

25 May, 2023

Standing Committee on Social and Economic Development
Manitoba Legislative Assembly
450 Broadway
Winnipeg, MB R3C 0V8

Re: Bill 222, *The Public Schools Amendment Act (Nutrition Programs)*.

Dear Committee Members:

On behalf of our association, we would like to thank you in advance for the opportunity to provide comment and observations on the above noted Bill.

The role of school boards in providing child nutrition programs cannot be more critical to student success and well-being. Extensive research has confirmed the vital co-relationship between school-based breakfast and lunch meals, provision of daily snacks and backpack-based care packages, and the performance of pupils in the classroom. In sum, these studies have concluded and confirmed that it is impossible for schools to fill eager young minds in the presence of empty stomachs.

Over the course of many years, external grant and funding support for school nutrition programs has regrettably not kept pace with demand for such programs. As a poignant example, not only have existing programs suffered the impacts of escalating food stuffs costs, leading them to try to do far more with far less, but the waitlist for grants in support of new programs only continues to grow. This contributes to a critical disparity that must be addressed if our most vulnerable students are to meet with success.

While the Federal Government stands on the cusp of developing a national school food initiative, such a program remains under development and funding has not yet materialized. Many school nutrition programs in Manitoba therefore continue to depend exclusively upon the grants that are made available through the Child Nutrition Council of Manitoba, for which our Association plays a supportive role in terms of the annual administration of these grants.

In order to enhance the provisions that are proposed under Bill 222 with the aim of promoting public accountability and transparency, we therefore recommend that the Bill be amended prior to third reading by adding three further sub-clauses under section 47.2(3.1):

d) the total amount of expenditures on nutrition programs at each school, and by each school division and district, with identification of the source and amount of funds by funder in support of such programs.

e) an estimate of variance between the total amount of expenditures on nutrition programs at each school, and by each school division and district, and the total amount required by such programs to respond to annual pupil needs

f) identification of any schools that are wait-listed to receive funding grants in support of the establishment or operation of school nutrition programs.

Commensurate with these proposed amendment, the word “and” would therefore be placed at the end of subclause e) rather than subclause b).

The Manitoba School Boards Association believes that the addition of these further sub-clauses will foster a shared ethic of responsibility and of greater public awareness of the needs and requirements that exist across the public school system for nutrition programs moving forward.

While it is important for the Committee and our shared public to understand that reporting under such sub-clauses would capture monetary expenditures by divisions through grants received only, without equally capturing in kind donations and contributions from important non-divisional partners such as food banks and third party contributors, we remain firm in our belief that the ability of a future annual report to capture an ongoing assessment of current and projected requirements would help to strengthen transparency and accountability for the funding of nutrition programs.

With respect to section 47.2(3.2) of the Bill, we can confirm, on behalf of our members, full support for the introduction of such a reporting requirement and obligation.

In relation to the proposed addition, after clause 48(1)(h) of a new sub-clause (h.1): “provide, without charge, nutrition programs to pupils;” we would note that the proposed language does not cohere with the wording of clause 48(1)(h), insofar as the words “with charge” (as currently featured within 48(1)(h)) are not featured under the proposed new sub-clause.

With the sole objective of promoting greater ability and flexibility on the part of school boards to respond to the complex needs of all pupils as well as to ensure that nutrition programs are available where needed, we would advocate for coherence of provision between clauses 48(1)(h) and (h.1) by way of amending (h.1) to “provide, with or without charge, nutrition programs to pupils;”.

At current time, there is no nutrition program that is provided “with charge” to our pupils. However, we feel that the aim of any amendment to *The Public Schools Act* must align with the local autonomy of school boards to meet pupil needs according to each community’s context. We well understand the intention for providing nutrition programs without charge to our pupils. This is why at current time, no such programs are provided “with charge”. This said, we believe that nutrition programs, under current programming or under the prospect of a national school food program or any other such initiative as may be undertaken in future, must balance affordability and ability to pay on the part of schools, school divisions and districts, and the pupils and communities that we serve.

Adding “with charge” to proposed subclause (h.1) will promote our members’ responsiveness to meet needs according to local circumstance based on an assessment of our pupils’ ability to pay. In future, should a universal food program be introduced across all schools in Canada on an obligatory basis that foresees introduction of such programming for all pupils, adding “with charge” would ensure that

funding for such programming will not fall exclusively to school boards that are already having to address far greater needs within public education, albeit with far lesser funding and resources than ever before. Should the Committee feel that making such an amendment ought be accompanied by additional qualification such as “provide, with or without charge, nutrition programs to pupils based upon pupil ability to pay;” or some other such wording, we would certainly be open to such qualification.

As always, we thank both the members of the Committee and of the larger Legislative Assembly for their consideration of our observations and recommendations and request that you please do not hesitate to contact us further should you require any further information from us in the above respect. You may direct inquiries to Executive Director Josh Watt at jwatt@mbschoolboards.ca.

Sincerely,

A handwritten signature in black ink that reads "Sandy Nemeth". The signature is written in a cursive, flowing style.

Sandy Nemeth
President