



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

Developed in 2024

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Introduction

Background

This guide provides best management practices for reusable takeout containers that align with the [Massachusetts Merged Food Code](#) to help food service establishments in Massachusetts reduce waste from single-use disposables. Best management practices were developed in collaboration with multiple stakeholders. RecyclingWorks in Massachusetts (RecyclingWorks) worked with members of the Massachusetts Department of Environmental Protection (MassDEP) Reduce and Reuse Working Group, state and local health officials, food retail establishments, restaurants, colleges and universities, reusables organizations and advocacy groups, and other stakeholders from the food service industry to develop and vet these management practices.

RecyclingWorks defines reusable takeout container serviceware as durable containers, plates, bowls, and utensils used to hold food and/or beverages.

In Massachusetts, local health departments maintain the authority to interpret the Food Code as it applies to reusable serviceware. The Massachusetts Department of Public Health (MassDPH) continues to be a resource for local health departments when interpreting the Food Code. For food code questions, contact Mark Carleo, Senior Food Safety Trainer, MassDPH, at mark.l.carleo@mass.gov.

Please note: Switching from single-use disposables to durable reusable containers is not being mandated. For establishments interested in making the switch, this guide offers best practices to consider.

Who Should Use This Guide?

Food establishments such as restaurants, colleges and universities, hotels, grocers, corporate and hospital cafeterias, caterers, and stadiums utilizing single-use, to-go food containers and other disposable serviceware might find this guide valuable when initiating a reusable serviceware program.

Resources in this guidance may also be helpful for:

- Health department officials
- Recycling coordinators
- Organizations and advocacy groups focused on 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



How RecyclingWorks Developed This Guidance

RecyclingWorks hosted three virtual stakeholder engagement meetings (October 12, 2023; December 7, 2023; and August 6, 2024) with breakout rooms to encourage input from all participants. Stakeholders included businesses and institutions, service providers and vendors of reusable food container systems, local and state public health officials, recycling coordinators, reuse organizations and advocacy groups, and representatives from industry associations. Themes and topics discussed included considerations for establishment-provided and consumer-provided containers, at the intersection of waste reduction and public health protection.

In addition, RecyclingWorks:

- Conducted one-on-one interviews with key stakeholders
- Offered review sessions/comment periods on Best Management Practices (BMP) guidance in outline and draft forms
- Will make updates to the BMP as [Massachusetts Food Code](#) changes and as updates are made to supporting guidance documents

Why Should My Business Switch to Reusable Takeout Containers?

Long-term Financial Savings: While initial implementation costs exist, switching to reusable containers can significantly reduce ongoing purchasing and disposal expenses, which may ultimately save businesses money.

For example, over the course of one year, Boston-area restaurant [Grainmaker's reusable container program](#) generated approximately \$800 in savings and prevented 2,100 pounds of single-use packaging waste (RecyclingWorks Blog Post on Grainmaker, October 2020).

Encourage Customer Loyalty: Providing reusables may attract new or repeat consumers interested in reducing waste from single-use take out containers. When consumers return their reusables, they may also be more inclined to purchase another meal since they are already there.

Marketing Opportunities: Reuse supports the sustainability goals of the local community/municipality and potential customers.

Environmental Benefits: Reusable containers reduce waste, help mitigate greenhouse gas emissions created in the production and disposal of single-use items and save natural resources. Implementing a reusable container program can help meet business and state sustainability goals.

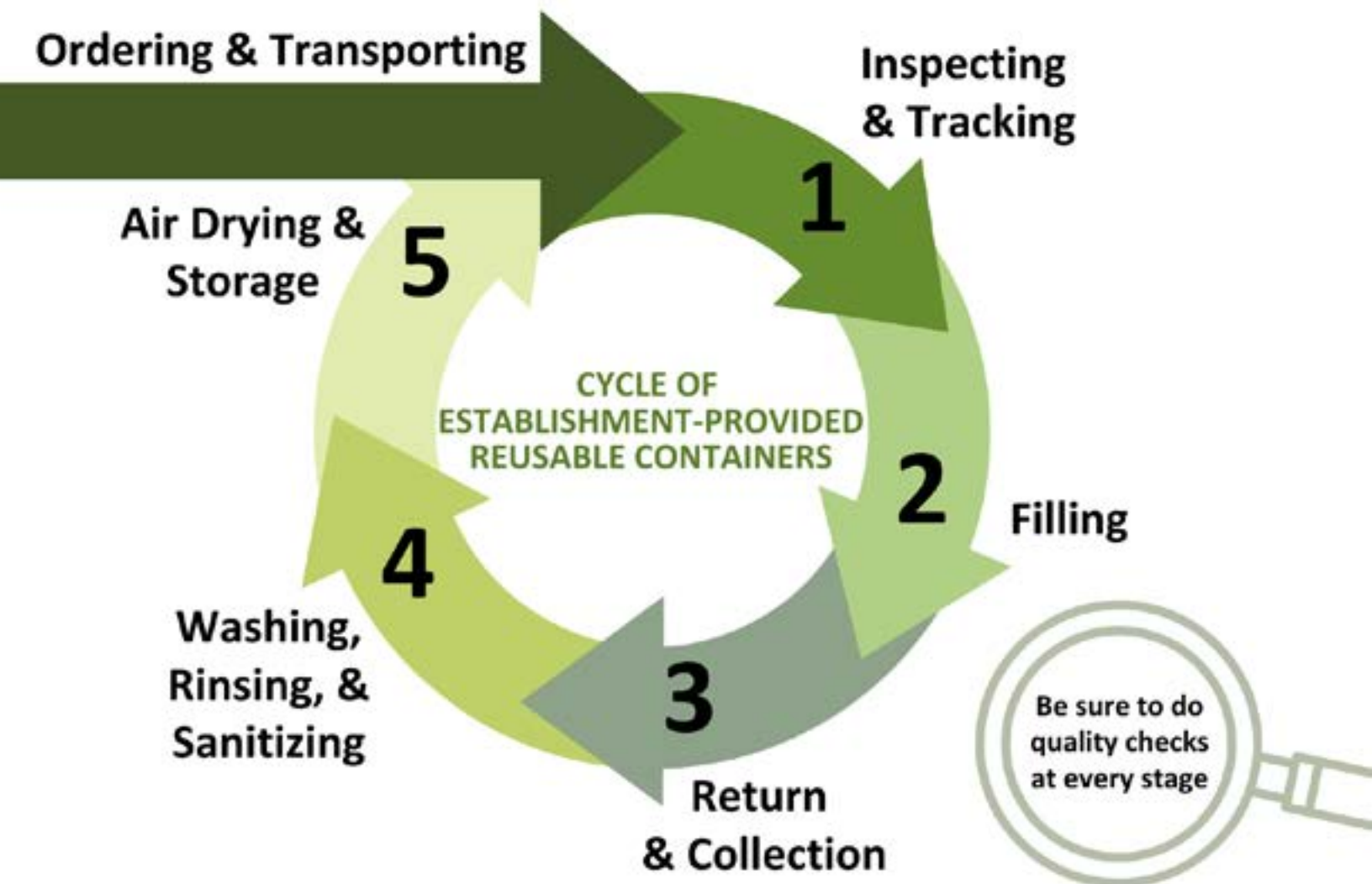
- MassDEP issued its final [2030 Solid Waste Master Plan](#) in October 2021. The plan outlines goals to reduce disposal statewide by 30% over the next decade (from 5.7 million tons in 2018 to 4 million tons in 2030). Reducing single-use containers contributes to reduction in overall waste disposed in alignment with the Solid Waste Master Plan goals and is addressed explicitly in [MassDEP's Reduce & Reuse Action Plan](#).
- Reusables create **fewer greenhouse gas (GHG) emissions** than disposables. When used as intended (multiple uses, with specific number of uses for different materials), reusable ceramic, stainless steel, and glass containers produce a fraction of KgCO₂ compared to paper and plastic containers. They reduce the need to extract resources from the Earth and process them into new products, thereby saving energy and natural resources. [Source: [The New Reuse Economy: The Future of Food Service is Reusable, Upstream](#)].

- Reusable food serviceware also **saves water over its lifecycle** versus single use disposables. According to Upstream, “using 500 paper cups consumes nearly 370 gallons of water, while using and washing one ceramic cup 500 times consumes only 53 gallons of water.” [Source: [The New Reuse Economy, Upstream](#)].

A Note on the Food Code

RecyclingWorks recognizes that the [Massachusetts Food Code - 105 CMR 590](#) (Massachusetts Adoption of the 2013 Food and Drug Administration (FDA) Food Code), referred to herein as the Massachusetts Food Code, and local health departments, are the best resources to ensure reusable containers are being offered and utilized in accordance with public health standards. Since food establishments are permitted and inspected locally, please confer with your local health department with questions regarding specific requirements. If additional information is sought which is not explicitly addressed in the Massachusetts Food Code, entities can refer to the most current information available from the [Conference for Food Protection Guidance Document](#) and defer to the Massachusetts Department of Public Health. For food code questions, contact Mark Carleo, Senior Food Safety Trainer, DPH, at mark.i.carleo@mass.gov.

In general, entities that are already in the business of preparing and serving food for public consumption are already practicing measures necessary to adopt the safe use of reusable food containers.



Establishment-Provided Reusable Containers

Food & Beverage Containers in Food Service

Establishment-Provided Reusable Containers are any durable bowl, plate, box, container, or cup of any sort provided by the establishment for consumer use both on and off-site.

Beverage containers are addressed in the [Massachusetts Food Code](#); however, please defer to your local board of health and/or health department for additional guidance.

Container Selection

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 4-2 (page 52).

[National Sanitation Foundation Institute \(NSF\)-certified](#): If a product is NSF-certified, it is compliant with the Massachusetts Food Code.

In addition to NSF-certification, GreenScreen Certification can be considered for a more in-depth evaluation of material composition. The nonprofit organizations Center for Environmental Health (CEH) and Clean Production Action (CPA) have created the GreenScreen Certified Standard for reusables: [GreenScreen Certified® for Reusable Food Packaging, Service Ware, & Cookware](#).

The reusable container must be:

- 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.

[Source: [Massachusetts Food Code](#), Part 4-101.11 (page 51)]

Receiving Shipments of Products

Receiving and storing reusables should follow the same guidelines as for storing equipment and utensils. The container holding the reusables needs to be clean and stored in a manner to prevent contamination. Reusable serviceware must be stored six inches off the ground, covered or inverted, and not exposed to splash, dust, or pests. [Source: [Massachusetts Food Code](#), Part 4-903.11 (page 67)]

If a business is receiving a shipment of reusables, they should follow similar guidelines to how they receive other materials: ensuring there is staff to appropriately unload the reusables, inspect them, and move them to the storage area.



Inspecting, Tracking, & Decommissioning/Retiring

All reusable containers should be visually inspected by a food establishment employee to verify that the container meets the requirements specified in the Massachusetts Food Code under Parts 4-1 (page 51) and 4-2 (page 52). [Source: [Massachusetts Food Code](#), Part 3-304.17 (page 35)].

Inspect containers after they are washed and sanitized 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)].

Quality assurance should be conducted by the establishment at every phase of the reusable container cycle, and containers identified for removal should be removed immediately. Visual signs to take a container out of circulation may include:

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

Filling

Reusable takeout containers should be filled in the same prep area and with the same methods as in-house food: Avoid cross-contamination and consider allergens when filling and handling the containers.

If applicable, ensure the container lid is closed securely after filling.

Container Return & Collection

Restaurants

Determine a convenient and clearly identified front-of-house collection method that allows consumers to locate and drop off used containers efficiently. Determine a collection schedule of the used containers to prevent unsanitary conditions; this may occur at the same time as other bus buckets are emptied. Clearly communicate or display standards for the condition in which consumers should return the container.

Clean and sanitize non-food contact collection bin (e.g. bus bucket) as necessary [Source: [Massachusetts Food Code](#), Part 4-602.13 (page 64)].

Institutions

Best practices for institutional collection include establishing distinct and easily identifiable collection receptacles and signage for returning reusable containers. Return receptacles may contain washable collection tote(s) inside to be removed and emptied as necessary. For ease of use, consider placing the container return in the same location as the tray return.



Washing, Rinsing & Sanitizing

Either a mechanical dishwasher or manual warewashing (three-bay sink) can be used to wash, rinse, and sanitize reusable containers to standards specified in the Massachusetts Food Code under Part 4-6 (page 63) and Part 4-7 (page 66).

Washing, rinsing, and sanitizing requirements for reusable takeout containers follow the same requirements as in-house durables: Scrape and rinse any noticeable food residue before washing and sanitizing containers returned by consumers; air dry and avoid stacking when wet (“wet-nesting”) as moisture can be a medium for bacteria growth.

- FDA Washing Guidelines¹, Mechanical:
 - Must automatically dispense detergent and sanitizer
 - Minimum wash tank temps:
 - 150°F - 165°F (high temp sanitization)
 - 120°F (chemical sanitization)
 - 180°F Minimum final rinse temp (high temp sanitization)
- FDA Washing Guidelines, Manual:
 - Use a triple basin. One sink each for:
 - Washing (detergent required)
 - » 110°F (minimum wash sink temp)
 - Rinsing
 - Sanitizing
 - » Fully submerge ware in chemical sanitizer sink for the time specified per the manufacturer instructions. Time may also be dependent on the type of chemical agent used.

The intricacy of container structure (e.g. gaskets, grooves etc.) may affect the complexity in washing and sanitizing. When deciding on container style, consider how the containers will effectively move through the washing, rinsing, and sanitizing cycle.

If needed, identify an off-site location for warewashing.

Example of Standard Operating Procedure (SOP) for third-party warewashing location: [Island Eats SOP Washing & Transportation.docx.pdf](#)

Air Drying & Storage

After washing and sanitizing, air dry all reusable containers and ensure complete drainage and drying.

Considerations for ensuring proper drying

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

Dishes and other serveware **cannot be towel dried** under the Food Code, only air dried, so adding reusables could require additional space.

To increase the efficiency of the drying process, special trays with partitions and racks can be used.

Considerations for storage

The standards for storing reusables are the same as those for in-house dining plates and other serviceware. Reusables may be stored in the space previously used to store single-use, disposable containers. Store dry reusables inverted or covered in National Sanitation Foundation (NSF)-certified racks or bins to protect from contamination [Source: [Massachusetts Food Code](#), Part 4-903.11, paragraph B (page 67)]. They must also be stored in a space away from poisonous or toxic materials and in a pest-free environment [Source: [Massachusetts Food Code](#), Parts 6-501.111 (page 82) and 7-201.11 (page 85)].

Consumer-Provided Reusable Containers

Beverage Containers in Food Service

Container Considerations

Consumer-provided reusable beverage containers are referenced in Part 3-304.17, paragraphs (C), (D), and (E) (page 35) of the [Massachusetts Food Code](#).

The Conference for Food Protection developed the “Guidance Document for the Safe Use of Reusables” to ensure safe consumption and suitability for reusable beverage containers: The Conference for Food Protection is a nonprofit that “brings together representatives from the food industry, government, academia, and consumer organizations to identify and address emerging problems of food safety to formulate recommendations.”

- Consumers can use insulated containers to store hot beverages.
- Additionally, containers intended for cold beverages should not be used for hot beverages.

For additional information, including details for Temperature Control for Safety (TCS) foods and beverages, refer to [Conference for Food Protection: Guidance Document for the Safe Use of Reusables](#) (page 10-11).

Rinsing

It is not necessary to rinse a consumer’s beverage container if it passes visual inspection by an establishment employee. Establishments may choose to rinse beverage containers that do not pass visual inspection if, as stated in the [Massachusetts Food Code](#), “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” [Source: [Massachusetts Food Code](#), Part 3-304.17 (page 35)].



Filling

The beverage container may be filled by an employee or the consumer as long as it follows a contamination-free filling process as specified in the [Massachusetts Food Code](#) under Part 4-204.13, paragraphs A, B, and D (page 54).

Ensure consumer-provided beverage container does not come into contact with back-of-house prep spaces.



Consumer-Provided Food Containers in Food Service

Consumers may transfer their freshly prepared meals or in-house dining leftovers from the establishment's dishware into personal containers at their dining table, as long as the consumer-owned container remains within the consumer area and has not been taken into the back of the house (behind the counter, into the kitchen, etc.).

Food Containers in Retail/Bulk Settings

This section covers reusable containers for bulk filling provided by the establishment and/or consumer.

Reusable bulk food containers should be: [Parts of this section are adapted from: [Massachusetts Food Code](#), Part 4-101.11 (page 51)]:

- Suitable for the intended use
- Durable, corrosion-resistant, and nonabsorbent
- Sufficient in weight and thickness to withstand repeated mechanical or manual warewashing (washing and sanitizing)
- Finished to have a smooth, easily cleanable surface
- Resistant to pitting, chipping, crazing, scratching, scoring, distortion, and decomposition

Additional guidance for ensuring safe consumption and suitability for reusable bulk food containers [Source: [Conference for Food Protection: Guidance Document for the Safe Use of Reusables](#) (page 11)]:

Consideration for establishment-provided bulk food containers: If a product is [National Sanitation Foundation \(NSF\)-certified](#), it is compliant with the [Massachusetts Food Code](#).

Consideration for consumer-provided bulk food containers: Business should defer to their local health department to inquire about any specific requirements for consumer-provided containers.

Inspecting

All reusable bulk food containers must be visually inspected by a food establishment employee to verify that the container meets requirements specified in the Massachusetts Food Code under Parts 4-1 (page 51) and 4-2 (Page 52) [Source: [Massachusetts Food Code](#), Part 3-304.17 (page 35)], or that the container is NSF-certified.

Employees must visually inspect consumers' reusable containers before they are filled. If customers pay for bulk by weight, employees could visually inspect containers when taring (weighing) them before customers fill them.

Containers should be free of:

- Visible soil or food debris
- Pitting, cracking, chipping, crazing (visual cracks on the surface), scratching, scoring and distortion

Filling

When filling reusable bulk food containers, the food establishment's dispensers, utensils, and other equipment should not come into contact with the container.

Here are examples of contamination-free filling methods:

- Gravity-fed dispensers (self-service, bulk gravity flow)
- Self-service, non-gravity fed (scoop bins, spice containers, bulk foods with utensils)
- Intermediary liners (full-service, employee refilling, using liners such as wax paper)

Please refer to page 12 of the [Conference for Food Protection Guidance Document for Safe Use of Reusable Containers](#) for detailed descriptions of each of the above filling methods.

Washing, Rinsing, Sanitizing, Drying, & Storage

Retail/bulk food establishments should ensure that scoops, tongs, ladles, or other utensils used to fill containers are sanitized at least every 24 hours [Source: [Massachusetts Food Code](#), Part 4-602.11, paragraph E (page 63)].

For guidance on washing, rinsing, sanitizing, drying, and storing Establishment-Provided bulk food reusable containers, see the applicable sections in the Establishment-Provided Food Containers in Foodservice section above.

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](#). If you have any questions about switching to reusable containers or would like no-cost assistance with implementing a reusables program, call RecyclingWorks at 888-254-5525 or email us at info@RecyclingWorksMA.com.

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 providers
 - Some examples of container providers are [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)

