# Reusable Containers: Overcoming Barriers to Scale

October 8, 2025 **NERC** MASSACHUSETTS





Our mission is to innovate, implement, and scale the environmental solutions that communities need to thrive.





# No-Cost Assistance for Businesses & Institutions

RecyclingWorks MA is funded by MassDEP, delivered under contract by CET

recyclingworksma.com

## Background

#### **MassDEP Solid Waste Master Plan:**

- 2030 Goal: Reduce disposal by 1.7 million tons annual basis Introduced Waste Disposal Bans starting in early 1990's Created RecyclingWorks in MA assistance program in 2011 Established Reduce & Reuse Workgroup in 2021:
  - Building material reuse and deconstruction
  - Reusable food service ware

The best lever to address capacity is through waste reduction and diversion.



## Massachusetts Waste Disposal Bans

#### **Commercial Food Material**

Applies to businesses & institutions generating one-half (0.5) tons or more food waste per week

## **Cardboard & Paper**

Metal, Glass, and Plastic Containers

**Textiles & Mattresses & Box Springs** 

**Construction & Demolition Materials** 

**Yard Waste** 

**White Goods** 

## What Is Technical Assistance?

Evaluate existing waste streams Identify opportunities to prevent, recover, and divert waste Connect with service providers Create customized waste bin signage Conduct cost analysis Implementation assistance – education and training





### **Wasted Food Scale**

How to reduce the environmental impacts of wasted food



## Best Management Practice Guidance Developed by RecyclingWorks

Source Reduction
Guidance

**Food Donation Guidance** 

Source Separation
Guidance

Guidance for Businesses
Contracting for Trash,
Recycling, and Food Waste
Services



https://recyclingworksma.com/sourc e-reduction-guidance/



https://recyclingworksma.com/donate/



https://recyclingworksma.com/local-healthdepartment-guidance-for-commercial-foodwaste-separation/



https://recyclingworksma.com/hauler-contracting-bmp/

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







## **Project Background**



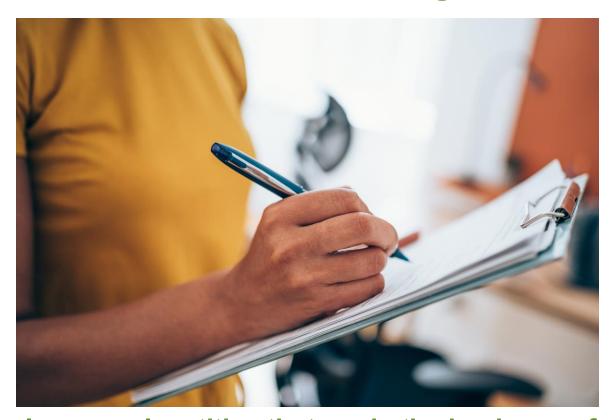
- 3 stakeholder meetings ('23-'24)
- Over 150 participants
- Multiple working drafts, feedback
- Aligned with MassDEP's goals to reduce solid waste.
- Ensure consistency with MA Food Code.

## **Guidance Process Input and Applicability**

- 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 service ware and/or takeout container systems
- Vendors of reusable service ware containers



## **Health and Safety**



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

#### 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 State-

#### 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-

DPH version 11/16/18

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## Three distinct scenarios emerged:

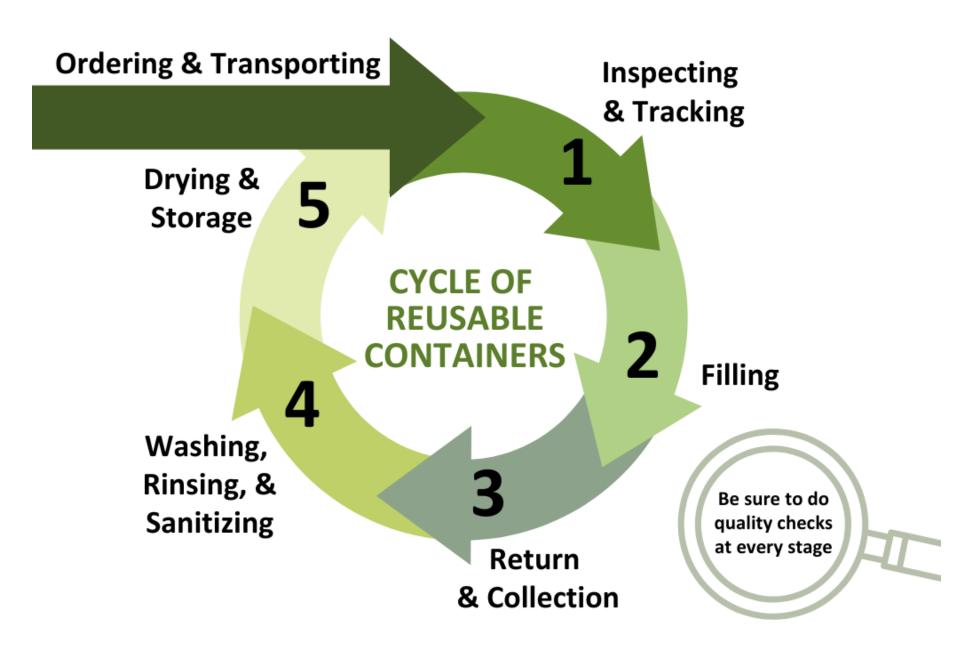
- Establishment provided containers for takeout and leftovers
- Beverage containers consumer provided containers for take out
- Retail and Bulk use consumer provided containers







## **Cycle of Establishment Provided Reusable Containers**



## 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 <u>Massachusetts Merged Food Code</u> 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?
- 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

#### 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.

Page 1 of 2

#### . 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 f it securely
- QR code damaged, if applicable

#### 6. Develop procedure for filling the container

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

#### . 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.

Determine procedure for containers no longer suitable

Return to vendor

□ Alternative plan

Recycle

#### 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.

#### 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.

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
<u>Usefull</u>	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
<u>Ozzi</u>	BPA-free plastic clamshells, bowls, and cups. Offers drop-off container collection	855-476-6994 info@planetozzi.com
<u>Preserve</u>	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 petroleumbased 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

<sup>\*</sup>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: <a href="mailto:info@recyclingworksma.com">info@recyclingworksma.com</a> or by calling 888-254-5525.

## **Consumer Beverage Containers**

Referenced in the Massachusetts Food Code.

The Conference for Food Protection developed the "Guidance Document for the Safe Use of Reusables"

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

The beverage container may be filled by an employee or the consumer as long as it follows a contamination-free filling process and does not come into contact with back-of-house prep space.

Source: Massachusetts Food Code, Part 3-304.17, paragraphs (C), (D), and (E) (page 35)

## Reusable bulk food containers

#### Containers should be:

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

## **Employees must visually inspect consumers' reusable containers before they are filled**Containers should be free of:

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

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

## **Filling**

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)

Conference for Food Protection

<u>Guidance Document for Safe Use of Reusable Containers</u>

detailed descriptions of each of the above filling methods.



## 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)

## **Stories to Inspire:**Blog Series on Successful Reusables Programs



Cassie Rogers 📋 July 24, 2025

#### Reusable Containers Blog Series

is series of blogs offers insights, success stories, and practical tips to help your organization start expand a reusable container program and reduce waste. The following blog focuses on reducing single use beverage containers.

For further guidance, please refer to our Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts and Implementation Guide.

The flowers are in full bloom, the sun is shining brightly, and Zero Waste Arlington is championing a variety of community events filled with summer fun and reuse activities

#### Arlington Beer Garden

For the second year in a row, Zero Waste Arlington is partnering with the Arlington Recreation Department and beer vendor Arlington Brewing Company to establish a reusable cup program for the bi-weekly Arlington Beer Gardens. From June through August, approximately 1,500 residents gather each week for a picnic while enjoying the view at the Arlington Reservoir. All beer sold at the event is poured into reusable cups, affixed with a sticker that reminds patrons to return the cup for reuse and includes a OR code to learn more about the Zero Visics committee's events and initiative.



A variety of methods are used to inform and remind patrons that the cups are reusable and, if returned, will be cleaned and sanitized



Cassie Rogers 📋 July 17, 2025

#### Reusable Containers Blog Series

This series of blogs offers insights, success stories, and practical tips to help your organization start or expand a reusable container program and reduce waste. The following blog focuses on filling customer-provided containers:

For further guidance, please refer to our Best Management Practices for Reusable Takeou Containers at Food Establishments in Massachusetts and Implementation Guide.

Trying a new recipe that needs a pinch of something not on your spice shelf? Devouring your favorite local honey and noticing a pile of jars stacking up? Fulfilled Goods of Newton has you covered.

Opened in 2022, Fulfilled Goods is a low-waste, package-free market and bulk refillery. It offers everything from dried goji berries and locally roasted coffee beans to herbal bath bombs and bamboo toothbrushes.

Instead of buying an entire jar of whole organic

caraway seeds when that new bagel recipe calls for only a tablespoon, you can visit Fuffilled Goods with a reusable container in hand to get exactly what you need. Whether the motivation to visit Fuffilled Goods is environmentally socially or economically motivated shoopers can enjoy multiple benefits



Cassie Rogers 🗂 July 22, 20

#### Reusable Containers Blog Series

This series of blogs offers insights, success stories, and practical tips to help your organization start or expand a reusable container program and reduce waste. The following blog focuses on establishment provided takeout containers and in-house washing: For further guidance, please refer to our Best Management Practices for Reusable Takeout Containers at Food Establishments in Massachusetts and Implementation Guide.

When Boston University (BU) identified an opportunity to replace single-use takeout containers on campus in February 2023, it considered several solutions and then launched its innovative and practical reuse program. Your goal was to change habits around reuse," asid texie Raczka, Sustainability Director for Boston University Dining Services. "We don't have a default option. We nudge students to choose reusables by disincentivizing single-use with a fee, making the reusable, sustainable choice the less expensive option." The reusable program also includes rewards to encourage participation, stuch as a lovality program offering \$10 off the next order after. It Stakeour mads ordered in reusable containers.

BU also wanted to make sure students knew they were being recognized for making sustainable choices, and started the "Caught Green Handed" campaign where students spotted with reusables in hand were given prizes and encouraged to share their thoughts on the reusable program.

After researching tracking software, the University chose Topanga in because it can be applied to any container. This allowed BU to immediately start a reusables program with previously purchased OZZI



Cassie Rogers | July 15, 2025

#### Reusable Containers Blog Series

This series of blags offers insights, success stories, and practical tips to help your organization start or expand a reusable container program and reduce waste. The following blag focuses on third-party warewashing. For further guidance, please refer to our

Are you interested in reusables but don't have commercial dishwashing capabilities, space, or time? Third-party warewashing may be the solution.

Pegasystems (Pega) is a software company headquartered in Waltham, MA. One of the perks of working from their offices is the staff pantries offening coffee, tea, and other beverages for employees. Pega realized the pantry beverage stations were generating significant single-use cup waste and decided to make a change.

Parmering with Re-Dish, both a MassDEP Reduce, Reuze, Repair Micro-Grant recipient and a MassDEP Recycling and Reuse Business Development Grant (RBDG) recipient. Pega replaced all single-use cups with reusable cups in their parntres. Re Dish now collects, washes, sanitizes, and returns the cups to supply the office. Additionally, Pega received on-site launch support and purchased custom return bins to streamline the collection process and better meet the needs of the space. Over five months, Pega's implementation of the Re-Dish cup system has prevented 14,000 single-use cups from entering the waste stream!



Cassie Rogers 📋 July 10, 2025

#### Reusable Containers Blog Series

This series of blogs offers insights, success stories, and practical tips to help your organization sta or expand a reusable container program and reduce waste. The following blog focuses on establishment provided takeout containers and reducing single use platsic establishment provided to be contained and provided the provided to For further guidance, please refer to our Best Management Practices for Reusable Takeout Cantainers at Food Establishments in Manaschusetts and Implementation Guide.

Headed to the Cape to put your feet in the sand and a cool drink in your hand? Halley O'Neil and Adam Gracia with CARE for the Cape and Islands and the Use Less Plastic Coalition are kicking off three initiatives to reduce single-use plastics during Plastic Free July.

Bring Your Own Cup (BYOC) Initiative



Starting in July and extending through September, businesses participating in the Bring Your Own Cup initiative will receive signage, staff tipsheets with health code guidance, tipsheets for simple order handling solutions, free social media promotion, and inclusion in an online map for participating locations. Participating businesses may see reduced costs in the purchasing of single-use containers, reduced volume of trash, increased customer loyalty through reuse discounts, and a boost in new customers drawn to environmentally focused business practices.

**Arlington Beer Garden** 

**Fulfilled Goods** 

**Boston University** 

Re:Dish

**CARE Cape Cod** 

## Thank You



## Heather Billings heather.billings@cetonline.org

info@recyclingworksma.com 888-254-5525 www.recyclingworksma.com