

Implementation of the Proposed 2022 B.C. School Food Guidelines

Discussion Paper for Education Sector Stakeholders

This paper has been developed by the Ministry of Health to seek input from the education sector on proposed revisions to the [2013 Guidelines for Food & Beverage Sales in B.C.](#) Schools now referred to as the 2022 B.C. School Food Guidelines.

The Ministry wants to understand the barriers and facilitators as identified by the education sector to implementing the proposed 2022 B.C. School Food Guidelines. The Ministry is interested in hearing from those that are involved in school food and/or have a food procurement role (e.g., school administrators, educators, school food program staff, and Parent Advisory Council members and their representatives).

The information set out in this paper is for consultation purposes only. Final decisions on the proposed 2022 B.C. School Food Guidelines will be made by the Ministry of Health after consultation with stakeholders is complete.

Comments and feedback must be provided by email to Natalie Laframboise, Office of Nutrition Policy and Promotion, Ministry of Health (natalie.laframboise@gov.bc.ca) **no later than April 30, 2022.**

Proposed 2022 School Food Guidelines

School food guidance is intended to:

- support meeting the nutritional needs of students while taking into consideration the typical consumption patterns of B.C. children and youth
- shift food environments in schools to be healthier to promote the growth, development and learning potential of students
- balance recommending the healthiest choices with what may be feasible for implementation within schools, given product availability and affordability

The proposed 2022 B.C. School Food Guidelines have been revised to reflect current national¹ and provincial nutrition recommendations² and results from a school administrator survey on implementation challenges with the 2013 Guidelines³. The proposed 2022 Guidelines are not intended to support student food and nutrition education⁴.

Discussion Paper

This discussion paper highlights key changes to the proposed 2022 Guidelines from the 2013 Guidelines and describes the new 2 step-process for determining whether a food or beverage may be sold, offered, or served in K-12 schools. It also describes the plans for the Brand Name Food List that currently supports implementation of the 2013 Guidelines. The 2022 Guidelines are voluntary for all K-12 schools in BC. They outline the gold standard for nutrition and are highly recommended, however, they offer flexibility in moving towards the gold standard.

Comments are welcome on any aspect of the proposed 2022 Guidelines. Proposals where the Ministry would specifically like to receive feedback are highlighted in a box.

The Ministry is also interested in hearing suggestions on how to facilitate implementation of the proposed 2022 Guidelines and how to encourage their promotion.

Key changes from the 2013 Guidelines

- 1) The 2013 Guidelines apply to foods and beverages **sold in schools**, excluding school food programs. The 2022 Guidelines apply to foods and beverages **offered, served, or sold to students**, including school food programs.

The 2022 Guidelines apply to:

- School vending machines, stores, and cafeterias
- All school food programs
- School/parent organized food and beverages offered, sold, or served at:
 - lunch sales
 - fun fairs, sporting events and field trips (on and off-campus)
 - fundraisers and bake sales

¹ Canada's Dietary Guidelines for Health Professionals and Policy Makers. January 2019. Available from: [CDG-EN-2018.pdf \(canada.ca\)](#)

² Provincial/Territorial Guidance Document: Nutrition Standards for K-12 Schools. March 2021. Internal document

³ 2020 K-12 Public School Food Survey Final Report. BC Stats. March 2020. Prepared for the Ministries of Education, Health, and Agriculture. Internal document. [2020 k-12 public school food survey - final report.pdf \(gov.bc.ca\)](#)

⁴ See Teach Food First – an educator's toolkit for exploring Canada's Food Guide with K-8 students from Healthy Schools BC.

- Food and beverages brought to school by students, parents, or teachers, to share with other students (e.g., classroom celebrations)

The 2022 Guidelines do **not** apply to:

- Foods brought from home for personal consumption (e.g., bagged lunches from home)
- Food and beverages sold, offered, or served only to adults
- Food and beverages prepared by students as part of class projects

The Ministry proposes that the 2022 Guidelines apply to **foods and beverages offered, served, or sold to students, including school food programs.**

- 2) The 2013 Guidelines categorize foods and beverages into three categories (*sell most, sell sometimes, do not sell*). The 2022 Guidelines categorize foods and beverages into two categories – foods to offer, serve or sell; and foods to avoid. The categorization of products is based on alignment with Canada’s food guide and the intent of school food guidance. The food lists provided in the 2022 Guidelines are not exhaustive for either category.

The Ministry proposes that the 2022 Guidelines have **two categories** – (1) **foods to offer, serve or sell** and (2) **foods to avoid.**

- 3) The 2013 Guidelines categorize some packaged, processed snack foods, such as lower fat baked chips and crisps, non-whole grain cereal bars, and lower sugar fruit bars, as *sell sometimes* options. In the 2022 Guidelines, these foods may be categorized as foods to avoid or may not meet the Nutrition Criteria. This is the gold standard for nutrition and highly recommended. However, this may limit snack food options in vending machines and tuck shops. Schools should consider providing lower fat, whole grain, and lower sugar snack food options, whenever available, as they move towards the gold standard.

The Ministry proposes that in the 2022 Guidelines **some packaged, processed snack foods** may be categorized as foods to avoid or may not meet the Nutrition Criteria.

- 4) The 2013 Guidelines categorize some non-whole grain foods, such as white/refine grain bread, pita, bagels, pizza crust, wraps and waffles, as *sell sometimes* options. In the 2022 Guidelines, the emphasis is on serving whole grain (or whole wheat) products and moving towards replacing refined grains, such as white bread products, as often as possible.

The Ministry proposes that in the 2022 Guidelines **whole grain (or whole wheat) products are emphasized** over refined grains.

- 5) The 2013 Guidelines allow foods and beverages containing sugar substitutes to be sold in secondary schools but not in elementary or middle schools. The 2022 Guidelines include foods and beverages containing sugar substitutes on the foods to avoid list for all K-12 schools.

The Ministry proposes that the 2022 Guidelines categorize foods and beverages containing **sugar substitutes** as foods to avoid for all K-12 schools.

- 6) The 2013 Guidelines do not allow commercially processed meats high in fat and high in sodium to be sold in schools. The 2022 Guidelines include commercially processed meats⁵ such as hot dog wieners and deli meats on the foods to avoid list. This is the gold standard for nutrition and highly recommended. However, this may limit options for sandwiches. Schools should consider providing lower fat and lower sodium options as they move towards the gold standard.

The Ministry proposes that the 2022 Guidelines include **commercially processed meats**, including hot dog wieners and deli meats, on the foods to avoid list.

- 7) The 2013 Guidelines allow 100% fruit juices to be sold in schools. In the 2022 Guidelines, under Beverages, 100% fruit juices are considered sugary drinks, consistent with Canada's food guide. They are included on the foods to avoid list.

The Ministry proposes that the 2022 Guidelines include **100% fruit juice** on the foods to avoid list.

- 8) The 2013 Guidelines allow lightly sweetened milks and sweetened plant-based beverages to be sold in schools. In the 2022 Guidelines, under Beverages, sweetened milks and sweetened plant-based beverages are considered sugary drinks, consistent with Canada's food guide. They are included on the **foods to avoid** list. This is the gold standard for nutrition and highly recommended. However, sweetened milks and sweetened plant-based beverages are sources of calcium and vitamin D for children. Schools may consider providing lightly sweetened versions of these beverages as they move towards the gold standard.

The Ministry proposes that the 2022 Guidelines include **sweetened milk and sweetened plant-based beverages** on the foods to avoid list.

- 9) The 2013 Guidelines allow some cookies, cakes, and bars to be sold in schools depending on their nutrient profile. In the 2022 Guidelines, under whole grains, cookies, bars (e.g., brownies), pastries, croissants, cakes (including cupcakes and cake pops), pies, tarts, donuts or sweet buns (e.g. cinnamon buns) are included on the **foods to avoid** list. Regardless of whether these foods are pre-packaged or made from scratch, they tend to be high in sugars and saturated fat and can displace the intake of nutrient-dense foods required for healthy growth and development. Reducing intake of processed or prepared foods that contribute excess sugars and saturated fat is a foundational recommendation within Canada's dietary guidelines.

The Ministry proposed that the 2022 Guidelines include **cookies, cakes, and bars** on the foods to avoid list.

- 10) The 2013 Guidelines include optional policies schools can consider implementing to further promote healthy school food environments. For example, restricting the marketing of unhealthy food and beverages. Ministry staff have not yet developed optional policies for the 2022 Guidelines but have considered the following topics:

- Environmental impacts (packaging, local foods, food waste etc.)

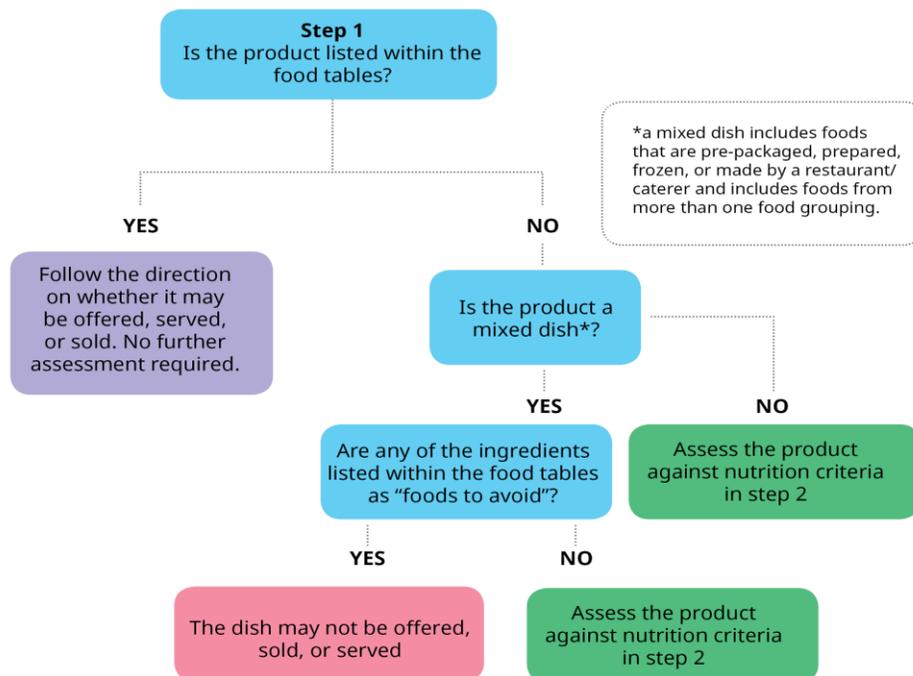
⁵ This does not include traditional foods prepared using Indigenous methods and that are part of traditional food systems.

- Cultural and Traditional Foods
- Safe food handling
- Celebrations that include food
- Specific amounts of food required to be offered through school food programs

The Ministry is keen to understand what, if any, **optional policies the education sector see value in** developing as part of the 2022 Guidelines.

Process for determining whether a food or beverage may be offered, served, or sold

The 2013 Guidelines use a nutrient-based approach to determine whether a food or beverage can be sold. The 2022 Guidelines use a food-based approach and a simplified two-step process to determine whether a food or beverage may be offered, served, or sold.



Step 2 Nutrition Criteria

The product must meet **all three** criteria to be offered, sold or served.

How is product offered, sold or served?	% Daily Value Saturated + Trans Fat	% Daily Value Sugars	% Daily Value Sodium
As an entrée/main meal	Less than 30%	Less than 30%	Less than 30%
As a side dish, snack or an ingredient	Less than 15%	Less than 15%	Less than 15%
As a vegetable or fruit, protein food, (whole) grain food, or beverage	Less than 15%	Less than 15%	Less than 15%

The Ministry proposes a **2-step decision-making process** for determining whether a food or beverage may be offered, served, or sold. First, if the food is listed in the food tables, follow the direction in the food tables; second, if the food is **not** listed in the food tables, follow the directions to assess the food against the Nutrition Criteria to determine if the food can be offered, served, or sold.

Implementation Supports

The Ministry wants to know what type of resources the education sector would find useful in supporting them to use the proposed 2022 B.C. School Food Guidelines.

1) **Brand Name Food List:**

The Brand Name Food List is an online tool at HealthLink BC. It uses the nutrition information on the food labels to score packaged processed foods and beverages and then assigns them to one of three categories: *sell most*, *sell sometimes*, and *do not sell* according to the 2013 Guidelines.

The Brand Name Food List is out-of-date and it is not in line with current national and provincial nutrition recommendations that are reflected in the 2022 Guidelines. Furthermore, focusing on packaged processed foods and beverages is not consistent with the intent of school food guidance. It will be discontinued when the 2022 Guidelines are released.

The Ministry of Health proposes to **discontinue the Brand Name Food List.**

2) **Education Sector Resources:**

The Ministry will be developing new resources to support both school food providers and the food and beverage industry to implement the 2022 Guidelines and move towards the gold standard for nutrition.

Proposed topics for school food providers include:

- ❖ Providing whole grains
- ❖ Providing plant-based proteins
- ❖ Providing alternatives to commercially processed meats

The Ministry of Health wishes to understand **what implementation supports** the education sector would like to see developed