
A LEGAL ANALYSIS OF UGANDA'S DRAFT NATIONAL SCHOOL FEEDING POLICY.

Examining the role of law and adequate nutrition in the protection of children's welfare and rights.



Uganda's
National and
International
Obligations
Towards
Safeguarding
School Going
Children from
Hunger and
Malnutrition.

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INTRODUCTION

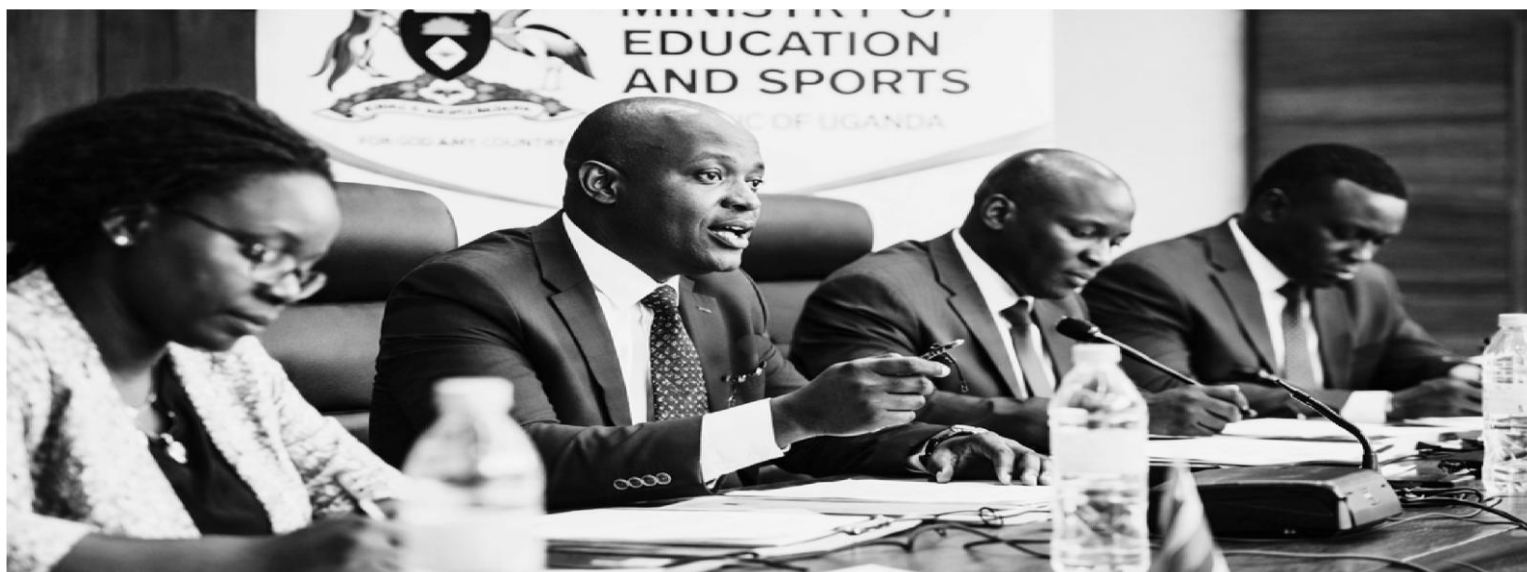
This inaugural issue by LULETI DAVID and AMINA REJOICE examines one of the most critical policy debates currently facing Uganda: The development of a National School Feeding Policy.

School feeding is not merely a matter of welfare or charity. It represents a fundamental question of constitutional responsibility, human dignity, and the protection of children's rights and welfare. When children attend school hungry, the right to education, health, and, livelihood become severely compromised. Uganda has made commitments both nationally and internationally to safeguard the welfare of children. However, the structure and implementation of school feeding programs remain contested. This issue therefore explores views of how a Human Rights-Based Approach (HRBA) and adequate nutrition standards can guide Uganda's National School Feeding Policy formulation. The issue examines the extent to which the State must assume responsibility for protecting children from hunger during school hours. By recontextualizing school meals as a fundamental constitutional responsibility, rooted in human dignity and child welfare. (Article 34 of the Ugandan Constitution 1995 and Section 3 of the Children's Act Cap. 62.)

This issue further highlights the need to define the physiological and biochemical parameters of what comprises 'adequate nutrition'. Since the development of an effective and comprehensive National School Feeding Policy requires governments not to resort to provision of cheap, monotonous, and, metabolically deficient feeding practices to the State's students for them to check an administrative box. Thus, to translate this legal theory into a functional public health intervention, this issue injects precise nutritional parameters that need to be put in consideration during the development of the policy.

The issue majorly dwells on Ugandan's Constitutional provisions, International Human Rights Laws, and comparative jurisprudence to evaluate whether the proposed policy framework adequately fulfils Uganda's legal obligations. It further aims to contribute to the policy dialogue and encourage the integration of a Human Rights-Based Approach in the development of school feeding practices in Uganda. Ordinarily 'nutritional adequacy' is interpreted as simple volumetric satiety of filling a child's stomach. Under the current institutional paradigms in Uganda, this results in menus dominated exclusively by refined maize porridge (porridge/posho) or boiled cassava etc. While this satisfies immediate caloric hunger and avoids energy deficits, it induces severe 'hidden hunger' (micronutrient malnutrition). A child whose stomach is full of pure starch remains severely malnourished since their brain is starved of zinc, iron, iodine, and, vitamin A.

Thus the policy must legally define 'adequate nutrition/food' through biological lens, mandating nutrient density, bio-available proteins, and essential micronutrient baselines. Data from the 'Uganda Demographic and Health Survey' (UDHS) 2022 revealed that 24.4% of children under five nationwide suffer from chronic stunting (irreversible physical and cognitive growth retardation), should the policy fail to legally mandate dietary diversity, a state-funded school feeding program would instead inadvertently finance and institutionalize child stunting on a national scale. In practical terms, the Uganda National Feeding Policy must be child-sensitive, protective, and responsive to children's unique vulnerabilities and evolving capacities to ensure that children are not subjected to hunger and malnutrition during school time. Authorities must ensure that legislative and administrative processes do not expose children to any form of foreseeable discrimination, neglect, or exploitation. Accordingly, the welfare principle is an ideal consideration during this policy formulation would operate as both a substantive right to children and as a procedural obligation to the State. Since the welfare principle compels the State and all relevant actors to prioritize children's best interests in decision-making and to adopt measures that genuinely enhance their protection, survival, well-being, holistic development, and dignity, by mitigating the possibility of cognitive failure, and, long-term chronic under nutrition.



Policy Background

Global statistics have revealed that an estimate of 149.2 million children have stunted growth and 340 million children under 5 suffer from deficiencies in vitamins and other essential micronutrients. (United Nations Children’s Fund, World Health Organization, & International Bank for Reconstruction and Development/The World Bank. (2021).

As of 2023–2026, Uganda has embarked on actively developing her National School Feeding Policy following her commitments to the School Meals Coalition in November 2023. The policy is a proposed law aimed at governing school feeding practices in Uganda. It is intended to replace the retrogressive UPE and UPPET guidelines on the Only-Parent-Led School Feeding Policy, which work contrary to the dual constitutional parenting responsibility between parents and the Government. Drafted by the Ministry of Education and Sports in 2023, the policy envisions a healthy and well-nourished school population as the foundation for active and effective learning. However, the policy has not been adopted due to outstanding concerns regarding:

- Implementation mechanism.
- Stakeholder responsibilities.
- Sustainability mechanism.

In this regard, the proposed policy is directed towards securing and promoting optimal nutritional outcomes for school children aged between six and fourteen years. This age bracket represents a critical stage in the life course, characterized by rapid physical growth, cognitive development, emotional maturation, and educational advancement.

There has been unveiling of several plans to implement a standardized school feeding program across Uganda by the ministry of education and sports, positioning school feeding as a critical intervention against the rising tide of malnutrition and diet-related diseases among children. A national meal plan for schools has already been drafted. However, its implementation is still under review, with consultations that have lasted quite longer than anticipated with various stakeholders before the policy can be turned into a formally binding legal document and once approved, all schools will adopt a standardized meal plan.

The Ministry of Health, in collaboration with the Ministry of Education and Sports, UNICEF, scientific experts, and other relevant stakeholders, is actively engaged in developing a school feeding model that is both scientifically robust and responsive to local realities. This multi-sectorial initiative seeks to ensure that the proposed framework is evidence-based, sustainable, and capable of addressing the nutritional needs of learners within the Ugandan context.

Against this background, the purpose of this analysis is to contribute to the ongoing policy-development process by examining the imperative of integrating a Human Rights-Based Approach (HRBA) and comprehensive nutritional perspectives/standards throughout all stages of the policy formulation, implementation, monitoring, and evaluation. Such an approach would ensure that the policy not only advances public health and educational outcomes but also aligns with the State's constitutional and international human rights obligations relating to the rights to health, food, education, and the welfare of children.

Problem Statement

The official commitments Uganda made when subscribing as a member of the Global School Meals Coalition in November 2023. Included the State's formal pledges to: (1) Finalize and approve the National School Feeding Policy; (2) Create a dedicated budget line and allocate national funds starting with the 2025/2026 Financial Year budget; and (3) Establish a National Multi-sectoral School Feeding Coordination Committee, to which none has attained full realization to date.

The draft National School Feeding Policy identifies limited food production as a major hindrance to the effective implementation of school feeding programs in Uganda. However, this challenge cannot be fully justified given the country's abundance of fertile soils and favorable agricultural conditions. The Uganda National School Feeding Policy is further inconsistent with the PANTHER Principles since it lacks strong mechanisms for participation, accountability, transparency, and empowerment. It places primary responsibility for school feeding on parents and communities without creating clear, enforceable obligations on the State, which weakens accountability and access to remedies.

The indirect parent-led approach carried forward in the draft policy discriminates against children from low-income households whose parents are unable to provide meals, thereby affecting equal access to education and nutrition. Limited public oversight, unclear funding commitments by the government, and the absence of effective complaint mechanisms further undermine transparency and empowerment. As a result, the policy risks falling short of Human Rights and rule of law standards, particularly where children continue to face hunger and malnutrition despite Constitutional protection. Yet the benefits of school feeding extend beyond mere provision of food to learners. The program significantly contributes to improving learners' nutritional status, promoting gender equity, school learner retention rates, and enhancing educational outcomes within communities. These impacts collectively advance national objectives of socio-economic transformation and human capital development.

In a country where 68.9% of households survive within a subsistence economy (National Population and Housing Census 2024), delegating absolute meal responsibility to parents creates severe nutritional disparities. Children from economically incapacitated families still face empty lunchboxes daily, leading to acute midday hypoglycemia. While Uganda has made strides in reducing poverty and boost agriculture, malnutrition remains a major obstacle to economic progress. Once approved, the National School Feeding Policy will require all schools to provide at least one balanced meal per child per day. This move will help reduce stunting, improve school attendance and performance, and prevent early-onset NCDs among children national wide.

According to the 2025 Baseline Education Census Report, by the Uganda Bureau of Statistics (UBOS), Uganda has a total of 13.5 million learners. Of these, 2.3 million are enrolled in pre-primary education, 9.1 million in primary schools, 2 million in secondary schools, while more than 74,000 learners are in non-tertiary institutions. However, learner retention in schools remains a big concern. Out of the 1.7 million learners who enroll in Primary One, only 739,204 complete Primary Seven. At the secondary level, only 352,929 students complete Senior Four out of the 508,769 who begin Senior One. The trend continues at the Advanced Level, where only 129,596 students complete Senior Six compared to the 170,271 who enroll in Senior Five. This works contrary to government's Poverty Eradication Action Plan (PEAP) which focuses on economically empowering the community through its strategic objective: better educated society. Lack of a properly financed school feeding program a major contributor to the low learner retention rates in Ugandan schools and low productivity. According to Uganda's Fourth National Development Plan, Uganda's Human Capital Index (HCI) is as low as 0.38, indicating that children born currently are likely to be only 38% productive as they could be with complete education and full health. Twenty-six percent of children under five in Uganda are stunted. That's one in every four children in Uganda suffer from chronic under nutrition. 2.9% of children are wasted suffering from acute malnutrition so severe that their bones are visible.



Constitutional obligations



State Obligation Towards Feeding School-Going Children.

Under Article 257(1) (c) of the Constitution of the Republic of Uganda (1995), a child is defined as a person below the age of eighteen years. This definition is reinforced under Section 2 of the Children's Act (Cap 62). However, in exceptional circumstances particularly relating to employment, a child may be regarded as a person below the age of sixteen years as contemplated under Article 34(5) of the Constitution of Uganda. The Constitution of Uganda further embeds the Rights of a Child under Article 34, providing a comprehensive framework for the protection and welfare of children. Notably, Article 34(7) expressly mandates that the laws of Uganda shall accord special protection to orphans and other vulnerable children. This constitutional framework underscores the State's commitment to safeguarding the rights, dignity, and well-being of all children, particularly those in vulnerable situations.

Protecting children from hunger is therefore a fundamental obligation of the State in fulfilling its duty to safeguard the dignity and welfare of every child. The above constitutional provisions are of a permanent nature and should be interpreted and applied in a dynamic, progressive, and liberal manner so as to give full effect to their purpose and to extend the benefits and protections they confer to the highest attainable extent. (*Okello John Livingstone & 6 Ors v Attorney General Constitutional Petition no.1 of 2005, South Dakota v South Carolina*, 192, USA 268). Uganda, like many African states, has adopted a constitutional framework that recognizes and protects a broad range of socio-economic rights, including the rights to health, food, and livelihood. These rights are embedded within the Constitution's normative commitment to social justice, human dignity, and equitable development. In particular, National Objective (14)/(XIV) (b) of the Constitution of the Republic of Uganda (1995) provides that; "The State shall endeavor to fulfil the fundamental rights of all Ugandans to social justice and economic development and shall, in particular, ensure that all Ugandans enjoy rights and opportunities and access to education, health services, clean and safe water, decent shelter, adequate clothing and food security." Importantly, constitutional provisions safeguarding socio-economic rights are not to be interpreted in isolation. (*P.K Ssemwogerere & Anor v Attorney General, C.A no.1 of 2002, Attorney General of Tanzania v Rev. Christopher Mtikila* (2010) E.A13).

Rather, constitutional interpretation requires a holistic and harmonious reading of the Constitution as an integrated legal instrument, with each provision informing, sustaining, and reinforcing the meaning and effect of the others. Such an approach accords with established principles of constitutional interpretation, which favor a purposive, liberal, and contextual construction capable of advancing constitutional values and objectives. Article 8A operationalizes the State's obligations under the National Objectives and Directive Principles of State Policy by elevating them from mere aspirational declarations to binding constitutional norms that must guide governance, legislative action, policy formulation, and judicial interpretation. (*Nyakaana v. National Environment Management Authority & Others, Constitutional Appeal no.5 of 2011*) [2015] UGSC 14 (20 August 2015). Accordingly, provisions relating to the welfare and protection of vulnerable groups, particularly children, must be read together with the State's broader socio-economic obligations. For example, Article 45, recognizes that rights and freedoms not specifically enumerated in the Constitution are not excluded from recognition and enforceability in Uganda. (*Center for Health, Human Rights and Development and 3 Others v. Attorney General* [2012] UGCC 4, Constitutional Petition No. 16 of 2011 Uganda: Constitutional Court). Thus, the above constitutional provisions impose positive obligations upon the State to safeguard children's welfare, including ensuring access to adequate nutrition and food. When read in conjunction with the National Objectives and Directive Principles of State Policy, Article 45 reinforces the State's duty to take reasonable and effective measures to secure the conditions necessary for the realization of children's socio-economic rights, including the right to adequate food.

INTERNATIONAL TREATY OBLIGATIONS

International Legal Obligations

Individuals inclusive of children have a right to a standard of living adequate for health and well-being (*Article 25, Universal Declaration of Human Rights, 1948*). Uganda's National School Feeding Policy must ensure access to adequate nutritious food and food security for children, particularly in circumstances such as economic incapacitation, orphan hood, or other situations beyond children's control that deprive them of livelihood.

Protecting children from hunger is anchored in Article 1 of the Universal Declaration of Human Rights, which affirms that all human beings are born free and equal in dignity and rights (Article 1, Universal Declaration of Human Rights, 1948). Consequently, governments bear responsibility to uphold the dignity of all children regardless of their social status, creed, sex, or ethnicity. Every child has the right to be protected from hunger, including those born to economically incapacitated parents who lack access to factors of production such as land to grow food. Some children are also orphans without adequate support for their nutritional needs. The State must therefore adopt an inclusive and equitable approach in formulating and implementing the National School Feeding Policy to ensure that no child is excluded due to circumstances beyond their control. The United Nations Child Committee in General Comment No.19 (2016) stated that the obligation imposed on States by Article 4 of the Convention on the Rights of the Child requires governments to realize children's economic, social, and cultural rights to the maximum extent possible (CRC Committee General Comment No.19, 2016). Every State is obliged to ensure for everyone under its jurisdiction access to the minimum essential food which is sufficient, nutritionally adequate and safe, to ensure their freedom from hunger. (ICESCR General Comment No. 12: The Right to Adequate Food, 1999).

The International Covenant on Economic, Social and Cultural Rights (1966) deals more comprehensively than any other instrument with the right to adequate food. Pursuant to Article 11 (1), of the Covenant, State parties recognize "the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions", while pursuant to Article 11 (2) the Covenant recognizes that more immediate and urgent steps may be needed to ensure "the fundamental right to freedom from hunger and malnutrition". The right to adequate food is of crucial importance for the enjoyment of all other rights. It applies to everyone; thus reference to Article 11 (1) does not imply any limitation upon the applicability of this right to individuals or to female-headed households. Since it is State obligation to promote and strengthen multi-sector and gender inclusive platforms at the national level, with the full and meaningful participation of small-scale food producers, farmers, livestock farmers and fishermen to develop, implement, and monitor policies towards the realisation of the right to food and nutrition. (The African Commission on Human and Peoples' Rights (the Commission), meeting at its 65th Ordinary Session held from 21 October to 10 November 2019, in Banjul, The Gambia:), and Uganda is a State Party to all the above instruments.



Judicial Interpretation

The welfare principle must guide every matter affecting children. Section 3(1) of the Children's Act (Cap 62) clearly provides that the welfare of a child shall be a paramount consideration in all matters concerning a child. The term paramount signifies that the child's best interests must take precedence over all other considerations. Decision-makers must therefore evaluate how any proposed law, policy, or action affects children's physical, emotional, moral, social, and educational development. (Re: Victoria Babirye Namutosi [2018] UGHCFD 1 (19 January 2018)). The Committee on Economic, Social and Cultural Rights, General Comment no. 12, on the Right to adequate food (Twentieth session, 1999), stated that the right to adequate food is indivisibly linked to the inherent dignity of the human person and is indispensable for the fulfilment of other human rights enshrined in the International Bill of Human Rights. The right to adequate food is realized when every man, woman and child, alone or in community with others, has physical and economic access at all times to adequate food or means for its procurement. (Center for Food and Adequate Living Rights [CEFROHT] v Attorney General Miscellaneous Cause no. 75 of 2020). The right to adequate food should therefore not be interpreted in a narrow or restrictive sense which equates it with a minimum package of calories, proteins and other specific nutrients. The right to adequate food has to be realized progressively with other rights and States have a core obligation to take the necessary action to mitigate and alleviate hunger as provided for in paragraph 2 of Article 11, even in times of natural or other disasters. (International Covenant on Economic, Social and Cultural Rights, 16th Dec, 1966). Article 14 of the African Children's Charter provides for children in Africa to enjoy the right to the highest attainable standard of health. The African Committee on the right of a child acknowledged that this right is to be achieved in a progressive manner with other rights such as the right to adequate food, as already highlighted in the Committee's Nubian children case. (Michelo Hunsungule and Others (On Behalf Of Children In Northern Uganda) V. The Governme of Uganda. Communication no.1 of 2005, 15 - 19 April 2013)

Thus, States should not adopt deliberate retrogressive measures in relation to children's rights. (Equal Education & Others v Minister of Education & Others, Case No. 22588/2020). Paragraph 15 of General Comment no.12 on the Right to Adequate Food provides that the right to adequate food imposes three levels of obligations on States:

- the obligation to respect
- the obligation to protect
- the obligation to fulfill

The obligation to fulfil includes both, facilitating access to nutritious food and directly providing food where necessary. In *Governing Body of the Juma Masjid Primary School v Essay NO and Ors.* (Para 57 & 58, 2011 (8) BCLR 761 (CC)), Court held that a breach of State Obligation occurs when there is a failure to respect rights, or when governments fail to prevent infringement of rights by others or diminish the protection of rights. Thus, failure by the Government of Uganda to strengthen and effectively implement the National School Feeding Policy in a manner that guarantees adequate and accessible food for school-going children will constitute a breach of its constitutional and legal obligations.



Recommendations

To strengthen Uganda's National School Feeding Policy, the Government should assume primary responsibility for financing and implementing school meals rather than relying mainly on parents and local communities. Embedding the program within national education, health, and social protection strategies would improve coordination, sustainability, and accountability as demonstrated in Kenya and Rwanda. Prioritizing home-grown food products sourced from local farmers, including women farmers and smallholders, would support local economies, promote food security, and ensure culturally appropriate food products supply and diets in schools to mimic Brazil's Programa Nacional de Alimentação Escolar (PNAE). There is also an urgent need for the Government to empower indigenous farmers through promoting mechanized environmental friendly agricultural models such as agro-ecology to enhance food production at the sub-county level. Sub-counties can be developed into sustainable food production hubs capable of supplying agro-ecological food products to schools within their catchment areas.

Crop production remains the most widespread agricultural activity in Uganda, with 99% of agrarian households engaged in it (Annual Agricultural Survey 2019 – Uganda Bureau of Statistics). However, crops are produced predominantly for own consumption, with 68.9% of households still operating within a subsistence economy (National Population and Housing Census 2024 / UBOS 2022). Uganda must therefore pursue an agricultural transition that prioritizes mechanised agricultural methods such as agroecology to sustainably increase food production. Evidence further indicates that agro-ecological practices can yield harvests that double those of conventional farming methods, demonstrating that agro-ecology is capable of feeding growing populations nutritious food products. Since poor-quality diets are one of the greatest obstacles to the survival, growth, development and learning of children today. (United Nations Children's Fund. (2019). The State of the World's Children 2019, Children, Food and Nutrition: Growing Well in a Changing World). Premised on the fact that Uganda is facing a unique nutritional crisis, undernutrition and overnutrition have heavily contributed to the country's disease burden especially among school going children.

In implementing the sub-country food supply strategy the State must as well pay kin observation to the Ugandan Malnutrition Paradox. Data from the Uganda Demographic and Health Survey (UDHS) 2022 reveals that 24.4% of children under five nationwide suffer from chronic stunting (irreversible physical and cognitive growth retardation). Crucially, the UDHS 2022 exposes shocking regional disparities: the lush, hyper-fertile, food-abundant Tooro sub-region exhibits the highest childhood stunting rate in the entire country at 40.6% surpassing even areas characterized by frequent climate shocks and absolute food scarcity. The Tooro paradox proves that agricultural abundance will not automatically guarantee nutritional security especially if communities remain ignorant with no sensitization offered to them and with no practical opportunities to participate in the ongoing policy drafting process. When communities cultivate food Crops primarily for commercial sale and feed their child monotonous mono Diet of pure starches (such as plain matooke or cassava) without animal-source proteins or micro nutrient diversification, chronic stunting flourishes. If the policy fails to legally mandate public participation and dietary diversity awareness, a state-funded program will inadvertently Finance and institutionalize child stunting on a national scale. Several Government interventions on school feeding have not yielded the anticipated outcomes due to the absence of a comprehensive and well conceptualized School Feeding Policy. Programs such as the Karamoja School Feeding Program and the School Milk Program in the South Western Region of Uganda are currently constrained, primarily due to the delay in finalizing and adopting the National School Feeding Policy. The rising prevalence of non-communicable diseases (NCDs) among children including obesity and diabetes is highly linked to poor diets especially during school hours.

Furthermore, the sub-county agrarian supply chains must be subjected to strict food storage procedures and rigorous sanitary and phytosanitary (SPS) regulations, otherwise the policy will expose children to a severe biological threat: of aflatoxins. Aflatoxins are highly toxic, carcinogenic mycotoxins produced by *Aspergillus* molds that thrive due to poor pre- and post-harvest handling, high humidity, and inadequate drying infrastructures across Uganda. Recent peer-reviewed national sampling (Akullo et al., 2023) reveals that 62.8% of maize food products and 41.8% of groundnut products sampled across Northern and Eastern Uganda drastically exceed the safe statutory threshold of 20 parts per billion (ppb), with baseline contamination levels frequently crossing 120-190 ppb. Furthermore, Ministry of Health and trade data from 2025/2026 highlights that over 1.3 million Ugandans suffer from foodborne illnesses annually, driven heavily by mycotoxin exposure. Ingesting sub-chronic levels of aflatoxins damages a child's intestinal lining, completely suppressing nutrient absorption and inducing severe immune suppression, liver damage, and stunting. If the government establishes school feeding infrastructure without strict, legally binding storage guidelines, mechanized solar drying mandates, and batch-testing certifications, it will risk creating a centralized network that systematically poisons the State's student population. The policy must contain explicit bio-security and food safety accountability measures. Since children spend most of their practical time at school, inadequate nutrition during school hours affects not only their physical health but also cognitive performance. A Human Rights-Based Approach is therefore essential to create the statutory teeth necessary to ensure that school-going children are protected from the lifelong physical and cognitive scars of malnutrition.

Lastly, conventional farming cannot be relied on to sustainably supply nutritious food products to schools since it excessively uses resources and soil nutrients faster than they can recover. If Uganda adopts conventional farming over agro-ecology, at some point the Country will have to face a moment where the soil will fail to produce enough food for schools? Since soils will be too exhausted. Water levels will as well be too low, and, the supplies of nutrients will be too poor. At both continental and global levels, it is widely recognized that the challenge of limited food production can be addressed through the adoption of improved agricultural models such as agroecology. *The Malabo Declaration on Accelerated Agricultural Growth and Transformation For Shared Prosperity and Improved Livelihoods 2014*(Article 1 (a)), and the *United Nations Sustainable Development Goals (SDGs)* particularly *SDG 2 (Zero Hunger)*, *SDG 5 (Gender Equality)*, *SDG 6 (Clean Water and Sanitation)*, and *SDG 12 (Responsible Consumption and Production)* underscore the critical role of sustainable agroecology in enhancing food security, promoting environmental stewardship, and fostering inclusive development. The promotion of mechanised agro-ecology at sub-county level offers a sustainable solution to the quality challenges in food production. Agro-ecological produces are globally known to be rich in nutritional value, and will thereby enhance the health, growth, and overall development of children if adopted. Compared to conventional agriculture, sustainable farming practices offer a combination of methods that regenerate soils, save water and energy, and provide greater diversity of nutrients for children consumption.

To safeguard children from chemical and biological hazards, the National Multi-sectorial School Feeding Coordination Committee in conjunction with the Ministry of Health and the National Bureau of Standards (UNBS) and other stakeholders should enforce binding sanitary protocols, no agricultural commodities should be supplied to schools from sub-county hubs unless they have undergone certified batch-testing for mycotoxins, specifically ensuring that aflatoxin levels do not exceed the statutory maximum limit of 10-20 parts per billion (ppb). Failure to implement post-harvest infrastructure and safety certifications shall constitute a direct, actionable breach of the State's constitutional duty to protect children from harm under Article 34. By weaving these medical, biochemical, and agricultural realities into a legal fabric, the government will close the loopholes in the policy and prevent future hunger and stunting among children without proper intervention and policy integration. If undermined government could legally feed State's children toxic or nutritionally bankrupt starch under the guise of an approved policy.



Failure by the Government of Uganda to strengthen and effectively implement the National School Feeding Policy in a manner that guarantees accessible and adequate nutrition/food for school-going children will constitute a breach of constitutional and legal obligations. The State has a duty to respect, protect, and fulfil children's rights, including the rights to food, health, an adequate standard of living, and life. Access to nutritious food is essential for children's growth, development, and education. An inadequate or poorly implemented school feeding policy may therefore violate these rights. It is therefore necessary for the Government of Uganda to adopt clear, inclusive, and sustainable measures to ensure that every child has access to adequate food during school hours.

Localized Food Blueprint

Still important to note is that, Uganda does not possess a singular dietary identity. A centralized, homogenous national menu cannot work. To make your sub-county food hubs sustainable and nutritionally optimized, the policy must mandate a regionalized Minimum Dietary Diversity Score (MDDS), ensuring that local agricultural outputs match the specific physiological deficiencies of the student population in those areas. Below is a practical, regionalized blueprint that should be annexed into the legal text:

Ugandan Agro-Ecological Zone	Dominant Local Carbohydrate	Mandatory Nutritional Pairings	Targeted Public Health/Clinical Outcome
Western & Central Regions (The Matooke Belt)	Matooke, Cassava, White Sweet Potatoes	Iron-rich biofortified beans, Groundnut paste (Binyebwa), and Amaranth leaves (Doodo).	Matooke contains near zero protein. Adding bio-fortified beans and lipids yields a complete amino acid profile, mitigating iron- deficiency anemia. Vitamin C naturally exist in fresh Doodo (amaranth leaves) chemically enhances the absorption of non-heme iron found in the biofortified beans.
Eastern & Northern Regions (The Cereal & Grains Belt)	Finger Millet, Sorghum, Cassava	Silverfish (Mukene) powder blended into porridge, Cowpeas, or Pigeon peas.	Millet provides exceptional calcium and iron. Silverfish powder injects highly bioavailable animal protein, zinc, and omega-3 fatty acids for brain growth.
Karamoja & West Nile (Arid / High-Wasting Zones)	Sorghum, Maize, cassava, Orange-Fleshed Sweet Potatoes	Pasteurized whole cow's milk (reviving the stalled regional milk initiatives), beans and Vitamin A Orange-Fleshed Sweet Potatoes. Fat for fat-soluble vitamins. With Doodo as a vegetable option	Combats acute wasting (around 10% in these zones) by delivering rich energy density, bioavailable calcium, protein and high-dose Vitamin A to prevent blindness. Lipids (fats) in whole cow's milk are biochemically required for the child's body to proper absorb the fat-soluble Vitamin A present in the orange-fleshed sweet potatoes. Without a fat source, vitamin A absorption drops significantly.

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