

**OSNPPHSchool Nutrition Workgroup
 Questions and Answers re:
 Ministry of Education School Food and Beverage Policy P/PM 150**

GENERAL QUESTIONS	
Q1.	<p>What is the portion size upon which the criteria are based e.g., what portion size of French fry will be allowed? What serving size are we using to read the nutrition label?</p> <p>The nutrient criteria were developed using reference amounts and serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>. The reference amount was selected as the basis for the nutrition criteria because:</p> <ul style="list-style-type: none"> • nutrient content and disease risk reduction claims, on which several of the nutrition criteria are based, use the reference amount; and, • the reference amount falls within a regulated range for serving sizes that are used on Nutrition Facts tables. <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards. For example, although the Nutrition Facts table for a slice of bread lists nutrition information for a serving size of 1 slice, because it is offered for sale as a sandwich requiring 2 slices as the serving size, all information on the Nutrition Facts table must be doubled and then compared to the nutrition criteria in the nutrition standards under the Bread sub-group in the Grains group.</p>
Q2.	<p>I understand that we are matching the nutrition criteria to the Nutrition Facts table. You mentioned that calculations must be done if serving size is larger or smaller than what is on the Nutrition Facts table. This is where my confusion starts. If we look on the facts table and the reference amount is 30g. Based on 30g the food item meets the criteria for <i>Sell Most</i>, for example. If the amount served is 20g and then doesn't meet some of the nutrition criteria for <i>Sell Most</i> or <i>Sell Less</i> it would no longer qualify? Or if the serving size is 50 g and then no longer meets the criteria for <i>Sell Most</i> but meets the criteria for <i>Sell Less</i> we would then categorize it there?</p> <p>Your analysis is correct for both questions. For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if a product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p> <p>A Nutrition Facts table does not state the reference amount, but rather the serving size.</p> <p>A reference amount is a specific regulated quantity of a type of food usually eaten by an individual at one sitting. Reference amounts, as established by Health Canada, are set out in the <i>Food and Drug Regulations</i>. With the exception of pre-packaged meals, reference amounts serve as the basis of compositional criteria for nutrient content claims and health claims. Reference amounts are also used for determining a single serving container size.</p> <p>Nutrient information presented in a Nutrition Facts table is based on a specific amount of food</p>

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	<p>(edible portion). The amount is indicated under the Nutrition Facts heading using the phrase "Serving (naming the serving size)", "Serving Size (naming the serving size)" or "Per (naming the serving size)". The stated serving size on the Nutrition Facts table is used to assess whether a product meets the nutrition criteria in the nutrition standards, however, the portion size can be adjusted as long as it still meets the nutrition criteria.</p>
<p>Q3.</p>	<p><u>What is the rationale for each of the nutrition values chosen for each food item? And why certain nutrients were not included?</u></p> <p>The nutrition standards were developed by a writing team of registered dietitians from public health and the food services sectors, as well as representatives from a variety of ministries.</p> <p>The writing team’s work was informed by:</p> <ul style="list-style-type: none"> • stakeholder consultation with over forty organizations; • a review of existing federal policies and guidelines; • a jurisdictional scan; and, • feasibility testing - the writing team pilot-tested the draft nutrition standards for the availability of food and beverage products that would meet the standards in order to ensure that products were available in both the retail and food services sectors. <p>Nutrients were selected with consideration to the following factors:</p> <ul style="list-style-type: none"> • Trans Fat Standards Regulation (O.Reg 200/08). • Analysis of Canadian nutrient intake data. • Directional statements from <i>Canada’s Food Guide</i>. • Information available on the Nutrition Facts table and the ingredient list. • Nutrient content claims and disease risk reduction claims. • The composition of the food product (i.e., the type of product, processing and ingredients). • Results from the jurisdictional scan. <p>A variety of sources were used to set the nutrient levels, including: <i>Canada’s Food Guide</i>, the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labeling and Advertising</i>, and feasibility testing of retail and food service products.</p>
<p>Q4.</p>	<p>Does one apply criteria before cooking or after cooking (e.g., frozen French fries may meet criteria before cooking but not afterwards...depending on cooking method?</p> <p>The nutrition standards apply to the item before it is cooked, since there would be no practical way to assess post-cooking nutritional values.</p> <p>The policy states that food should always be prepared in a healthier way – that is, using cooking methods that require little or no added fat or sodium, such as baking, barbequing, boiling, broiling, grilling, microwaving, poaching, roasting, steaming or stir frying and no deep frying.</p>

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<p>Q5.</p>	<p>Portion sizes are not mentioned for deli meats. Pepperoni generally doesn't meet the criteria (presuming the fat and sodium is based on 75g serving), if a pizza uses a smaller amount than the reference amount (75g), in turn the pizza would have less total amount fat and sodium, so could it be served? Most pizzas in school would only have 3-4 slices of pepperoni on it... much less than a serving size from CFG. Or since reference amounts aren't mentioned, does that mean regular pepperoni, regardless of serving size can't be served? Same for deli meats in a wrap, maybe even meat on a sub? It's back to eating less than the serving size on the Nutrition Facts Table. Would that be permitted? Or do portion sizes not matter?</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a smaller (or larger) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards. For example, if the pepperoni does not meet the nutrition criteria based on the stated serving size (e.g., 75g), but only 25g of pepperoni is going to be offered for sale in the school, then that is the amount that needs to meet the nutrition criteria. For this example, the fat and sodium information on the Nutrition Facts table would be divided by three and then compared to the nutrition criteria in the nutrition standards under the Fresh and Frozen Meat sub-group in the Meat and Alternatives group.</p>
<p>Q6.</p>	<p>Are these standards a first 'draft'? Will they be revised as the food industry evolves to provide more nutritious choices? For example, what opportunity is there to improve the sodium or fibre values as products become more readily available?</p> <p>The Ministry of Education intends to review the policy when there are significant developments in food science or amendments to federal laws relating to food and beverages to ensure that it remains relevant and up-to-date. The ministry always welcomes input on this, or any other healthy schools related initiative, through email at healthy.schools@ontario.ca.</p>
<p>Q7.</p>	<p>Mercury content isn't listed on food labels; do food service providers or parents organizing hot lunches need to verify that tuna is light and not white or albacore?</p> <p>No. The footnote provided at the bottom of the Meat and Alternatives group refers individuals to visit Health Canada's website at: www.hc-sc.gc.ca/fn-an/securit/chem-chim/environ/mercur/cons-adv-etud-eng.php for more information on making informed choices about fish.</p>
<p>Q8.</p>	<p>Not Permitted for Sale category. Are these foods allowed on the 10 exemption days or are they really "Not permitted for Sale"? For example, could a high school cafeteria serve pop once a month? Or do the exemption days just mean that you don't have to follow the 80/20 rule? How does the Ministry see these items not being sold if they're sitting in a storeroom waiting for the next "Fry and Pop day" to happen?</p> <p>The School Food and Beverage Policy allows a school principal, in consultation with the school council, to designate up to ten days (or fewer, as determined by the school board) during the</p>

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	<p>school year as special-event days on which food and beverages sold in schools would be exempt from the nutrition standards.</p> <p>Principals are also encouraged to consult with their students in making these decisions.</p> <p>The policy is about creating an environment where the healthiest choices are the easiest choices for students to make and ensuring that while students are in school, they are able to choose healthy and nutritious products. However, it does recognize that schools and school board should be given some flexibility during special-event days.</p> <p>The Ministry of Education encourages schools to consider healthy options or non-food related items for special-event days.</p>
<p>Q9.</p>	<p>It appears that the <i>Sell Most</i> category aligns more with the Moderate Nutritional Value category in the Nutrition Tools for Schools (NTS) Food standards rather than the Maximum Nutritional Value category. Given that a number of school boards are already using NTS and have established school board policies to reflect the NTS standards, is it okay to continue to go with the higher standards that has been established? Assume that we can continue to work with schools using NTS standards but adjusting for those categories where the MOE criteria are superior.</p> <p>All existing school board or school policies or guidelines related to nutrition standards for food and beverages sold on school premises for school purposes must, at minimum, meet the requirements set out in the School Food and Beverage Policy.</p> <p>School boards and schools may decide to apply the nutrition standards more broadly than what is outlined in the policy or chose to go beyond the nutrition criteria outlined in the policy.</p>
<p>Q10.</p>	<p>Is it ok to still fundraise with chocolate bars since they're sold off school property? However, chocolate bars are provided to students on school property and we do collect the money on school property.</p> <p>The School Food and Beverage Policy applies to food and beverages sold on school premises for school purposes. The policy exempts food and beverage offered for sale off school premises.</p> <p>The policy is about creating a school environment where the healthiest choices are the easiest choices for students to make and ensuring that students are able to choose healthy and nutritious products.</p> <p>As well, school boards and schools always have the ability to apply the nutrition standards more broadly than what is outlined in the policy.</p>
<p>Q11.</p>	<p>Would it be ok for a staff member to sell sports drinks or other foods and or beverages from</p>

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	<p>the NPFS category from the staff room, since selling in the staff room is allowed? The purpose of the School Food and Beverage Policy is to help contribute to improved education and health outcomes for all students. The policy is about creating an environment where the healthiest choices are the easiest choices for students to make.</p> <p>We do not expect that staff members would be selling food or beverages to students from the staff room as a means to contravene the spirit of the policy.</p>
<p>Q12.</p>	<p>Does PPM 150 apply to private Christian schools? No. P/PM 150 is mandatory for all publicly funded elementary and secondary schools in Ontario. A privately funded school may adopt the policy if it likes.</p>
<p>Q13.</p>	<p>A principal mentioned that a food provider/caterer markets school meals directly to parents. The school is aware of it but no money transaction happens through the school. Would that still be considered food "sold" and therefore need to follow PPM 150? If the food is being offered for sale on school premises for school purposes (e.g., a lunch program sponsored by the school) then the policy applies. The policy applies to all food and beverages sold in all venues on school premises for school purposes, such as: the cafeteria, vending machines, tuck shops and sports fields.</p>
<p>Q14.</p>	<p>How does one apply the 80/20 rule? Does the 80/20 refer to all the foods being sold from a venue (i.e., cafeteria, tuck shop) or does it refer to specific food groups (e.g., grains) or to a food category (e.g., baked goods)? For example, is it ok to offer all baked goods in the cafeteria from the <i>Sell Less</i> category as long as they don't exceed 20% of all food choices being sold from the cafeteria, which would mean, I don't need to offer baked goods from <i>Sell Most</i> too, since I am selling other foods that come from <i>Sell Most</i> category. Or am I allowed to sell only 20% of the food group (e.g., grains) from the <i>Sell Less</i> and 80% of the grains need to be from <i>Sell Less</i>, or can I sell only 20 of baked goods from the <i>Sell Less</i> and 80% have to be from the <i>Sell Most</i>? The 80/20 rule applies to products available for sale in each venue, program or event, not products sold.</p> <p>When assessing the food and beverage choices offered for sale remember:</p> <ul style="list-style-type: none"> • Food choices are assessed separately from beverage choices. • All food choices are assessed together (you do not need to assess each food group). • All beverage choices are assessed together. <p>If there are fewer than five food or beverages choices offered for sale, all products must be <i>Sell Most</i> choices.</p>
<p>Q15.</p>	<p>How is the 80-20 rule applied for schools that offer pizza day and sub day every week? Every Friday they alternate between getting pizza (no other food choice) or subs. From my</p>

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	<p>understanding, pizza and subs need to be assessed as a food without an ingredient list...so if there is one ingredient on it that is from the <i>Sell Less</i> category then the whole pizza or sub (if less than 5 ingredients) would be from the <i>Sell Less</i>. Is this right? Second what about the frequency? If schools have 50 Fridays that they sell either pizza or subs then would the 80-20 rule mean they could potentially offer pizza and subs from the sell less category on 10 days.</p> <p>A school that operates a catered lunch program (e.g., hot lunch program) or holds a weekly lunch event (e.g., pizza day, sub day) would have to ensure that at least 80% of the food choices and 80% of the beverage choices offered as part of each program or event, each day, fit the <i>Sell Most</i> category. The only exception would be on up to 10 special event days each year.</p> <p>If there are fewer than 5 food choices available, they must all be <i>Sell Most</i> choices.</p>
<p>Q16.</p>	<p>How does the 80/20 rule work for my special food day, where our school sells pizza slices once a week? Does it mean that 80% of the ingredients on the pizza have to be from the <i>Sell Most</i> category and 20% of the ingredients can be from the <i>Sell Less</i> category?</p> <p>A school that operates a catered lunch program (e.g., hot lunch program) or holds a weekly lunch event (e.g., pizza day, sub day) would have to ensure that at least 80% of the food choices and 80% of the beverage choices offered as part of each program or event, each day, fit the <i>Sell Most</i> category.</p> <p>If there are fewer than 5 food choices available, they must all be <i>Sell Most</i> choices.</p> <p>For this example, if only one type of pizza is offered for sale each week as part of the pizza day, then the pizza must be a <i>Sell Most</i> choice.</p> <p>If the pizza has a Nutrition Facts table, then the information from the Nutrition Facts table needs to meet the <i>Sell Most</i> nutrition criteria in the nutrition standards under the Entrées sub-group in the Mixed Dishes With a Nutrition Facts Table group.</p> <p>If the pizza does not have a Nutrition Facts table, then each individual ingredient (e.g., crust, cheese, pepperoni, and sauce) must be assessed separately using the appropriate food groups. For the pizza to be considered a <i>Sell Most</i> choice, all ingredients (e.g., crust, cheese, pepperoni, and sauce) must meet the appropriate <i>Sell Most</i> criteria</p>
<p>Q17.</p>	<p>Does PPM 150 apply to foods being sold in school board or administrative offices (e.g., vending machines)?</p> <p>No. The nutrition standards do not apply to food or beverages sold in school board or administrative offices. The policy is about creating a school environment where the healthiest choices are the easiest choices for students to make and ensuring that students are able to choose healthy and nutritious products.</p>

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Q18.	<p>At a presentation to secondary school principals as part of their PPM 150 training, the major area of concern identified by this group (aside from loss of revenue) was how to address schools with specialist food school programs (training students specifically for positions in food service industry). Students are required to demonstrate certain skills and make certain products – most of which would not meet nutrition criteria in PPM 150. These food items are often sold to students and are a major source of revenue for the programs. What is the best way to support these schools?</p> <p>The nutrition standards do not apply to the food or beverages that are being prepared as part of the program, unless the food or beverages are being offered for sale on school premises for school purposes.</p> <p>If the food or beverages are being offered at no cost then the nutrition standards do not apply. As well, a school principal, in consultation with the school council, may designate up to ten days (or fewer, as determined by the school board) as special-event days on which food and beverages sold in schools would be exempt from the nutrition standards. This could include the sale of food or beverage prepared as part of school programs. Principals are encouraged to consult with their students in making these decisions.</p>
Q19.	<p>What should we advise high schools that may also have grade 7 or 8 students in the school with access to all vending machines/cafeterias...re: beverages?</p> <p>School boards determine how to apply the policy in such a situation.</p>
Q20.	<p>If a school offers 5 different hot lunch entree (pizza, sub, Caesar salad, sushi, burger) items in a month and then repeats those same offerings each and every month. Does PPM 150 require the school to assess all the items together as one "venue or event" so all 5 items and in doing so does this mean if 4 of the choices could be Sell Most and one could be Sell Less to meet the 80/20 rule. OR does each entrée get assessed individually.</p> <p>A school that operates a catered lunch program (e.g., hot lunch program) would have to ensure that at least 80% of the food choices and 80% of the beverage choices offered as part of the program, each day, fit the <i>Sell Most</i> category.</p> <p>If there are fewer than 5 choices available, they must all be <i>Sell Most</i> choices.</p>
Q21.	<p>What should schools and schools boards do about PPM 135. Has it become irrelevant?</p> <p>Schools can continue to follow PPM 135 (Healthy Food and Beverages in Elementary School Vending Machines) until September 1, 2011, at which time the new School Food and Beverage Policy (PPM 150) will replace PPM 135.</p>
VEGETABLES AND FRUIT	
Fresh, Frozen, Canned and Dried Vegetables and Fruit	
Q22.	The <i>Sell Most</i> criteria requires that vegetable or fruit is the first item on the ingredient list.

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	<p>Often water is the first ingredient and not vegetable or fruit. Does this mean the vegetable or fruit would not be allowed?</p> <p>If water is the first ingredient followed by vegetable or fruit, the product would be classified as a <i>Sell Most</i> choice (provided it meets the other <i>Sell Most</i> criteria).</p>
Q23.	<p>Why is it necessary to include sodium criteria for <i>Sell Most</i> in this category?</p> <p>This criteria aligns with Canada’s Food Guide’s directional statement to choose vegetables and fruit with little or no added salt.</p> <p>Some canned vegetables have added sodium to preserve them.</p>
Q24.	<p>“Concentrated fruit juice” is included in the footnote for other words meaning “Sugar”. However, the CFIA indicates that foods can qualify for a No Sugar Added or other unsweetened claims in some fruit based products “where the functional effect of fruit juice or concentrated fruit juice may be as a fruit ingredient as opposed to a sweetening ingredient”. As such, some products (eg, PC Fruit Twists, Del Monte Fruit Twists) have a “No Sugar Added” front of pack claim and concentrated fruit juice on the ingredient list. How should fruit based products be classified if concentrated fruit juice is in the ingredient list (1st or otherwise)?</p> <p>Concentrated fruit juice as the first ingredient is acceptable provided the product meets the additional nutrition criteria.</p>
Canned Tomatoes and Tomato-Based Products	
Q25.	<p>What is the rationale for the sodium of 480 mg?</p> <p>The sodium criterion is set higher compared to other vegetables and fruit categories to allow for the sodium level required for the preservation of canned tomato and tomato-based products.</p> <p>The sodium criterion under the <i>Sell Most</i> category is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fat permitted by the federal Food and Drug Regulations.</p>
Vegetable and Fruit Chips	
Q26.	<p>What are the “higher levels of essential nutrients” found in vegetable and fruit chips given that these are found in the <i>Sell Most</i> category? Canada’s Food Guide does not include these in the vegetable and fruit food group? Why are they here? What are vegetable and fruit chips? What is the difference between a lower-fat, low-sodium apple ‘chip’ and dried apple slices?</p> <p>Nutrients that may be provided by vegetable and fruit chips include carbohydrates, vitamins A and C, potassium, magnesium and some B vitamins such as folate.</p> <p><i>Canada’s Food Guide</i> recommends choosing vegetables and fruit that are prepared with little</p>

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	<p>or no added fat, sugar and salt.</p> <p>Vegetable and fruit chips could include, potato, carrot, banana, apple, pear, etc.</p> <p>Fruit chips are prepared using a drying process that often adds sodium for preservation purposes. This causes them to have slightly higher sodium content than fresh fruit, or dried fruit.</p>
Q27.	<p>What is the rationale for not including criteria that vegetable or fruit is the first item on the ingredient list?</p> <p>We did not find any products that did not have vegetable or fruit as the first item on the ingredient list.</p>
Q28.	<p>What is the rationale for the sodium criteria of 240 mg?</p> <p>The sodium criterion under the <i>Sell Most</i> category of ≤ 240 mg was set at 50% less than the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations.</p> <p><i>Canada's Food Guide</i> states to choose vegetables and fruit prepared with little or no added fat, sugar or salt.</p>
GRAIN PRODUCTS	
Bread	
Q29.	<p>Does the nutrition criteria in the food standards apply to one slice or two slices of bread? For example, when assessing the bread for a sandwich does the nutrition criteria for that sandwich have to meet the nutrition criteria for bread (ie, two slices)? If so, in many cases two slices would be over the criteria for sodium. Would 2 slices of bread need to be classed as a mixed dish?</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards. If two slices of bread are used in a sandwich, then two slices need to be assessed to determine the final mixed dish (e.g., sandwich).</p> <p>If sandwiches are sold on a made-to-order basis (e.g., sandwich station), each ingredient must be assessed using the nutrition criteria for the appropriate group in the nutrition standards. For instance, to determine which category bread fits into, compare the information on the bread's Nutrition Facts table to the criteria under the Bread sub-group in the Grain Products category.</p> <p>Each major ingredient from the sandwich station counts as one food choice (e.g., whole grain</p>

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	<p>bread, white sub buns, tomatoes, lettuce, deli turkey, deli roast beef).</p> <p>If sandwiches are pre-made and do not have a Nutrition Facts table, use the nutrition criteria for Mixed Dishes Without a Nutrition Facts Table. Using the example of a sandwich consisting of two slices of bread and 25g of deli meat, compare the relevant information on the bread's food label (based on the amount used in the sandwich - i.e., two slices) with the nutrition criteria under the Bread sub-group in the Grain Products category. Compare the relevant information on the deli meat's food label (based on the amount used in the sandwich - i.e., 150mg) with the nutrition criteria under the Deli (Sandwich) Meat sub-group in the Meat and Alternatives group.</p> <p>If all major ingredients are from the <i>Sell Most</i> category, then the sandwich would be a <i>Sell Most</i> choice. If one or more major ingredients are from the <i>Sell Less</i> category, then the sandwich would be considered a <i>Sell Less</i> choice.</p> <p>Alternatively, the pre-made sandwich could be assessed using the nutrition criteria in the Mixed Dishes With a Nutrition Facts table group provided you are able to calculate the amount of each of the nutrients listed under the entrées subgroup for the end product (i.e., fat, saturated fat, trans fat, sodium, fibre and protein). This could be achieved by adding together the nutrients of all major ingredients used in the sandwich (e.g., two slices of bread).</p> <p>Each unique pre-made sandwich would count as one food choice.</p>
<p>Q30.</p>	<p>Is it possible to serve 1 whole bagel? There doesn't appear to be a bagel in the market currently that has less than 240 mg Na. Could it be classed as a mixed dish even though the only thing it would have added is a source of fat (margarine, butter, cream cheese)? If the whole bagel meets the nutrition criteria then it may be sold.</p> <p>A mixed dish is considered to be a food product with more than one major ingredient. A major ingredient is any product that is identified in one of the food groups (i.e., Vegetables and Fruit, Grain Products, Milk and Alternatives, Meat and Alternatives) or beverages in the nutrition standards.</p>
<p>Q31.</p>	<p>What is reconstituted enriched whole grain wheat flour? This is being listed on products (eg, some cookie mixes)? In processing the germ, the endosperm and kernel are 'added back' – but not necessarily in the same proportions to be 100% whole grain. Additionally, several sources indicated 'reconstituted' whole wheat flour is often white flour and bran added. This would preclude reconstituted enriched whole grain wheat flour from being considered 'whole grain'.</p>
<p>Q32.</p>	<p>Is whole wheat flour a whole grain flour? Has something been removed (eg, the germ)? Not necessarily. Health Canada defines whole grain as, "Whole grains and whole grain foods</p>

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	<p>are composed of all three edible layers of the grain seed or kernel. To find out if a product is made with whole grain, read the ingredient list on the food label. Whole grain foods will have the words “whole” or “whole grain” followed by the name of the grain as one of the first ingredients. For example, the beginning of the list could say whole grain wheat or whole grain oats.”</p> <p>Whole wheat flour may be considered a whole grain, if the germ and bran are added back so that the grain is "whole" (100%) again. If "whole wheat flour with added germ" is listed on the ingredient list, the flour is whole grain flour.</p>
<p>Q33.</p>	<p>Does bread that lists ‘whole wheat flour’ vs ‘whole grain, whole wheat flour’ fit in the Sell Most or Sell Less category? Does the ingredient list have to have the words “whole grain”? Yes, “whole grain” must be the first ingredient listed to fit in the <i>Sell Most</i> category.</p>
<p>Q34.</p>	<p>Does pizza dough have to be made with 100% whole wheat flour, or if whole wheat flour is listed as the first ingredient but additional ingredients include white flour is this ok? Including white flour is okay, provided the pizza dough meets the nutrition criteria in the nutrition standards.</p>
<p>Q35.</p>	<p>How does one determine if a slice of pizza from a “mom and pop” shop has two grams of fibre (to meet Sell Most nutrition criteria)? In order for a product to be offered for sale in schools, the product will need to meet the nutrition standards in the School Food and Beverage Policy. Schools should ask the pizza shop to attest that the pizza meets the nutrition standards, including the fibre criterion.</p>
<p>Q36.</p>	<p>What is the rationale for the sodium criteria of 240 or 480 mg? The <i>Sell Most</i> sodium criterion of ≤ 240mg was set at 50% less than the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations. The criterion aligns with <i>Canada’s Food Guide’s</i> directional statement to choose grain products that are lower in fat, sugar or salt. It is also based on current market availability.</p> <p>The <i>Sell Less</i> sodium criterion of ≤ 480mg is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations.</p>
<p>Q37.</p>	<p>Should “enriched” be another criterion for the Sell Less (SL) category? Some bread isn’t enriched if it comes from another country. All white flour in Canada must be enriched; therefore an ‘enriched’ criterion is not necessary.</p> <p>The Canadian Food and Drug Regulations (FDR) require that all white flour and all foods sold in Canada that contain white flour, such as bread and pasta, be made from enriched white flour.</p>

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	<p>The sale of unenriched white flour or foods containing unenriched white flour is not permitted in Canada. The only exception to this requirement is white flour sold for the production of gluten or starch.</p>
Pasta, Rice and Other Grains	
Q38.	<p>What is the rationale for excluding at a minimum whole grain OR fibre criteria for Sell Most to reflect the healthiest choice and Canada Food Guide’s directional statements, messaging and tips for consumers (page 16-17). Using OR in this case would be fine given that many ‘other grains’ may not reach the 2g of fibre.</p> <p>There is no fibre criterion, so as not to exclude rice which is a staple of many cultures’ diets.</p>
Q39.	<p>What is the rationale for the sodium requirements?</p> <p>The <i>Sell Most</i> sodium criterion of $\leq 240\text{mg}$ was set at 50% less than the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations. It also aligns with <i>Canada’s Food Guide’s</i> directional statement to choose grain products that are lower in fat, sugar or salt. The criterion is also based on current market availability.</p> <p>The <i>Sell Less</i> sodium criterion of $\leq 480\text{mg}$ is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations.</p>
Q40.	<p>Why is ‘enriched’ not a requirement for the Sell Less category given that some imported pasta products may not be enriched and therefore nutritionally inferior (CFG page 17)?</p> <p>All white flour in Canada must be enriched; therefore an ‘enriched’ criterion is not necessary.</p> <p>The Canadian Food and Drug Regulations (FDR) require that all white flour and all foods sold in Canada that contain white flour, such as bread and pasta, be made from enriched white flour. The sale of unenriched white flour or foods containing unenriched white flour is not permitted in Canada. The only exception to this requirement is white flour sold for the production of gluten or starch.</p>
Q41.	<p>What portion size is this based upon given the difference in the food products found in this category? How should we explain this to food service providers when we work with them?</p> <p>The portion size was not used to determine the nutrition criteria in the nutrition standards. The nutrient criteria were developed using reference amounts and serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale</p>

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	needs to meet the nutrition criteria in the standards.
Baked Goods	
Q42.	Where do Rice Krispie squares fit? Rice Krispie squares would be classified under the Baked Goods sub-category for the purposes of the nutrition standards in the School Food and Beverage Policy.
Q43.	What is the portion size upon which the criteria are based? The portion size was not used to determine the nutrition criteria in the nutrition standards. The nutrient criteria were developed using reference amounts and stated serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i> . For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.
Q44.	What is the rationale for not including whole grain in the criteria for Sell Most? OSNPPH had recommended that whole grain be added to the criteria since these products could potentially be offered every day. Why do these criteria not align with CFG (page 17 of Resource Guide)? Canada's Food Guide recommends making "at least half of your grain products whole grain each day." Including a 'whole grain' criterion in the <i>Sell Most</i> category in this sub-group was not considered feasible given market availability. Should cookies and cupcakes, regardless of fibre, be limited to the Sell Less group (like milk based desserts)? Or any other products with sugar as first ingredient? If pudding made with milk can only be a Sell Less item, then shouldn't cookies and cupcakes only be Sell Less as well? Provided a baked good, such as a cookie, meets the criteria for <i>Sell Most</i> , then it is acceptable.
Q45.	How was the fat criterion determined? What is the rationale for the numbers chosen? The <i>Sell Most</i> fat criterion of $\leq 5g$ for baked goods was set higher than the 3g limit for the 'low in fat' claim due to the current market availability of these products.
Q46.	How do schools assess muffin and pancake mixes that have a Nutrition Facts table based on 100g serving? Schools would need to prorate the nutrition criteria and the weight of the muffin to 100g.
Q47.	Why are grain-based bars included with Baked Goods and not the Grain-Based snacks? Grain-based bars can come in many forms, such as breakfast bars, granola bars, meal replacement bars, and 'power' bars. Most grain-based bars include fat, fibre, protein and sugar and are more nutrient dense.

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Grain-based Snacks	
Q48.	<p>What is the portion size upon which these criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p>
Q49.	<p>What is the rationale for not including whole grain and fibre in the criteria for Sell Most? We had recommended that both of these criteria be included in the Sell Most category to represent healthier choices and CFG messaging.</p> <p>Canada's Food Guide recommends making "at least half of your grain products whole grain each day." Including a 'whole grain' criterion in the <i>Sell Most</i> category in this sub-group was not considered feasible given market availability.</p>
Cereals	
Q50.	<p>What is the rationale for only using 2 g of fibre for criteria in Sell Most vs 4 g? (<i>High source of fibre</i>). OSNPPH had recommended 4 g to align with CFG (e.g. page 16 in CFG, it suggests picking a cereal made with whole grains or bran or one that is at least a <i>high source of fibre</i>. A <i>high source</i> is 4g of fibre).</p> <p>The fibre criterion is consistent with the 'source of fibre' nutrient content claim. When combined with the whole grain criterion, this criterion should ensure that more nutritious cereals will be available in schools. The criterion is also based upon current market availability.</p>
Q51.	<p>What is the rationale for not including nutrient criteria for Sell Less? OSNPPH had recommended that this be included since there are an abundance of cereals that have only 2g fibre.</p> <p>Combining whole grain as the first item on the ingredient list with the fibre criterion will ensure that only the healthiest cereals will be offered in sale in schools (i.e., high-sugar cereal made with whole grain or whole grain wheat, but without 2 g of fibre will not be permitted for sale in schools).</p>
Q52.	<p>What is the rationale for not including sodium criteria in any of the categories? Research has shown cereals are one of the 10 highest sources of sodium in the diet?</p> <p>A sodium criterion for cereals was not needed. A review of market availability determined that the sodium content was below the lowest sodium criterion (240mg).</p>
MILK AND ALTERNATIVES	
Yogurt/Kefir	

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Q53.	<p>What is the portion size upon which these criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p>
Q54.	<p>What is the rationale for the fat criteria for this category as there is an inconsistency with CFG (3.25% MF vs CFG messaging of 2% MF or less?) as well as other lower fat recommendations within this category (eg, cheese 20% MF or less) and fluid milk in the Beverages category (eg, 2 %MF or less)</p> <p>The fat criterion of $\leq 3.25\%$ milk fat or ≤ 3 g is consistent with the 'low fat' nutrient content claim and aligns with <i>Canada's Food Guide's</i> directional statement to select lower-fat milk alternatives. The criterion is feasible based on the portion sizes and types of yogurt commonly sold in schools.</p>
Q55.	<p>What was the rationale for not including vitamin D and Ca criteria for Sell Most, given the significant importance of both of these and the inconsistent amounts found in these food products?</p> <p>The standards are not intended to prescribe daily intakes for students, but rather identify a common set of standards for what can be offered for sale in schools.</p>
Cheese	
Q56.	<p>Is this where cheese slices, cheese whiz, cream cheese, parmesan cheese fit?</p> <p>Yes, any variety of cheese that is used in quantities greater than that listed under the Minor Ingredients - Other sub-group in the Miscellaneous Items group would be classified in this Cheese category.</p> <p>However, it is expected that products such as parmesan cheese would generally be used in small quantities and would therefore be considered a Minor Ingredient.</p>
Q57.	<p>Aramark is using a soy product on their poutine because of its melting properties — where do soy cheeses fit in the food standards?</p> <p>These products would be classified under the Cheese sub-group in the Milk and Alternatives group.</p>
Q58.	<p>Cheese: Do we interpret that a cheese with greater than 20% MF is <i>Sell Less</i> if it meets the Ca (Calcium) and Na (Sodium) requirements or should it be <i>Not Permitted for Sale</i>? Neither columns mentions higher fat cheeses, only Ca and NA.</p> <p>Yes, cheese would be <i>Sell Less</i> if it had $\geq 20\%$ MF, but was ≤ 480 mg of sodium and $\geq 15\%$ DV of</p>

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	calcium.
Milk-Based Desserts	
Q59.	<p>What is the portion size upon which these criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p>
Q60.	<p>What is the rationale for the fat and sodium and calcium criteria?</p> <p>The <i>Sell Less</i> fat criterion of ≤ 5 g is feasible based on current market availability and it aligns with Canada's Food Guide's directional statements to limit food and beverages high in Calories, fat, sugar or salt (sodium) such as ice cream and frozen desserts, and to select lower-fat milk alternatives.</p> <p>The sodium criterion of ≤ 360 mg was set at 25% less than the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats and is based on current market availability.</p> <p>The calcium criterion of $\geq 5\%$ DV is consistent with the '<i>source of calcium</i>' nutrient content claim. The criterion also excludes products that meet the fat and sodium criteria, but do not contain any calcium (e.g., some puddings made with milk solids).</p>
Q61.	<p>Is frozen yogurt classified as a yogurt or Milk-Based dessert?</p> <p>Frozen yogurt would be classified as a milk-based dessert.</p>
MEAT AND ALTERNATIVES	
Fresh and Frozen Meat	
Q62.	<p>Why is there no saturated fat criterion for fresh and frozen meat in the SM category?</p> <p>Given the natural variation in the saturated fat content of meat (e.g., chicken, beef), it was not feasible to determine a single saturated fat criterion for this sub-group.</p>
Q63.	<p>What is the rationale for the sodium and fat (eg, 10 g for SM vs 14 g for SL) criteria?</p> <p>The <i>Sell Most</i> fat criterion of ≤ 10g aligns with the Canadian Food Inspection Agency's guidelines for labelling the fat content of meat:</p> <ul style="list-style-type: none"> • Lean meat or poultry (not ground) must contain no more than 10% fat , which equals to 10g of fat per 100g reference amount of cooked meat or poultry (The reference amount for <u>cooked</u> meat or poultry is used because meat and poultry are most commonly handled in precooked form in schools). Extra lean meat or poultry must contain no more than 7.5% fat.

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	<ul style="list-style-type: none"> Lean ground meat or poultry must contain no more than 17% fat, which equals to 10g of fat per 60g reference amount of cooked ground meat. Extra lean ground meat or poultry must contain no more than 10% fat (Canadian Food Inspection Agency. Meat Hygiene Manual of Procedures. http://www.inspection.gc.ca/english/fssa/meavia/man/mane.shtml). <p>Both the <i>Sell Most</i> sodium and fat criteria also aligns with <i>Canada's Food Guide's</i> directional statement to select lean meat and alternatives prepared with little or no added fat or salt. Both are also feasible based on current market availability.</p> <p>The <i>Sell Less</i> fat criterion aligns with the Canadian Food Inspection Agency's guidelines for labelling the fat content of meat:</p> <ul style="list-style-type: none"> Medium ground meat or poultry may contain up to 23% fat, which equals to 14g of fat per 60g reference amount of cooked ground meat.
Q64.	<p>What portion size should we use? Is an 8 oz burger okay to sell, 4 or 6 chicken strips nuggets?</p> <p>The amount sold for serving is the amount that should meet the nutrition criteria in the food standards. Therefore if at 8oz, the burger does not meet the nutrition criteria, but the 6oz does, then the 6oz burger can be offered for sale.</p>
Deli (Sandwich) Meat	
Q65.	<p>What is the portion size upon which these criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p>
Q66.	<p>What is the rationale for including criteria for Sell Most? We had recommended only having criteria for Sell Less, to align with CFG messaging.</p> <p>Comment: Classifying hot dogs (as well as bacon, etc) as "fresh or frozen meat" as if they are nutritionally equivalent to "fresh" meat is inaccurate and inconsistent with directional statements in Canada's Food Guide. It does not reflect the definition of 'fresh' provided in the food and drug regulations (http://www.inspection.gc.ca/english/fssa/labeti/guide/ch4e.shtml#a4_5) which is as follows:</p> <p>4.5 Fresh [5(1), FDA; 7, CPLA]As for all claims, the use of the term "fresh" is subject to the</p>

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	<p>prohibitions contained in the <i>Food and Drugs Act</i> and of the <i>Consumer Packaging and Labelling Act</i> respecting misleading and deceptive representations for foods. The context in which the term "fresh" is used will generally dictate its meaning. Accordingly, "fresh" may be used to describe the nature, the organoleptic qualities or the age of a food, or it may be used as part of a trade name or brand name.</p> <p>4.5.1 Fresh to Indicate a Lack of Processing The term “fresh” may imply that the food so described has not been processed or preserved in any way. The claim “fresh (naming the food)” should generally be used to describe a food that is not canned, cured, dehydrated, frozen or otherwise processed or preserved. The following should, however, be noted – d. – Meats, including poultry and fish products that have not been treated by any means, other than by refrigeration, vacuum packaging or modified atmosphere packaging to ensure their preservation, may be called “fresh”.</p> <p>Therefore, hotdogs and any cured meat (eg, pepperoni, salami etc.) would be accurately and more appropriately placed in the Deli Meat category which should be renamed to “Deli Meats/Cured Meats”. This would be scientifically correct as well as it would provide more nutritionally sound criteria...given this category includes a lower fat criteria and would result in fewer unhealthy hotdogs being sold to children at school.</p> <p>Thank you for your input. The ministry will take this into consideration in any future revisions of the nutrition standards.</p>
<p>Q67.</p>	<p>What is the rationale for fat and sodium in Sell Most and Sell Less categories?</p> <p>The <i>Sell Most</i> and <i>Sell Less</i> fat criterion of $\leq 5g$ aligns with Canada’s Food Guide’s directional statement to choose luncheon meats that are lower in fat. The criterion is also based on current market availability.</p> <p>The <i>Sell Most</i> sodium criterion of $\leq 480mg$ is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations. It also aligns with <i>Canada’s Food Guide’s</i> directional statement to choose luncheon meats that are lower in salt (sodium). The criterion is also feasible based on current market availability.</p> <p>The <i>Sell Less</i> sodium criterion of $\leq 600mg$ was set at 25% more than the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats.</p>
<p>Fish</p>	
<p>Q68.</p>	<p>What is the portion size upon which these criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and <i>the Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to</p>

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	<p>assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p>
Q69.	<p>What is the rationale for the fat and sodium criteria in each category?</p> <p>The <i>Sell Most</i> and <i>Sell Less</i> sodium criteria of $\leq 480\text{mg}$ is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations. It also aligns with Canada's Food Guide's directional statement to select lean meat and alternatives prepared with little or no added fat or salt.</p> <p>The <i>Sell Most</i> fat criterion of $\leq 8\text{g}$ is based on current market availability and ensures a lower fat content for processed frozen fish commonly sold in schools, while allowing for the types of fish that have higher amounts of healthy fat.</p> <p>The <i>Sell Less</i> fat criterion of $\leq 12\text{g}$ allows for the types of fish that have higher amounts of healthy fat.</p>
Eggs	
Q70.	<p>What is the portion size (eg, 1 egg or 2 eggs) that the criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and <i>the Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p> <p>Eggs are graded based on size.</p>
Q71.	<p>Why is there a Sell Most for eggs? Isn't an egg an egg? If it was mixed with something, wouldn't it be classified as a mixed dish?</p> <p>This accounts for egg products that include minor ingredients. This could include liquid egg products.</p>
Q72.	<p>What is the rationale for making eggs a separate category? Does this category include mixed egg dishes, like omelettes or scrambled eggs made with milk? If made with cheese or other ingredients (vegetables, etc) shouldn't the mixed dish criteria be used to assess the food?</p> <p>Eggs are in a separate subgroup because they have a different nutrient profile than other Meat and Alternative sub-groups.</p> <p>If one or more ingredients are added to eggs, the final product would be considered a mixed dish.</p>

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Nuts, Protein Butters, and Seeds	
Q73.	<p>What is the portion size upon which these criteria are based?</p> <p>The nutrient criteria were developed using reference amounts and the stated serving size, as defined in the <i>Food and Drug Regulations</i> and the <i>Guide to Food Labelling and Advertising</i>.</p> <p>For ease of implementation, the serving size stated on the Nutrition Facts table is used to assess products. However, if the product is offered for sale as a larger (or smaller) serving than that stated as the serving size on the Nutrition Facts table then the amount offered for sale needs to meet the nutrition criteria in the standards.</p>
Q74.	<p>Where do soy butters fit?</p> <p>Soy butters would be categorized under the Nuts, Protein Butters and Seeds sub-group under Meat and Alternatives.</p>
Meat Alternatives, such as Tofu, Beans, and Lentils	
Q75.	<p>What is the rationale for the criteria in the Sell Most category?</p> <p>The <i>Sell Most</i> fat criterion of $\leq 8g$ aligns with <i>Canada's Food Guide's</i> directional statement to select lean meat and alternatives prepared with little or no added fat or salt. It is also based on current market availability, especially of simulated meat products.</p> <p>The <i>Sell Most</i> sodium criterion of $\leq 480mg$ is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations. It also aligns with Canada's Food Guide's directional statement to select lean meat and alternatives prepared with little or no added fat or salt. The criterion is also based on current market availability.</p> <p>The <i>Sell Most</i> protein criterion of $\geq 10g$ ensures that meat alternatives are nutritionally similar to meat products in protein content and is based on the average protein content of a $\frac{3}{4}$ cup serving of beans or 2 large eggs. The criterion is also based on current market availability.</p>
Q76.	<p>What is the rationale for not including saturated fat in criteria?</p> <p>Given the variation in the saturated fat content of meat alternative products, it was not feasible to determine a single saturated fat criterion for this subgroup.</p>
Q77.	<p>Why isn't there a criterion for Sell Less?</p> <p><i>Sell Less</i> criterion was deemed to be unnecessary given current market availability.</p>
MIXED DISHES WITH A NUTRITION FACTS TABLE	
Q78.	<p>How should snack sized mixed dishes (eg, Tuna salad kits, snack n' go hummus and cracker kits) be evaluated? Due to their snack size serving size, many don't have the protein to meet the mixed dish criteria.</p>

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	<p>The type of products identified would generally be classified as a side dish under the Mixed Dish with a Nutrition Facts Table group. The food label information should be compared with the nutrition criteria in the nutrition standards for Mixed Dishes with a Nutrition Facts Table, from the side dishes sub-category.</p>
Entrées	
<p>Q79.</p>	<p>What is the rationale for the criteria used in the SM and SL?</p> <p>The rationale for the <i>Sell Most</i> criteria is as follows:</p> <ul style="list-style-type: none"> • Fat: ≤ 10g – The criterion is based on current market availability. • Saturated fat: ≤ 5g – The criterion is based on current market availability. • Sodium: ≤ 960mg – The criterion is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations. • Fibre: ≥ 2g – The criterion is consistent with the ‘source of fibre’ nutrient content claim. • Protein: ≥ 10g – The criterion ensures that entrées contain an amount of protein equivalent to the average protein content of a ¼ cup serving of beans or 2 large eggs (consistent with the protein criterion in the Meat and Alternatives subgroup). The criterion is also feasible based on current market availability. <p>The rationale for the <i>Sell Less</i> criteria is as follows:</p> <ul style="list-style-type: none"> • Fat: ≤ 15g – The criterion is based on current market availability. • Saturated fat: ≤ 7g – The criterion is based on current market availability. • Sodium: ≤ 960mg – Same as <i>Sell Most</i> • Fibre: ≥ 2g – Same as <i>Sell Most</i> • Protein: ≥ 7g – The criterion allows for mixed dish entrées that contain smaller amounts of protein sources, but may also contain greater amounts of vegetables/fruit or grain products.
<p>Q80.</p>	<p>What is the rationale for listing hot dogs as an example of an entree in the Mixed Dishes category? A mixed dish is defined as a product with more than one major ingredient, so in the case of the hot dog, are you referring to the wiener and the bun? Mixed Dishes Without a Nutrition Facts Table cannot be sold if prepared with any ingredients from the 'not permitted for sale' category. Most wieners would not be permitted for sale because they do not meet the Fresh and Frozen Meat criteria for sodium (480 mg), but the 'mixed dish' of a wiener and bun they might meet the Mixed Dishes With a Nutrition Facts Table criteria of 960 mg sodium. Many do not have 10 g of protein, but if served two they might.</p> <p>A hot dog includes more than one major ingredient – the bun and the wiener – and therefore is considered an entrée under the nutrition standards.</p>
<p>Q81.</p>	<p>How do I apply the nutrition standards to a sandwich sold in a school cafeteria that does not have a Nutrition Facts table?</p> <p>If sandwiches are sold on a made-to-order basis (e.g., sandwich station), each ingredient must</p>

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	<p>be assessed using the nutrition criteria for the appropriate group in the nutrition standards. For instance, to determine which category bread fits into, compare the information on the bread's Nutrition Facts table to the criteria under the Bread sub-group in the Grain Products category.</p> <p>Each major ingredient from the sandwich station counts as one food choice (e.g., whole grain bread, white sub buns, tomatoes, lettuce, deli turkey, cheese, tuna).</p> <p>If sandwiches are pre-made and do not have a Nutrition Facts table, use the nutrition criteria for Mixed Dishes Without a Nutrition Facts Table. Using the example of a sandwich consisting of two slices of bread and 25 g of deli meat, compare the relevant information on the bread's food label (based on the amount used in the sandwich - i.e., two slices) with the nutrition criteria under the Bread sub-group in the Grain Products category. Compare the relevant information on the deli meat's food label (based on the amount used in the sandwich - i.e., 25 g) with the nutrition criteria under the Deli (Sandwich) Meat sub-group in the Meat and Alternatives category.</p> <p>If all major ingredients are from the <i>Sell Most</i> category, then the sandwich would be a <i>Sell Most</i> choice. If one or more major ingredients are from the <i>Sell Less</i> category, then the sandwich would be considered a <i>Sell Less</i> choice.</p> <p>Alternatively, the pre-made sandwich could be assessed using the nutrition criteria in the Mixed Dishes With a Nutrition Facts table group provided you are able to calculate the amount of each of the nutrients listed under the entrées subgroup for the end product (i.e., fat, saturated fat, trans fat, sodium, fibre and protein). This could be achieved by adding together the nutrients of all major ingredients used in the sandwich (e.g., two slices of bread).</p> <p>Each unique pre-made sandwich would count as one food choice.</p>
<p>Q82.</p>	<p>Can we take two or three items with individual facts tables, add the tables together to create a facts table and assess this combined food as if it had a proper facts table as a Mixed Dish?</p> <p>Yes.</p>
<p>Q83.</p>	<p>What is the rationale for using 960 mg sodium for both Sell Most and Sell Less? How should 'meal deals' be assessed? If a child consumes a mixed dish, soup and salad (meal deal) they will likely be far above the AI for sodium (1200-1500 mg sodium, depending on age) for one meal only</p> <p>The sodium criterion of ≤ 960mg is consistent with the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations.</p>

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	Each food item (e.g., mixed dish, soup, salad) in the 'Meal deal' would be assessed separately for the purpose of calculating the 80-20 rule.
Q84.	<p>Why wasn't a portion size criteria included? We recommended that there should be a portion size criteria based on CFG (eg, must be at least one serving of vegetables and fruit)</p> <p>The decision to use information available on a food label was taken to help with implementation by everyone involved in the sale of food and beverages in schools, including those with little, or no, technical knowledge or experience.</p> <p>The standards are not intended to prescribe daily intakes for students, but rather identify a common set of standards for what can be offered for sale in schools.</p>
Soups	
Q85.	<p>What is the rationale for the sodium? Why is it set so high, knowing that it can be part of a meal deal?</p> <p>The sodium criterion of $\leq 720\text{mg}$ was set at 25% less than the sodium criterion included in the disease risk reduction claim with respect to saturated and trans fats permitted by the federal Food and Drug Regulations.</p> <p>The criterion is also based on current market availability.</p>
Side Dishes	
Q86.	<p>What is the rationale for each nutrient criteria?</p> <p>The rationale for the <i>Sell Most</i> criteria is as follows:</p> <ul style="list-style-type: none"> • Fat: $\leq 5\text{g}$ – The criterion is based on current market availability. • Saturated Fat: $\leq 2\text{g}$ – The criterion is consistent with the 'low in saturated fat' nutrient content claim. • Sodium: $\leq 360\text{mg}$ – The criterion is consistent with the sodium criterion for the Fresh, Frozen and Canned Vegetables and Fruit subgroup and is based on current market availability. • Fibre: $\geq 2\text{g}$ – The criterion is consistent with the 'source of fibre' nutrient content claim and is based on current market availability.
MIXED DISHES WITHOUT A NUTRITION FACTS TABLE	
Entrées	
Q87.	<p>Does the major ingredient have to be at least one serving from CFG?</p> <p>No.</p>
Q88.	<p>Is the entrée assessed on individual ingredients? For example if a pizza is being sold, can 20% of the ingredients be from SL and 80% of the ingredients be from SM? For example pizza made with dough, sauce, pepperoni and cheese, 3 out of 4 ingredients have to be from SM? Or is it that you have 10 slices of pizza and 8 of them have to be all ingredients from</p>

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	<p>SM and 2 slices can have SL ingredients on them?</p> <p>The 80/20 rule depends on the major ingredients used in preparing the dish without a Nutrition Facts table. If all major ingredients are from the <i>Sell Most</i> category, then the final mixed dish would be a <i>Sell Most</i> choice. If one or more major ingredients are from the <i>Sell Less</i> category, then the final mixed dish would be considered a <i>Sell Less</i> choice.</p> <p>For mixed dishes made-to-order in a cafeteria, each major ingredient would be assessed as a food choice within the cafeteria and would contribute to the overall 80/20 for the cafeteria. Students can choose any combination of major ingredients to make the final product.</p>
<p>Q89.</p>	<p>What is the rationale for not including criteria for the amount of vegetables or other ingredients in mixed dishes?</p> <p>The nutrition criteria contained in the nutrition standards are based on information available on a food label (i.e., Nutrition Facts table and ingredient list), not on weight, portion size, etc. (except for Miscellaneous Items). The decision to use information available on a food label was taken to help with implementation by everyone involved in the sale of food and beverages in schools, including those with little, or no, technical knowledge or experience.</p> <p>The standards are not intended to prescribe daily intakes for students, but rather identify a common set of standards for what can be offered for sale in schools.</p>
<p>Q90.</p>	<p>When assessing a mixed dish without a Nutrition Facts table, is okay to add up the nutrient values of each ingredient and evaluate it as a Mixed Dish with a Nutrition Facts Table? For example if assessing each individual ingredient for a sub from Subway, the sub will not fit the criteria for Sell Most because the buns are too high in sodium. However, if you add all ingredients up and assess on Mixed Dish with a Nutrition Facts Table, some Subs will be allowed.</p> <p>Yes</p>
<p>Q91.</p>	<p>I have met with Pita Pit, and discussed PPM 150 to help determine what can be sold. All of the bread are over the 240 mg of sodium limit however if we put some pita sandwiches together (ham, ww grain pita etc) and add up the nutrients there are a few that would meet the criteria under Mixed Dish with a Nutrition Facts table...so although they don't have a nutrition facts table per se, just by doing the calculations ourselves they can fit. Is this acceptable?</p> <p>Yes.</p>
MISCELLANEOUS ITEMS	
<p>Q92.</p>	<p>How do we determine what is lower in fat and sodium for the minor ingredients? For example, if making gravy from scratch, how does one know how to make it lower in fat and salt? Or if there is a food label, what is considered low sodium and low fat?</p> <p>If Miscellaneous Items, such as Oils and Dressings, are offered for sale then the serving size</p>

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	must be limited to the amount defined in the nutrition standards.
Q93.	What is the rationale for classifying Cream-Based Pasta sauce as a Miscellaneous Item? The Miscellaneous section includes standards for “Minor Ingredients”, which are items that are to be used in limited amounts, as defined under “Serving Size”.
Q94.	Under minor ingredients, it only specifies the serving size, not the type of fat. So are butter, lard and cream-based salad dressings Okay? Yes, butter, lard and cream-based salad dressing are okay as long as they are offered for sale in the permitted amount
Q95.	A chef wanted to use lard to make a baked good. Since there is no Nutrition Facts table, I was going to analyse it as a Mixed Dish without a Nutrition Facts table, but how do I address the minor ingredients in this case (flour, sugar, eggs, etc.)? An individual may wish to use nutrient/recipe analysis software to assess the baked good.
Q96.	At a school they make quiches with a store bought pastry shell. How do I assess this mixed item? If I assess the major ingredients, there are egg yolks (NPFS), veggies and milk and the pastry shell? There are two ways to assess: If the quiche is made at the school and does not have a Nutrition Facts table, use the nutrition criteria for Mixed Dishes Without a Nutrition Facts Table. Using this method, assess the pastry shell using the nutrition criteria for baked goods, the eggs using the nutrition criteria for eggs, the veggies using the nutrition criteria for vegetables and the milk using the criteria for milk. If all ingredients are <i>Sell Most</i> items, then the quiche is a <i>Sell Most</i> food choice. If one or more major ingredients are from the <i>Sell Less</i> category, then the sandwich would be considered a <i>Sell Less</i> choice. Alternatively, the quiche could be assessed using the nutrition criteria in the Mixed Dishes With a Nutrition Facts table group provided you are able to calculate the amount of each of the nutrients listed under the entrées subgroup for the end product (i.e., fat, saturated fat, trans fat, sodium, fibre and protein). This could be achieved by adding together the nutrients of all major ingredients used in the quiche, or by using nutrient/recipe analysis software to analyze the entire quiche recipe and comparing it to the nutrition criteria for an Entrée.
Q97.	Where does broth fit, if the school makes their own soup? I was going to assess it as a Mixed Dish without a Nutrition Facts table and therefore Na would have to be less than 720 mg. How many bouillon cubes is this? Broth would be assessed using the nutrition criteria for Soups. Compare the specific bouillon cubes to the nutrition criteria to determine how many may be used.
Q98.	Under minor ingredients, does a school have to sell lower-fat dressings and sauces or can

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	<p>they sell the regular version as long as they adhere to the serving size? If it is OK to use the regular minor ingredients (not lower fat, not lower sodium), why would a school sell lower-fat dressings at all- since they are simply watered down versions of the regular?</p> <p>If Miscellaneous Items, such as Oils and Dressings, are offered for sale then the serving size must be limited to the amount defined in the nutrition standards.</p>
Q99.	<p>Since salad dressing is allowed only in 15 mL portions and prepacked dressings are up to 43mL, is the only way around this to “give away” the dressing? What if the salad is a ‘meal size’ salad? 15 mL is not a reasonable portion.</p> <p>If Miscellaneous Items, such as Oils and Dressings, are offered for sale then the serving size must be limited to the amount defined in the nutrition standards.</p> <p>If salad dressing is used an ingredient in a ‘meal size’ salad, it should be assessed as part of the entrée.</p>
BEVERAGES	
Water	
Q100.	<p>It is not stated under the Not Permitted for Sale category that “vitamin” water is Not Permitted for Sale –is it permitted or not?</p> <p>Vitamin water cannot be sold in elementary schools and must meet the nutrition criteria to be sold in secondary schools.</p>
Q101.	<p>How would coconut water be assessed?</p> <p>Coconut water would be assessed under the Other Beverages sub-group.</p>
Milk and Milk-Based Beverages	
Q102.	<p>For fluid milk for elementary schools, the container size is 250 ml or less; however, the calcium requirement is 25% DV, which is the amount in 250 ml. Some schools prefer the 200 ml plastic bottle of milk because it can be recycled (unlike the 250 ml cartons in some areas) but these only have 20% DV calcium. Is there a 200 ml recyclable container that meets the 25% DV for calcium? Is there a rationale for allowing container sizes smaller than 250 ml for elementary schools but not allowing for the observed decreased calcium %DV?</p> <p>The nutrition criteria for milk in elementary schools, is based on a reference amount of 250 ml. If an elementary school decides to sell ≤ 2% milk in a 200mL container size, to determine whether the product fits, compare the sugar and calcium amount on the Nutrition Facts table with the nutrition criteria in the nutrition standards per reference amount of 250 ml.</p> <p>For example, if the Nutrition Facts table information on the 200 ml container is based on a serving size of 1 container (200 ml) and it states that the calcium is 20% DV, to determine if the product fits compare the calcium amount on the Nutrition Facts table with the calcium criteria in the nutrition standards per reference amount of 250 ml (the calcium nutrition criteria in the nutrition standards is ≥ 25% DV).</p>

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	<p>The calculation would be:</p> <ul style="list-style-type: none"> • 25% DV x 250ml/200ml = 31.25% DV per 250ml <p>Therefore, this product meets the <i>Sell Most</i> calcium criteria under the Milk and Milk-Based Beverages sub-group in the Beverages – Elementary Schools group.</p>
Q103.	<p>In the Revised Standards with the change to milk in secondary schools why the asterisk wasn't placed after the name of the entire category " Milk* and Milk-Based Beverages (Plain or Flavoured)" (i.e. after milk-based beverages). Does the * only apply to milk and not milk-based beverages? What are milk-based beverages? Are these milks with Splenda? Do you want to promote increasing numbers of products with artificial sweeteners?</p> <p>The asterisk only applies to milk. Milk-based beverages are beverages that use milk as the main ingredient of the beverage.</p>
Yogurt Drinks	
Q104.	<p>Why is the fat criterion for fluid milk and milk-based beverages different from yogurt drinks? Is this not a milk based beverage? What is the rationale for not aligning with CFG messaging to select lower fat milk products?</p> <p>This is consistent with the Canadian Food Inspection Agency's 'low fat' nutrient content claim (i.e., 3 g or less per serving of stated size and per reference amount).</p>
Soy/Milk Alternative Beverages	
Q105.	<p>What other milk alternative beverage would be permitted other than soy beverage? Rice, potato or almond beverages even if fortified with calcium and vitamin D do not contain the level of protein found in milk or fortified soy beverage (page 20) and are not a suitable alternative according to CFG. Is this just a typo to have the forward slash (/) before the word milk or are there other milk alternatives that would fit these criteria and be as nutritionally equivalent to milk?</p> <p>The Soy/Milk Alternative Beverages subgroup could include some rice, potato and almond beverages. Beverages found in this subgroup must be fortified with calcium and vitamin D in order to meet the <i>Sell Most</i> nutrition criteria.</p> <p>This subgroup does not require that the beverage be considered an equivalent alternative to milk.</p>
Q106.	<p>What is the rationale for not including a fat or sugar criterion for this beverage given that there is potential for a flavoured version to be higher in fat and sugar than the fluid milk at 2% MF or less?</p> <p>Thank you for your input. The ministry will take this into consideration in any future revisions of the nutrition standards.</p>

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	In developing the nutrition standards, the ministry reviewed recommendations from a number of organizations, representing a variety of sectors.
Q107.	<p>What other types of beverages, besides soy beverages, qualify in the Soy/Milk Alternative Beverages given that Health Canada only recognizes fortified soy beverages as an equivalent alternative to milk?</p> <p>The Soy/Milk Alternative Beverages subgroup could include some rice, potato and almond beverages. Beverages found in this subgroup must be fortified with calcium and vitamin D in order to meet the <i>Sell Most</i> nutrition criteria.</p> <p>This subgroup does not require that the beverage be considered an equivalent alternative to milk.</p>
Iced Tea	
Q108.	<p>How was the 40 calorie criteria chosen?</p> <p>According to Health Canada, the nutrient content claim for “low-calorie” is 40 calories or less per reference amount and per stated serving size.</p> <p>This amount was selected to be consistent with Health Canada’s labeling regulations.</p>
Other Beverages	
Q109.	<p>How was the 40 calorie criteria chosen?</p> <p>According to Health Canada, the nutrient content claim for “low-calorie” is 40 calories or less per reference amount and per stated serving size.</p> <p>This amount was selected to be consistent with Health Canada’s labeling regulations.</p>