

Consensus-Based Best Management Practices for Reusable Food and Beverage Containers in Food Establishments

Sonja Williams

Program Consultant



Guidance Introduction

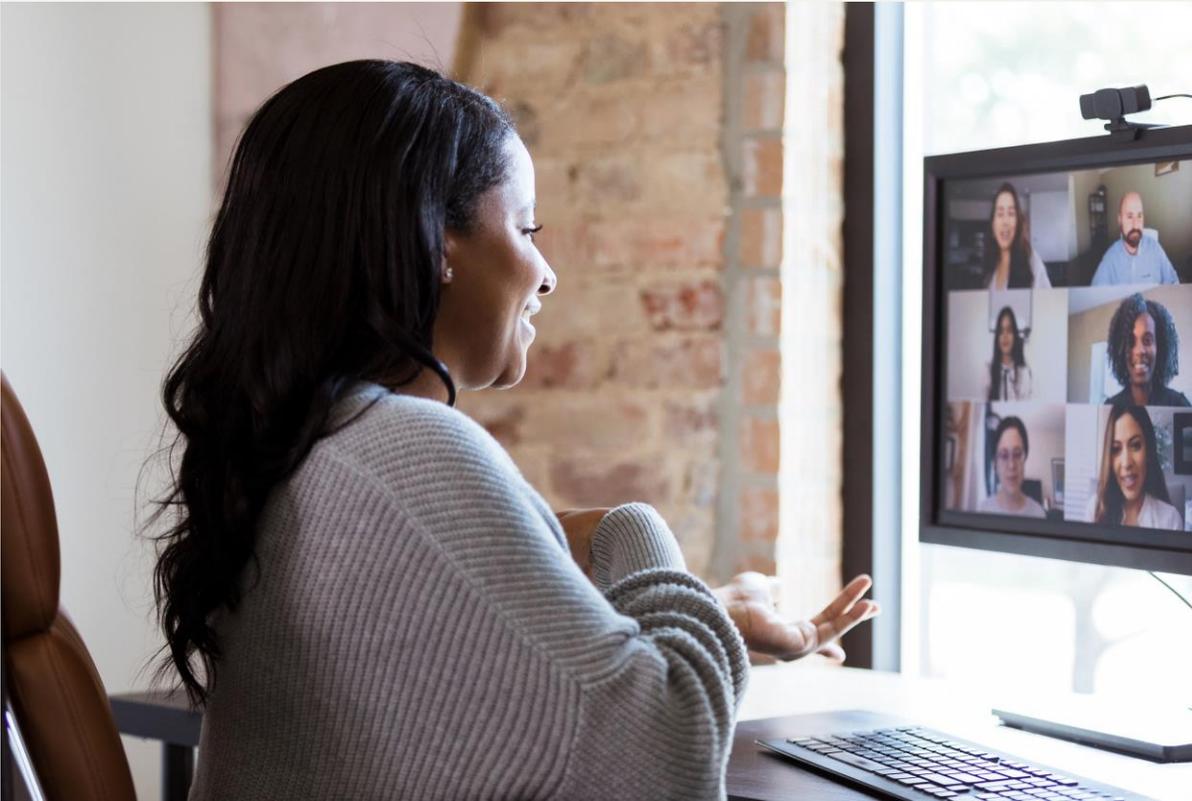


Who Should Use This Guide?

Resources in this guidance may also be helpful for:

- Food-serving establishments
- Health department officials
- Recycling coordinators
- Organizations and advocacy groups for reusables and/or waste prevention
- Industry associations for restaurants, colleges and universities, etc.
- Service providers for reusable serviceware and/or takeout container systems
- Vendors of reusable serviceware containers

Project Background



- 3 stakeholder meetings
- Over 150 stakeholders
- Multiple working drafts, feedback
- Aligned with MassDEPs goals to reduce solid waste.

Why should a business switch to reusable takeout containers?

1. Long-term Financial Savings
2. Encourage Customer Loyalty
3. Marketing Opportunities
4. Environmental Benefits

Health and Safety



Chapter 1 - Purpose and Definitions

105 CMR 590.001

1-1 Title, Intent, Scope

1-101 Title

1-101.10 Food Code

These provisions shall be known as the Food Code, hereinafter referred to as "this Code."

1-102 Intent

1-102.10 Food Safety, Illness Prevention, and Honest Presentation.

The purpose of this Code is to safeguard public health and provide to CONSUMERS FOOD that is safe, unADULTERATED, and honestly presented.

1-103 Scope

1-103.10 Statement.

This Code establishes definitions; sets standards for management and personnel, FOOD operations, and EQUIPMENT and facilities; and provides for FOOD ESTABLISHMENT plan review, PERMIT issuance, inspection, EMPLOYEE RESTRICTION, and PERMIT suspension.

FC 1-1 Purpose. [590.001(B)]

The purpose of 105 CMR 590.000 is stated within FC 1-101.10 2013 Food Code, FC 1-102.10 Food Safety, Illness Prevention, and Honest Presentation and FC 1-103.10 Statement.

1-2 Definitions

1-201 Applicability and Terms Defined

1-201.10 Statement of Application and Listing of Terms.

(A) The following definitions shall apply in the interpretation and application of this Code.
(B) Terms Defined. As used in this Code, each of the terms listed in ¶ 1-201.10(B) shall have the meaning stated below.

Definitions. [590.001(C)]

For the purposes of 105 CMR 590.000, the following terms shall have the meanings hereinafter specified. These definitions shall be in addition to or a substitution for the same definition in 2013 Food Code section FC 1-201.10 entitled Definitions. Citations to the 2013 Food Code shall be referenced FC followed by the section number (e.g. FC 1-201.10).

Accredited Program.

(1) "Accredited program" means a food protection manager certification program that has been evaluated and listed by an accrediting agency as conforming to national standards for organizations that certify individuals.
(2) "Accredited program" refers to the certification process and is a designation based up-

on an independent evaluation of factors such as the sponsor's mission; organizational structure; staff resources; revenue sources; policies; public information regarding program scope, eligibility requirements, re-certification, discipline and grievance procedures; and test development and administration.

(3) "Accredited program" does not refer to training functions or educational programs.
(4) Accredited Program also means food protection manager certification programs that are recognized by the Department

Additive.

(1) "Food additive" has the meaning stated in the Federal Food, Drug, and Cosmetic Act, § 201(s) and 21 CFR 170.3(e)(1).
(2) "Color additive" has the meaning stated in the Federal Food, Drug, and Cosmetic Act, § 201(t) and 21 CFR 70.3(f).

Adulterated means the definition in M.G.L. c. 94, § 186 as it pertains to food.

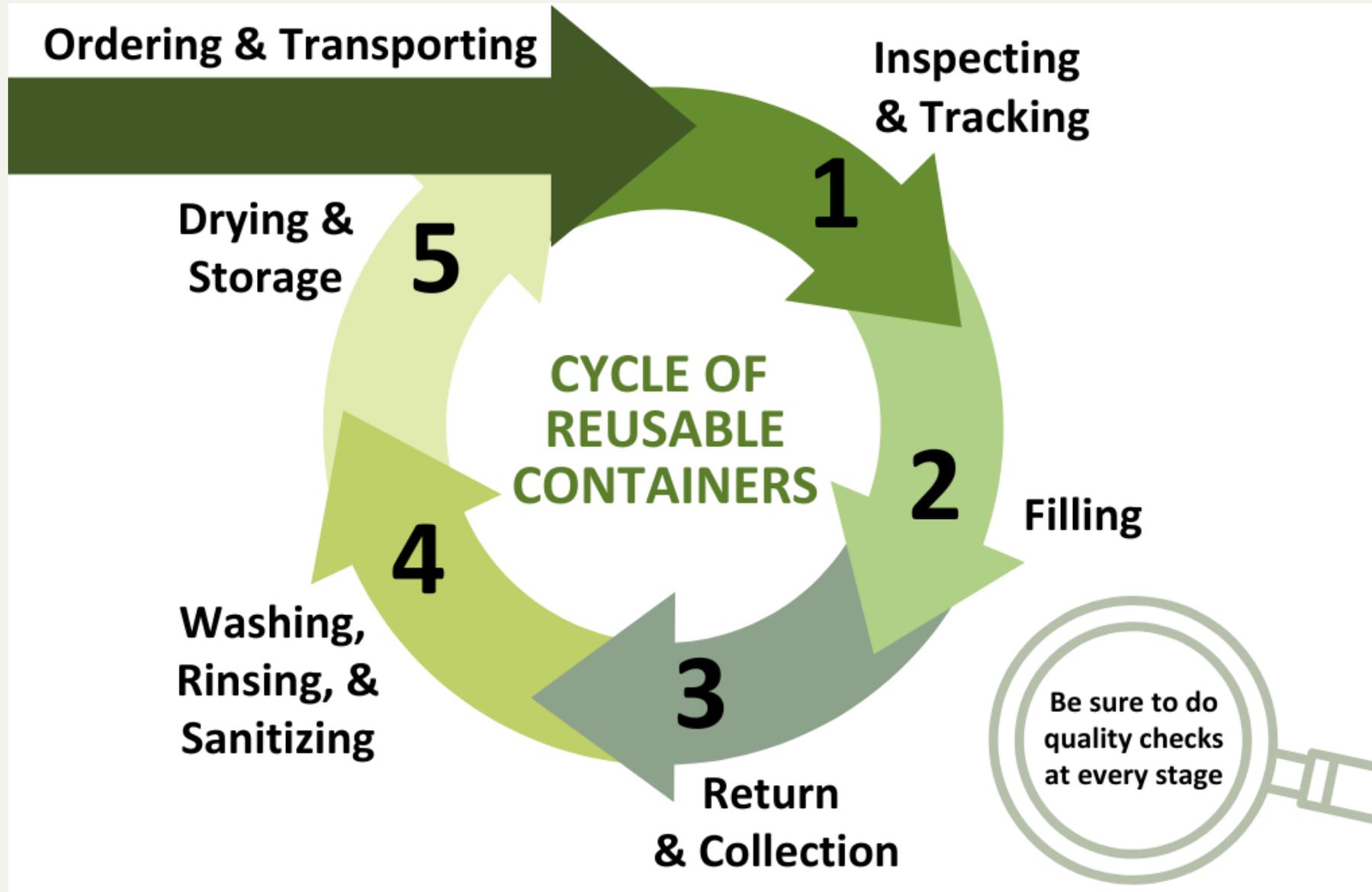
"Approved" means acceptable to the REGULATORY AUTHORITY based on a determination of conformity with principles, prac-

Three distinct scenarios emerged:

- Establishment provided containers for takeout and leftovers
- Beverage containers - consumer provided containers for take out
- Retail and Bulk use - consumer provided containers



Cycle of Reusable Containers





- BUYING RECYCLED PRODUCTS
- BUILDING MATERIALS
- FURNITURE & OFFICE EQUIPMENT REUSE GUIDANCE
- REUSABLE TAKEOUT CONTAINERS GUIDANCE

REUSABLE TAKEOUT CONTAINERS GUIDANCE

Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts

To download or view the guide as a PDF, click here: [Reusable Containers BMP](#)

Table of contents

- Introduction
 - Background
 - Who should use this guide?
 - How RecyclingWorks developed this guidance
 - Why should my business switch to reusable takeout containers?
 - A note on the Food Code
- Establishment-provided reusable containers
 - Food & beverage containers in food service

Find A Recycler

Choose A Material

Any Material

Location

Enter location

50 mi

Pick Up/Drop Off

Pick Up/Drop Off

Keyword

OR, try a keyword or biz name

Guidance Conclusion

This collection of best management practices focuses on the use of reusable take out containers in foodservice and retail/bulk food settings in alignment with the [Massachusetts Food Code](#).

For any questions about switching to reusable containers or if you know of a business that would like no-cost assistance with implementing a reusables program, contact the RecyclingWorks MA hotline:

Phone: 888-254-5525

Email: info@RecyclingWorksMA.com



Implementation Guide



Implementation Guide: Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts



Developed in 2024, the [Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts](#) aligns with the [Massachusetts Merged Food Code](#) to help food service establishments in Massachusetts reduce waste from single-use disposables. This Implementation Guide can assist decision-makers with the transition to reusable serviceware.

Reusable containers for to-go items are provided by the food establishment. The containers can be purchased and exchanged by a customer or borrowed like library books, typically through an app for a set number of days with reminders and ultimately fines for not returning. The containers are returned to the participating food establishment(s), washed, and inspected for reuse. *Consumer* provided containers can be used for leftovers but cannot be filled by the establishment.

Here are some points to consider.

- o Is there a program or initiative in your municipality that you can join?
- o Local health departments have the ultimate say in what their food establishments can do. Contact them to discuss your ideas and gather their input.

1. Why switch to reusables?

While initial implementation costs exist, switching to reusable containers can support sustainability goals and significantly reduce ongoing purchasing and disposal expenses, which may ultimately save businesses money.

2. How to incorporate reusables into your system

Providing reusables may attract new or repeat consumers interested in reducing waste from single-use takeout containers. When consumers return their reusables, they may also be more inclined to purchase items again since they are already at the establishment.

Consider:

- Point of Sale procedures
- Website and/or storefront banner promoting reusable program
- Discount on each order when reusables are used
- [Point and Loyalty Programs](#)

3. Determine menu items to be offered in reusable takeout containers

Consider:

- Menu items that are a suitable match for the container (bowl vs plate, liquid vs solid)
- Portion size and temperature of menu items that will fit the properties of the container
- Some menu items may not be suitable for packing in reusable containers

[Resource list for container types and service providers.](#)

4. Contact a service provider or choose a container to purchase

Establishments should first decide to:

- Purchase their own reusable takeout containers, or
- Lease containers through a service provider

The container selected is:

- ✓ Durable, corrosion-resistant, and non-absorbent
- ✓ Sufficient in weight and thickness to withstand repeated warewashing (washing and sanitizing)
- ✓ Finished to have a smooth, easily cleanable surface
- ✓ Resistant to pitting, chipping, crazing, scratching, scoring, distortion, and decomposition

Containers must be designed and constructed for reuse and in accordance with the requirements specified in the [Massachusetts Food Code](#) under Parts 4-1 (page 51) and [National Sanitation Foundation Institute \(NSF\)-certified.](#)

[GreenScreen Certified® for Reusable Food Packaging, Service Ware, & Cookware](#) is an additional evaluation of containers, including their chemical compositions such as PFAS.

5. Develop an Inspection Plan

After washing and sanitizing, inspect containers before filling to check for food residue, remaining debris, or physical damage, as one would any washed durable good [Source: Massachusetts Food Code, Part 3-304.17 (page 35)].

Look for:

- Cracks
- Dented beyond use
- Heavily scratched
- Lid (if applicable) doesn't fit securely
- QR code damaged, if applicable

Determine procedure for containers no longer suitable for use:

- Return to vendor
- Recycle
- Alternative plan

6. Develop procedure for filling the container

- Fill containers the same way as in-house dining or to-go orders. Avoid cross-contamination.

7. Determine where and how the containers will be received from customers

- Follow the same procedures as handling used plates. Wash hands before touching ready-to-eat food.
- Bus buckets can be used to collect reusable containers and should be serviced and sanitized with normal frequency.

8. Develop a plan to wash, rinse, and sanitize

Establishments should also decide:

- If they plan to wash, rinse, and sanitize containers in-house following FDA guidelines for:
 - Mechanical Warewashing, or
 - Manual Warewashing
- If they plan to subscribe to an off-site third-party warewashing service.

9. Determine a plan for air drying

- Consider the intricacy of container structure (e.g. gaskets, grooves etc.) which may result in increased complexity in drying.
- Adjust drying procedures to compensate for intricate structures (e.g., allow more dry time; remove parts to dry separately).

10. Determine a plan for storing reusable containers

Receiving and storing reusables should follow the same guidelines as for storing dishes and/or utensils. The container holding the reusables needs to be clean and stored in a manner to prevent contamination. If a business receives a new shipment of reusables or a shipment of returned third party-washed reusables, they should follow similar guidelines to how they receive other materials. Ensure staff can appropriately unload the reusables, inspect them, and move them to the storage area.

The storage location should ensure containers are:

- ✓ Six inches off the ground
- ✓ Covered or inverted
- ✓ Not exposed to splash, dust, or pests

Containers in active use are clean, readily available, and as accessible as any other takeout container.

11. Train employees

- Provide initial and ongoing training to employees on the reusables program.
- Determine a point-person for the program and share their name and contact information in case of any questions.

12. Review, analyze, and adjust to meet the needs of your establishment

- Periodically review how the programs are working.
- Solicit staff input for continuous improvement.
- Adjust the program as needed.

If you are a business that would like no-cost assistance with implementing a reusables program, or have questions about switching to reusable containers, contact the RecyclingWorks MA hotline at: 888-254-5525 or email info@RecyclingWorksMA.com.

Implementation Guide



Implementation Guide: Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts



Developed in 2024, the [Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts](#) aligns with the [Massachusetts Merged Food Code](#) to help food service establishments in Massachusetts reduce waste from single-use disposables. This Implementation Guide can assist decision-makers with the transition to reusable serviceware.

Reusable containers for to-go items are provided by the food establishment. The containers can be purchased and exchanged by a customer or borrowed like library books, typically through an app for a set number of days with reminders and ultimately fines for not returning. The containers are returned to the participating food establishment(s), washed, and inspected for reuse. *Consumer* provided containers can be used for leftovers but cannot be filled by the establishment.

Here are some points to consider.

- Is there a program or initiative in your municipality that you can join?
- Local health departments have the ultimate say in what their food establishments can do. Contact them to discuss your ideas and gather their input.

1. Why switch to reusables?

While initial implementation costs exist, switching to reusable containers can support sustainability goals and significantly reduce ongoing purchasing and disposal expenses, which may ultimately save businesses money.

2. How to incorporate reusables into your system

Providing reusables may attract new or repeat consumers interested in reducing waste from single-use takeout containers. When consumers return their reusables, they may also be more inclined to purchase items again since they are already at the establishment.

Consider:

- Point of Sale procedures
- Website and/or storefront banner promoting reusable program

Implementation Guide

1. Why switch to reusables?

While initial implementation costs exist, switching to reusable containers can support sustainability goals and significantly reduce ongoing purchasing and disposal expenses, which may ultimately save businesses money.

2. How to incorporate reusables into your system

Providing reusables may attract new or repeat consumers interested in reducing waste from single-use takeout containers. When consumers return their reusables, they may also be more inclined to purchase items again since they are already at the establishment.

Consider:

- Point of Sale procedures
- Website and/or storefront banner promoting reusable program
- Discount on each order when reusables are used
- [Point and Loyalty Programs](#)

3. Determine menu items to be offered in reusable takeout containers

Consider:

- Menu items that are a suitable match for the container (bowl vs plate, liquid vs solid)
- Portion size and temperature of menu items that will fit the properties of the container
- Some menu items may not be suitable for packing in reusable containers

[Resource list for container types and service providers.](#)

4. Contact a service provider or choose a container to purchase

Establishments should first decide to:

- Purchase their own reusable takeout containers, **or**
- Lease containers through a service provider

Containers must be designed and constructed for reuse and in accordance with the requirements specified in the Massachusetts Food Code under Parts 4-1 (page 51) and [National Sanitation Foundation Institute \(NSF\) certified](#)

Implementation Guide

- Portion size and temperature of menu items that will fit the properties of the container
- Some menu items may not be suitable for packing in reusable containers

[Resource list for container types and service providers](#)

4. Contact a service provider or choose a container to purchase

Establishments should first decide to:

- Purchase their own reusable takeout containers, **or**
- Lease containers through a service provider

The container selected is:

- ✓ Durable, corrosion-resistant, and non-absorbent
- ✓ Sufficient in weight and thickness to withstand repeated warewashing (washing and sanitizing)
- ✓ Finished to have a smooth, easily cleanable surface
- ✓ Resistant to pitting, chipping, crazing, scratching, scoring, distortion, and decomposition

Containers must be designed and constructed for reuse and in accordance with the requirements specified in the **Massachusetts Food Code under Parts 4-1 (page 51) and [National Sanitation Foundation Institute \(NSF\)-certified](#).**

[GreenScreen Certified® for Reusable Food Packaging, Service Ware, & Cookware](#) is an additional evaluation of containers, including their chemical compositions such as PFAS.

Implementation Guide

5. Develop an Inspection Plan

After washing and sanitizing, inspect containers before filling to check for food residue, remaining debris, or physical damage, as one would any washed durable good [Source: Massachusetts Food Code, Part 3-304.17 (page 35)].

Look for:

- Cracks
- Dented beyond use
- Heavily scratched
- Lid (if applicable) doesn't fit securely
- QR code damaged, if applicable

Determine procedure for containers no longer suitable for use:

- Return to vendor
- Recycle
- Alternative plan

6. Develop procedure for filling the container

- Fill containers the same way as in-house dining or to-go orders. Avoid cross-contamination.

7. Determine where and how the containers will be received from customers

- Follow the same procedures as handling used plates. Wash hands before touching ready-to-eat food.
- Bus buckets can be used to collect reusable containers and should be serviced and sanitized with normal frequency.

Implementation Guide

- Follow the same procedures as handling used plates: wash hands before touching ready-to-eat food.
- Bus buckets can be used to collect reusable containers and should be serviced and sanitized with normal frequency.

8. Develop a plan to wash, rinse, and sanitize

Establishments should also decide:

- If they plan to wash, rinse, and sanitize containers in-house following FDA guidelines for:
 - Mechanical Warewashing, or
 - Manual Warewashing
- If they plan to subscribe to an off-site third-party warewashing service.

9. Determine a plan for air drying

- Consider the intricacy of container structure (e.g. gaskets, grooves etc.) which may result in increased complexity in drying.
- Adjust drying procedures to compensate for intricate structures (e.g., allow more dry time; remove parts to dry separately).

10. Determine a plan for storing reusable containers

Receiving and storing reusables should follow the same guidelines as for storing dishes and/or utensils. The container holding the reusables needs to be clean and stored in a manner to prevent contamination. If a business receives a new shipment of reusables or a shipment of returned third party-washed reusables, they should follow similar guidelines to how they receive other materials. Ensure staff can appropriately unload the reusables, inspect them, and move them to the storage area.

The storage location should ensure containers are:

- ✓ Six inches off the ground
- ✓ Covered or inverted
- ✓ Not exposed to splash, dust, or pests

Containers in active use are clean, readily available, and as accessible as any other takeout container.

11. Train employees

- Provide initial and ongoing training to employees on the reusables program.
- Determine a point-person for the program and share their name and contact information in case of any questions.

12. Review, analyze, and adjust to meet the needs of your establishment

- Periodically review how the programs are working.

Implementation Guide

drying.

- Adjust drying procedures to compensate for intricate structures (e.g., allow more dry time; remove parts to dry separately).

10. Determine a plan for storing reusable containers

Receiving and storing reusables should follow the same guidelines as for storing dishes and/or utensils. The container holding the reusables needs to be clean and stored in a manner to prevent contamination. If a business receives a new shipment of reusables or a shipment of returned third party-washed reusables, they should follow similar guidelines to how they receive other materials. Ensure staff can appropriately unload the reusables, inspect them, and move them to the storage area.

The storage location should ensure containers are:

- ✓ Six inches off the ground
- ✓ Covered or inverted
- ✓ Not exposed to splash, dust, or pests

Containers in active use are clean, readily available, and as accessible as any other takeout container.

11. Train employees

- Provide initial and ongoing training to employees on the reusables program.
- Determine a point-person for the program and share their name and contact information in case of any questions.

12. Review, analyze, and adjust to meet the needs of your establishment

- Periodically review how the programs are working.
- Solicit staff input for continuous improvement.
- Adjust the program as needed.

If you are a business that would like no-cost assistance with implementing a reusables program, or have questions about switching to reusable containers, contact the RecyclingWorks MA hotline at: 888-254-5525 or email info@RecyclingWorksMA.com.

Implementation Guide

Reusable Container Service Providers and Product Information		
Service Providers	Notes	Contact Information
Fill it Forward	Utilizes QR codes on containers and return locations to track uses.	1-888-824-7375 info@fillitforward.com
Recirclable	Tailored support for Boston-area restaurants switching to reusables. App and QR code tracking system on containers. Provides-BPA free plastic containers.	Margie Bell, Co-Founder 617-407-7232 margie@recirclable.com
Re:Dish	Reusable container and warewashing program.	info@redish.com
ReusePass by Topanga.io	A platform that can be used with any container to manage inventory and monitor reusable containers using RFID and QR codes.	818-423-5142 ReusePass@topanga.io
Usefull	For college/universities looking to switch to reusables. App and QR code tracking system on containers. Provides stainless steel reusable cups and bowls.	781-650-8935 info@usefull.us
Products	Notes	Contact Information
Ahimsa	School-focused stainless steel foodware	Contact – Ahimsa® Schools
Ball	Aluminum cups	Contact Form
Ozzi	BPA-free plastic clamshells, bowls, and cups. Offers drop-off container collection	855-476-6994 info@planetozzi.com
Preserve	BPA-free plastic to-go containers	888-354-7296 info@preserve.eco
WeReUse	Stainless steel foodware	John Fedyski 602-790-4567 John.M.Fedyski@WeWillReUse.com

Funding Opportunities	Notes	Contact Information
MassDEP Reduce, Reuse, Repair Micro-Grant	Grants of up to \$10,000 to eligible for-profit and non-profit organizations, regional authorities, municipalities, and schools/colleges for short-term reuse and repair projects.	Leah Kelleher, MassDEP leah.kelleher@mass.gov
MassDEP Sustainable Materials Recovery Program (SMRP) Grant Program	MassDEP Sustainable Materials Recovery Program (SMRP) Municipal Grant funding may be used to improve local recycling, composting, reuse, and household hazardous waste diversion programs.	Rachel Smith, MassDEP rachel.smith@mass.gov
Plastic-Free Restaurants Subsidy	Subsidy program is available to any food service establishment that currently gives single-use items containing either petroleum-based plastic or PFAS to its customers (or students), is willing and ready to switch to reusables, and is not required by (local, county, state) law to discontinue using the single-use plastic.	Subsidy Application Form
ReThink Disposable	A Clean Water Action and Clean Water Fund program that works with local governments, businesses and institutions, and consumers of single use food packaging to switch to reusables.	Contact Form

**Please note: this list was compiled by RecyclingWorks for contact purposes, and a listing does not imply a recommendation or endorsement. If there are any products or services that should be considered for this list, please contact the RecyclingWorks MA hotline: info@recyclingworksma.com or by calling 888-254-5525.*

Additional Resources

- [MassDEP Reduce and Reuse Working Group](#)
- [MassDEP Reduce & Reuse Action Plan](#)
- [Massachusetts Merged Food Code](#)
- [Guidance Document for Safe Use of Reusable Containers, Conference for Food Protection](#)
- [NSF Food Storage Containers webpage](#)
- **Third Party Container provider examples:**
 - [DeliverZero](#), [Muuse](#), [Ozzi](#), [Recirclable](#), [ReThink Disposable](#), [ReUser](#), [Preserve](#), and [USEFULL](#)
- [Reusable Container Quickstart Guide, Circular Philadelphia](#)
- [Toolkit Refilling Consumer owned Containers _1_.docx](#)
- [The New Reuse Economy: The Future of Food Service is Reusable](#) (an **UPSTREAM resource**)

Examples of Businesses with Successful Programs



Grainmaker Reduces Waste with Reusable Takeout Containers

Kat McCarthy | October 22, 2020

During the pandemic takeout meals have become the norm, enabling restaurants across Massachusetts to continue serving customers when in-person dining is limited. For consumers, this convenience comes with a trade-off: an abundance of packaging and single-use items that often cannot be recycled. For the food service industry, this means spending money to purchase items that often cannot be recycled, and leaving customers with extra packaging waste.

Grainmaker, a fast-casual restaurant with locations in Boston and Somerville, has embraced its values of strengthening the community and being a positive influence by creating a program to reduce packaging waste from to-go orders. After less than a year of implementation, this program is already reducing waste and saving the business and customers money. RecyclingWorks in Massachusetts (RecyclingWorks) recently spoke with Grainmaker owner Chris Freeman to learn more about their Zero Waste Project.



[Grainmaker Blog](#)



Johnny's Luncheonette Implements a Reusable Takeout Container Program

Olivia | September 29, 2023



Johnny's Luncheonette, an iconic Newton diner with robust recycling and food waste diversion programs, continues to push the envelope in sustainability.

The diner now offers a reusable takeout container program! Customers who choose to join the program can order menu items for takeout in containers that won't end up in any waste, recycling, or composting bins, but rather be returned, thoroughly sanitized, and re-used in a continuous cycle.

Through a collaboration with **Recircible**, Johnny's Luncheonette now provides a selection of its breakfast and lunch menu items in easily recognizable green-hued reusable to-go containers. The containers are manufactured by Preserve and Ozzi, and are composed of readily available and recyclable BPA-free polypropylene (#5 Plastic). These containers can be used up to 1,000 times, and at their end-of-life, Preserve and Ozzi take the containers back to have them recycled. As evidenced, this initiative is helping to reduce both the disposal and purchasing of single-use takeout items.

[Johnny's Luncheonette Blog](#)



Returnable Takeout Packaging: A Step Toward Zero Waste

Olivia | November 28, 2022

The dining halls and eateries at colleges and universities are ripe with waste prevention opportunity. Transitioning away from single-use takeout containers is one way institutions can significantly reduce their waste and carbon footprints.

This year, **Mount Holyoke College swapped out its single-use food containers and cups for returnables**. The college accomplished this by partnering with **USEFULL**, a company that customizes durable stainless steel foodservice containers that are made to be used, returned, washed, and reused.



In an average year, Mount Holyoke was using around 250,800 compostable containers. Their switch to returnable packaging is projected to prevent 5,488 pounds of single-use material from entering the waste stream each year.

Here is the impact of Mount Holyoke's transition to USEFULL containers since they implemented the program in February 2022:

[Mount Holyoke Blog](#)

Next Steps:

- Continued promotion through RecyclingWorks MA technical assistance, newsletters, presentations, and conferences.
- Adjust, improve, and continue to incorporate feedback!

Contact the RecyclingWorks MA hotline:

- Phone: 888-254-5525
- Email: info@RecyclingWorksMA.com