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Assessing Philadelphia's Health Regulations to Reduce Commercial Waste

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Introduction

The City of Philadelphia has been infamously referred to as “Filthadelphia” for many years, given the City’s enormous litter problem and reputation as dirty. According to Philadelphia Mayor Jim Kenney, “Philadelphia disposes of nearly one ton of waste for each of our 1.5 million residents. So, while everyone knows cleaning up litter is important, we also have to concentrate on reducing waste before it has the chance to become litter.”¹

For my Capstone project, I worked with the City of Philadelphia’s Zero Waste and Litter Cabinet, Philadelphia Department of Public Health (PDPH), and other partners within the City of Philadelphia to review both federal and local health regulations governing foodservice establishments. I utilized this research to analyze how businesses that serve food can accommodate and adopt zero-waste practices to reduce the usage of single-use disposable items while still operating within the constructs of food safety and health laws. This project sought to:

- Research health and food safety regulations and interpret their ability to accommodate zero-waste practices in food preparation and service;
- Explore case studies both in the City of Philadelphia and elsewhere in the United States to serve as successful examples of integrating zero-waste practices;
- Understand what zero-waste practices foodservice establishments in Philadelphia currently have, and what practices they would be open to adopting in the future; and
- Produce a how-to guide for food businesses in the City describing reduction and reuse practices they can implement while maintaining compliance with the required health and safety procedures.

The final deliverable is a how-to guide for food businesses in the City describing reduction and reuse practices they can implement while maintaining compliance with the required health and safety procedures.

Literature/Policy Overview

Together, food and food packaging account for almost 45% of the materials landfilled in the United States, and some of these discarded materials are food-related packaging and containers. Food service establishments generate a significant amount of wasted food and packaging. Between 4 and 10 percent of food purchased by food service operations in the

¹ Philadelphia Releases Action Plan to Address Waste and Litter - Report Emphasizes Zero Waste Policy. *Philadelphia Streets*, 7 Aug. 2017, <https://www.philadelphiastreet.com/newsroom/news-item-detail/philadelphia-releases-action-plan-to-address-waste-and-litter-report-emphas>

U.S. is thrown out before reaching the plate. By reducing the amount of food and packaging discarded, they can significantly reduce their waste stream and save money.²

Containers and packaging alone contribute over 23% of the material reaching landfills in the U.S., and some of these discarded materials are food-related containers and packaging. Additionally, packaging makes up a majority of the litter that ends up on our beaches and other waterways. This is a problem because fish, birds, and other aquatic wildlife are often harmed by ingesting plastic bags and other debris from packaging. Waste in the ocean also causes navigation hazards for boats and results in losses to the shipping, fishing, and tourism industries.³

Preventing waste is also a critical factor in reducing the planet's greenhouse gas emissions, and thus minimizing the worst impacts of global climate change. Waste minimization translates into less energy needed to extract, transport, and process raw materials. Reduction and reuse minimize the energy-intensive process of manufacturing. Waste minimization also helps reduce greenhouse gas emissions from incinerators as well as methane emissions from landfills. As the threats of climate change worsen, waste reduction is an integral part of mitigation and adaptation strategies.⁴

The City of Philadelphia has a goal to become “zero-waste” — reducing and diverting at least 90% of waste generated in the city away from the trash — by the year 2035. To achieve this goal, Philadelphia will need to focus not only on recycling and composting, but also reuse and source reduction. Much of the waste currently produced in the City stems from eating and drinking, like single-use hot beverage cups and Styrofoam takeout containers. Best practices for reuse in the foodservice industry are a critical component of Philadelphia becoming a zero-waste city. However, there are concerns from staff in the foodservice industry about how zero waste practices might interfere with both local and statewide health and safety regulations on preparing and serving food and beverages.

Reviewing the Food and Drug Administration (FDA) Food Code shows that food establishments may use reusable food containers if they are designed and constructed for reuse in accordance with FDA requirements, initially provided by the food establishment, and subject to a series of specific cleaning and sanitizing steps.

According to Section 3-304.17 of the FDA Food Code, empty containers returned to a food establishment may be refilled at a food establishment with **food** if the food container is:

² “Reducing Wasted Food & Packaging: A Guide for Food Services and Restaurants.” *United States Environmental Protection Agency*, 2015, www.epa.gov/sites/production/files/2015-08/documents/reducing_wasted_food_pkg_tool.pdf, page 1.

³ “Reducing Wasted Food & Packaging: A Guide for Food Services and Restaurants” page 3.

⁴ “Climate Change and Municipal Solid Waste Fact Sheet | Pay-As-You-Throw.” *Environmental Protection Agency*, 21 Feb. 2016, <https://archive.epa.gov/wastes/conserve/tools/payt/web/html/factfin.html>

- Designed and constructed for reuse and in accordance with the requirements specified under the FDA Food Code;
- One that was initially provided by the food establishment to the consumer, either empty or filled with food by the food establishment, for the purpose of being returned for reuse; and
- Subject to a series of specific cleaning and sanitization steps before being refilled with food.⁵

The FDA Food Code explains that food establishments may permit reusable beverage containers if the container design and nature of the beverage allows for effective cleaning, the facilities have the capability to rinse containers with hot, pressurized water, and the container is refilled in a contamination-free transfer process.

According to Section 3-304.17 of the FDA Food Code, empty containers returned to a food establishment may be refilled at a food establishment with **beverage** if:

- The design of the container and of the rinsing equipment and the nature of the beverage, when considered together, allow effective cleaning at home or in the food establishment;
- The process for refilling take-home food containers with beverages must include facilities for rinsing before refilling returned containers with fresh, hot water that is under pressure; and
- The container is refilled by an employee of the food establishment or the owner of the container of the beverage system includes a contamination-free transfer process as specified under the FDA Food Code.⁶

The City of Philadelphia’s “Regulations Governing Food Establishments” adopt the FDA Food Code, with the addition of prohibiting the act of refilling take-home food containers with potentially hazardous food.

Philadelphia’s regulations adopt the FDA Food Code with one notable addition:

- Refilling take-home food containers with **potentially hazardous food** is prohibited, where potentially hazardous food is defined as a food which consists of milk or milk products, eggs, meat, poultry, fish, shellfish, edible crustacean or other ingredients, including synthetic ingredients, which is in a form capable of supporting rapid and progressive growth of infectious or toxigenic microorganisms.⁷

⁵ United States, Congress, “Food Code.” *Food and Drug Administration*, Health and Human Services, 2017. <https://www.fda.gov/media/110822/download>, page 79.

⁶ United States, Congress, “Food Code.” *Food and Drug Administration*, Health and Human Services, 2017. <https://www.fda.gov/media/110822/download>, pages 79-80.

⁷ City of Philadelphia, “Regulations Governing Food Establishments.” Department of Public Health, 2009. https://www.phila.gov/media/20181003154610/Food_Regulations.pdf, pages 62-63.

Reviewing the FDA Food Code and Philadelphia’s regulations showed that food establishments may use reusable food and beverage containers with certain restrictions, including specific cleaning and sanitizing protocols. While these regulations speak to what happens in theory, I wanted to understand what happens in practice by speaking with staff from the Philadelphia Department of Public Health, learning from local staff in the foodservice industry, and exploring case studies in the U.S.

Stakeholder Interviews and Case Studies

Local Perspective

In order to better understand the processes and perspectives of folks working in the foodservice industry and in food safety enforcement, I conducted interviews with key players in the City of Philadelphia. Discussions with these stakeholders has shown that it is difficult to declare a blanket statement or policy regarding zero-waste practices, as this area is ever-changing, with a lot of new research and evidence emerging on a regular basis. Because there is no blanket policy, Interpretation of the FDA and Philadelphia food regulations varies widely among sanitarians — staff from the Philadelphia Department of Public Health (PDPH) who routinely inspect foodservice establishments to ensure compliance. In lieu of a blanket policy, PDPH prefers for people within the foodservice industry to come to PDPH with a plan or proposal for adopting zero-waste practices, and the staff at PDPH can work with the foodservice employees to ensure that their practices are safe and adhere to the necessary regulations.⁸

For example, starting in 2019, the City of Philadelphia’s *Parks on Tap* program offered reusable custom Parks on Tap plastic cups and specialty Parks on Tap silicone pint cups, with those who have them receiving \$1 off their drink each time they reuse it.⁹ The team at Philadelphia Parks and Recreation (PPR) came to the Philadelphia Department of Public Health with the idea for reusable cups to reduce waste at *Parks on Tap* sites. The PPR team worked with PDPH staff to address all logistics involved with the reusable cup program and addressed all stages of the refill process to ensure safety and sanitation. Because PPR worked through the planning process directly with PDPH, the reusable cup program ran smoothly for the 2019 season of *Parks on Tap*.¹⁰

Just Salad, a fast-casual chain with 40 locations, including 2 locations in Philadelphia, emphasized the importance of having a standard operating procedure (SOP) that ensures

⁸ Kiesewetter, D. “PDPH Office of Food Protection Perspective” [Telephone interview], 11 May 2020.

⁹ Cummings, S. “Parks on Tap will visit a different Philly park each week for 23 weeks.” *PhillyVoice*, 24 April 2019, <https://www.phillyvoice.com/parks-on-tap-2019-locations-dates-beer-garden/>.

¹⁰ Kiesewetter, D. “PDPH Office of Food Protection Perspective” [Telephone interview], 11 May 2020.

the customer's container is never touched by anyone other than the customer throughout the entire preparation and serving process. Just Salad sells \$1 branded reusable bowls, which customers can bring to any Just Salad and get one free topping with every use. As part of Just Salad's SOP, a customer's reusable bowl never makes contact with any food surface in the restaurant. In contrast, disposable bowls make contact with various surfaces at various points in the food prep and hand-off areas. In this case, reusable bowls can actually be considered safer and more sanitary than their disposable counterparts.¹¹

In an article from Restaurant Business Magazine, Dr. Jonathan Deutsch, a Professor of Culinary Arts and Food Science at Drexel University in Philadelphia, describes guests bringing reusable containers to restaurants for takeout as a "win-win." Restaurants save money on disposables, guests feel better about green initiatives, and both parties work together to reduce single-use disposables in the waste stream. Dr. Deutsch suggests leveraging guests' interest in sustainability in two ways. First, restaurants should restrict the use of personal containers to front-of-house, equivalent to packaging leftovers. Second, buy and sell reusable takeout containers that are designed for reuse, so that staff can properly clean and sanitize containers before they are refilled, they can include a restaurant's branding, and they can be ideally sized for a particular business's operation.¹²

To summarize, the constantly changing nature of this area makes it difficult to declare a blanket statement regarding the usage of reusable containers, and the Philadelphia Department of Public Health suggests that people within the foodservice industry come to PDPH with a plan and work together to ensure that the proposed waste reduction practices adhere to the necessary regulations. Having a clearly articulated and strictly adhered to standard operating procedure is critical for both foodservice establishment employees and customers to implement waste reduction practices.

Additional Case Studies

Reviewing other case studies around the United States has also been helpful in providing examples of zero-waste implementation in the foodservice industry.

In July of 2019, the State of California signed legislation allowing consumers to bring their own reusable containers to carry out food and beverages at public events. Starting in January 2020, food vendors and restaurants will also have the option to provide their own reusable products. The current law says that reusable containers have to be cleaned at an approved facility — meaning that temporary food vendors like those at farmer's markets

¹¹ Noonan, S. Zero-Waste Practices at Just Salad [Telephone interview], 8 May 2020.

¹² Deutsch, J. "Should Restaurants Allow Guests to Bring Their Own Takeout Containers?" *Restaurant Business*, 28 Mar. 2019, www.restaurantbusinessonline.com/advice-guy/should-restaurants-allow-guests-bring-their-own-takeout-containers.

and food festivals — have to provide single-use, disposable containers that eventually end up in trash cans or worse, on the ground. However, customers cannot just use any container. Restaurants and food vendors can refuse to fill up containers that aren't specifically designed for reuse, like rinsed-out yogurt cups, says Genevieve Abedon, representative of the bill sponsor Clean Seas Lobbying Coalition.¹³

A proposed zero-waste bill in Washington D.C. would require hotels and large restaurants to provide reusable serviceware to customers and only offer disposable alternatives upon request. Council Member Mary Cheh introduced the “Zero Waste Omnibus Amendment Act of 2019” as part of a larger effort to ensure that Washington D.C. remains on track to achieve its goal of zero-waste by 2032. One major component of the bill addresses hotels and large restaurants, which would be required to provide reusable serviceware to customers and only offer disposable alternatives upon request. It is unclear how restaurants might address the serviceware change, but the Food Packaging Institute (FPI) has already expressed some reservations. In a statement to Waste Dive, the organization emphasized the importance of reducing waste and boosting foodservice package recovery, but asserted it will oppose any regulations limiting the use of that packaging.¹⁴

Due to cultural differences between the City of Philadelphia and the State of California, it is reasonable to conclude that a successful policy in one location does not guarantee success in the other. However, the existence of proposed zero-waste legislation in Washington D.C. demonstrates that high standards for waste reduction are not just for the West Coast. While Washington D.C. and Philadelphia are certainly different, they share several commonalities. They are both historic, Mid-Atlantic cities on the East Coast with aging infrastructure. The two City Councils have comparable structures, and both cities share similar demographics for race & ethnicity, average age, and political party. Because of the parallels that exist between Washington D.C. and Philadelphia, the proposed zero-waste bill in D.C. can serve as an exemplary model off of which Philadelphia could base future legislation.

In conclusion, states and municipalities around the United States have proposed and/or signed legislation either requiring or encouraging bring-your-own practices to reduce waste in the foodservice industry. While neither Pennsylvania nor Philadelphia have proposed or passed similar legislation, these case studies from elsewhere in the U.S. set a precedent and help lay out a roadmap for other states and cities to follow.

¹³ Deutsch, J. “Should Restaurants Allow Guests to Bring Their Own Takeout Containers?” *Restaurant Business*, 28 Mar. 2019, www.restaurantbusinessonline.com/advice-guy/should-restaurants-allow-guests-bring-their-own-takeout-containers.

¹⁴ Crunden, E.A. “New D.C. Zero Waste Bill Would Have Major Implications for Composting and Recycling.” *Waste Dive*, 11 Nov. 2019, www.wastedive.com/news/dc-zero-waste-bill-organics-epr-landfill-packaging-compost-implications/566872/

Quantitative Methodology

My exploration of existing literature, interviews with stakeholders, and review of case studies in the previous section revealed important insight into the processes and framework under which waste reduction in foodservice establishments can occur. However, I also wanted to hear directly from local, frontline staff in the industry. These frontline staff have the experience and institutional knowledge necessary to anticipate whether or not the best practices and mandates explored in the previous section could happen in Philadelphia, as well as their likelihood of adoption and success.

A survey was distributed to allow for greater input from these frontline foodservice employees and learn about any concerns or misconceptions they may hold surrounding zero-waste practices. The survey was distributed via email listservs to hundreds of foodservice establishments in the Philadelphia area through several organizations and communications channels, including:

- Zero Waste and Litter Cabinet's restaurant partners contact list
- Philadelphia chapter of the PA Restaurant & Lodging Association contact list
- University City District's restaurant contact list
- The Walnut Hill College Restaurant's industry advisory board

The survey sought to answer 4 main research questions to learn about current waste reduction practices at foodservice establishments in Philadelphia, as well as perceptions and barriers to implementing zero-waste practices. This survey was not exhaustive of potential waste reduction practices, but instead focused on high-impact areas of food preparation and foodservice identified through the literature review and stakeholder interviews. The four research questions were:

Research Question 1

- What practices do foodservice establishments have for dine-in customers around reusables currently? Additionally:
 - What practices would they be willing to implement in the future?
 - For what specific reasons would they **not** be willing to implement practices around reusables for dine-in customers?

Research Question 2

- What practices do foodservice establishments have for customers bringing their own containers currently? Additionally:
 - What practices would they be willing to implement in the future?

- For what specific reasons would they **not** be willing to implement practices around customers bringing their own reusables?

Research Question 3

- What practices do foodservice establishments have for donating leftover food currently?
 - What practices would they be willing to implement in the future?

Research Question 4

- In addition to the practices addressed in research questions 1-3, what other waste reduction practices do foodservice establishments currently employ, both in food preparation and food service?

The survey was taken by **five** foodservice establishments within the City of Philadelphia.

While five is a very small sample size, I believe that the existence of multiple (3) responses from the “restaurant, deli, or cafe” type can actually provide a fairly representative picture of the practices and opinions of this establishment category throughout the City. There was a singular response in the “university” category, a singular response in “other” (catering and vending), and no responses from food trucks, entertainment venues, hospitals, or several other foodservice establishment types. Thus, the applicability of the results from the survey is limited, and the findings cannot be extrapolated to these unrepresented foodservice industry categories.

Findings

Research Question 1: Dine-In Practices

All five respondents currently have reusable bowls/plates/silverware that they wash and reuse for people who dine in and ask for their food “for here.”

Research Question 2: Bring-Your-Own Practices

Four out of the 5 respondents do not currently allow customers to bring their own reusable plate/bowl/container, and 3 out of these 4 said they would probably not allow customers to do this in the future.

Businesses cited several reasons for not wanting to allow customers to bring their own reusable plate/bowl/container. The most popular reason (selected by 3 out of the 5 respondents) was concerns about violating health and safety regulations. Two out of the 5 respondents also expressed concerns about bring-your-own containers interfering with operational efficiency or workflow.

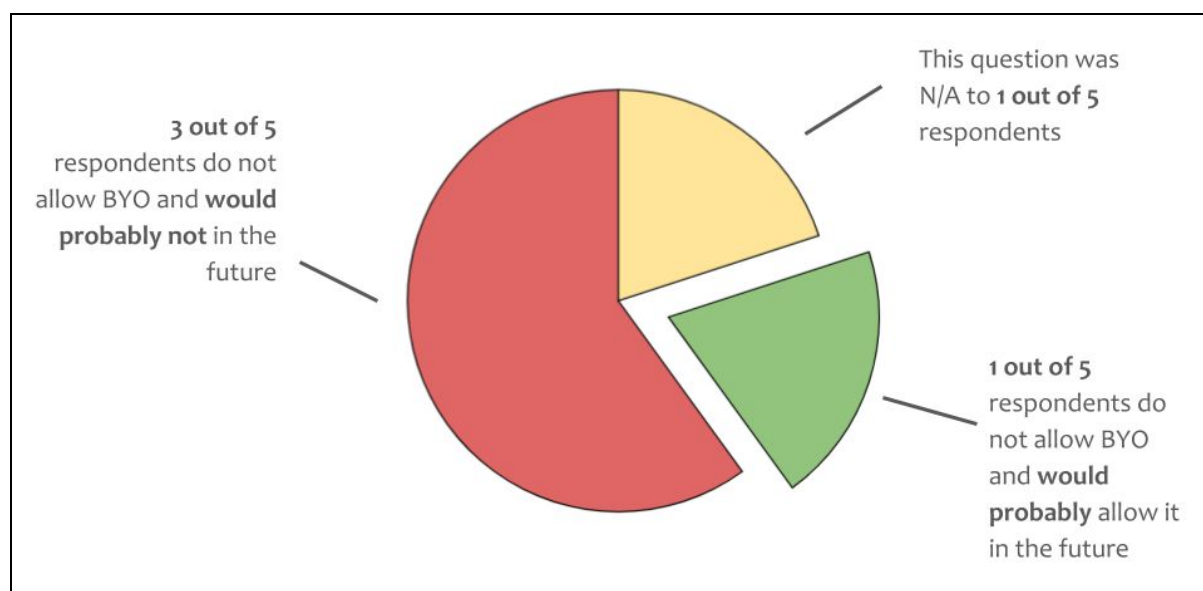


Figure 1. Shows the survey results for current and future bring-your-own practices at foodservice establishments.

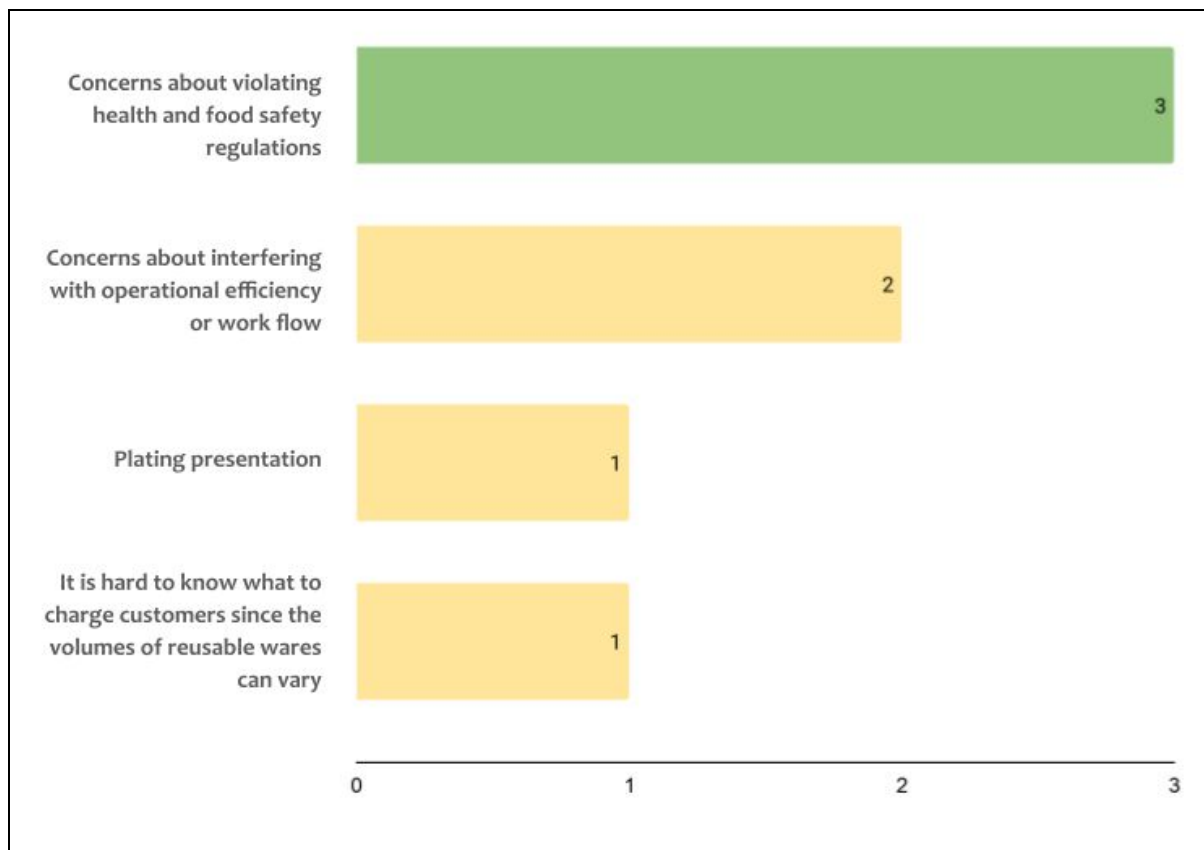


Figure 2. Shows the survey results for the reasons why foodservice establishments would probably not allow bring-your-own practices in the future, and the frequency with which each reason was cited.

Research Question 3: Donating Leftover Food

Three out of 5 respondents currently donate leftover unopened food. The other 2 respondents expressed that they typically do not have enough leftover unopened food to make donations worth it. One business explained that their daily inventories are well-tailored to daily sales trends. Because this business makes as many items in-house and/or to-order, they typically do not generate leftover food.

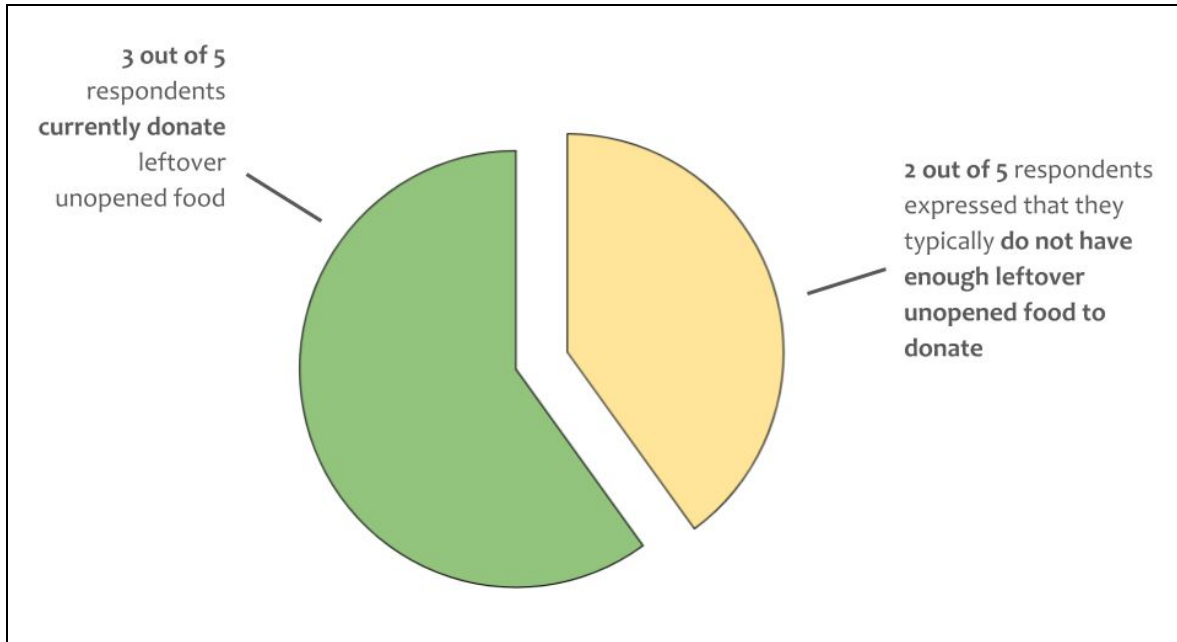


Figure 3. Shows the survey results for food donation practices at foodservice establishments.

Research Question 4: Other Waste Reduction Practices

Three out of the 4 businesses that serve beverages responded that they only have disposable straws available upon request. Additionally, all of the businesses responded that they always ask the customer if they want their food/drink "for here" or "to-go."

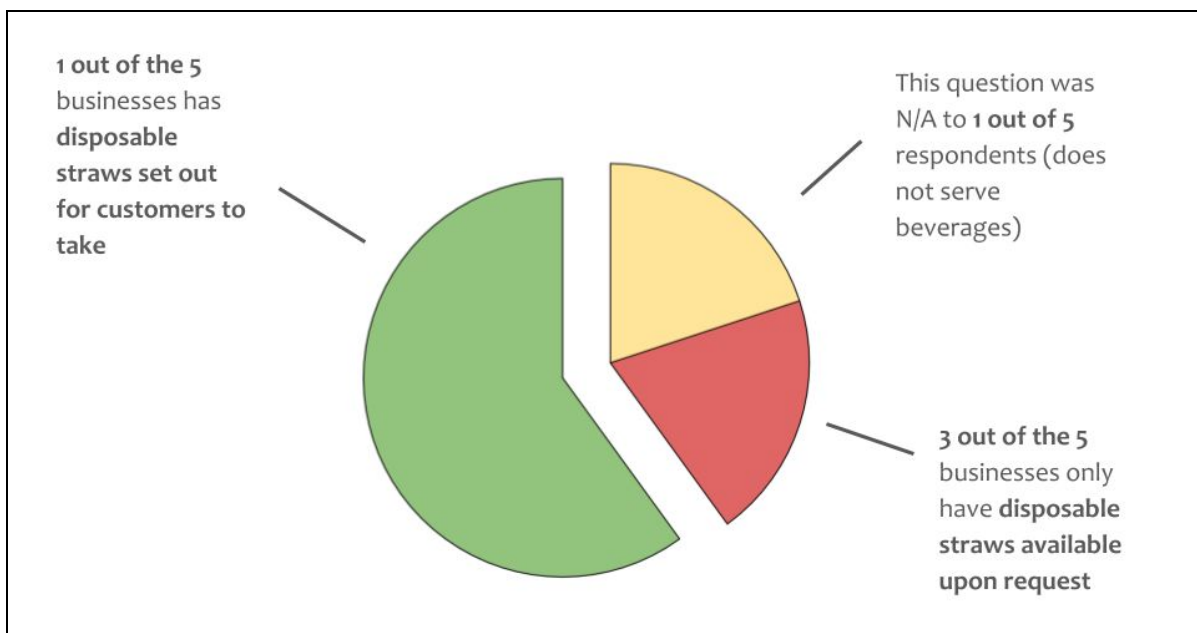


Figure 4. Shows the survey results for disposable straw practices at foodservice establishments.

While my analysis of the survey data was limited by the low number of respondents, the responses were able to provide me with a clearer picture of foodservice establishments' interpretation and understanding of regulations, current operational practices, and the willingness to adopt waste reduction practices in the future. Additionally, the survey responses gave me insight into the reasons behind current and future practices (or lack thereof), thus helping to guide the focus and content of future educational initiatives.

Limitations

COVID-19

Changes in Types of Service and Perceptions

In Spring of 2020, the use of reusable food and beverage containers had to cease in order to protect the health and safety of foodservice staff and customers during the COVID-19 global pandemic. Foodservice establishments could only serve food for takeout or delivery in single-use disposable containers. At the time of this writing, foodservice establishments can now serve customers through outdoor seating, but the City of Philadelphia has not yet authorized indoor dining.

The COVID-19 pandemic has stirred up fears about the spread of viruses and maintaining safe and healthy operations in all industries, but particularly the foodservice industry. Because of these growing health and safety concerns, many people are questioning reusable food and beverage containers in the future. Public perceptions tend to view single-use disposables as the safest option for foodservice.

However, as the United States experienced with hand sanitizer, toilet paper, masks, and other personal protective equipment (PPE) at the beginning of the pandemic, it is conceivable that a supply chain issue could develop in the near future for food and beverage single-use disposables. This potential for complications in sourcing single-use materials renders the knowledge of how to safely use reusable wares even more critical to the foodservice industry.

Impact on Survey Response Rate and Answers

Major operational changes and shifting priorities during the COVID-19 pandemic can help explain the low response rate for the survey. Below are a few reasons why foodservice establishments in Philadelphia may not have taken and/or distributed the survey:

- Many foodservice establishments closed altogether (some temporarily and some permanently) and thus could not be reached to take the survey;

- Many communications channels (including newsletters of local foodservice associations and networks) that normally would have offered to distribute the survey to their contacts wanted to limit their communications to mission-critical messaging regarding COVID-19;
- All outreach regarding the survey occurred digitally given the Commonwealth of Pennsylvania's stay-at-home order and physical distancing requirements, which limited the number and type of communications channels and distribution methods;
- Foodservice establishments could have seen the survey as futile, if they did not see their businesses ever returning to or adopting zero-waste practices, and thus did not bother to complete the survey.

The survey response rate was extremely low, with only 5 foodservice establishments participating. According to the Philadelphia Department of Public Health, there are over 6,000 places to dine in Philadelphia¹⁵, making the sample size in this study insignificant. Thus, the practices and opinions of this small group of respondents cannot be generalized to the population of Philadelphia foodservice establishments as a whole.

Finally, there was a disclaimer at the beginning of the survey stating that “the questions posed in this survey refer to a time period in the future when foodservice establishments can resume normal operations, as the majority of the practices mentioned in the survey are temporarily prohibited due to the COVID-19 pandemic.” However, it is likely that survey respondents were unable to put aside current conditions and thus may have answered the questions through the lens of the COVID-19 pandemic, which could have heavily influenced their answers.

Project Scope

In its final form, the project focused heavily on traditional cafés and restaurants. The original scope of the project was too wide, so I quickly had to narrow the scope to a more digestible segment of traditional cafes and restaurants. Thus, I did not get an opportunity to talk with folks in the sports/events space, food trucks, the Philadelphia International Airport, the School District of Philadelphia, and many other important foodservice establishments that fall outside the traditional definition/view of a foodservice establishment that most people hold. These unique spaces produce a large quantity of single-use disposable waste and are critical partners for achieving the City's Zero Waste by 2035 Goal.

¹⁵ Neighborhood Food Retail in Philadelphia. Philadelphia Department of Public Health, Division of Chronic Disease and Injury Prevention, <http://phl.maps.arcgis.com/apps/MapSeries/index.html?appid=ab8597d96ece43be97e718f919e79194>.

Program/Policy Recommendations

I have several recommendations for policy and program development, as well as several recommendations for future research given the project's limitations.

Create a Steering Committee and Working Groups in the Absence of a Zero Waste and Litter Cabinet

The City of Philadelphia dissolved the Zero Waste and Litter Cabinet and eliminated the Zero Waste and Litter Cabinet Director position in the summer of 2020 due to COVID-19 related budget cuts and constraints. This issue touches upon many different areas of both the private and public sectors and requires a diversity of knowledge and capabilities. Therefore, in order to bring these diverse stakeholders together in the absence of the Cabinet, I recommend creating a Foodservice Waste Steering Committee with relevant stakeholders from around the City to guide and coordinate this project in the future. This steering committee should include (but is not limited to) the people listed in the table below:

Foodservice Waste Steering Committee				
<i>Name</i>	<i>Position</i>	<i>Office</i>	<i>Industry Represented</i>	<i>Notes/Area of Expertise</i>
Palak Raval-Nelson	Director of Environmental Health Services	Philadelphia Department of Public Health	All	Office enforces statutes and issues licenses and permits
Molly Riordan	Good Food Purchasing Coordinator	Philadelphia Department of Public Health	Schools, Prisons	
Catherine Bartoli	Good Food, Healthy Hospitals Coordinator	Philadelphia Department of Public Health	Hospitals	
Kate Scully	Director of Government Affairs	Philabundance	N/A	Food donations
Alisa Shargorodsky	Sustainability Consultant and Founder	ECHOSystems	N/A	Reusables
Haley Jordan	Zero Waste and Litter Coordinator	Philadelphia Office of Sustainability	N/A	Zero Waste Employee for the City
TBD	TBD	Licenses and Inspections	N/A	Give out permits for food trucks

I also recommend that the Steering Committee form smaller working groups with industry representatives from the industries outlined in the **Foodservice Establishment Types** table listed in the **Recommendations for Future Research** section. These smaller working groups would report up through the Steering Committee and allow for greater work efficiency by grouping together complementary stakeholders.

Pass City-Wide Legislation

As previously mentioned, PDPH currently uses a reactive method to industry requests and proposals for zero-waste practices, rather than approaching this topic proactively. I suggest that the Foodservice Waste Steering Committee work with members of Philadelphia City Council to draft legislation similar to that of Washington D.C.'s proposed legislation. While Philadelphia has its own unique challenges that may change some of the specifics of the policies, Washington D.C.'s proposal is an excellent framework for Philadelphia to use as a starting point. Having a blanket policy and clearly articulated standards surrounding zero-waste practices at foodservice establishments would promote more widespread adoption of waste reduction practices throughout the industry.

One challenge that Philadelphia faces over Washington D.C. in passing such a law is its location in a state with a split government that does not always support environmental legislation. For example, in 2019, Pennsylvania Governor Tom Wolf signed a law that blocked municipal bans or taxes on plastic bags and packaging for at least one year (a moratorium which has since been extended until 7/2021 due to COVID-19).¹⁶ The challenges associated with passing environmental laws in a swing state like Pennsylvania do not affect Washington D.C. However, Philadelphia has overcome state-wide challenges like this before to become a leader in environmental sustainability, with the City's adoption of strict, energy-efficient building codes being a recent example. Philadelphia's Zero Waste goal is three years behind that of D.C.'s, but with a much larger population and area, Philadelphia has much farther to go. Binding legislation is the fastest and most effective way to make substantial progress.

If Philadelphia City Council did eventually pass legislation, the subsequent step is education. First, sanitarians employed by the Philadelphia Department of Public Health must be highly trained to ensure understanding of the new rules and policies. As aforementioned, interpretation of food regulations varies widely among the PDPH staff who perform inspections. Thus, educating these staff following the authorization of a City-wide measure is integral to the success of zero-waste practices. Additionally, PDPH and other stakeholders must lead an educational campaign to help foodservice establishments decipher the new regulations and clearly understand how the legislation will affect their operations.

¹⁶ "Pennsylvania Blocks All Bans, Taxes On Plastic Bags For At Least One Year." *CBS Philly*, 18 June 2019, <https://philadelphia.cbslocal.com/2019/06/28/pennsylvania-blocks-all-bans-taxes-on-plastic-bags-for-at-least-one-year/>.

Utilize Central Resources Like ServSafe

As previously mentioned, the interpretation of food regulations varies widely among PDPH sanitarian staff who perform audits and inspections. Additionally, specific knowledge of food regulations and how to interpret them varies among staff at foodservice establishments. If passing city-wide legislation is not feasible, I recommend incorporating information and best practices into central resources that will reach a larger proportion of the intended population for maximum awareness, adoption, and clarity.

ServSafe is a well-known food and beverage safety training and certificate program administered by the U.S. National Restaurant Association. Most restaurants require sanitation certification as a basic credential for their management staff. In the absence of governmental policy, I recommend implementing information on best practices for waste reduction into ServSafe in order to widen awareness and transparency around adopting zero-waste practices while still adhering to guidelines, especially since ServSafe is a name that people in the foodservice industry trust.

If information about zero-waste practices is not incorporated centrally into a program like ServSafe, only those who are already interested in environmental sustainability will seek it out, find it, and implement it. If the City is going to reach its Zero Waste by 2035 goal, foodservice industry members who do not already have a demonstrated interest in sustainability and waste reduction must have access to this type of information.

Focus on Communicating the Safety of Reusable Wares

I recommend that future research and campaign development around this topic area focus on communicating the safety of reusable wares as the world transitions to a post-COVID-19 state. There are many existing organizations and resources working to do this, including the Post Landfill Action Network (PLAN), which is headquartered in Philadelphia. PLAN recently compiled a Reusables and Sanitation Toolkit, which cites reliable and widely-trusted resources including the CDC, FDA, and scientific journal publications.¹⁷

Even in the future when the risk of contracting COVID-19 is largely gone, perceptions around health and safety will likely cause people to remain hyper-vigilant and cautious. Having the Department of Public Health sanitarians and other PDPH food safety staff take the time to explain sanitation processes and safety procedures surrounding zero-waste practices, particularly around reusable wares, is critical for gaining buy-in and securing the trust of both foodservice establishment employees and customers.

¹⁷ “Reusables and Sanitation Toolkit.” *Post Landfill Action Network*, 18 June 2020, <https://docs.google.com/document/d/19oBlhgWK-OF3GJ248j5uTEjmBu3BOoIC-siWA4d3DfQ/edit>.

Recommendations for Future Research

Continue Research and Program Development Regularly

The world of waste reduction and zero-waste practices is an ever-evolving field with regulations and perceptions changing rapidly. This was true prior to the COVID-19 pandemic, and is even more true now as federal, state, and local regulations surrounding public health and safety evolve quickly in response to new research. Therefore, I recommend continuous research on this topic in order to keep resources and other communications materials up-to-date, including the Resource Guide located in the *Appendix* of this paper, with the latest standards and guidelines. This research could be done by members of the Foodservice Waste Steering Committee (should it be formed), or through internal staff or student interns in the City's Office of Sustainability, using outside consultants, or through partnerships with academic institutions or other organizations (like GovLabPHL).

Reduce the Project Scope

The scope of this project was too large from the start. I recommend that future research focus on specific types of businesses within the sector to study zero-waste practices in more manageable chunks. Because foodservice establishments differ so much from one another (ex. comparing operating a food truck to operating a prison cafeteria), I recommend that this research be broken out into sub-projects so that researchers can give the proper attention and analysis to each type of foodservice establishment. I recommend future sub-projects that work directly with the categories of businesses outlined in the table below (*please note that the list of industry types listed in the table is not exhaustive*).

Foodservice Establishment Types
Restaurants, delis, and cafes
Retail locations that serve prepared food
Food trucks
Sports and entertainment venues
Hospitals and health care facilities
Long-term care facilities
Schools
Prisons
Universities
Airports and train stations
Hotels

The majority of foodservice establishments in the City of Philadelphia do fall under the first type listed in the table (**restaurants, delis, and cafes**), meaning that this category should continue to be a primary focus in future research. However, this category of restaurants, delis, and cafes is also one of the furthest along in terms of waste reduction progress to-date. Thus, I also recommend that future research prioritize **food trucks, sports and entertainment venues, and hospitals & health care facilities**, as these establishments have further to go in terms of waste reduction practices.

Recirculate the Survey

I recommend recirculating the survey in a post COVID-19 climate. While this alone will not necessarily generate the desired response rates, waiting until after the pandemic has passed to recirculate the survey will eliminate several of the limitations of this project, including the extremely limited ability for distribution and existence of competing priorities. While future distribution of the survey may not happen for quite some time, I do believe it is important to wait until businesses have the capacity to meaningfully participate.

For future recirculation of the survey, I would also recommend including an incentive or the chance to win a prize for those who take the survey. While cash and gift cards are common survey prizes, there are limitations with the prizes that government and non-profit institutions can give away. A valuable incentive in this case could be free advertising for the foodservice establishment. Finally, I would recommend that the survey be updated and re-circulated on a 3- or 5-year basis to be inclusive of recently established businesses and allow older businesses to provide updates on practices they may have implemented since the last time they took the survey.

I also believe that reducing the project scope will help with increasing survey response rates in the future. Rather than attempting to reach thousands of foodservice establishments through generic communications channels, narrowing the project scope to particular types of businesses within the sector allows for more targeted outreach, and hopefully a corresponding higher response rate.

Conclusion

The City of Philadelphia disposes of nearly one ton of waste for each of its 1.5 million residents each year. Food containers and packaging make up a significant portion of this waste, ending up in landfills or littered on our streets and beaches. In order for the City of Philadelphia to reach its Zero-Waste by 2035 goal, businesses that serve food must accommodate and adopt zero-waste practices to reduce the usage of single-use disposable items while still operating within the constructs of food safety and health laws.

To accomplish this lofty goal, I first recommend creating a Foodservice Waste Steering Committee, along with smaller working groups composed of diverse industry stakeholders. Next, I recommend that the steering committee draft zero-waste legislation, similar to that of Washington D.C.'s proposed measure. If legislation is not feasible, I recommend utilizing central resources that can reach a larger number of foodservice establishments to promote zero-waste practices, specifically ServSafe.

In the wake of the COVID-19 global pandemic, future research and program development must focus on communicating the safety of reusable wares. Even in the future when the risk of contracting COVID-19 is largely gone, perceptions around health and safety will likely air on the side of caution. Taking the time to explain sanitation processes and safety procedures surrounding zero-waste practices is critical for gaining buy-in and securing the trust of employees and customers.

Environmental sustainability and waste reduction efforts may seem irrelevant or futile in the current state of affairs. However, humanity's response to COVID-19 can almost be seen as a test run for the response to climate change. In a very short period of time, people have made huge lifestyle shifts and adapted to a new way of life, which will also be required as climate change worsens and begins to impact us on a daily basis. Climate change will not stop because of a global health pandemic interruption, and neither can efforts to mitigate its effects.

Appendix

Resource Guide

This resource guide was developed based on the literature/policy review, stakeholder interviews, and survey responses. While it is intended to be useful for all foodservice establishments, not all guidelines and recommendations in the guide are applicable to all types of foodservice establishments.

ZERO - WASTE GUIDE

FOR FOODSERVICE ESTABLISHMENTS
IN THE CITY OF PHILADELPHIA

INTRODUCTION

INTRODUCTION

Foodservice establishments generate a significant amount of wasted food and packaging. Between 4 and 10 percent of food purchased by food service operations in the U.S. is thrown out before reaching the plate. By reducing the amount of food and packaging discarded, foodservice establishments can significantly reduce their waste stream and save money (EPA, pg. 1). Packaging also makes up a majority of the litter that ends up in our waterways, harming fish, birds, and other aquatic wildlife who ingest plastic bags and other debris from packaging (EPA, pg. 3).

The City of Philadelphia has a goal to become “zero-waste”- reducing and diverting at least 90% of the waste generated in the city away from the trash - by the year 2035. Much of the waste currently produced in the City stems from eating and drinking, like single-use hot beverage cups from coffee shops and Styrofoam takeout containers from food trucks. Best practices for reduction and reuse in the foodservice industry are a critical component of Philadelphia becoming a zero waste city. **This guide aims to educate both employees in and customers of the foodservice industry on how to implement zero waste practices while still complying with local and national health and safety regulations.**



WHAT DOES THE FDA FOOD CODE SAY?

Reusable Food Containers

Empty containers returned to a food establishment for cleaning and refilling with food shall be cleaned and refilled in a regulated food processing plant, except:



A take-home food container returned to a food establishment may be refilled at a food establishment with food if the food container is:

1. Designed and constructed for reuse and in accordance with the requirements specified under Part 4-1 (Materials for Construction and Repair) and Part 4-2 (Design and Construction) of the FDA Food Code;
 2. One that was initially provided by the food establishment to the consumer, either empty or filled with food by the food establishment, for the purpose of being returned for reuse;
 3. Returned to the food establishment by the consumer after use;
 4. Subject to the following steps before being refilled with food:
 - a. Cleaned as specified under Part 4-6 (Cleaning of Equipment and Utensils) of the FDA Food Code
 - b. Sanitized as specified under Part 4-7 (Sanitization of Equipment and Utensils) of the FDA Food Code; and
 - c. Visually inspected by a food employee to verify that the container, as returned, meets the requirements specified under Part 4-1 (Materials for Construction and Repair) and Part 4-2 (Design and Construction) of the FDA Food Code.
-

WHAT DOES THE FDA FOOD CODE SAY?

Reusable Drink Containers

Empty containers returned to a food establishment for cleaning and refilling with food shall be cleaned and refilled in a regulated food processing plant, except:



A take-home food container returned to a food establishment may be refilled with beverage if:

1. The beverage is not a time/temperature control for safety food;
2. The design of the container and of the rinsing equipment and the nature of the beverage, when considered together, allow effective cleaning at home or in the food establishment;
3. Facilities for rinsing before refilling returned containers with fresh, hot water that is under pressure and not recirculated are provided as part of the dispensing system;
4. The consumer-owned container returned to the food establishment for refilling is refilled for sale or service only to the same consumer; and
5. The container is refilled by:
 - a. An employee of the food establishment, or
 - b. The owner of the container of the beverage system includes a contamination-free transfer process as specified under Section 4-204.13(A), (B), and (D).

Consumer-owned, personal beverage containers, such as thermally insulated bottles, non-spill cups, and promotional glasses, may be refilled by employees or the consumer if refilling is contamination-free as specified under Section 4-204.13(A), (B), and (D).

WHAT DOES THE PHILADELPHIA FOOD CODE SAY?

Philadelphia adopts the FDA Food Code with one notable addition:

- Refilling take-home food containers with potentially hazardous food is prohibited, where potentially hazardous food is defined as a food which consists of milk or milk products, eggs, meat, poultry, fish, shellfish, edible crustacean or other ingredients, including synthetic ingredients, which is in a form capable of supporting rapid and progressive growth of infectious or toxigenic microorganisms.

A Note from the Philadelphia Department of Public Health Office of Food Protection:

It is difficult to declare a blanket statement or policy regarding reusable containers, as this area is ever-changing, with a lot of new research and evidence emerging regularly.

In lieu of a blanket policy, the Philadelphia Department of Public Health prefers for staff in the foodservice industry to come to PDPH with a plan or proposal for adopting zero-waste practices, and the staff at PDPH can work with the business to ensure that their practices are safe and adhere to the necessary regulations.

Case Study: Parks on Tap

Starting in 2019, the City of Philadelphia's Parks on Tap program offered reusable plastic and silicone pint cups, with those who have them receiving \$1 off their drink each time they reuse it. The team at Philadelphia Parks and Recreation came to PDPH with the idea and worked with PDPH staff to address all stages of the refill process to ensure safety and sanitation.

GUIDELINES

REUSABLE WARES

Oftentimes, foodservice establishments assume that customers want their food to-go or default to packaging food to-go. Be sure to train your staff to ask the question "for here or to-go?" with each order placed.

For Here

For customers who are eating in, reduce the amount of single-use disposable waste produced by serving them in reusable wares, including:

- Ceramic mugs and glass drinkware
- Reusable dishes and bowls
- Metal silverware and straws

Not only does providing reusable wares reduce the amount of waste your establishment produces, but they also give your establishment a more upscale feel that customers will notice and appreciate.

To-Go

Guests who bring reusable containers for to-go orders or for packing their leftovers can save you money on disposables and waste. If a staff member is filling a reusable container, they should either place a physical barrier down or sanitize the surface after filling.

DID YOU KNOW?

Customers cannot transfer food directly to their reusable plate/container from shared food sources like buffets. This must be done by a trained staff member. Make sure the kitchen utensils you use to make the transfer do not touch the customer's container.

GUIDELINES

MINIMIZING SINGLE- USE DISPOSABLES

Reduction and Reuse

- Use a reusable lid on food storage containers on your food prep line instead of disposable plastic wrap (ex. invest in stainless steel food containers with lids for storing and preparing food)
- Use health department-approved, refillable condiment dispensers instead of individual packets
- Don't automatically put to-go food in a bag; rather, have bags available upon request
- Don't automatically give customers hot coffee sleeves or straws; rather, have these items available upon request only
- Use a sneeze guard display case for customers to see baked goods while protecting the food instead of baked goods individually wrapped in disposable plastic wrap

Single-Use Disposable Alternatives

- In general, paper wares are preferable to plastics and bioplastic/compostable wares
 - Use butcher, waxed, and parchment paper whenever possible in place of plastic wrap

DID YOU KNOW?

Compostable and biodegradable materials must go in the landfill stream. No large-scale recycling or compost vendors in our area have the ability to take and process these materials. If you are ever unsure where an item should go, put it in the trash to prevent contamination of other streams. Remember: "*when in doubt, throw it out!*"

LEFTOVER FOOD AND ORGANIC WASTE

One in five Philadelphians struggles with food insecurity, yet many foodservice establishments face issues of excess food. The federal Bill Emerson Good Samaritan Food Donation Act provides liability protection for food donors, and Pennsylvania state law provides some additional protection. Help give excess food a second life by:

- Working with a local organization to donate leftover, unopened food, including:
 - Philabundance
 - Food Connect
 - Philly Food Rescue
 - Fooding Forward
- Composting; for food scraps and opened food that cannot be donated, turn that valuable organic waste into rich compost through companies like Bennett Compost and Circle Compost
 - These companies offer a variety of services based on the volume of food waste you are producing and the frequency of pickups



RESOURCES AND SOURCES

Resources

City of Philadelphia Department of Public Health Regulations Governing Food Establishments:

https://www.phila.gov/media/20181003154610/Food_Regulations.pdf

FDA Food Code 2017: <https://www.fda.gov/food/retail-food-protection/fda-food-code>

Philadelphia Disposal, Recycling, and Donation Options:

http://cleanphl.org/wp-content/uploads/2017/11/Haulers-List_web.pdf

Event Compost Hauler Options: http://cleanphl.org/wp-content/uploads/2017/11/Haulers-List_web.pdf

For additional zero-waste resources, visit:

<https://cleanphl.org/resources/>

Sources

“Reducing Wasted Food & Packaging: A Guide for Food Services and Restaurants.” United States Environmental Protection Agency (EPA), 2015, www.epa.gov/sites/production/files/2015-08/documents/reducing_wasted_food_pkg_tool.pdf.

Zero-Waste Practices Survey

Start of Block: Intro

*****DISCLAIMER: The questions posed in this survey refer to a time period in the future when foodservice establishments can re-start normal operations, as the majority of the practices mentioned in the survey are temporarily prohibited due to the COVID-19 pandemic.*****

The City of Philadelphia has a goal to become “zero-waste”- reducing and diverting at least 90% of the waste generated in the city away from the trash - by the year 2035. To achieve this goal, Philadelphia will need to focus not only on recycling and composting, but also reuse and source reduction. Much of the waste currently produced in the City stems from eating and drinking, like single-use hot beverage cups from coffee shops and Styrofoam takeout containers from food trucks. Best practices for reuse in the foodservice industry are a critical component of Philadelphia becoming a zero waste city.

This survey is intended to document your foodservice establishment's current zero-waste practices and gauge your interest and openness to adopting more zero-waste practices in the future. Your answers will help us to develop a zero-waste resource guide for other foodservice establishments in the City. We thank you in advance for your time and input!

This survey is being conducted as part of an MPA Capstone project through the *Fels Institute of Government* of the University of Pennsylvania. Please contact Elizabeth Main (main.elizabeth.a@gmail.com) with any questions.

General Information

Name

Email Address

Name of Business

How would you classify the foodservice establishment on behalf of which you are taking this survey?

- Restaurant, deli, or cafe (1)
- Food truck/cart (2)
- Retail location or grocery store that serves prepared food (3)
- School (4)
- University (5)
- Hotel (6)
- Hospital or health care provider facility (7)
- Other (please explain below) (8) _____

Page Break

End of Block: Intro

Start of Block: Reusable Wares

Reusable Wares
(cups, mugs, plates, bowls, silverware, etc.)

Do you serve prepared drinks (for dine-in or to-go) at your foodservice establishment?

- Yes (1)
 - No (2)
-

Display This Question:

If Do you serve prepared drinks (for dine-in or to-go) at your foodservice establishment? = Yes

Q31 Do you have reusable cups/mugs that you wash and reuse for people who dine in and ask for their drinks “for here”?

- Yes (1)
 - No (please explain why not below) (2)

 - Other (please explain below) (3) _____
-

Display This Question:

If Do you serve prepared drinks (for dine-in or to-go) at your foodservice establishment? = Yes

Q32 Do you currently allow customers to bring their own reusable mug/cup at your foodservice establishment?

- Yes (1)
 - No (2)
 - It depends (please explain below) (3)
-

Display This Question:

If Do you currently allow customers to bring their own reusable mug/cup at your foodservice establis... = No

Q33 In the future, would you allow customers to bring their own reusable mug/cup at your foodservice establishment?

- Definitely yes (1)
 - Probably yes (2)
 - Might or might not (3)
 - Probably not (4)
 - Definitely not (5)
-

Q34 Do you serve prepared food (for dine-in or to-go) at your foodservice establishment?

- Yes (1)
 - No (2)
-

Page Break

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q35 Do you have reusable bowls/plates/silverware that you wash and reuse for people who dine in and ask for their food “for here”?

- Yes (1)
- No (please explain why not below) (2)

- Other (please explain below) (3) _____
-

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q36 Do you currently allow customers to bring their own reusable plate/bowl/container at your foodservice establishment?

- Yes (1)
- No (2)
- It depends (please explain below) (3)

-

Display This Question:

If Do you currently allow customers to bring their own reusable plate/bowl/container at your foodser... = No

Q37 In the future, would you allow customers to bring their own reusable plate/bowl/container at your foodservice establishment?

- Definitely yes (1)
 - Probably yes (2)
 - Might or might not (3)
 - Probably not (4)
 - Definitely not (5)
-

Q60 In general, what would prevent you from providing a reusable cup/mug or plate/bowl/container at your establishment for customers who are dining in? (Please select all that apply.)

- We do not have the dishwashing capacity necessary for providing reusable wares (1)
 - It is less expensive to provide single-use disposable wares (2)
 - It is less time-consuming and/or easier to provide single-use disposable wares (3)
 - Concerns about interfering with operational efficiency or work flow (4)
 - Other (please explain below) (5) _____
 - N/A - my business is interested in or already providing reusable wares to customers who dine in (6)
-

Q38 In general, what would prevent you from allowing customers to bring their own reusable cup/mug or plate/bowl/container at your establishment? (Please select all that apply.)

- Concerns about violating health and food safety regulations (1)
- Concerns about interfering with operational efficiency or work flow (2)
- It is hard to know what to charge customers for the food/drink since the volumes of reusable wares can vary widely (3)
- Disposable wares branded with our company's name/logo are a critical component of our marketing strategy (4)
- Other (please explain below) (5) _____
- N/A - my business is interested in or already allowing customers to bring their own wares (6)

Page Break

End of Block: Reusable Wares

Start of Block: Food Donations

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q54 Leftover Food

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q55 Do you currently work with an organization to donate leftover unopened food? (Ex. Philabundance, FoodConnect, etc.)

Yes (please enter name of organization below) (1)

No (2)

Display This Question:

If Do you currently work with an organization to donate leftover unopened food? (Ex. Philabundance,... = No

Q56 In the future, would you be interested in working with an organization to donate leftover unopened food?

Yes (1)

No (2)

It depends (please explain below) (3)

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q57 In general, what would prevent you from donating leftover unopened food from your establishment? (Please select all that apply).

- Concerns about violating health and food safety regulations (1)
- My business does not have the staff capacity or time required to make food donations (2)
- My business typically does not have enough leftover unopened food to make a donation worth it (3)
- My business was not aware of opportunities to donate leftover unopened food (4)
- It is easier to just throw away any leftover food (5)
- Other (please explain below) (6)
- N/A - my business is interested in or already participating in donating leftover food (7)

End of Block: Food Donations

Start of Block: Block 3

Q60 Other Waste Reduction Practices

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q61 Do you individually wrap/package food, or do you have a food shield/sneeze guard display case that prevents you from needing to individually wrap food?

(Ex. individually-wrapped baked goods vs. baked goods protected by a food shield display case at a cafe)

- My business has individually wrapped/packaged food (1)
- My business uses a food shield/sneeze guard to protect food instead of individual wrapping/packaging (2)
- Other (please explain below) (3) _____
- N/A; this does not apply to my business (4)

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q62 On the food prep line, do you cover food storage containers with reusable lids (i.e. stainless steel, hard plastic) or use disposable plastic wrap?

(Ex. stainless steel lid covering a container of spinach vs. container of spinach with plastic wrap over the top)

- Other (please explain below) (1) _____
- Click to write Choice 3 (2)

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q63 Do you provide individual condiment packets or do you have refillable condiment dispensers? (Ex. ketchup, coffee creamer)

- My business provides individual packets for condiments (1)
 - My business uses refillable condiment dispensers (2)
 - Other (please explain below) (3) _____
 - N/A; this does not apply to my business (4)
-

Display This Question:

If Do you serve prepared food (for dine-in or to-go) at your foodservice establishment? = Yes

Q68 For customers who take their food to-go, do you automatically provide a disposable bag, or do you only provide a disposable bag if the customer asks for one?

- My business automatically provides disposable bags for to-go orders (1)
 - My business only provides disposable bags if the customer requests one (2)
 - Other (please explain below) (3) _____
 - N/A; this does not apply to my business (4)
-

Display This Question:

If Do you serve prepared drinks (for dine-in or to-go) at your foodservice establishment? = Yes

Q64 For drink orders, do you automatically provide a disposable straw, do you have disposable straws set out for customers to take, or do you have disposable straws available only upon request?

- My business automatically provides disposable straws for drink orders (1)
 - My business has disposable straws set out for customers to take (2)
 - My business only has disposable straws available upon request (3)
 - Other (please explain below) (4) _____
 - N/A; this does not apply to my business (5)
-

Q66 Do you always ask the customer if they want their food/drink "for here" or "to-go"?

- My business automatically packages all food/drink "to-go" (1)
 - My business always asks the customer if they want their food/drink "for here" or "to-go" (2)
 - Other (please explain below) (3) _____
 - N/A; this does not apply to my business (4)
-

Q58 Please use this space for any other explanations, comments, or suggestions you may have related to zero-waste practices at your business specifically or generally for foodservice establishments in Philadelphia.

End of Block: Block 3
