

WOWBUTTER FOODS

January 15, 2026
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Re: Exemption Information for the Buy American Provision for the National School Lunch Act (NSLA) for the purchase of WOWBUTTER

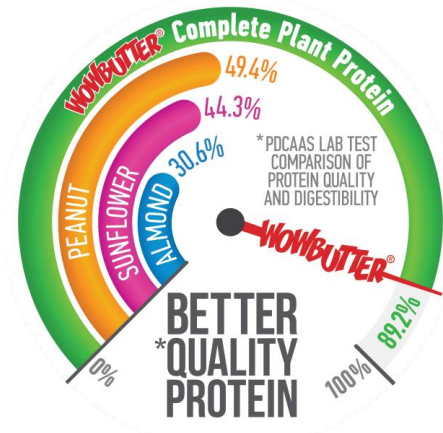
Wowbutter is made in Canada using five simple ingredients: Whole Toasted Soy (Canada), Pressed Soy Oil (United States), Cane Sugar (South America), Sustainable Palm Oil (Malaysia), Sea Salt (United States). There are two allowed exemptions to the Buy American provision for purchasing non domestic foods as they relate to the continued purchasing of WOWBUTTER. You only need to satisfy one of the exemption options and there is no requirement to request a waiver from your State Agency or FNS in order to purchase a non-domestic product. If you are audited by your State Agency for the “Buy American” requirement, you may need to provide supporting documentation. A simple letter stating that there are no other comparable in quality spreads to WOWBUTTER that are made in the USA with all of the required quality attributes of taste, texture, nutrition, safety, flexibility and acceptance by kids that would meet your needs. This letter will provide sufficient facts and information necessary.

There is no reason why an exemption for WOWBUTTER should be declined. The two allowed exemptions that School Food Authorities can use for the Buy American requirement of the NSLA are:

1. *“The product is not produced or manufactured in the U.S., in sufficient and reasonable available quantities of a satisfactory quality”*

WOWBUTTER is a significantly **better quality** spread with far superior nutritional benefits and taste acceptance than other available spreads. Some of the key quality advantages are:

- A **true taste and texture just like peanut butter** that kids already know and love which **reduces “plate waste”**, a **better economic choice when evaluating the true cost benefit.**
- Third party taste tests consistently reveal Wowbutter is the preferred peanut free spread choice by kids.
- **#1 Rated Quality Protein with over 80% (1.8 times) Better Quality Protein than Peanut Butter, over 100% (2 times) Better Quality Protein than Sunflower Butter and over 190% (2.9 times) Better Quality Protein than Almond Butter** based on Lab Test Comparisons of PDCAAS (Protein Digestibility Corrected Amino Acid Score) providing better available nutrition. Lab tests can be provided upon request. *PDCAAS is the accepted method adopted by the US FDA and the World Health Organization (WHO) in 1993 for evaluating the quality of a protein based on both the amino acid requirements of humans and their ability to digest it. The higher the quality score, the more bioavailable and digestible it is and consequently, the more nutritional benefit to your body and wellness from consuming it. Wowbutter is one of the only **TRUE** meat alternate options as a plant-based complete protein source containing all 9 essential amino acids similar to a meat or dairy protein.*



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- For the better health of kids, only 100% **ALL NATURAL NON-GMO** verified ingredients are used with absolutely **no unhealthy hydrogenated oils (such as mono & di-glycerides) and no undesirable oil separation occurs**, commonly found in other spreads.
- Packaged with high food safety standards in a 100% dedicated GFSI (BRC) certified facility.

2. Competitive bids reveal the costs of a U.S. product is significantly higher than the foreign product

There is **no specific price differential specified** to meet this requirement and is therefore open for interpretation by individual School Food Authorities. It can be easily justified that any price differential is significant even when small, if it means that even one more meal could be served with the savings. Even with WOWBUTTER being far superior in so many ways, the cost is typically as good as or in most cases significantly better than any other peanut free spread. **More importantly with a proven far higher taste acceptability and less “plate waste”, WOWBUTTER is always the better economic choice when evaluating the true cost benefit compared to other peanut free spreads.**

The items meeting the quality exemption are as follows:

Description	Packaging	Item Number	Case Code
WOWBUTTER – Creamy Peanut Free Spread	175 x 0.56oz (16g) Portion Cup	10915	107 73948 10915 5
WOWBUTTER – Creamy Peanut Free Spread	100 x 1.12oz (32g) Portion Cup	10920	107 73948 10920 9
WOWBUTTER – Creamy Peanut Free Spread	6 x 1.1lb (500g) Jars	20100	207 73948 20100 9
WOWBUTTER – Crunchy Peanut Free Spread	6 x 1.1lb (500g) Jars	20101	207 73948 20101 6
WOWBUTTER – Creamy Peanut Free Spread	2 x 4.4lb (2kg) Jars	40100	207 73948 40100 3
WOWBUTTER – Creamy Peanut Free Spread	22lb (10kg) Pail	70770	107 73948 70770 2

School Food Authorities can feel confident that **WOWBUTTER is always the best nutritional and economic solution** and that they are fully justified in choosing WOWBUTTER while utilizing either one of the exemptions outlined above. Choosing the significantly better quality WOWBUTTER spread to meet the nutrition and child acceptability needs is the right decision for child nutrition with sufficient validation based on these aforementioned facts and PDCAAS quality comparison values.

Regards,

Scott Mahon, President

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