetz (2020) describe, the next move toward a national school food policy arrived in 2018, when Senator Art Eggleton put forward a motion to develop a funded, cost-shared, universal nutrition program, echoing a similar 1997 recommendation from the House of Commons Standing Committee that had also failed to advance (Haines & Ruetz, 2020). Another failed attempt came with 2019's Bill C-446, introduced by NDP health critic Don Davies as an effort to develop a national school food program, which, like past motions, never went beyond its first reading (Haines & Ruetz, 2020). Finally, with the arrival of the COVID-19 pandemic in 2020, the federal government came forward with a $2 billion budget to ensure schools' safe re-openings, a moment that, per Haines and Ruetz, signalled that a "federalist" approach to school food might be viable even within provincial education jurisdiction (2020).

The Canadian school meal landscape's history reveals that a national school food program in Canada has been unprecedentedly close to realization of some sort at various points dating back to World War II, yet the timing of these policy "windows" never converged into an established program until more recent years. That such efforts trace back this far is revealing, especially given that the WWII-era programs in Montreal, Toronto, and Vancouver were designed to assist a declining agricultural sector rather than to feed students, and that the 1944 proposal's failure was tied to a political effort to push women out of the workforce. The establishment of a national school food policy in Canada, in other words, has consistently stayed in relation with political and financial agendas beyond child hunger itself, a pattern worth holding onto when assessing the NSFP's current design.

This most recent chapter of the NSFP's history moved considerably faster than any of the near-misses that preceded it. Years of civil society advocacy coincided with a 2019 federal budget commitment to begin negotiations with provinces and territories (Government of Canada,

2019) and a 2021 Liberal election platform pledge that would later become the NSFP's founding $1 billion commitment (Liberal Party of Canada, 2021). The National School Food Policy was formally announced on June 20, 2024 (Employment and Social Development Canada, 2024), and by March 2025, the federal government had signed bilateral agreements with all thirteen provinces and territories (Field, 2025). Budget 2025 then proposed the legislation and $216.6 million in annual funding, starting in 2029 and 2030, needed to make the program permanent. (Employment and Social Development Canada, 2026), and the National School Food Program Act legislation received Royal Assent through Bill C-15 on March 26, 2026 (Employment and Social Development Canada, 2026), essentially at or around the time of completing this research. It's also notable that Canada's decision to move forward with the NSFP also came from a wish to align with its international commitments; per Food Secure Canada, Canada pledged to meet all 17 Sustainable Development Goals (or, SDGs), set out by the United Nations by 2030, one of which is the elimination of poverty (Food Secure Canada, 2021). This international pressure was compounded by the fact that Canada had remained, up until this point, the only G7 country without a national school food program or national standards for feeding children in schools (Breakfast Club of Canada, 2023). And with all of this movement, finally, after decades of proposals that stalled or were set aside under changes in government, sustained civil society pressures, a federal government not willing to promise funding the commitment, a legislative window withstood long enough to finally see the bill through.

The National School Lunch Program as it stands today promises to deliver a range of school food supports to youth in schools across Canada, according to the Canadian government (Canada.ca, 2024) – thus aiming to directly improve food security in Canada. The Liberal party stated its policy goals in 2021, including to offer culturally-appropriate foods in the program, and to "work with… provincial, territorial, municipal, Indigenous partners, and stakeholders to develop a National School Food Policy and work towards a national school nutritious meal program with a $1 billion dollar investment over five years" (Liberal Party of Canada, 2021); more recently, Prime Minister Mark Carney has announced that the National School Food Program will be permanent (Prime Minister of Canada, 2025).

Through my close research of the lead-up to the now permanent school lunch program, international examples of already existing school lunch programs became of interest as case studies to help inform Canada's emerging school lunch programming. This is particularly true of

Brazil's, which remains to this day a stand-out example of a national school lunch program. Brazil's PNAE, the *Programa Nacional de Alimentação Escolar*, (National School Feeding Program), has been in existence since 1955 as a means of providing children meals in schools with the aim of providing healthy and adequate food (Global Alliance Against Hunger and Poverty, 2025). According to a report from RAES, (the Sustainable School Feeding Network), which is a strategy of the Brazil-FAO International Cooperation in school meal programs, Brazil has been a leader in public school meal policies, with the creation of the School Meal Campaign which was a precursor to PNAE (RAES, 2025). Researching PNAE offers potential lessons for the Canadian policy context. And so, in this research paper, I attempt to gather these insights so that the NSFP can be inspired to fulfil its policy promises.

In the following paper, I explore the ways in which PNAE continues to be kept alive today, and how this internationally recognized program might potentially serve as a model for Canada's emerging National School Lunch Policy. Through my research, I have uncovered useful points of comparison between Brazil and Canada; issues such as school infrastructure, culturally-appropriate foods, and food movement mobilizations are among themes pertinent in discussing potential policy lessons from Brazil's PNAE to Canada's NSFP. I also interview food actors in Canada to discover their hopes and visions for establishing a Canadian food program that learns from Brazil's example, and how this trajectory compares to the NSFP that is currently being rolled out.

My research poses the following central question: What lessons can Canada take from Brazil's school lunch program (PNAE), both benefits and challenges, to develop a stronger national school food program?

As supplementary questions, my research investigates the following:

1. What are the hallmarks and shortcomings of Brazil's celebrated school lunch program?
2. What are the strengths and weaknesses of Canada's newly implemented NSFP in its early stages?
3. What do Canadian food advocates and practitioners who organize(d) for the NSFP's implementation think of the program as it currently emerges?

My research positions Brazil's PNAE as a key program to learn from, guided by research demonstrating that a universal, publicly funded school meal program is most effective when grounded in community involvement and input, cultural relevance, and provision of support for local agricultural initiatives. Brazil's integrated approaches offer a robust framework for policy analysis and learning.

My research aims to produce evidence-based policy recommendations to contribute to Canada's emerging National School Food Policy by drawing on comparative analyses from Brazil through interviews with key actors. Through qualitative research methods, my research identifies key design principles that aim to help Canadian school meal programs become more sustainable and equitable nation-wide. My research highlights themes like food sovereignty, supporting local agriculture procurement, robust community involvement, and many more.

This research contributes to academic conversations around Global South-North knowledge transfer and policy comparisons. Brazil's PNAE shows how a "Global South nation" can aid Northern policies through its integration of multiple aspects like food sovereignty, community engagement, and the promotion of local agricultural initiatives. Brazil remains a leader in the school food movement with a growing body of literature documenting the program's structural innovations and their relevance beyond the Brazilian context.

Scholarly literature on national school food programs has grown considerably in recent decades, with Brazil's PNAE attracting particular attention as a globally recognized model of rights-based, universally accessible school food. Researchers such as Recine (2017), Affonso et al. (2025), and Ipolito et al. (2025) have documented PNAE's achievements across dimensions of nutrition, local agricultural procurement, food sovereignty, and community participation. Similarly, a growing body of Canadian scholarship has begun to examine Canada's emerging National School Food Program, with researchers like Hernandez et al. (2018) and Feldman et al. (2018) identifying both the promise and the structural limitations of school food efforts in the Canadian context. However, despite the depth of knowledge on each program individually, direct comparative analysis between Brazil's PNAE and Canada's NSFP remains yet to be further explored. Hoyer et al. (2025) in *School Food Programs Around the World: Lessons for Canada* introduce Brazil as one of the most instructive global examples for Canada, alongside many other countries as well, yet a more sustained, theoretically-grounded comparison between these

two national contexts has not been developed in the existing literature, particularly one that encompasses interviews from food advocates active in the formation and implementation of Canada's NSFP.

My research positions itself within that gap. While Global South-to-North policy comparisons are increasingly recognized as a valuable mode of inquiry – particularly as a corrective to the dominant tendency to treat Northern policy frameworks as default reference points – the Canada-Brazil pairing has not yet received dedicated scholarly treatment in school food literature. This is an absence given the meaningful structural similarities between the two countries: both are large, federal, resource-rich nations grappling with regional diversity, significant Indigenous populations, and persistent food insecurity. These shared conditions make the comparison especially meaningful.

This study does not treat Brazil's PNAE as a prescriptive template to be transplanted onto the Canadian context. Instead, it uses the comparison as a lens for surfacing questions about governance, universality, cultural relevance, local procurement, and political sustainability to help broaden the discussion within Canadian school food literature. In doing so, this research contributes to an emerging conversation about what robust, equity-oriented national school food policy can look like in the Canadian context – and what it might take to get there.

All in all, this research aims to provide insights and guidance for policymakers for creating food access that complements healthy, culturally relevant, and sustainably sourced meals at schools in Canada.

This paper is organized into three main chapters. This first chapter introduces the research topic, outlining the background and context that shaped this study, the central research question and its supplementary questions, and the purpose and significance of the research within the broader literature on national school food programs. The chapter reviews the existing literature and policy history of both Canada's National School Food Program and *Brazil's Programa Nacional de Alimentação Escolar*. The chapter closes with a comparative analysis and thematic synthesis that identifies the recurring tensions: universality, governance, procurement, cultural relevance, participation, equity, and political durability – that carry throughout the rest of the paper.

The second chapter establishes the theoretical and literature foundations of my research. It sets out the dual analytical framework of policy transfer and lesson-drawing theory (Dolowitz & Marsh, 2000; Rose, 1991) and food sovereignty theory (Wittman, Desmarais, & Wiebe, 2010; Holt-Giménez et al., 2012; Coté, 2016),

The third chapter moves through the findings from my interviews with nine food informants across Canada, organized around eight major themes, with each theme placed in direct conversation with the literature and with what Brazil's PNAE offers by comparison, rather than presenting the findings and the discussion as separate steps. The chapter closes by drawing these findings together into policy and advocacy recommendations for Canada's NSFP, and with a concluding reflection on the significance of this research within the broader struggle for food justice in Canada. The paper closes with a bibliography of the sources drawn upon throughout.

THEORETICAL FRAMEWORK AND LITERATURE REVIEW

My research is guided by three intermingling frameworks: policy transfer and learning theory, which structures the comparative methodology; food sovereignty theory, which I use as a standard to evaluate both programs; and a decolonial critique of extractive knowledge transfer, drawn from Rivera Cusicanqui (2012), which I hold throughout as a check against the comparative method itself. Together these frameworks answer three questions that inform this research: how can Canada learn from Brazil's experience, what should a strong and equitable national school food program look like, and how can that learning happen without reproducing the very extractive dynamics this research is trying to move away from?

Policy transfer theory examines the processes by which knowledge about policies, administrative arrangements, institutions, and ideas in one political setting is used in the development of policies in another (Dolowitz and Marsh, 2000). Rose (1991) further refines this through the concept of *lesson-drawing* – an evidence-based process in which policymakers and advocates study how a program functions elsewhere and extract principles that might get adapted – rather than simply copied – to suit their own context. The differences between transfer and lesson drawing are important – my research does not position Brazil’s PNAE as a blueprint to be

duplicated in Canada, but instead as a longstanding robust program from which transferable design principles can be identified and critically assessed.

Policy learning theory looks at *who* drives the learning process. In my research, the agents of potential policy learning aren't only government officials but also civil society actors, advocates, dietitians, educators and researchers, who are engaged in the groundwork of Canada's NSFP. The interviews conducted with these participants are central to the comparative analysis, as they reveal what food advocates in Canada already know about international models, what they believe to be gaps in the NSFP as it stands today, and what they believe to be structural changes that are possible. This places my research within what Benson and Jordan (2011) describe as a bottom-up model of policy learning in which knowledge circulates through advocacy networks and civil society coalitions, not just through formal government structures.

My research applies policy transfer theory in what I hope is a unique direction. The dominant narrative in policy diffusion literature has been to directly transfer between "Global North" countries to those of the "Global South" – this treats Northern frameworks as default and programs of the Global South as recipients of "expertise". My research attempts to change this assumption. Brazil's PNAE, as a decades-long, rights-based, universally accessible program embedded in broader social protection infrastructure is positioned here as the more informed and instructive model. Canada however, despite economic resources here, has the emerging program with a great deal to learn. This South-to-North framing is a deliberate methodological choice consistent with growing amounts of literature that challenges such knowledge transfers in comparative policy research (Peck & Theodore, 2010).

The third framework operates differently from the other two. Policy transfer theory structures how the comparison is built, and food sovereignty theory supplies the normative standard against which both programs are judged; but Rivera Cusicanqui's (2012) critique of extractive knowledge transfer is not a standard applied to Brazil or Canada. It is a check applied to me, and to the comparative method itself, throughout the research process.

Food Sovereignty as Evaluative Framework

While policy transfer theory looks at how this research compares the two programs, food sovereignty frameworks provide the normative lens through which both of them are evaluated. Food sovereignty, as described by La Vía Campesina and further articulated by scholars including Wittman, Desmarais, and Wiebe (2010), holds that communities have the right to define their own food systems – including what is grown, how the food is produced, who controls the food, and how it gets distributed – in ways that are sustainable ecologically, culturally meaningful and democratically governed.

Applied to national school food policy, food sovereignty shifts the conversation from arguably cold and narrow nutrition metrics to broader questions like: Does the program support local and smaller-scale agriculture? Does the program consider culturally-appropriate and traditionally relevant foods? Are communities, such as Indigenous, racialized, and rural communities – involved in meaningful engagement with the NSFP's design? Is the NSFP embedded in a rights-based legal framework that protects it from political shifts? From a food sovereignty perspective, these questions are indicative of what a just program for school meals looks like.

This applied framework is especially important given the current Canadian context. As described by Coté (2016), Indigenous food sovereignty in Canada requires not just access to food but the revitalization of Indigenous food practices, ecological knowledge, and self-determination over land and food systems. A school food program that doesn't closely engage with these perspectives risks reproducing (not challenging) colonial food structures. And so food sovereignty frameworks demand that Canada's NSFP be assessed by how and by whom it is ultimately governed.

Brazil's PNAE is not perfect, however it demonstrates how food sovereignty principles can be institutionalized within a national school meal program: through legally mandated procurement from family farmers, community-level participation in menu planning via School Feeding Councils, or *CAE*s, specific protections and considerations for Indigenous and *Quilombola* food cultures, and integration with broader social protection programs like *Bolsa Família*. These elements make PNAE a productive model, because it has made food sovereignty its priority and its shortcomings demonstrate lessons as well.

Policy transfer theory and food sovereignty theory create an intersectional approach for structuring my research. Policy transfer poses: what has Brazil built, what's worked, what has been difficult, and what principles are possibilities for the Canadian context? Food sovereignty theory asks: do these principles reflect a vision of food justice that amplifies community control, cultural relevance, local agriculture initiatives, and democratic governance? This further drives the analysis of my research.

Canada's National School Food Program (NSFP)

School meal efforts in Canada prior to the announcement of the National School Food Program were largely decentralized, inconsistently funded, and reliant on provincial, municipal, or charitable structures rather than coordinated federal investment. As Ruetz & McKenna (2021) describe, most programs operated at the local level and depended heavily on voluntary contributions, parental labour, and NGO support. Scholars document meaningful benefits of these existing programs – including improved concentration, reduced food insecurity among participants, and enhanced social belonging – yet they have traditionally operated with limited budgets and narrow reach (Feldman et al., 2018; Hernandez et al., 2018). The absence of a national framework meant that access to school food varied enormously depending on where a child lived, creating significant inequities across provinces, territories, and communities.

Framing the NSFP as a novel federal intervention, however, risks obscuring a longer and more radical history of community-led school feeding. Formal, state-administered school meal programs are often traced to nineteenth-century Europe, yet this framing leaves out a more instructive precedent much closer to Canada's own political moment: the Black Panther Party's Free Breakfast for School Children Program, launched in Oakland in January 1969, which fed thousands of children daily through community-run, mutual-aid infrastructure rather than government provision (Lateef & Androff, 2017). Within a year the program had spread to dozens of chapters nationwide, and its success is widely credited with pressuring the U.S. federal government to expand its own school breakfast provisions - a reminder that the state has historically followed, rather than led, community practices of feeding children (Lateef & Androff, 2017). The newly announced National School Food Program represents an unprecedented shift toward coordinated federal involvement in school food. Its recent move to

permanence under Prime Minister Mark Carney signals a growing institutional commitment to school food as public infrastructure (Prime Minister of Canada, 2025), with planned commitments to culturally appropriate foods and partnerships with provincial, territorial, municipal, and Indigenous partners (Liberal Party of Canada, 2021).

A key dimension of the Canadian context is the significant civil society mobilization that shaped the creation of this policy. The *Coalition for Healthy School Food* – Canada's largest school food advocacy network, comprising over 380 non-profit member organizations across every province and territory - unite educators, health professionals, farmers, Indigenous leaders, and national NGOs around the goal of a universal, fully funded school food program (Healthy School Food, n.d.). Their collective efforts across government relations, pre-budget submissions, as well as evidence-based advocacy helped to motivate the federal government to finally announce the NSFP. These advocacy efforts were grounded in overwhelming evidence of decreasing food security in marginalized communities: a 2023 Statistics Canada report reveals that Black Canadians experienced the highest rate of food insecurity that year, with almost 38% of the population reporting food insecurity (Statistics Canada, 2023), highlighting the urgency to work towards policy and program interventions that reach the most vulnerable communities. Food insecurity is even more dire for Indigenous communities in the North and on reserve – First Nations people living on-reserve are more than twice as likely to experience household food insecurity as the general population, a gap national surveys don't capture since they exclude on-reserve and territorial populations entirely (Batal et al., 2021; Alternative Federal Budget Project/AFB Working Group, 2023). In the territories, nearly half of Nunavut's population lives in a food-secure household, alongside roughly one in four in the Northwest Territories (Alternative Federal Budget Project/AFB Working Group, 2023).

Despite the momentum represented by the NSFP's announcement, Canadian school food researchers have identified significant structural challenges that will need to be addressed as the program develops. Scholars emphasize that Canadian programs still lack the comprehensive legal and institutional frameworks that are necessary to ensure consistent delivery, equitable access, and long-term program sustainability (Ruetz & McKenna, 2021; Feldman et al., 2018). Key questions remain about governance structures, the degree to which the program will be universal in practice, how culturally relevant and locally sourced meals will be guaranteed, and what mechanisms will help to ensure equity across each unique region in the nation. Notably,

PROOF's 2025 report *From Evidence to Accountability* further outlines the need for interventions that can substantively reduce food insecurity (PROOF, 2025).

Questions about infrastructure are also urgent. Because food in Canada has been historically framed as a private, domestic matter – with the burden placed disproportionately on mothers and families – school food infrastructure is usually underdeveloped or absent at the school level. Building the physical and institutional capacities to deliver meals at large scales presents foundational challenges. In addition, Canada's federal structure means that the NSFP must navigate relationships with provincial and territorial governments, each of which holds jurisdiction over education, adding complexity to implementing the program nationally.

These challenges make Canada's emerging NSFP a critical site of policy inquiry. They also show why more established international models of school food policy, especially ones that have grappled with issues of universality, local procurement, cultural relevance, political longevity and more – may offer meaningful comparative lessons for both Canadian policymakers and advocates working on shaping the NSFP program's design.

A closer look at the policy's actual structure reveals just how much of the NSFP's implementation is still being negotiated rather than settled. The federal government's own school food policy report frames the NSFP's core commitments in fairly broad terms – supporting access to food in schools; prioritizing culturally appropriate options, and encouraging Canadian-grown or Canadian-produced food – but leaves out the specifics of delivery to bilateral agreements negotiated individually with each province and territory (Canada.ca, 2024). This matters since it means the NSFP isn't so much a single national program as it is thirteen separate provincial rollouts loosely coordinated under a shared federal umbrella. Employment and Social Development Canada's *Opportunity for All* Framework situates school food within a broader poverty reduction structure (Employment and Social Development Canada, 2022), but the connection between that framework and the daily logistics of who gets fed, how often, and through what funding formula remains unclear.

The unevenness of provincial buy-in illustrates this well: Saskatchewan was among the last provinces to sign, and even after signing, reporting has flagged the province as at risk of losing millions of dollars in committed school food funding over implementation disputes (Spray, 2025; Engler-Stringer, 2025). This is an example of the kind of political fragility that

participants in this study's interviews would later name as one of their central concerns about the program's design. A national program that can lose funding in a single province over a jurisdictional disagreement is not yet the kind of program that can always be relied upon.

Public appetite for a stronger program doesn't appear to be the limiting factor, as polling commissioned by the Breakfast Club of Canada found that a large majority of Canadians wanted a national school nutrition program implemented as quickly as possible (Breakfast Club of Canada, 2023), suggesting that the gap here is one of political will rather than public demand. Comparative research reinforced urgency – Hock et al. (2022) found that Canada has historically lagged behind most peer OECD nations in offering any kind of coordinated school food program, arriving late to a policy area where other wealthy countries have operated mature systems for decades. Ruetz et al. (2024) further make the economic case, arguing that the returns on investment in school meal programs – through improved health outcomes, educational performance and more – considerably outweigh the costs of delivery, a point that re-frames school food less as a compassionate add-on and more as sound public investment.

The existing evidence base also points to who is currently being missed. Tugault-Lafleur and Black (2022) found that children living in food-insecure households were twice as likely to go without lunch on school days as their food-secure peers, with older children also at greater risk, prior to the NSFP's rollout. Notably, the study found no significant differences by parental income, education, or racial/ethnic background, suggesting that missing lunch cuts across demographic lines even as food insecurity remains the clearest predictor. This overlaps closely with the populations already flagged throughout this section as facing the greatest barriers to school food access, which a truly universal program would need to prioritize reaching. Whether the NSFP, as currently structured through its patchwork of bilateral agreements, is positioned to close that gap remains a question – perhaps drawing public criticism from opposition while it moves toward permanence (Marcelo, 2024; Hutcheson, 2024; Geddes, 2024).

Brazil's *Programa Nacional de Alimentação Escolar* (PNAE)

Brazil's P*rograma Nacional de Alimentação Escolar* (PNAE) is internationally recognized for its comprehensive, rights-based approach to free school meals. Silva et al. (2025) find that the nutritional quality of foods procured for PNAE meals improved substantially in the

years following the pandemic, with a marked increase in natural and minimally processed foods and a corresponding drop in ultra-processed items. Extending from kindergarten through high school, PNAE's universal coverage ensures that all students in public schools receive free and nutritious meals daily. This long-standing, nationalized model stands in stark contrast to Canada's previously fragmented approach to school food (Ruetz & McKenna, 2021) and offers a mature system from which Canada can learn as it builds its own.

A defining feature of PNAE is its integration with local agriculture. Recine (2017) and Ipolito et al. (2025) highlight that under Law no. 11.947/2009, at least 30 percent of food purchased for school meals must come from family farmers, which has now been updated to 45 percent (Mascarenhas, 2026). This requirement strengthens regional economies, supports small-scale producers, and ensures schools serve fresh, minimally processed foods. These institutionalized procurement mechanisms offer important insights for Canada, where discussions about strengthening local food networks often lack structured policy frameworks to guarantee stable demand.

This gap has not gone unnoticed among advocates. Prime Minister Carney's June 2026 National Food Security Strategy (Agriculture and Agri-Food Canada, 2026), while investing over $3 billion in food terminals, processing capacity, and grocery competition, stopped short of attaching any procurement mandate to the National School Food Program itself – a gap that food policy analysts had flagged prior to the announcement, as they had called for public procurement policies that prioritize regional sourcing for the NSFP specifically (Edge & Regnier-Davies, 2026). It remains to be seen whether this strategy will be extended into a structured procurement level for school food, or whether it will remain focused on retail competition and export capacity rather than institutional demand.

Brazil's School Food Programming: PNAE and Food Sovereignty

PNAE also plays a key role in advancing food sovereignty. Brazilian scholars document how the program supports family farming and ancestral agricultural practices in Indigenous and *Quilombola* communities (Affonso et al., 2025), themes increasingly central to Canadian food policy debates related to reconciliation, Indigenous food systems, and sustainable supply chains. Affonso et al. further show how PNAE's procurement practices empower women in agriculture,

promote agrobiodiversity, and enhance autonomy in rural communities. While agroecology is only partially institutionalized in PNAE's legal framework, Antunes et al. (2025) note that municipalities frequently use the program to strengthen sustainable food systems – demonstrating how institutional meal programs can facilitate policy transformation.

Nutritional impacts are well documented. Menezes et al. (2024) show that emphasizing fresh, plant-based foods and limiting highly processed items leads to improved physical nutrition, including reduced LDL cholesterol. PNAE participation is also associated with lower food insecurity among households with school-aged children (de Amorim et al., 2022). These findings offer valuable lessons for Canada, where PROOF's 2025 report From Evidence to Accountability highlights the need for interventions that measurably reduce food insecurity.

Governmental structures play a central role in PNAE's success. Legislation requires municipalities to employ trained nutritionists who plan menus, oversee procurement, and ensure adherence to dietary guidelines. This system limits processed foods and supports culturally relevant meals that reflect regional culinary traditions (de Paiva et al., 2016). These institutional arrangements contrast with the varied implementation capacity across Canadian jurisdictions and highlight governance practices that could support consistency and quality in Canada's developing program.

The COVID-19 pandemic further demonstrated the resilience of PNAE's institutional infrastructure. Rabello et al. (2025) found that school closures temporarily increased food insecurity for students reliant on daily meals, yet Rabello et al. (2025) show that municipal networks and procurement relationships enabled rapid adaptation through food baskets and take-home rations. These experiences point to the importance of stable funding and coordinated planning – insights relevant to Canada as it designs a program capable of withstanding future disruptions.

Educational benefits also emerge from PNAE's broader impacts. Marinho et al. (2025) found that increased school funding through PNAE in Ceará correlates with improved student performance in Portuguese and mathematics. However, they note that funding must be accompanied by investments in infrastructure, nutrition education, and community engagement. Recine (2017) similarly emphasizes that school meal programs are most effective when integrated within broader social policy frameworks.

Brazil's PNAE is rights-based at its core and operates on two levels. At the program level, the law that created PNAE, Law 11.947/2009, states that school meals are "a right of students in public basic education and a duty of the State" (Art. 3), which is written into the statute itself. On a broader level, the 2006 *Lei Orgânica de Segurança Alimentar e Nutricional* (LOSAN) (Brasil, 2006), which established Brazil's food and nutrition security system around the human right to adequate food, and the 2010 constitutional amendment that added food to Brazil's list of constitutionally protected social rights (Brasil, 2010).

PNAE is certainly not without challenges. Bicalho et al. (2021) find that existing tools for evaluating PNAE's management quality are themselves methodologically weak and inconsistently validated, limiting how well quality can even be measured across municipalities, while Affonso et al. (2025) highlight shortcomings in serving Indigenous, *Quilombola*, and forest-region communities. Antunes et al. (2025) note that agroecology remains unevenly implemented. Budget cuts after 2016 weakened supporting programs like the Food Acquisition Program (PAA), although the PAA was reinstated in 2023 under President Lula (Vilela, 2023). Even with such challenges, Brazil remains one of the only countries with a universal school meal system legally protected and deeply integrated across health, agriculture, and education sectors - making it a particularly valuable comparator for Canada.

Comparative Analysis from International Contexts: Lessons for Canada's NSFP from Brazil's PNAE

Viewed through the lens of policy transfer and food sovereignty frameworks, comparing Canada's developing National School Food Program alongside Brazil's *Programa Nacional de Alimentação Escolar* raises several questions of how national school food policies can be designed and sustained in ways that meaningfully advance food justice.

A key part of analyzing universal school lunch programs is looking at their long-term equity and stability. PNAE has historically been grounded in a universal, rights-based framework (as discussed in the section 3.2) supported by federal legislation, while Canada's NSFP is still in its early stages and has not yet established equivalent legal or structural guarantees. This contrast raises broader questions about the extent to which national programs require statutory protections and universal access to prevent fragmentation, ensure continuity, and avoid inequities from

region to region. Notably, PNAE's durability cannot be isolated from the broader social policy in which it is embedded. Launched as a part of President Lula's Zero Hunger strategy in 2003, PNAE operated alongside *Bolsa Família* – Brazil's conditional cash transfer program – *Bolsa Família* addressed institutional food access in schools (Wong et al., 2021; Rocha, 2009). This presents a systemic approach to food insecurity – a meaningful example when coming back to the PROOF report (2025) that explicitly cautions that a school food program on its own will not resolve household food insecurity without parallel income-based interventions.

Another foundational question relates to the role of community participation. PNAE emphasizes participatory governance, including local councils, school-level input, and community engagement in menu planning and food procurement. Canada's NSFP, by contrast, operates within a more decentralized landscape shaped by provincial and territorial mandates. This difference invites inquiry into how community voices can (or should) be embedded within national frameworks, and what models of local decision-making best balance consistency with cultural and regional autonomy. Research on Brazil's broader social protection programs reinforces this point: studies of *Bolsa Família*'s implementation find that municipalities with active local policy councils – where citizens hold genuine authority over program priorities and budgets – consistently reach more robust social program outcomes than those without such structures in place (Wong et al., 2021).

The programs also prompt questions about the integration of school food policy with local and sustainable agriculture. Brazil's legally mandated requirement, now at least 45% of food purchases from family farmers (Mascarenhas, 2026), highlights a structural linkage between school food, rural livelihoods, and local economies. Ipolito et al. (2025) find that this mandate has a measurable positive effect on family-farm revenue, providing participating farmers with a stable and predictable income stream - though the strength of this effect varies considerably across Brazil's regions. For Canada, where agricultural policies and food systems vary significantly across provinces and territories, this raises questions around feasibility, regional variation, and the potential benefits and challenges of connecting national school meal provision with local agricultural development.

Questions also emerge around cultural relevance and food sovereignty. PNAE includes explicit mechanisms to incorporate regional and traditional food cultures, and it aims to support

Indigenous and *Quilombola* communities within its nutritional and educational framework. Canada's NSFP faces similar considerations related to Indigenous food sovereignty, cultural diversity, and the need for culturally relevant meals across a geographically vast and highly diverse population. This comparison raises broader questions about how national school food programs can meaningfully integrate cultural and community-specific approaches while maintaining overarching policy coherence. Brazil's experience reaching geographically remote and socially marginalized communities -- including Indigenous and *Quilombola* communities and rural peoples living far from city cores – by using outreach and mobile service delivery is relevant for Canada's challenge of achieving equitable program reach in remote, rural and Indigenous communities (Wong et al., 2021; Affonso et al., 2025).

Finally, an overarching set of questions concern political continuity, institutional resilience, and the vulnerability of national programs to shifting political agendas. PNAE has endured for decades but has also experienced periods of contestation, budget pressures, and political re-alignments. *Bolsa Família 's* own complex political history – re-structured under President Bolsonaro and re-instated by President Lula in 2023 – further illustrates how even well-established and widely supported social programs in Brazil can remain vulnerable to political change (Wong et al., 2021; Rocha, 2009; Vilela, 2023). Canada's emerging NSFP, as a new framework, faces similar questions about how national school food policies can be made resilient to political change, fiscal constraints, and competing public priorities over time.

It is worth pausing on the difference between naming a policy tension and mining it for a solution. Rivera Cusicanqui's (2012) critique of how ideas from the Global South are extracted and depoliticized as they travel north is a useful point of tension here. The questions raised throughout this section are openings that require Canada to deal with the political conditions that produced them. Together, these questions illuminate a shared landscape of policy considerations that arise when examining national school food programs in different contexts. They point to broader themes – universality, governance, community participation, cultural relevance, procurement, equity, and political sustainability – that shape how school food systems are envisioned and implemented. These themes provide a conceptual foundation for understanding where Canada's NSFP and Brazil's PNAE illuminate one another and generate opportunities for deeper reflection on the design of equitable and resilient national school meal policies.

Thematic Synthesis: Framework for Comparative Analysis

The literature presented so far points to a set of recurring tensions and questions that neither the Canadian nor the Brazilian context fully resolves – but that both illuminate in distinct ways. They overlap and contradict each other at times but do form a sort of shared terrain that makes the Canada-Brazil comparison meaningful.

A foundational tension surrounds what universality actually means in practice. PNAE is framed as a universal entitlement: every student in public school receives a free meal, and this grounding matters hugely for how the program has survived political shifts over decades (Recine, 2017; Silva et al., 2025). Canada's NSFP hasn't made an equivalent commitment as of yet, and it remains somewhat unclear so early on how "universal" the program will be in practice once it moves through provincial and territorial jurisdictions in education (Blais et al., 2025). From a food sovereignty lens, what's central is that universality is a question of justice. A program that reaches some kids but not others (depending on where they may live or what province their government happens to be) isn't a rights-based approach, but patch-work.

Related is the question of governance – who holds authority over these programs and who is held accountable when things go wrong. PNAE's layered governing structure, with nutritionists employed at the municipal level and community oversight through School Feeding Councils (CAEs), has created real mechanisms of accountability, even if implementation is uneven across municipalities (Silva et al., 2025; de Paiva et al., 2016). Canada's decentralized structure makes this less structured. It should be highlighted that education is a provincial jurisdiction, which means federal program commitments have to travel through many hands before they reach a physical school cafeteria – or, in many cases, a gym with folding tables – since school food infrastructure barely exists in much of the country (Haines & Ruetz, 2020; Feldman et al., 2018). The governance question is not just about bureaucratic efficiency. Central to governance should be about whether or not there are solid structures in place to ensure that the program serves the communities it's supposed to serve, especially populations that are systematically left out.

The question of procurement is one of the most conducive parts of this Brazil comparison. PNAE's legal requirement that at least 45% of food purchases come from family farmers (Mascarenhas, 2026) - with priority for agroecological producers - is the sort of policy

mechanism that does several things at once: keeping money circulating in local economics, supporting smaller-scale producers who may otherwise be pushed out by industrial suppliers, and, as Ipolito et al. (2025) find, generating a measurable and stable revenue effect for participating family farms. In Canada, there is certainly movement and enthusiasm in the advocacy community for local procurement, however enthusiasm doesn't equate to legal mandate. Without structural guarantees, local sourcing gets stuck as aspirational, depending too heavily on individual school administrators, available budgets, and any relationships that happen to exist in a given community. A food sovereignty framework is useful here because it insists on asking whose food system a program is supporting, and whether the institutional design reflects this commitment or solely gestures towards it.

Cultural relevance or appropriateness is a theme across both contexts, but carries different weight depending on who is asked and what community you are referring to. Brazil's PNAE has explicit provisions for culturally relevant menus, and ongoing scholarly revisions to how well, or poorly, such provisions actually reach Indigenous and *Quilombola* communities in practice (Affonso et al., 2025). In Canada, the cultural relevance conversation is inseparable from questions of Indigenous food sovereignty, which cannot be reduced to only menu planning. Coté (2016) and Settee and Shukla (2020) are clear that Indigenous Food Sovereignty is about land, about traditional ecological knowledge, about the right to determine what is grown and eaten and by whom – not just about adding bannock to a school lunch menu. It's also a question of governance and jurisdiction: without Indigenous nations holding real authority over land, food systems, and decision-making structures that shape what ends up on a school plate, cultural relevance risks being reduced to simply a menu-planning exercise. A candid assessment of Canada's NSFP should engage with this, including ways in which a well-meaning national program can still reproduce colonial logics if not designed with genuine care at its core.

The question of participation is related. Both contexts point to the difference between programs that consult communities and programs that are actually governed by them. PNAE's School Feeding Councils are an imperfect but meaningful example of the latter – spaces where members of the community hold genuine authority, not just as advisory roles (Wong et al., 2021). Research on *Bolsa Família* makes a similar point: municipalities with active local policy councils where citizens genuinely shape the priorities within programs consistently outperform those without such structures (Wong et al., 2021). Canada's NSFP, in its current form, doesn't

have equivalent mechanisms. The Coalition for Healthy School Food has been enormously effective as a force of advocacy, but advocacy has to tie in with governance. The question of who gets to make decisions, not just who gets to weigh in, matters for whether or not a program ends up serving the communities it is designed to serve.

Equity is possibly a gap where stated intentions and lived realities is most visible in both contexts. PNAE's universal mandate hasn't prevented significant disparities in program quality and reach, particularly for Indigenous, *Quilombola*, and remote communities (Affonso et al., 2025; Bicalho et al., 2021). In Canada, the data is alarming: nearly 38% of Black Canadians reported food insecurity in 2023, the highest rate of any population group (Statistics Canada, 2023). A national program that doesn't actively account for these realities may treat equity as an add-on rather than a starting point and may reproduce the same hierarchies it claims to address. Both the literature and the interview data gathered for this research suggest that this is an urgent design challenge facing the NSFP.

There's also a question of political durability, an easy part to overlook when a program is newly announced, and momentum is high. PNAE has survived decades of political turbulence in Brazil, including the years under Bolsonaro and the gutting of complementary programs like the PAA (Brazil Food Acquisition Program), although not without real damage (Vilela, 2023; Wong et al., 2021). Canada's NSFP is operating under today's own unique political moment, with sometimes provincial reluctance, federal opposition criticisms, and sometimes uncertainty about long-term funding promises (Marcelo, 2024). The lesson from Brazil isn't that legal enshrinement "solves" everything, as it clearly does not, but that programs with statutory foundations and broader civil society investments are much harder to dismantle than those that depend on political goodwill. This is worth sitting with as Canada's program takes shape.

The aforementioned themes are a set of live tensions that run within each school meal program and that this paper does its best to take seriously. The tensions structure the interview analysis and the cross-analysis in the following sections, ultimately informing the policy recommendations at the end of this paper. The driving point is to use the comparison to ask harder questions about what a genuinely just national school food program would require, and whether or not Canada's current trajectory is headed there, rather than finding where Brazil gets it "right" and where Canada gets it "wrong".

RESEARCH DESIGN AND METHODOLOGY

My research design employs a qualitative methods approach to investigate what Canadian policymakers and advocates could learn from Brazil's PNAE to develop a strong, equitable, and community-informed National School Food Policy Program, and to strengthen Canada's advocacy efforts. My approach explores how values such as strengthening food sovereignty, boosting local agriculture, and cultural relevance can be engrained into multiple facets of the National School Food Policy in Canada. This chapter presents the semi-structured interviews conducted with key food informants across Canada, which build on the literature review and policy analysis presented in Chapter Two.

These methods give space to both perspectives from key literature and on-the-ground expert perspectives. My hope is that this provides a multi-faceted understanding of Global South-Global North lessons in food policy – considering contextual differences and potential futures for a strong Canadian school meal program. I synthesize this information into areas suitable for the purpose of this paper.

Especially important to my research design was the inclusion of individuals from racialized backgrounds, as I wanted to bring diverse perspectives that may otherwise be excluded from conversations surrounding food policy – within the pool of participants, my hope was to amplify these voices. Of the nine participants interviewed, eight identify as women and one as a man, which reflects broader patterns of gendered labour within the school food movement and related advocacy in Canada and beyond. Two of the participants – Asma Musa, and Anonymous Participant X – are racialized women, bringing perspectives that are frequently underrepresented in mainstream food policy discourse. One participant is an immigrant woman from Brazil, Cecilia Rocha. My inclusion of racialized and immigrant participants was a deliberate methodological choice for this research's commitment to centre otherwise excluded voices. Asma Musa's work with the Black School Food Working Group and her doctoral research on the impact of school food programs on Black children and youth for example brings dimensions that this research finds imperative amongst samples composed of many white Canadian practitioners.

The remaining five women participants – Debbie Field, Stef Foster, Clara Birnie, Maxine Meadows, and Ashley Byrne – represent a range of institutional roles and levels of engagement with the NSFP, from national Coalition leadership to provincial dietetics practice to community-

based consulting. Brent Mansfield, the only male participant in this study, contributes an important school-level educator perspective that is not always found among food policy advocates, bringing in a grounded perspective in day-to-day, on-the-ground program delivery from a multicultural Vancouver school.

All participants are advocates for a strengthened and more equitable National School Food Program, and each brings experience navigating the program's early implementation within their respective regions. Their professional careers span direct school-level program delivery, provincial coordination, national coalition building, and international comparative research.

It should be noted that the majority of participants are affiliated with the Coalition for Healthy School Food, which reflects both the Coalition's central role in shaping Canada's school food landscape and the deliberate decision to centre voices that have been very closely engaged in the program's development. This concentration is acknowledged as a potential limitation of the sample.

This study employs semi-structured interviews as its primary method of data collection. This approach was selected for its capacity to elicit in-depth, experience-based perspectives while allowing the conversation to follow threads specific to each participant's area of expertise. The participants in this study were given the option to be identified or remain anonymous when completing the required consent for research participation (one chose to remain anonymous).

Interview questions were organized around three interrelated areas of inquiry: participants' assessments of the current strengths and shortcomings of Canada's NSFP in its early stages; their familiarity with and perspectives on Brazil's *Programa Nacional de Alimentação Escolar* (PNAE) as a long-standing model of national school food policy; and their views on the degree to which lessons from the Brazilian context might be meaningfully applied to the Canadian one.

Rather than positioning Brazil as a prescriptive template, interviews were designed to open a comparative dialogue – inviting participants to reflect critically on what structural, governance, and community-based elements of the PNAE could inform Canada's evolving approach, and also considering where policies require careful adaptation.

Data collected from the semi-structured interviews was analyzed using thematic analysis, a qualitative method used for identifying patterns across multiple participants' perspectives. Interview recordings were transcribed and imported into *Taguette*, an open-source qualitative data analysis platform, where they were coded systematically across all transcripts.

The resulting thematic framework organized participant responses around major themes, such as funding structures and sustainability, governance and accountability, equity and universality, cultural relevance, local procurement, community participation, food literacy, and political stability. These themes served as the analytical framework through which the Canadian and Brazilian contexts were placed in dialogue with one another, allowing for a structured comparative analysis to navigate the empirical findings from interviews and the broader literature reviewed in my study.

Following the coding process, synthesized findings were used to find recommendations for strengthening Canada's National School Food Program. These recommendations are grounded in the qualitative evidence gathered from participants – people with direct, on-the-ground experience in Canada's school food landscape – and are informed by the comparative insights drawn from Brazil's PNAE. The analysis identifies transferable lessons and acknowledges the contextual adaptations that this kind of comparison study requires.

Interview Questions

Listed below are the interview questions I posed to each of the nine participants:

1. From your perspective, what are the most important elements of an effective national school food program?

2. How would you describe the current strengths and weaknesses of Canada’s National School Food Program (NSFP), particularly in its early stages?

3. In your view, what gaps or challenges remain in achieving an equitable, culturally relevant, or community-based school food program in Canada?

4. How familiar are you with Brazil’s PNAE? What aspects of the program - such as community involvement, public procurement, or cultural food practices - stand out to you?

5. Brazil’s PNAE mandates purchasing from local and family farms. Do you think Canada could be inspired by this approach, and what barriers might exist to adopting something similar here?

6. Community participation is a key feature of PNAE. In what ways could Canadian communities be more meaningfully involved in shaping the NSFP, in your view?

7. Brazil's PNAE has faced challenges related to regional inequities and political shifts, such as threats to funding for their PNAE. What political parallels, if any, do you see in Canada? What strategies might help ensure long-term stability for the NSFP?

8. How important do you think cultural relevance is in shaping school food policy, and what would it look like for Canada to better reflect diverse food traditions in school meals?

9. Where do you see the greatest opportunities for policy innovation or improvement in Canada's school food program over the next decade or so?

10. If Canada were to adopt or adapt lessons from Brazil's PNAE, which elements do you believe would be most transferable - and which would require careful contextual adaptation?

Table 1: Table of Participants and Affiliations

Initials	Name	Date of Interview	Role/Affiliation
CR	Cecilia Rocha	Feb 26, 2026	Professor Emerita, School of Nutrition, Toronto Metropolitan University; Brazil PNAE expert
SF	Stef Foster	Mar 6, 2026	Researcher, University of Saskatchewan; former teacher and School Principal
BM	Brent Mansfield	Mar 19, 2026	Teacher (Vancouver); LunchLAB; Coalition for Healthy School Food
DF	Debbie Field	Mar 20, 2026	National Director, Coalition for Healthy School Food
CB	Clara Birnie	Mar 25, 2026 (Joint Interview)	Dietitian and Co-Lead, Child Nutrition Council of Manitoba
MM	Maxine Meadows	Mar 25, 2026 (Joint Interview)	Dietitian and Co-Lead, Child Nutrition Council of Manitoba
AM	Asma Musa	Mar 30, 2026	Registered Dietitian, PhD student at University of Toronto, and Black School Food Working Group Coordinator

AB	Ashley Byrne	Mar 31, 2026	School food lead, Food First NL; Coalition for Healthy School Food
X	Anonymous Participant X	May 8, 2026	Academic researcher and food work-related affiliations

Comparative Analytical Frameworks

The comparative analytical framework employed in this study draws on the theoretical foundations established in Chapter Two. Policy transfer and lesson-drawing theory (Dolowitz & Marsh, 2000; Rose, 1991) guides the structure of this international comparison, framing Brazil's PNAE not as a perspective template but as a source of transferable design principles that have to be critically assessed for applicability to the Canadian context. Food sovereignty theory (Wittman et al., 2010; Holt-Giménez et al., 2012; Coté, 2016) provides the standard against which both programs are evaluated. Interview questions were designed around key principles like governance, local agriculture, funding sustainability and equity – all central to both frameworks. When analyzing the data, similar themes or codes were organized in order to place the contents from the interviews in conversation with the literature and the evaluative framework.

Transcripts were analyzed using thematic analysis in Taguette qualitative data analysis software. Eight major themes were drawn across the interviews. Each theme is presented in the following discussion with more details drawn from participants' interviews.

The interview data presented in the previous chapter do not exist in a vacuum. This information emerges from this particular moment in Canadian food policy history, one that is characterized by cautious institutional optimism and significant structural uncertainty. This is best understood when read against the broader comparative and theoretical context this paper has attempted to establish. Together, many themes brought up by many participants interviewed point to direct conclusions: that Canada's NSFP as is currently being designed reflects a politics of aspiration more than a politics of obligations that the structural innovations most clearly demonstrated by Brazil's PNAE remain largely absent from the Canadian framework – and, that meaningful progress will not only require more funding, but a substantively different set of

institutional commitments. The following remarks move through this argument, attempting to weave together the points brought from interviews with what is drawn from literature.

MOVING FROM POLITICS OF ASPIRATION TO POLITICS OF OBLIGATION

Funding Matters

Participants across all nine interviews raised concerns about whether or not existing federal funding is adequate to sustain a meaningful universal program. The federal commitment of $1 billion over five years was widely seen as a starting point rather than a sufficient investment, and significant variation in per-student provincial spending was raised as a serious concern regarding equity.

Stef Foster was direct on this point: "*Even a billion dollars over five years is not enough to feed every kid – it's not even near enough*." Brent Mansfield illustrated the magnitude of provincial disparities by pointing to British Columbia's funding structure: "*In BC, $71 million comes from the province and $13 million comes from the feds — most people don't know that*." This imbalance, he argued, shows how uneven the program's costs are being distributed, with some provinces carrying far more than others and with no concrete guarantee that this gap will be addressed.

Beyond food costs, several of the participants stressed that funding has to cover the human infrastructure required to run school meal programming. As Foster observed, "*Food is a major expense and staffing is a major expense – and we have created a situation where schools don't have kitchens*." This absence of physical and human infrastructure was raised as a fundamental barrier by participants across regions, pointing to the broader structural under-investment in school food in Canada's history.

Asma Musa articulated the dual purpose of the Pay-What-You-Can (PWYC) model – a mechanism adopted in several programs – as both a tool for destigmatizing and for financial sustainability: "*PWYC is truly for two main reasons: to de-stigmatize school food access, and to ensure it is a sustainable financing model.*" Conversely, participants including Foster and Debbie

Field were clear that PWYC should be understood as a transitional step toward universal, free provision, not as an end in itself.

Participants across all interviews returned to a common basic concern, that the federal commitment of $1 billion over five years is insufficient for a genuinely universal program. Critiques that came about from interviews with the participants (besides calling for a larger amount of funding), pointed out that in Canadian history, there has been an overall absence of any expectation that schools should feed children. Stef Foster's observation regarding schools not having kitchens is not simply a complaint about logistics. This calls out the reality that food in Canada has historically been constructed as a private and domestic concern with the burden placed on families and disproportionately on mothers – rather than a public responsibility (Mosby, 2014). The NSFP is attempting to build a national program on top of an infrastructure that was never actually built.

PNAE's financial logistics looks different because it developed over many decades within a broader set of social protections. Brazil's Zero Hunger strategy, which gave PNAE its renewed institutional basis in the early 2000s, treated school meals as one component of a larger rights-based approach to food security that included income support through *Bolsa Família*, procurement support through the PAA, and constitutionally embedded protections for nutrition as a social right (Wong et al., 2021; Rocha, 2009). PROOF's report (2024) cautions that a school food program alone will not resolve household food insecurity, and in parallel, one cannot separate feeding children at school from the material conditions of their families. A program that doesn't engage with this reality, however well-funded, will always be only doing partial work. Good language in a policy document does not protect against the pressures that emerge when implementation hits financial realities.

Governance, Accountability, and Policy Implementation

A recurring theme across interviews is the gap between federal policy aspirations and what is actually happening at the provincial, school district and school levels. Participants identified the absence of standardized monitoring and evaluation, unclear communication chains, and weak accountability mechanisms as the most urgent structural challenges in the program's current design.

Brent Mansfield captured the underlying concern: "*We can have the perfect policy, but unless it makes it down to what is actually happening in the experience of students, none of it matters.*" Clara Birnie described the confusion this creates at the school level: "*Schools have received funding and need to decide what to do with it – but who are the decision makers?"* This lack of clarity about who holds authority at each level of the system – federal, provincial, school board, school – was raised as a consistent obstacle to implementation.

Debbie Field noted that even the bilateral agreements signed between the federal government and all thirteen provinces and territories are structured around aspiration rather than obligation: "*The agreements say things like, 'we agree with the federal government's National School Food Policy in principle' – but there is not a lot of teeth to those agreements*." This lack of enforceability extends, in the view of many of the participants, to language surrounding procurement. As Anonymous Participant X notes: "'*Locally sourced when possible' – how do we define or determine what 'when possible' means? That is a gap right now in terms of procurement.*"

Stef Foster and others made a direct link between monitoring and political durability: "*We need robust evaluation and monitoring, keeping good statistics, and actively looking at the impacts of school food – if we don't, eventually some government will say they don't see the benefits and cut it.*" Without strong data infrastructure, the program is not just difficult to improve, but it may become especially vulnerable to political shifts and changes.

A common theme in the interview data was the gap between federal policy commitments and what actually takes place in school cafeterias (or dedicated rooms where food is distributed). The bilateral agreements that underpin the NSFP, in Debbie Field's characterization, possess language of aspiration, without meaningful enforcement mechanisms. This matters enormously, because Canada's constitutional structure means that food at schools must pass through provincial and territorial education jurisdictions before it reaches a child. This is a long chain and right now much of it is voluntary.

Brazil's PNAE offers a different structural image. The requirement that trained nutritionists be employed at the municipal level to plan menus and oversee procurement (de Paiva et al., 2016) is not just a quality control measure, but a governance mechanism that ensures someone with professional responsibility is held accountable at a level close to the ground. The

School Feeding Councils (CAEs), though imperfect in implementation, formalize community participation into the program's structure, creating spaces where parents, students, civil society members and local government hold genuine oversight authority (Wong et al., 2021; de Paiva et al., 2016). What Brent Mansfield identified as a key structural gap: "having those mechanisms like Brazil's councils embedded in each and every community", is an argument for governance improvements. Programs that are owned and operated by communities are harder to dismantle than programs that exist only in federal agreements.

The issue of the "individual school lunch champion" named by many participants captures what happens without such structures. If the survival of a school meal program depends on one particular individual's willingness in schools to take on extra work, the program becomes structurally fragile regardless of federal commitment level. At its core, governance design remains a question of institutional durability, and the interview data from this study suggests that Canada's current approach has not fully resolved this.

Universality and the Politics of Who Gets Fed

Participants across the sample articulated a shared vision: school food in Canada should, in the long run, be universal, free, and designed so that no student goes hungry or becomes a "charity case". This consensus framing however also reveals significant disagreements about what equity requires, and who is currently being left out of the conversation.

Debbie Field offers an important lesson on history: "*Because we come from a poverty angle rather than a rights-based, all-children angle, the programs we have are mostly reaching kids in low-income families – that is not where we need to go.*" This poverty framing, several participants argued, is in itself a source of stigma. As Asma Musa explained PWYC models: "*Nobody is going to know who paid and who did not pay – and that is really the point.*"

Geographic inequity was raised as a particularly acute dimension of the problem surrounding access. Stef Foster argues that per-student funding must increase with distance from regional centres: "*The further out you get from a regional centre, the more money kids should get per student – and as a rural country, that should be a key piece.*" Foster also raised the mishandling of Indigenous school food funding as an urgent and largely unaddressed injustice:

"*From the Indigenous lens, how Indigenous Services Canada is handling funding needs to change immediately – they are not supporting First Nations school food right now.*"

Anonymous Participant X expanded this critique toward a food justice and food sovereignty framing, arguing that the NSFP's current policy language fails to centre the communities that are most affected by food insecurity. X observes of the National School Food Policy that a right-to-food framework is notably absent: "*I don't think there is enough focus on a right-to-food framework within the Canadian context when it comes to school food – it is very invisibilized. You don't really hear it, and it is certainly not in the Act*." For X, the program's ultimate goal should be explicitly linked to advancing food justice: "*How can these programs really help advance food justice and food sovereignty at different scales – local, provincial, territorial, federal? That is where my interests lie.*"

The common ground across the interview sample in favour of a universal program is striking and it connects directly to a debate that runs through the broader literature – the difference between programs designed around poverty and programs designed around rights. Worth noting is Debbie Field's framing of this: "Because we come from a poverty angle rather than a rights-based, all-children angle, the programs we have are mostly reaching kids in low-income families – that is not where we need to go." This is an argument with structural implications. Programs designed to target poverty require means-testing or requesting income verification tend to generate stigma. Programs designed as universal entitlements don't ask who needs help, but instead aim to feed all.

PNAE's universality is both a design feature and a legal and constitutional commitment, yet universality alone hasn't insulated the program from political risk. Recine (2017) documents how, following a 2016 shift in federal leadership, the structures supporting PNAE's family-farming procurement mandate were substantially weakened: the Ministry of Agrarian Development was dissolved, and the Food Acquisition Program's budget was cut by 15 percent between 2016 and 2017, reducing the number of families it reached. The universal meal entitlement itself held, but the equity-oriented infrastructure built around it proved far more vulnerable. This is instructive for Canada's NSFP: a universal commitment to feeding children may prove durable in its most visible form, while the redistributive mechanisms layered onto it - local procurement, cultural supports, community governance - are not automatically protected by

that same universality. Anonymous Participant X's observation that a right-to-food framework has become "invisibilized" in the policy document points to a real absence.

Geographic equity makes this point much more urgent. Stef Foster's argument that per-student funding should increase with distance from regional centres reflects a basic principle of equitable program design – equal treatment does not mean identical funding when conditions are structurally different. And, her concern about supports needed for more Indigenous school funding touches on the most serious equity shortcomings of the program in its current state. A national school food program that does not actively address the conditions facing Indigenous communities is not a national program; it is a program with exceptions that happen to follow colonial narratives.

Procurement as Policy Rather than Aspiration

The connection between school food programs and local food systems was raised across all the interviews as both a key aspiration as well as a site of significant structural challenge. Brazil's PNAE and its legally mandated requirement that at least 45% (Mascarenhas, 2026) of food purchases come from family farmers, was repeatedly invoked as the standard Canada should aspire to. Cecilia Rocha framed the procurement mandate as one of PNAE's most significant structural innovations: "*If 30% of the fund must go to purchasing local foods, you can already support regional cultural relevance – and those are the types of structural innovations Canada should be looking at.*"

Against this backdrop, the vagueness of the NSFP's current procurement language was identified as a significant accountability gap. Anonymous Participant X was direct: "*As much as possible' is really vague, non-helpful language – there is a huge opportunity for improvement in that area*." X along with others noted that without clear and specific targets, enforceable definitions of "local," and protected funding streams for small and family farms, local procurement aspiration will only remain as aspirational.

Participants also raised the practical constraints of Canadian geography and seasonality of ingredients. Anonymous Participant X noted: "*A huge barrier is seasonality and being able to ensure sufficient yield to meet the demand for a school food program – and are there sufficient*

numbers of family farmers to support these programs?" Ashley Byrne offered a pragmatic regional adaptation – in the Atlantic provinces, "local" is often defined at the regional scale to allow for intra-provincial sourcing where production is limited in a single province.

Stef Foster reframed local procurement as an economic and political argument as much as a food systems one: "*The question should be how much are we putting back into the economy – into local farmers, local growers, local grocery stores, local workers. That money has the potential to stay in Canada if we do our purchasing right.*"

Of all the gaps between Canada's NSFP and Brazil's PNAE identified from the interview data, the procurement gap might be the most concrete and the most addressable. PNAE's legal requirement - originally 30% of food purchases from family farmers, now raised to 45% (Mascarenhas, 2026) - is the sort of policy mechanism that accomplishes several aims at once: keeping money circulating in regional economies, supporting smaller-scale producers, and creating stable demand signals that family farms can plan around, which Ipolito et al. (2025) confirm translates into a measurable, positive revenue effect for participating farms. Cecilia Rocha, drawing on her decades of PNAE scholarship, identified this as "the type of structural innovation Canada should be looking at". Anonymous Participant X's critique of the NSFP's vague "as much as possible" language lands in this context as more than an editorial objection. Without specific and measurable targets with enforceable definitions of "local", local procurement will remain aspirational only. It will depend too much on individual initiative and available budget in each specific school or board – which is essentially where it already sits.

The Canadian geography and seasonality challenge is real, and participants acknowledged this issue. However, the Atlantic provinces' definition of "local" at the regional scale – allowing intra-provincial sourcing – points to a pragmatic adaptation that may be replicated elsewhere. The question is whether or not Canada has the policy framework to support this sort of regional flexibility within a national program, or whether it will continue to rely on case-by-case decisions. Stef Foster's re-framing of procurement as an economic argument is also worth emphasizing – the question of how much money stays in Canada through local purchasing decisions is a political argument that can reach across constituencies in a way that food systems language sometimes does not.

Cultural Relevance and Food Diversity

Participants expressed broad and consistent support for culturally relevant school meals, but equally consistent concern that this principle is poorly embedded in current policy language and practice. The National School Food Policy's limited engagement with cultural relevance was confirmed empirically by Anonymous Participant X during their interview, noting that the policy document reveals the word 'culture" only once or twice. As X puts it: "*I just did a quick search for 'culture' in the policy framework and it is mentioned once or twice – but I feel there is not enough emphasis on it, and that creates a lot of variability in how much of a commitment it becomes at different levels.*"

Participants were united in challenging the idea that school food is, or should be, a culturally neutral initiative. Anonymous Participant X stated plainly: "*Food is not just a source of nutrients. It is also about culture, about connecting people to traditions and family heritage – and we need to honour and support that.*" Stef Foster connected cultural relevance to the limits of a settler Canadian food imagination: "*We need to get out of the pasta, pizza, chicken finger mentality – when settler Canadians think about food, we think about it very differently from the new Canadian population, and school food needs to reflect that.*"

Concrete examples of the gap between standard menu offerings and students' actual food cultures were raised by Clara Birnie, whose work in Manitoba illustrated the issue clearly – "(*A significant portion) of our student population are from the Philippines and they typically eat rice for breakfast – this continental grab-and-go is not really their normal breakfast*", who also added that the school would like to serve appropriate cultural food if they had more time and more substantial cooking facilities. Ashley Byrne, speaking from Newfoundland and Labrador, emphasized that adaptability is the practical solution available to programs at present: "We advocate hugely for adaptability to the school and that community – flex days allow for a bit of creativity, and menus should be able to reflect each area's cultural landscape."

Perhaps the most compelling counter-narrative to adult assumptions about children's food preferences come from Foster, who shared a story about an encounter with a child whose family insisted he would "never" eat an unfamiliar school lunch – "*Within weeks, the family got a call saying he had become the most adventurous eater in the school*." This observation – echoed by

several others – challenges the "picky eater" framing and points toward the power of peer social modelling as a lever for expanding food acceptance.

The interview data reveals broad agreement that culturally relevant food matters, and equally broad concerns that the NSFP's current policy language treats cultural relevance as an afterthought. Anonymous Participant X's observation that the word "culture" appears rarely across the entire NSFP policy framework is indicative in its specificity. The policy framework does not appear to embed cultural relevance in any meaningful way, meaning it might be implemented unevenly at best.

Brazil's PNAE has explicit provisions for culturally relevant menus, including specific protections for Indigenous and *Quilombola* food cultures. Yet as Affonso et al. (2025) document in their research in Oriximiná, Pará, these protections are unevenly realized in practice, and reaching remote and marginalized communities has remained a persistent implementation challenge. The lesson here is not that written commitments are sufficient, they clearly are not, but that their absence makes a bad situation much worse. Canada cannot have a meaningful conversation about culturally appropriate meals in school if the policy framework does not even name culture as a priority.

The stakes of this matter are even higher in the Canadian context than they may initially appear. Coté (2016) and Settee and Shukla (2020) are clear that Indigenous food sovereignty in Canada is not a simple question of menu planning. This concerns land, traditional ecological knowledge and the rights of communities to determine what's grown, harvested and eaten. A school food program that simply opts to add fry bread to a cafeteria menu while continuing to operate within colonial food procurement structures has not meaningfully addressed Indigenous food sovereignty. Clara Birnie's example from a Manitoba school, who had a significant portion of its student population from the Philippines who typically eat rice for breakfast over the continental-style grab-and-go that programs tend to default to, speaks to the same structural needs at a different scale. Culturally relevant food design that is meaningful requires ongoing community input into program design, not just a one-time consultation.

Community Participation and Multi-Stakeholder Governance

The question of who gets to shape school food programs – not just who gets consulted, but who holds genuine decision-making authority – was raised across all of the interviews as a structural gap in Canada's current approach. Brazil's School Feeding Councils (CAE), in which community members including parents, students, civil society organizations, and local government hold formal oversight roles, were cited by multiple participants as the most immediately transferable governance innovation from PNAE.

Brent Mansfield identified the absence of these sorts of structures as the most important gap: "*Having those mechanisms like Brazil's councils embedded in each and every community so that community involvement is meaningfully built in – that is a huge gap right now*." Ashley Byrne connected community participation directly to the program's political resilience: "*If there is community buy-in at a national level, if people are proud of the program, they won't touch it – no political party will dismantle something that people wear proudly as a feather in Canada's hat.*"

Clara Birnie and Maxine Meadows, speaking from Manitoba, emphasized the importance of multi-sectoral collaboration at the local level: "*Having people at different government levels – education and health and agriculture – all working together to see how we can support this, not just a superintendent with a little extra time on their plate.*" The "individual champion" problem, in which a program's survival depends on a single dedicated volunteer or staff member, was raised by many of the participants as a structural vulnerability that community governing structures could help to address.

Anonymous Participant X brought a specific angle to equity in this discussion. Pointing to Canada's existing food policy council structures (and similar groups) as an example, they questioned whether meaningful participation is possible when council members are expected to contribute their time and expertise without compensation: "*Can there be school food policy councils that are compensated for their work? Not only compensating people involved in delivery and preparation of food, but also those invested in how programs are designed and implemented on the ground*." This concern extends to who is able to participate at all: unpaid participation structurally excludes those who cannot afford to take time away from paid work, which disproportionately affects the racialized and low-income communities whose engagement

is most needed. As X put it: "*You don't want it to be token participation – it has to mean something.*"

The distinction that runs through several participants' reflections surrounding community involvement, between being consulted and genuinely holding authority, maps directly onto the difference between PNAE's CAE structure and anything currently present in Canada's NSFP. Ashley Byrne connected this to the program's political durability – programs that communities own are programs that communities defend. Anonymous Participant X offered further critique, which is that meaningful participation is structurally impossible if it stays unpaid since unpaid participation disproportionately excludes the racialized and low-income communities whose voices matter most in shaping a program that serves them. As X puts it, "You don't want it to be token participation – it has to mean something." This is not a new critique in food policy literature – Levkoe and Sheedy (2019) on Canada's People's Food Policy project make similar observations about the structural barriers to genuine participation – but it has particular urgency for a program that explicitly names equity as a goal.

The research on *Bolsa Família*'s implementation is relevant here as a point of comparison. Municipalities with active local policy councils – where citizens hold real authority over program priorities – consistently produce stronger social program outcomes than those relying on administrative delivery alone (Wong et al., 2021). The participation wasn't just meaningful in theory, but offered better governance. Canada's reliance on the Coalition for Healthy School Food, despite the group's incredible efforts at building the political case for the NSFP, cannot be a substitute for community governance structures embedded in the program itself. Advocacy from outside a program is not the same as democratic authority within it.

Food Literacy and School Food Culture

A recurring concern across interviews was the degree to which Canadian school culture has not yet integrated food as part of its educational mandate. School food, participants note, tends to be treated as an "operational" matter, something to be managed instead of taught, instead of as a site of learning. Brent Mansfield articulates this structural issue: "*Teaching and learning is here, and operations are here – and school food ends up fitting within operations, so it becomes separate from teaching and learning. That is a huge missed opportunity*."

Clara Birnie captured the cultural gap at the level of school administration: "*Because it is so new, it is not part of our culture, not part of our way of thinking about school – and that is a challenge. A principal will say, 'I'm not a restaurant manager'.*" This resistance, participants suggested, isn't just a matter of individual attitude but reflects the absence of any historical expectation that schools should feed children – a gap that requires deliberate cultural shifts rather than simply more funding.

Several participants articulated a vision of school food that goes beyond nutrition delivery to encompass joy, dignity, and educational connection. Mansfield described the aspiration this way: "*We want to get to food – and joy, and culture, and education, and all those other pieces that a food program has the potential to connect to*." Anonymous Participant X extended this framing to the broader social purposes of the program: "*A well-designed program can support not only students and children, but their families, and wider communities – and help advance food justice and food sovereignty at different scales.*"

Anonymous Participant X, well researched on Ghana's school food programming, also drew on this example to show how school food programs can be designed to accomplish multiple goals simultaneously – nutritional, educational, economic, and social: "*Ghana has long recognized the value of these programs – not only supporting educational achievement, but improving nutritional outcomes and aiming to support local farmers' livelihoods. Multiple goals can be realized depending on how they are designed*." This multi-faceted framing was echoed throughout the sample and represents, in the views of the participants, the direction in which Canada's NSFP must evolve.

The finding that school food tends to get categorized as "operations" instead of a part of teaching and learning is, as explained by Brent Mansfield, "a huge missed opportunity". Brazil's PNAE was designed from the start as an educational program as well as one addressing nutrition. Its integration into broader agricultural education, the role of nutritionists in teaching as well as menu planning, and the visibility of local food within the school environment (Recine, 2017). Canada's emerging program has not yet claimed this education dimension as a central goal, which means it risks replicating the same narrow framing it's trying to move away from.

Political Stability and Long-Term Vision

The vulnerability of the NSFP to shifts in government was a source of concern across virtually all interviews. Having witnessed what occurred in Brazil under President Bolsonaro, when complementary social programs were gutted and PNAE itself was weakened, participants were clear on the risks facing any newly established program that lacks deep legislative roots.

Legislation was identified, consistently across regions, as the most important protection available. Asma Musa was categorical, "*If things are in law, no one can change them – that is why provincial, territorial, and municipal governments need to get on board as well, not just the federal level.*" Stef Foster linked this to the monitoring and evaluation gap identified in Theme 2 (T2): "*If we never come to a place where we have adequate data to show how powerful school food is, eventually some government is going to come in and cut it. Let's not allow that to happen.*"

Alongside legislative protections, participants pointed to broad public ownership as another safeguard. Ashley Byrne articulated: "*I want Canada to get to the point where it is like, of course we do this – how insane would it be not to? The same way Canadians feel about healthcare.*" Anonymous Participant X offered a complementary political framing, drawing on the cross-partisan appeal of feeding children as a point of moral consensus: "*It is really hard to argue against providing food to kids – that has been the anchor point in terms of how school feeding programs have been able to persist despite political shifts.*"

Anonymous Participant X introduced Ghana as a second comparative reference point for political durability. Despite repeated changes in government, Ghana's school feeding program has maintained a degree of continuity that contrasts with the fate of complementary programs in Brazil: "*...in many ways, it has been able to be sustained despite politicization.*" This observation complicates any simple assumption that Brazil's constitutional model is the "only" path to program durability, while also affirming that cross-partisan legitimacy, achieved differently across different contexts, is the common thread.

Cecilia Rocha, speaking from her decades of experience observing PNAE's development, offered a counsel of patience that several participants echoed: "*People need to be patient and not immediately frustrated because they're not accomplishing everything at once – celebrate what you have, and always work to solve the problems as they come.*" This long-term focus, this

incremental progress toward a clear and ambitious framework – describes the overall outlook participants had who have spent careers working on food and school food and also reflects the structural timelines of the policy changes that they are advocating for.

The theme of political stability generated some of the most instructive comparative material across the interviews. Participants were clear about the risks. They've observed the survival of PNAE despite its turmoil through the years of Bolsonaro in Brazil. They've observed programs like the PAA gutted then re-instated under President Lula (Vilela, 2023). Food advocates across Canada have witnessed Canada's NSFP face provincial reluctance and federal opposition criticism in real time (Marcelo, 2024). The lesson drawn almost unanimously is that legislation matters because it simply makes a program much harder to dismantle.

The two paths of political continuity and broad public ownership rather than legal mandate can provide protection – the paths are not mutually exclusive. As Asma Musa stated, "If things are in law, no one can change them", and Ashley Byrne's aspiration that feeding children should feel as natural to Canadians as healthcare, are different routes to the same destination – a school meal program that is understood by both the public and by politicians, as untouchable. Stef Foster's link between monitoring, evaluation, and political protection completed the picture – a program that cannot demonstrate its impacts is a program that cannot defend itself.

CONCLUSION

Several themes emerged with strong consistency across the nine participants, regardless of regional location, institutional roles or professional background. These convergences deserve particular attention as the analysis moves into cross-national comparison.

Many observations also came about from the data: federal funding is widely understood to be insufficient; the absence of standardized monitoring and evaluation is considered the most immediate gap in governance; universal access – instead of targeted programming – is the consensus long-term vision; Brazil's PNAE is the primary international reference point across the sample; and legislation is consistently identified as the most reliable protection against political instability.

There is broad agreement that federal funding at current levels is inadequate for a meaningful universal program, and that this insufficiency includes existing provincial and geographic inequities. Also, the absence of standardized monitoring and evaluation is identified as the most urgent gap in governance, not only because it limits program improvement but because it leaves the NSFP politically vulnerable to claims that it cannot demonstrate its effects and impacts. In addition, universality, the principle that every student regardless of income or location should receive a free and nutritious meal, is the consensus long-term vision, with program design understood as a central tool for achieving this without stigma. Importantly, Brazil's PNAE is the primary international reference point across the sample, cited for its procurement mandate, community council model, constitutional grounding and decades of longevity. Cultural relevance and food literacy are also broadly valued but weakly reflected in current policy language and funding structures. Finally, legislation at federal, provincial, and where possible municipal levels, is consistently identified as the most reliable safeguard against political rollbacks.

All together, these eight themes and their patterns form the empirical basis for the comparative cross-analysis in this study and for the policy recommendations to follow in this paper.

What is clear from these findings is: a gap between Canada's current program and Brazil's long-standing, established one; and, between the NSFP's stated ambitions and the institutional architecture it has actually built. The themes brought up by interview participants like: inadequate funding; weak governance mechanisms; unclear universality commitments; vague procurement language; thin cultural relevance provisions; limited community authority; and political vulnerability – do not exist in isolation. These are symptoms of the same underlying issue, which is that Canada has launched a national school food program without yet committing to the structural depth that a genuinely just national program needs.

Policy transfer and lesson-drawing theory, as Dolowitz and Marsh (2000) and Rose (1991) both argue, does not mean transplanting a model wholesale from one context to the next. Brazil's PNAE was built over decades through particular political struggles within a specific social protection framework. Canada cannot simply import this. What Canada can do however,

and what this research suggests, is take seriously the structural logic behind PNAE's most durable features:

- The legal enshrinement of the right to food;
- A procurement mandate tied to family farmers;
- Community governance structures with real authority; and
- The integration with broader anti-poverty programs and the explicit cultural relevance provisions.

The above are design principles that reflect a coherent vision of what a food-sovereign, rights-based school meal program can look like, not simply a transfer of Brazilian context to up north. Evaluated through a food sovereignty lens, Canada's NSFP as currently designed does not quite yet embody that vision. It does make promising gestures toward it, however. The interview data gathered for this research suggest that the advocates, practitioners and researchers closest to the program know this, are frustrated by elements of it, and are actively working within the constraints available to them. The question this research ultimately puts to Canadian policymakers is whether the NSFP will continue to be a program of promising gestures, or whether it will be built into something the country can actually stand behind long-term.

Concluding Remarks and Reflection

This research has been set out to answer a deceptively simple question: what can Canada learn from Brazil's school lunch program to build a stronger national school food policy? The answer is both more instructive and more complicated than just a straightforward list of transferable features. What Brazil's PNAE offers Canada is not a blueprint but a decades-long demonstration of what it looks like when a national school food program is prioritized legally, institutionally, financially, and culturally, and what happens when it is not.

The comparative arc of this paper has moved through several forms. The literature review established the structural and historical terrain of both programs – PNAE's evolution from a modest mid-century rights-based system serving millions of students across a vast and diverse country; and Canada's NSFP, newly announced, newly permanent, and still very much finding its way within a decentralized federal structure that was not built with school food in mind. The

theoretical frameworks of policy transfer and food sovereignty provided two complementary lenses for understanding what is at stake. Policy transfer theory, drawing on Dolowitz and Marsh (2000) and Rose (1991), offered a way to think rigorously about what it means to learn from another country's program. Not to copy the program but to extract design principles and assess their applicability to a different context. Food sovereignty theory, drawing on Wittman, Desmarais, and Wiebe (2010), Holt-Giménez et al. (2012), and Coté (2016), provide the normative standard: a vision of food system grounded in community control, cultural relevance, local agriculture, and democratic governance against which both programs could be genuinely evaluated.

Against this standard, the interview data tells a consistent story. The participants across five Canadian provinces bring varying institutional vantage points and distinct regional realities to their work. Yet they converge across eight distinct themes on a shared diagnosis that the NSFP is a meaningful beginning that isn't yet substantive enough to the task it has set out for itself. The funding base is too narrow, the governance mechanisms too thin. The universality commitment is too tentative and the provisions for cultural relevance too vague. The community participation structures could be strengthened greatly. And finally, the program's long-term political protection is too dependent on goodwill rather than law.

None of these concerns are a cry for despair. It's certainly worth noting what Cecilia Rocha brought up near the end of her interview, speaking from a place of genuine authority about how long institutional change actually takes: "*People need to be patient and not immediately frustrated because they're not accomplishing everything at once – celebrate what you have, and always work to solve the problems as they come*." Brazil's PNAE did not arrive fully formed. The PNAE was built, contested, damaged, and even partially weakened and re-built over decades by people who understood that the work of food justice is generational. Canada is only at the beginning of this process, not the end of it.

What my research contributes to that process is a clearer picture of the distance between where the NSFP currently sits and where a genuinely just, food-sovereign school meal program would need to go. The South-to-North framing of this comparison has been a deliberate methodological and political choice, one that pushes back against the assumption often prevalent in comparative policy literature that knowledge flows from richer countries to poorer countries

and not the other way around (Peck & Theodore, 2010). Brazil is not a recipient of Canadian expertise in school food policy; it is, by almost every relevant measure, the more instructive model. Sitting with that inversion is likely part of the lesson. Yet inversion alone is not innocent of the dynamics it hopes to escape from: Rivera Cusicanqui (2012) warns that ideas moving from South to North can still be extracted, repackaged, and depoliticized in transit - regardless of which direction they travel. Avoiding that outcome has meant resisting the temptation to reduce PNAE to a set of portable technical features, and insisting instead, throughout this paper, that its procurement mandate, its community councils, and its legal architecture cannot be understood apart from the decades of Brazilian civil society struggle that built them. If this research holds any value for Canada, it is not as a supply of raw material to be refined into policy recommendations, but as an invitation to undertake the same magnitude of political work (organizing, legislating, building institutions) that gave PNAE its durability in the first place.

The voices gathered in this research also reflect something important about *who* is doing the work of building Canada's school food movement. The participants are not waiting for perfect policy from Ottawa, but instead they are, for instance: Dietitians designing culturally responsive menus with the constrained budgets they have; teachers building food literacy into classrooms that were never designed for it; community advocates demanding that Black and Indigenous children be centered, not added on, in program design; researchers documenting what works and what doesn't, insisting on evidence in a space where evidence has historically been thin. The NSFP, whatever its current limitations may be, exists in large part because people like this pushed it into existence. What the NSFP becomes will depend on whether the same energy can be channeled into the structural and legislative work that the program still requires.

This paper argues that the most transferable lessons from Brazil's PNAE are structural commitments over technical details – the decision to embed the right to food in law; the decision to mandate local procurement at a specified and enforceable level; the decision to build community governance into the program's architecture rather than treating participation as a consultation exercise; the decision to integrate school meals with broader social protections rather than isolating them as a stand-alone nutrition intervention. None of these decisions requires copying Brazil. They require Canada to make its own version of them suited to their own federal context and regional diversities; their own Indigenous realities and own political landscapes.

Whether Canada is prepared to make those decisions is, ultimately, a political question more than a technical one. The evidence for what a robust national school food program can accomplish is not in short supply. What is currently in shorter supply is the institutional will to build one.

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