



February 13, 2009

Green Seal is in the process of developing an Environmental Standard for Restaurants and Food Service Operations, GS-46. Comments from the public were solicited on a Proposed Standard from October 8, 2008 until November 26, 2008.

Included in this document are the comments received on the Proposed Standard with responses and explanation on how the Proposed Standard was modified accordingly.

By participating in Green Seal's standard setting process, the following organizations that provided comments played an important role in Green Seal's effort to encourage the design, manufacture and end use of environmentally superior products. Their assistance and involvement is greatly appreciated.

Aramark
California Pizza Kitchen
Ecolab Inc.
Foodservice Packaging Institute
Global Green USA
Green Chicago Restaurant Coop
Hoffmaster
Institute for a Sustainable Future
Institute for Agriculture and Trade Policy
PortionPac Corporation
Sustainable Food Service Consulting
Terra Choice
Thimmakka
Waste to Water Environmental, LLC
And individuals

General Comments

General comments or questions regarding the standard shall be made here.

Comment:

Green Seal is a certifying body that has traditionally focused on cleaning products, paper products and other items that are easily certifiable based on a set of scientific criteria. Restaurants on the other hand are incredibly diverse in their operations, practices, and purchasing, which is typically dependent on the geographic region and food-service type. Overall we felt the standard doesn't work for the scope of the project. Below are several reasons why:

The "All or Nothing" Approach.

The standard in its current form, an "all or nothing" approach, lacks flexibility based on the incredibly diverse scope of the industry for which it applies. We want to see a lot of restaurants apply for this standard which means there must room for those that excel in some areas and lack in others.

The scope of the standard extends to a huge number of food-service types (i.e. full-service, non-commercial, catering). We want to ensure that if an operation is un-able to purchase 25% of their animal-based purchases from an organic, local, humanely-raised source, it does not un-qualify them completely from the certification process.

The BRONZE level must be achievable or else people will disregard the entire standard.

Suggestion: Integrate a point system (similar to LEED). This would allow an operation to select the criteria which are most achievable, most cost-effective, and have the most impact on their specific operation. Not only does it allow restaurants to adapt the standard, but it assigns a weighted importance (more points for practices having greater impact) to a category. This system can still have Bronze, Silver, and Gold levels that indicates to the consumer what level they have achieved, but each category would fall under a range of points (45-60) Bronze, (60-85) Silver, (85-100+)Gold.

We believe certain requirements should remain prerequisites, such as sourcing a percentage of sustainable coffee, but others should vary. Overall, the point system would make the standard more attainable.

Response:

Since this standard aims to include a wide range of operation types, more flexibility was added to the standard. Mandatory requirements have been outlined, and Bronze only needs to complete the mandatory requirements (at the Bronze levels, where so indicated). Silver and Gold certification requires the completion of the mandatory requirements (at the Silver and Gold levels, where so indicated) and the specified number of option requirements. This incorporated flexibility in the standard by providing a menu of options for an operation to earn the higher levels of achievement, Silver and Gold. To provide a means of recognizing

innovative measures taken to improve an operation's environmental performance, an innovation category was also added.

Comment:

Standards need more detail; for example, when you say energy efficient lighting, do customers know what they are? LEDs, Cold Cathode, CFLs, T-8s, MR16IRs, non-electrical Exit Signs need to be mentioned in detail.

Response:

The term energy-efficient lighting was defined in order to capture different types of technology. An appendix (Appendix C and D) was added to provide more details about the types of technology that currently meet that definition, as well as the definition for energy-efficient appliances.

Comment:

There is strong interest, at least gauged by the response of the healthcare community, in GGHC credits. My sense is that any opportunity you have to align your certification with specific topic areas within the GGHC credits it would be very helpful to your certification and to the GGHC, and would provide great marketplace synergy. The GS credits do overlap in a variety of places but I think it would be helpful for you to review the credit language and not just the tech brief to see if there are any other areas of alignment.

Specifically, some type of certification that might parallel the GGHC and that is not included in the GS, are the community to institution linkages.

Other areas that might be helpful included in the GS include language or credit around: biobased materials, water bottle elimination, promotion of foods that do not include GMO's, promotion of foods and foodservice ware and kitchenware that avoid nanotechnology (and other embedded antimicrobials), food additives, and finally nutrition (following nutrition guidelines on transfats, sodium, high fructose corn syrup, etc). Perhaps for hospitals and schools the nutrition guidelines are somewhat more required...

If this cannot be done, one alternative is to include some of these ideas above in a innovation type credit(s) similar to what LEED does.

Response:

As noted, there were a number of places with overlap to the Green Guide for Healthcare (GGHC) program. Green Seal had discussions with those involved in the development of the GGHC food service requirements and found that the two programs could work together by ensuring appropriate alignment between the Green Seal standard and the GGHC. This will then help those already using the GGHC who want to get recognition for their efforts in their food service operations (since GGHC does not provide a means for recognition). Once the

Green Seal standard is finalized, a comparison of the two programs will be made available on the Green Seal web site.

The specific items suggested for inclusion have been included either as specific requirements or through innovation credit. For example, water bottle elimination was already included in the standard, but clarified in the Draft Final standard below. Nutritional strategies have been included in the innovation credit, noted below.

3.4.10 Packaged Water - Mandatory.

| <i>BRONZE</i> | <i>SILVER: Meet the bronze requirements plus:</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <i>The operation shall have tap water available for consumers, as an alternative to bottled water.</i> | <i>No bottled water shall be sold, unless it was packaged on-site or locally packaged.</i> | <i>The operation shall have purified water available for consumers and employees.</i> |

3.1.8 Food Innovation – Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Initiative supporting one of the following objectives 1) source sustainable food options, 2) reduce GHG impact of food purchased, 3) support local agriculture, or 4) support customer dietary health and wellness.</i> | |

1.0 SCOPE

This standard establishes environmental requirements for restaurants and food service operations where their primary business is preparing and serving food to the general public or private consumers. This includes full-service, limited-service, non-commercial, and catering operations. Lodging property food services are included in this standard. This standard does not include bars, vending, or retailing operations such as grocery or convenience stores.

All operations, including full-service, limited-service, non-commercial, and catering, are included in each criterion, except when specifically noted. Some criteria state “where applies” and are not required when the criterion is not under the control of the operation such as when the operation runs in a leased or rented facility.

There are three certification levels achievable in this standard: bronze, silver, and gold. The three levels are sequential and not all criteria are required for all levels. Each subsequent level (e.g., bronze to silver) assumes the requirements for the previous level in addition to the requirements outlined for its own level. For

example, silver includes all bronze criteria plus the silver requirements. If criteria overlap for different levels (i.e., silver and bronze criteria) the stricter requirement is applied if the operation wishes to obtain the higher certification level.

Comment:

The goal of any food service operation is to safely feed their customers. In what way does this standard address food safety programs?

Response:

Food safety is covered by regulations and local authorities. The standard does not include aspects covered by regulatory bodies, such as food safety or worker hygiene. Further, this standard aims to not conflict with such regulations. During certification to this standard, a site audit is required and the facility cannot have any current or outstanding citations.

Comment:

At the end of the second paragraph where it states "where applies," what requirements are included to address leased facilities are owned and operated by related companies?

Response:

Some criteria state “where applies” and are not required when the criterion does not apply to that operation or it is not under the control of the operation such as when the operation runs in a leased or rented facility. In most examples, the “where applies” is limited to the type of food service operation. One example is for food merchandising, where it applies only to all-you-care-to-eat and full-service operations.

3.4.11 Food Merchandising, Where Applies - Option.

| <i>BRONZE</i> | <i>SILVER: Meet the bronze requirements plus:</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement.</i> | <ul style="list-style-type: none"> • <i>All-you-care-to-eat operations shall implement merchandising change procedures to minimize food volumes leading up to closing/transition periods without reducing selection or quality of presentation.</i> • <i>Full-service operations shall not serve non-alcoholic beverages in cans or bottles, unless it was packaged on-site or</i> | <ul style="list-style-type: none"> • <i>All-you-care-to-eat operations shall not provide trays to customers.</i> • <i>Full-service operations shall offer half-portion options for entrees on the menu.</i> |

| | | |
|--|-----------------|--|
| | <i>locally.</i> | |
|--|-----------------|--|

2.0 DEFINITIONS

Comment:

Environmentally responsibly produced food, humanely-raised, socially responsibly produced food, sustainably-produced-I'd look for a way to combine these under eco-labeled/third party certified foods to simplify and apply the same standard you are using for EPP-no financial interest, no conflict of interest, etc. We usually recommend use of labels that Consumer's Union considers "meaningful" under the classification- "somewhat" or "highly" meaningful since their ratings are based on the types of criteria you use in the EPP definition. You could even consider rolling all of this under EPP and have separate categories where the "meaningful" certifications are listed for a product area. In general, I am very knowledgeable on this topic and I found they way you have this set up very confusing. P.S. I don't think UTZ Certified meets some of the tests outlined above. Last time I checked Consumers Union hadn't rated them. I'd also encourage you to incorporate USDA and FDA approved label claims that are meaningful for certain food items, i.e., No Hormones Added (beef and lamb), Raised Without Antibiotics (poultry, beef and pork), USDA Grassfed (ruminants), rBGH-free (dairy), no genetically-engineered ingredients (products made from corn, soy, canola or their derivatives)

Response:

These terms were streamlined to provide more clarity. The term environmentally-preferable will be used to capture products certified third parties as such, including food and other products like supplies. This definition includes the characteristics from the ISO standard for ecolables and the Consumers Union. Since this definition is not specific to food, an appendix was added to provide examples of which programs currently meet that definition.

Environmentally-Preferable. A product or service certified as such by a Type 1 (i.e., third-party) environmental label that was developed in accordance with the ISO 14024 Environmental Labeling Standard. Alternatively, a product or service may be designated as environmentally preferable by an established and legitimate nationally-recognized third-party certification program developed with the purpose of identifying environmentally preferable products. The program must not have any financial interest or stake in sales of the product or service, or other conflict of interest. The standard must be appropriate, meaningful, and based on the product's life cycle with consideration of human health and safety, ecological toxicity, other environmental impacts, and resource conservation. Product criteria must be publically available, developed with stakeholder input, and distinguish market leadership for that product category. Certification must be completed by a third party, include site inspections, and have a monitoring

program to verify ongoing compliance. Examples of programs that meet this definition are included in Appendix A.

***Third-Party Certification Program.** A program without any financial interest or stake in the sales of the product or service being certified, or other conflict of interest. There must be a standard to base the certification from and the standard must be appropriate and meaningful for its intended purpose. The standard must be publically available, and developed with stakeholder input. Certification to the standard must be completed by an independent party (i.e. not the product company), include site inspections, and have a monitoring program to verify ongoing compliance. Examples of some programs are included in Appendices A and B.*

Carbon Offsets

Projects or processes that reduce carbon dioxide (CO₂) emissions that are developed and/or certified by a third-party provider (e.g., Carbon Fund, Center for Resource Solutions). A successful project is issued credits for its CO₂ reduction (usually one credit equals one ton of abated CO₂) and these credits can be purchased by an individual or restaurant to help mitigate or offset the individual's or restaurant's own greenhouse gas emissions.

Comment:
very good

what is credible

what is regulation

The Federal Trade Commission has examined the emerging market for carbon offsets (i.e., greenhouse gas emission reduction products) and renewable energy certificates, and related advertising claims. The workshop focused on consumer protection issues in these markets, such as consumer perception of carbon offset and REC advertising claims and substantiation for such claims. Many questions remain.

Comment:

From a practical standpoint how would a mom and pop type operation offset its CO₂ production? Would the use of suppliers with alternative fuel vehicles be sufficient? Would the reduction of deliveries or an increase in dedicated storage space to allow for bulk purchases over a month qualify?

Comment:

The BIO-EZ turns food waste in to liquid will give every establishment the ability to offset its carbon emissions and sell off the residual credits. Rotting food waste in landfill produce methane which is 23 time more efficient a GHG. It also keep MSW trucks off the road. All these diversion are exactly what the CO₂ trading is looking for

Response:

Carbon off-setting is an option for higher levels of certification. Carbon-off sets will only be accepted if they are certified by a third-party certification program. This provides the credibility needed for this complex program. There are also programs available to help operations identify their emissions and thus how many off-sets are needed, such as Carbon Fund. On-site efforts to reduce emissions have other routes to earning credit beyond carbon-offsetting. For example, on-site energy generation through a BIO-EZ system could earn credit for energy conservation, renewable energy, or on-site digester.

Carbon Offsets. Projects or processes that reduce carbon dioxide (CO₂) emissions that are developed and/or certified by a third-party certification program (see Appendix B for examples of programs). A successful project is issued credits for its CO₂ reduction (usually one credit equals one ton of abated CO₂) and these credits can be purchased by an individual or restaurant to help mitigate or offset the individual's or restaurant's own greenhouse gas emissions.

Third-Party Certification Program. A program without any financial interest or stake in the sales of the product or service being certified, or other conflict of interest. There must be a standard to base the certification from and the standard must be appropriate and meaningful for its intended purpose. The standard must be publically available, and developed with stakeholder input. Certification to the standard must be completed by an independent party (i.e. not the product company), include site inspections, and have a monitoring program to verify ongoing compliance. Examples of some programs are included in Appendices A and B.

Compostable

Food or other organic material capable of undergoing biological decomposition in a compost site, such that the material (i.e., feedstock) is not visually distinguishable and breaks down to carbon dioxide, water, inorganic compounds, and biomass, at a rate consistent with known compostable materials.

Comment:

You may want to find a way to incorporate certification of compostability by the Biodegradable Products Institute, AIB Vincotte, DIN Certco, Biodegradable Plastics Society or Australian Environmental Labeling Association into this definition or create a new one. For instance, require that all plastic (biobased or fossil-fuel based) and plastic coated paper food service ware and food packaging be certified compostable by one of the entities listed above or certified by AIB Vinçotte as home compostable and displays the “OK Compost Home” logo. We recommend this even if a product won't be composted because as part of this certification the products cannot exceed certain heavy metal limits and because some products are compostable in a commercial scale operation

but not in a backyard or other smaller scale operation where temps just don't get high enough.

Response:

When compostable is used to describe a product, it requires certification from a third-party certification program. An appendix was added to provide examples of programs that meet the definition of a third-party certification program.

***Third-Party Certification Program.** A program without any financial interest or stake in the sales of the product or service being certified, or other conflict of interest. There must be a standard to base the certification from and the standard must be appropriate and meaningful for its intended purpose. The standard must be publically available, and developed with stakeholder input. Certification to the standard must be completed by an independent party (i.e. not the product company), include site inspections, where applies, and have a monitoring program to verify ongoing compliance. Examples of some programs are included in Appendices A and B.*

3.4.12 Disposable Food Service Products - Option. Containers, utensils, cups, plates, straws, and other disposable food service items shall be:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Environmentally-preferable; biobased and certified compostable by a third-party certification program (see Appendix B); OR contain the maximum amount of recovered and post-consumer content feasible and processed chlorine free.¹</i> | |

¹*Certified compostable products should be used when such products can be composted.*

Directly-Purchased

The transaction of procuring food at the farm or farmer’s market, or other means where there is no intermediary party and the food travels less than 100 miles.

Comment:

Directly-Purchased[/b]-

1. In some ways I like the term directly-purchased instead of what most people refer to as local, however in doing it this way it would appear that facilities that buy locally-produced food via a distributor would be penalized. If you are trying to encourage support of local producers, freshness of ingredients, fewer miles traveled, I'm not sure you want to be so restrictive, especially if distribution, say by a local distributor, ends up being more efficient.
2. You might also want to consider extending the mileage beyond 100 miles. I've seen 150-miles used most often. However, the new food service credits in the Green Guide for Health Care uses 200-mile radius and food needs to be grown, and, if applicable, processed within that radius.

3. You may also want to include a definition for what would constitute a local processed food. e.g. greater than 50% of ingredients grown and processed within 150-mile radius; greater than 75% by weight...

Response:

Directly-purchased is intended for purchases made from the producer and to encourage more engagement in local-sources of products and understanding how those products are produced. There isn't a penalty for using a distributor. When the term directly-purchased is used, there is a way to met the requirement with a distributor. Further, if a distributor is efficient, that can be further recognized. However, if there is a party that is used just for transporting the food, in an efficient manner, this would be allowed and clarified.

The distance was adjusted to 200 miles to provide a more realistic option universally. Process food was clarified as suggested to provide for products that have multiple ingredients, such as pasta sauce.

***Directly-Purchased.** The transaction of procuring food at the farm or farmer's market, or other means where there is no intermediary party needed for the transaction and the food travels less than 200 miles to the operation. Multiple-component processed food (e.g., tomato sauce) must include at least 75% of the components (by weight) produced and processed from less than 200 miles to the operation.*

***Intermediary Party.** A broker or distributing company that coordinates most levels of procurement for a food service operation such that the food service operation has limited to no interaction with the food producer/processor. This does not include delivery services or other means that provide efficient transportation of products, provided there remains direct interaction between the producer/processor and food service operation.*

Vegetarian

Food that does not contain meat or animal-based products.

Comment:

It should not be dictated by this standard that restaurants change their menus to include a number of vegetarian meal options. This is not an essential part of sustainability, and can alter the restaurant's appeal to guests.

Comment:

Please clarify your definition of vegetarian. There are several definitions and you need to be clear about which you mean. Below is a definition from The Vegetarian Society (<http://www.vegsoc.org/info/definitions.html>). It will be extraordinarily difficult for restaurants to offer vegan options, and I believe that standard Lacto-ovo should be sufficient, even for gold.

A vegetarian is someone living on a diet of grains, pulses, nuts, seeds, vegetables and fruits with or without the use of dairy products and eggs.

A vegetarian does not eat any meat, poultry, game, fish, shellfish or crustacea, or slaughter by-products.

Types of Vegetarian

Lacto-ovo-vegetarian. Eats both dairy products and eggs. This is the most common type of vegetarian diet.

Lacto-vegetarian. Eats dairy products but not eggs.

Vegan. Does not eat dairy products, eggs, or any other animal product.

Response:

Research has shown that in general there are greater environmental impacts associated with animal-based food products. However, there are less-intensive ways to produce animal-based food products, and also very intensives ways to produce vegetables. As a result, focus should be on more responsible agricultural production practices overall rather than dictating a certain kind of menu. This has been clarified in the standard. Further, the definition for vegetarian was clarified to only exclude, fish, poultry, pork, lamb, beef, and other foods derived from animal flesh and a definition was added for vegan. The use of menus that are vegetarian or vegan are an option, not mandatory.

***Vegan.** Food that does not contain any animal-based products.*

***Vegetarian.** Food that does not contain meat.*

***Meat.** Fish, poultry, pork, lamb, beef, and other foods derived from animal flesh.*

3.1.5 Animal-Based Food Purchases or Vegetarian/Vegan Menu, Where Applicable - Option. *The percentage of total animal-based food purchases, based on cost averaged over a minimum of the last three 3 months and up to the last 12 months, that is either humanely-raised (see Appendix B), organic or environmentally-preferable (see Appendix A) or a combination thereof, shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>50% of total animal-based food purchases; Or the menu shall not include red meat products.</i> | <i>80% of total animal-based food purchases; Or the menu shall be vegetarian or vegan.¹</i> |

¹*Where a comparable operation typically includes meat or animal-based food.*

Sustainable Food Purchasing

General comments regarding sustainable food purchasing shall be made here.

Comment:

1. All purchases should be averaged over a 1 year period to accommodate for seasonal changes and the availability to source locally/regionally. It would be much easier for an operation to get audited in the summer when local food is available rather than the winter.

2. Total food purchases should be broken down into categories (* new categories). By doing so, we are giving more opportunity to venues such as coffee houses, seafood restaurants, and steakhouses that purchase heavily from one category and may fall short in others. For example, if a restaurant can't meet the 25% animal-products requirements, they have the option to counter-act that with a higher percent of sustainable dry-goods or produce. It can still add up to 25% of total purchases, but this way it doesn't opt a restaurant out completely if they lack in one area. Restaurants have a chance to "get creative". We pointed out that the more specific the standard gets the harder it is to audit so perhaps there could just be mention that the total purchased includes all of the following. Alcohol was specifically mentioned as there is no reference to it in the standard and EPA now certifies wineries across the country. Organic/local beer and wine is quite popular now.

- a. Animal products (includes dairy)
- b. Dry-goods *
- c. Produce *
- d. Alcohol *
- e. Seafood
- f. Coffee

3. Sourcing locally was very important to our committee and should be its own separate category.

"Directly-Purchased" is defined as within 100 miles. This should be 250 miles at a minimum (250 miles is the benchmark that Whole Foods Market set).

Again we wanted to take into account the regional disparity between California and Chicago for example. If this were a "regionally specific requirement" it would indicate both the importance of sourcing locally "when possible" and it would be based on number of farms within 250 miles. A farm in Chicago sourcing 25%-50% locally is a HUGE achievement whereas a restaurant in California might be able to achieve that quite easily.

If you need specific numbers of farms that are accessible to us within 100-250 miles we would be happy to supply this information*

In general, one standard can not apply fairly to all restaurants across the country.

Response:

Food in this standard includes both edible food products as well as beverages such as alcohol. As a result, there is flexibility in how an operation meets this requirement – any type of food or beverage would be considered. This has been shown to be achievable. Efforts beyond this requirement have been provided as a means to earn achievement at the higher levels (e.g., a high level of sustainable animal-based food purchases). A twelve month average is permitted for this requirement, and has been clarified in the standard.

Directly-purchased was expanded to 200 miles, given the regional variety. Locally sourced food can earn credit under several requirements including, responsible food purchases, socially-preferable food purchases, or seasonal food purchases. The animal-based requirement was changed to be an option, to provide the flexibility suggested.

3.1.1 Responsible Total Food Purchases - Mandatory. *The portion of total food purchases, based on cost averaged over a minimum of the last 3 months and up to the last 12 months, that is either organic or environmentally-preferable (see Appendix A) or a combination thereof, shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------|---------------|-------------|
| <i>25%</i> | <i>50%</i> | <i>80%</i> |

Food that is directly-purchased and not certified by the programs outlined in Appendix A but is produced in an equivalent means to organic or environmentally-preferable may qualify for up to half of the required purchases when appropriate documentation is provided for review.

Directly-Purchased. *The transaction of procuring food at the farm or farmer’s market, or other means where there is no intermediary party needed for the transaction and the food travels less than 200 miles to the operation. Multiple-component processed food (e.g., tomato sauce) must include at least 75% of the components (by weight) produced and processed from less than 200 miles to the operation*

3.1.6 Socially-Preferable Food Purchases - Option. *The percentage of total food purchases, based on cost averaged over a minimum of the last three 3 months and up to the last 12 months, that is either socially-preferable (see Appendix B), or directly-purchased and not certified but attested to be equivalent:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|---------------|-------------|
| <i>No requirement</i> | <i>25%</i> | <i>50%</i> |

Seasonal. *Food that is produced within the normal growing cycle of the operation’s agricultural geographic location (e.g., excludes hot house production) and within 200 miles of the operation.*

3.1.8 Seasonal Food - Option. *The percent of total food purchases, based on cost averaged over the last 3 months and up to the last 12 months, that is seasonal food shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|---------------|-------------|
| <i>No requirement</i> | <i>25%</i> | <i>50%</i> |

3.1.3 Sustainable Seafood

Fish and seafood purchased, not environmentally responsibly produced, shall not be on the Monterey Bay Seafood Watch “Avoid” list.

Comment:

I think the fact that you are only pulling from 1 list (the Monterey Bay Seafood Watch "Avoid" list) could be viewed as being biased. I would pool together 2-3 bodies who put out lists and take the overlap. This will be a more balanced view.

Comment:

The existing requirement is not strict enough. What is written should be the BRONZE level. Silver should be 50% green (best choice), msc certified (marine stewardship council)

Gold should be 80%-100% green, msc certified

Response:

The Blue Ocean Institute’s Guide to Ocean Friendly Seafood has a comparable process and list (but use a number-based system) to the Monterey Bay Seafood Watch list and has been added as a resource. After discussing these lists with a range of operations, it was feasible to expect that all operations not purchase foods on the red/avoid lists. If Marine Stewardship Council certified products, or other equivalent responsible sources, are purchased and happen to be on the red/avoid lists they would be permitted. The higher levels of achievement will be required to purchase only from the green lists.

3.1.3 Responsible Seafood Purchases, Where Applies - Mandatory. *All fish and seafood purchased, over a minimum of the last three 3 months and up to the last 12 months, shall:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>Not be on the Monterey Bay Seafood Watch “AVOID” web list; Or score RED (1.39 or less) on the Blue Ocean Institute’s Guide to Ocean Friendly Seafood.</i> | <i>Be on the Monterey Bay Seafood GREEN web list; Or score GREEN (2.6 or higher) on the Blue Ocean Institute’s Guide to Ocean Friendly Seafood.</i> | |

¹ An exception is permitted for environmentally-preferable food, such as that certified by MSC and food that adheres to the farmed shrimp and farmed salmon purchasing policies designed by Environmental Defense Fund..

3.1.4 Sustainable Coffee

BRONZE:

No requirement.

SILVER, GOLD:

Coffee purchased shall be either organic, environmentally responsibly, socially responsibly, sustainably produced, or directly-purchased and not certified by the programs outlined in Appendix A but is produced in an equivalent means to organic, environmentally responsibly, socially responsibly, or sustainably may qualify for up to half of the required purchases when appropriate documentation is provided for review.

Comment:

For silver and gold (or to differentiate, just for gold) I think you need to spell out what you mean when you say socially responsible/environmentally responsible coffees -- Shade grown, Fair Trade, etc. You need to use those words so people know what to look for or ask about.

I find this to be especially important because if we can get all restaurants to make this move (including coffee houses) it could put the mass producers and environmental destroyers in a change-or-die position, which is essential to changing that industry (which desperately needs the change).

Comment:

The requirement should be for Bronze, Silver and Gold. There should be no “freebies” at the Bronze level.

Response:

The terms have been streamlined, and an appendix has been provided to give clear direction on the sources of coffee that would meet the requirement. After discussing sustainable coffee purchasing with a range of operations, it was determined that it would be feasible to expect all operations to purchase some level of responsible coffee. However, given the volume of coffee (coffee is the second largest commodity globally), bronze will require 50% of coffee purchases be responsible, rather than all purchases (which is required for silver and gold). This is consistent with industry trends, for example Starbucks claims that 65% of their coffee comes from responsible sources, including a significant portion as Fair Trade certified.

3.1.4 Responsible Coffee Purchases - Mandatory. *The amount of coffee purchased, based on cost averaged over a minimum of the last three 3 months and up to the last 12*

months, either organic, environmentally-preferable (see Appendix A), or socially-preferable (see Appendix B) shall be:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------|---------------|-------------|
| <i>50%</i> | <i>100%</i> | |

Directly-purchased coffee that is not certified by the programs outlined in Appendix A and B but produced in an equivalent means to organic, environmentally-preferable, or socially-preferable may qualify for up to half of the required purchases when appropriate documentation/attestation is provided for review.

3.2 Vegetarian Options

BRONZE:

No requirement.

SILVER, GOLD:

An assortment of vegetarian options shall be available to all customers on the menu, at all meal offerings, and be represented at each course option (e.g. appetizer, entrée, dessert).

Comment:

Vegetarian.

This category should be deleted from the standard. If there is already a requirement to purchase sustainable foods and there was argument

Comment:

While you mentioned reduction of meat entrees in restaurants as having a significant impact on the environment in the background document, how is it that there is no point or standard that addressing it in the guidelines?

Response:

The concept of reducing total environmental impact of food choices by reducing meat was included in the vegetarian options requirement (3.2), but was clarified in the Draft Final standard by requiring a decrease in the purchase of red meat products for silver and gold levels of achievement. This allows a bronze level operation the opportunity (three years) to find the best strategy to reducing their environmental impact associated with their red meat purchases. The reduction has been demonstrated to be feasible with waste reduction strategies, portion size reduction, or single menu item replacement. For example, Bon Appétit Management Company has committed to reducing their red meat purchases by 25% this April (<http://www.circleofresponsibility.com/page/322/bon-appetits-commitment.htm>). There remains an option for operations taking additional steps to reducing impact associated with animal products to earn credit for the silver and gold levels of achievement. Vegetarian or vegan menus are not required.

3.1.2 Animal-Based Food Purchases, Where Applies - Mandatory. *The percent of the total animal-based food purchases, based on cost averaged over a minimum of the last three 3 months and up to the last 12 months, shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <i>• Demonstrated and attested to be 25% raised without antibiotics</i> | <ul style="list-style-type: none"> <i>• Demonstrated and attested to be 50% raised without antibiotics, and</i> <i>• Demonstrate a 15% reduction in red meat, normalized for sales volume¹</i> | <ul style="list-style-type: none"> <i>• Demonstrated and attested to be 80% raised without antibiotics, and</i> <i>• Demonstrate a 25% reduction in red meat, normalized for sales volume¹</i> |

¹*For operations that serve red meat and compared to a baseline that was no less than one year ago, no greater than three years ago.*

3.1.5 Animal-Based Food Purchases or Vegetarian Menu, Where Applicable - Option. *The percentage of total animal-based food purchases, based on cost averaged over a minimum of the last three 3 months and up to the last 12 months, that is either humanely-raised (see Appendix B), organic or environmentally-preferable (see Appendix A) or a combination thereof, shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>50% of total animal-based food purchases; Or the menu shall not include red meat products.</i> | <i>80% of total animal-based food purchases; Or the menu shall be vegetarian with no meat products.</i> |

3.3.1.1 Energy Use Tracking

BRONZE:

Monitor energy bills at least quarterly with the ENERGY STAR portfolio manager or an equivalent energy management or documentation system (e.g., utility’s software or Excel spreadsheet) that: tracks utilization, EUI (e.g. BTU/sq ft), and costs; benchmarks these factors relative to past performance; and determines percent improvement or energy savings.

SILVER meet BRONZE requirements plus:

Conduct an annual energy audit, such as a utility company’s free energy audit.

GOLD meet SILVER requirements plus:

Demonstrate a 10% improvement in EUI over baseline (no less than one year ago, no greater than 3 years ago) or an EUI 15% better than national restaurant EUI average (refer to ENERGY STAR's national average table).

Comment:

For Bronze and Silver, I think you must quantify a minimum savings on energy. People could call out a 0.0001% savings as an improvement and that won't do much for the cause. I would recommend at least a 2% for Bronze and a 5% improvement for Silver.

Response:

A performance requirement for energy conservation at the bronze and silver level was added. The level of performance permits more flexibility in energy conservation practice requirements – the operation can choose the practices that fit their business, provided the operation achieves the required level of energy conservation. The performance levels are aligned with the Green Guide for Healthcare

3.2.2 Energy Use and Conservation Tracking - Mandatory.

| <i>BRONZE</i> | <i>SILVER: Meet the bronze requirements plus:</i> | <i>GOLD: Meet the bronze requirements plus:</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <i>Monitor energy bills monthly with the ENERGY STAR portfolio manager² or an equivalent energy management or documentation system (e.g., utility's software or Excel spreadsheet) that: tracks utilization, EUI (e.g., BTU/sq ft), and costs; benchmarks these factors relative to past performance (normalized for sales volume); and determines percent improvement or energy savings.</i> | <i>Conduct an annual energy audit that includes an inventory, evaluation, and inspection of energy use and energy loss, including but not limited to equipment, lighting, and building envelope.</i> | |

3.2.3 Energy Conservation Performance - Mandatory. Energy conservation measures shall achieve the following, normalized for sales volume:

²Portfolio Manager offers a way for restaurants to track their weather-normalized energy and water use. Portfolio Manager allows certain commercial buildings (e.g., office buildings, warehouses) to obtain an ENERGY STAR label; restaurants, unfortunately, are not eligible for this label. Portfolio Manager can still be a very useful tool for restaurants to track energy and use, reduction in carbon dioxide emissions from saving energy as well as communicate these savings to EPA and customers.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>A 7% improvement in EUI over baseline (no less than one year ago, no greater than 3 years ago) or an EUI 15% better than national restaurant EUI average (refer to ENERGY STAR's national average table).</i> | <i>A 10% improvement in EUI over baseline (no less than one year ago, no greater than 3 years ago) or an EUI 20% better than national restaurant EUI average (refer to ENERGY STAR's national average table).</i> | <i>A 15% improvement in EUI over baseline (no less than one year ago, no greater than 3 years ago) or an EUI 30% better than national restaurant EUI average (refer to ENERGY STAR's national average table).</i> |

Renewable energy directly used on-site, but not including renewable energy certificates, may be considered an energy conservation measure and counted toward the above requirement.

**3.3.2 Start-Up and Shut-Down Schedule
BRONZE, SILVER, GOLD:**

The operation shall have a documented start-up and shutdown schedule for lights, equipment, and other energy consuming items that includes at least the following:

- Turn off electronic devices and lighting when not in use or use the standby mode on kitchen equipment, and office equipment, or use timers or sensors.
- Setback the thermostat at night and when facility is not in use.

Comment:

Will this allow situations where the local food code require lighting stay on? For instance, hood ventilations systems and NRAEF guidance to keep areas well lit to help with pest issues.

Response:

In situations where local code conflicts with requirements in the standard, documentation should be provided to prove that is the case, and then the requirements would not apply.

**3.3.3.1 Lighting Equipment
BRONZE, SILVER, GOLD:**

Energy-efficient lights shall be used in areas where lights are on for 4+ hours (e.g., exit signs, kitchen, seating area, restrooms, staff offices, etc.). Specialty light fixtures (e.g., display or accent lighting) may be exempt from this requirement if compatible options are not available. T-12 fluorescent lighting shall not be used.

Comment:

Similar to the coffee, I think it's important to spell out what lightbulbs are recommended (LEDs, florescents, etc).

You need to spend some time putting gradations for b/s/g differentiations. Perhaps Bronze could be changing 10% of the lightbulbs over. Silver 25% and Gold 50%.

This is a big one because if we can get them to change the bulbs (small cost) it will yield big cost savings on their bill and may give them motivation to pursue other green initiatives they didn't previously consider.

Comment:

Explanation: Is this 100% of lighting? Maybe there be a % of budget, % of total power, % of lights required to be energy efficient at the Bronze Level.

Response:

An appendix was added to outline typical energy-efficient lighting options. In addition, supplementary materials will be available once the standard is finalized to give more specific guidance on how to implement the requirements in the standard. The gradations for this requirement were added by having this be a requirement option (one of nine for energy) for the silver and gold levels of achievement.

3.2.10 Energy-Efficient Lighting - Option. *The operation shall have:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Energy-efficient lighting (see Appendix D) shall be used in areas where lights are on for 4+ hours (e.g., exit signs, kitchen, seating area, restrooms, staff offices, etc.). Specialty light fixtures (e.g., display or accent lighting) may be exempt from this requirement if compatible options are not available. T-12 fluorescent lighting shall not be used.</i> | |

3.3.3.2 Lighting Control

BRONZE:

No requirement.

SILVER:

Lighting controls shall be used such as vacancy sensors, bypass/delay timers, photosensors, or time clocks in low occupancy areas such as walk-ins, closets, and restrooms.

GOLD meet SILVER requirements plus:

Daylight dimming systems shall be used so that the light turns off automatically

when light is sufficient, where applies or dimmable ballasts shall be used in areas where daylight is available in regularly occupied spaces within 15 feet of windows or skylights.

Comment:

Silver: *Wherever possible* lighting controls shall be used such as vacancy sensors, bypass/delay timers, photosensors, or time clocks in low occupancy areas such as walk-ins, closets, and restrooms.

Response:

This modification was made.

3.2.6 Lighting Controls - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet the bronze requirements plus:</i> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Whenever possible, lighting controls shall be used such as vacancy sensors, bypass/delay timers, photosensors, or time clocks in low occupancy areas such as walk-ins, closets, office, and restrooms.</i> | | <i>Where applies, daylight dimming systems or manual dimmable ballasts shall be used so that the light turns off automatically when daylight is sufficient including in areas where daylight is available in regularly occupied spaces within 15 feet of windows or skylights.</i> |

3.3.4.2 Refrigerator and Freezer Doors

BRONZE:

Cracked or worn gaskets and strip curtains that allow air transmission shall be replaced and doors shall be aligned.

SILVER meet BRONZE requirements plus:

Walk-in refrigerator and freezer doors shall have plastic strip curtains.

GOLD meet SILVER requirements plus:

Walk-in refrigerator and freezer doors shall have either open-door buzzers or automatic door closers.

Comment:

For gold, consider a temperature monitoring system as a requirement. I believe raising refrigerator temperatures and lower freezer temps can yield significant energy savings. You would need to research the proper temperature ranges, but it should be in here.

Response:

Temperature monitoring was added as a way to conserve energy for higher levels of achievement.

3.2.8 Refrigerators and Freezers - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement</i> | <ul style="list-style-type: none"> • <i>Walk-in refrigerator and freezer doors shall have plastic strip curtains.</i> • <i>Refrigeration cold suction lines and hot water storage tanks shall be insulated with minimum of R-13 unless insulation does not fit in space provided.</i> | <ul style="list-style-type: none"> • <i>Walk-in refrigerator and freezer doors shall have either open-door buzzers or automatic door closers.</i> • <i>An automated temperature monitoring system for refrigerators and freezers that is frequently monitored.</i> |

3.3.4.5 Energy-Efficient Appliances

BRONZE:

Purchasing energy-efficient appliance when purchasing new ones, when available.

SILVER meet BRONZE requirements plus:

Use at least one energy-efficient appliance on a most days of business.

GOLD meet SILVER requirements plus:

Use at least two energy efficient appliances on most days of business.

Comment:

Gold should be more stringent. 2 is not enough. It should be more like 4. The Gold standard should be the ideal, this does not strive high enough in my opinion.

Comment:

3.3.4.5 Energy-Efficient Appliances

Wording: under bronze... Also, I think there could be stronger wording. All new equipment shall be energy star compliant when available.

Typo: under silver. "on most a days"

Comment:

Silver: Use at least one *primary* energy-efficient appliance *during regular operation*.

Gold: Use at least two *primary* energy efficient appliances *during regular operation*.

Explanation: If you only require one energy efficiency appliance to be used it could be the mixer that is used daily. This doesn't address the dishwasher and ice machine, primary appliances, which are the major consumers of energy. This should be looked at as a % of total power.

Comment:

Pilot lights should only be on when in use – they drain a lot of unnecessary energy. Not all equipment can be turned on and off easily (there are electric starters for some), so maybe be for the gold level.

Response:

The use of energy-efficient appliances is an important means of conserving total energy, provided such appliances are used frequently (as noted in the comments). As a result, this was clarified in the standard. However, looking at a single appliance's energy use as a percent of total energy used may not be accessible for many operations. Thus, the requirement is based on number of appliances, and increased as suggested along with the suggestion to have higher levels of achievement only using a pilot light when needed..

3.2.9 Energy-Efficient Appliances - Option. *The operation shall have:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>20% of its energy-efficient qualified kitchen appliance options (see Appendix C) as energy-efficient, including at least two used on most days of business such as one primary energy-efficient appliance during regular operation.</i> | <ul style="list-style-type: none"> <i>• 50% of its energy-efficient qualified kitchen appliance options (see Appendix C) as energy-efficient, including at least four used on most days of business such as two primary energy-efficient appliances during regular operation, and</i> <i>• Turn pilot light on only during equipment use.</i> |

3.3.4.7 Water Heaters and Storage Tanks

BRONZE, SILVER GOLD:

All hot water storage tanks shall be insulated with a minimum of an R-13 blanket or have internal insulation of the same insulation value (blanket can be added to internally insulated tank). Hot water heaters shall be set in accordance with the minimum or recommended supply temperature for the facility's dish machines. In

the absence of a dish machine, water temperature shall be set in accordance with minimum health code requirements.

Comment:

3.3.4.7 Water Heaters and Storage Tanks

You could require a timer on water heaters for Gold rating, same as the HVAC system.

Response:

These practices were not included specifically, but can help an operation achieve the required energy conservation performance.

3.3.6 HVAC Maintenance

BRONZE, SILVER, GOLD:

Regularly scheduled maintenance shall be done and documented on the HVAC, refrigeration, and other similar cooling systems, where applies, including:

- **Clean permanent filters with mild detergents and change replaceable filters according to manufacturer guidelines.**
- **Check entire system each year for coolant and air leaks, clogs, and obstructions of air intake and vents.**
- **Keep condenser coils free of dust and lint.**
- **Keep evaporator coils free of excess frost.**

Comment:

Regularly scheduled maintenance *per manufacturer guidelines* shall be done and documented on the HVAC, refrigeration, and other similar cooling systems, where applies, including:

- Clean permanent filters with mild detergents and change replaceable filters according to manufacturer guidelines.
- Check entire system each year for coolant and air leaks, clogs, and obstructions of air intake and vents.
- Keep condenser coils free of dust and lint.
- Keep evaporator coils free of excess frost.

Explanation: There are a variety of requirements here, spread across various types of equipment. Right now, certification calls for "regular" maintenance in all these areas. That feels weak to me, but imposing any frequency standards would not be flexible enough to accommodate wide variety of equipment used.

We suggest requiring each business to write its own equipment maintenance checklist with list of each piece of equipment it operates, with specific maintenance schedules for

each. Then, each business would document its fulfillment of its plan. This way, each business picks what is appropriate, but the plan gives it a stronger commitment and documentation requirement.

Hoods should have their own maintenance schedule.

Bronze: commit to specific maintenance plan, and check to see that cfm's are at code minimum, no more.

Silver: same as bronze

Gold: Retrofit existing hoods with variable controls such as the Melink system. (typically \$5000-\$7000 investment)

In addition, I would have silver and gold require the variable hood controls for any new hoods being installed.

Response:

A checklist is now included for the equipment maintenance items that conserve energy and shall be practiced by operations. In addition, given the significance of hood maintenance and design in energy demand it was added to the checklist (air balance), and the capital options for hood efficiency were made requirement options for silver and gold levels of achievement.

3.2.4 Energy Conservation Maintenance Checklist - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall have a maintenance checklist and records of inspections for lighting, equipment, and other energy-consuming items that includes at least the following:</i></p> <ul style="list-style-type: none"> <i>• The operation shall perform and document manufacturer recommended maintenance to appliances to ensure all equipment is functioning properly and maintaining energy efficiency levels, including an air balance for the kitchen exhaust system.</i> <i>• Clean lighting fixtures, diffusers and lamps monthly. Unused ballasts in delamped fixtures shall be disconnected.</i> <i>• Cracked or worn refrigerator and freezer door gaskets and strip curtains that allow air transmission shall be replaced and doors shall be aligned.</i> <i>• Clean permanent filters with mild detergents and change replaceable filters according to manufacturer guidelines.</i> <i>• Check HVAC system each year for coolant and air leaks, clogs, and obstructions of air intake and vents.</i> <i>• Keep HVAC condenser coils free of dust and lint and evaporator coils free of excess frost.</i> <i>• Hot water heaters set in accordance with the minimum or recommended supply temperature for the facility's dish machines. In the absence of a dish machine, water temperature shall be set in accordance with minimum health code requirements.</i> | | |

- *Monitor refrigerator and freezer temperatures.*

3.2.11 Ventilation Hoods - Option. *Kitchen ventilation hoods shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <i>No requirement</i> | <i>Efficiently designed, such as switches for different stations, variable-speed controls, side-panels, using a larger overhang hood.</i> | <i>Demand control.</i> |

3.3.7 HVAC Replacement
BRONZE, SILVER, GOLD:

When replacing or purchasing new HVAC equipment, purchase ENERGY STAR qualified equipment, where applies.

Comment:

When replacing or purchasing new HVAC equipment, purchase ENERGY STAR qualified equipment, where applies.

Explanation: What about gas appliances? Under the impression there is no Energy Star gas appliance standard. What about the California Standard for Commercial HVAC?

Response:

The standard now includes all energy-efficient appliances in one requirement; to capture any that would qualify. This includes electric and gas equipment that meets the ENERGY STAR, CEE, and PG&E requirements, or equivalent programs. HVAC replacement would enable higher energy conservation performance, but will not be required. Instead it will be an option for silver and gold credit.

3.2.9 Energy-Efficient Appliances - Option. *The operation shall have:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>20% of its energy-efficient qualified kitchen appliance options (see Appendix C) as energy-efficient, including at least two used on most days of business; such as one energy-efficient appliance used</i> | <ul style="list-style-type: none"> • <i>50% of its energy-efficient qualified kitchen appliance options (see Appendix C) as energy-efficient, including at least four used on most days of business; such as two energy-efficient</i> |

| | | |
|--|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <i>during regular operation.</i> | <i>appliances used during regular operation, and</i> <ul style="list-style-type: none"> • <i>Turn pilot light on only during equipment use.</i> |
|--|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**3.4.1 Water Management Plan
BRONZE, SILVER, GOLD:**

The operation shall have a water management plan with goals and an action plan for water conservation includes at least the following, with records of inspections:

- Turn off faucets not in use.
- Regularly check for and repair all leaks.
- Use signs in restrooms to encourage water conservation and to report leaks
- For full-service operations, serve customers drinking water and refill drinking water only upon request.
- Do not use running water to melt ice in sinks.
- Hand-scrape dishes before loading into dishwasher.
- Soak dirty pots and pans instead of cleaning with running water or use 1.6 gpm or less pre-rinse spray valve to spray dishes.
- Operate dishwashers only when full.
- Indoors, use dry floor cleaning methods, followed by damp mopping, rather than spraying or hosing with water.
- Use dry methods to clean outdoor hard surfaces and a water broom only when absolutely necessary.

Comment:

This needs to be split out. Bronze and gold should not have the same standard for this very important topic.

What about for Gold:

1. Use low flow toilets
2. Sensored faucets that turn off automatically
3. Credit for a % water reduction
4. Use cold water when possible (saves energy on the hot water heater)

Response:

The water efficiency national code requirements have been used for the mandatory level, followed by higher water-efficiency options for the silver and gold levels of achievement. In addition, a water reduction option has been added for the silver and gold levels.

3.3.4 Water-Efficiency - Mandatory. *The operation shall have water fixtures that meet the specifications outlined below. Any existing toilets and urinals that exceed the required*

pressure or flow rates shall be on a schedule for replacement within two years. An exception is permitted if the plumbing infrastructure will not adequately function with lower flow rates.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD:</i> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|--------------|
| <ul style="list-style-type: none"> • <i>2.2 gpm or less for kitchen faucet</i> • <i>0.5 gpm or less for lavatory faucet</i> • <i>1.6 gpf or less for toilets</i> • <i>1.0 gallon or less or waterless for urinals</i> | | |

3.3.5 Restroom Water-Efficiency - Option. *The operation shall have water fixtures that meet the specifications:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------|-----------------------------------------------------------------------------------------|-------------|
| <i>No requirement.</i> | <i>Dual flush toilets (e.g., 1.6/0.8 gpf) or other fixture with 1.28 gpf or better.</i> | |

3.3.6 Kitchen Water-Efficiency - Option. *The operation shall have water fixtures and appliances that meet the specifications:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement.</i> | <ul style="list-style-type: none"> • <i>1.28 gpm or less for spray valve</i> • <i>1.5 gpm or less for kitchen faucet</i> • <i>Water-conserving or ENERGY STAR dishwasher and ice maker, if available (Note: ENERGY STAR does not currently address conveyor machines).</i> | |

3.3.7 Water Controls - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement.</i> | <i>The operation shall have hands-free taps (electronic or foot peddle operated) or sensors for all hand and kitchen sinks, an exception is permitted for spray valve-operated faucets..</i> | |

3.3.8 Water Conservation Performance, Where Applies - Option. *Water conservation measures shall achieve:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|----------------------------------------------------------|----------------------------------------------------------|
| <i>No requirement</i> | <i>A 10% improvement from baseline (no less than one</i> | <i>A 20% improvement from baseline (no less than one</i> |

| | | |
|--|-----------------------------------------------------------------------|-----------------------------------------------------------------------|
| | <i>year ago, no greater than 3 years ago), as described in 3.3.2.</i> | <i>year ago, no greater than 3 years ago), as described in 3.3.2.</i> |
|--|-----------------------------------------------------------------------|-----------------------------------------------------------------------|

Comment:

I agree with minimizing spraying and hosing but what does "dry floor cleaning methods" mean?

Comment:

Add toilet maintenance

Comment:

3.4.1. It is not always possible to operate dishwashers only when full. Grease impregnated concrete is not cleanable via a dry method or without water and detergent.

Response:

Dry floor cleaning, means using a broom or other device that doesn't use water. It is recognized that toilet maintenance is an important component of water conservation. The suggested changes have been made and included in an overall checklist requirement.

3.3.3 Water Conservation Checklist - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall have a water conservation checklist and records of inspections that include at least the following:</i></p> <ul style="list-style-type: none"> <i>• Turn off faucets not in use.</i> <i>• Regularly check for and repair all leaks.</i> <i>• Maintain toilets and urinals.</i> <i>• For full-service operations, serve customers drinking water and refill drinking water only upon request.</i> <i>• Do not use running water to melt ice in sinks.</i> <i>• Hand-scrape dishes before loading into dishwasher.</i> <i>• Use 1.6 gpm or less pre-rinse spray valve.</i> <i>• Operate dishwashers when full, whenever possible.</i> <i>• Use dry floor and outdoor cleaning methods, followed by damp mopping, rather than spraying or hosing with water.</i> <i>• Dishwasher temperature shall be set to the lowest temperature allowed by health regulations and consistent with the type of sanitizing system used.</i> | | |

Comment:

There is missing an entire section: there is absolutely no mention of stormwater pollution BMPs, which are the one legal and mandatory requirement of restaurants. They read as

follows:

- Install a catch basin filter in your parking lot storm drains.
- Clean private catch basins at least once each year, before the first rain, and as needed thereafter to prevent clogging.
- Sidewalk may not be cleaned with running water without containing that water and diverting to sanitary sewer. Dry sweeping and mopping is preferred.
- Outside windows and walls may not be cleaned with running water
- Parking lot may not be cleaned with running water, or chemicals of any kind, environmentally –friendly or not
- Keep dumpster area clean and free of litter
- Dumpster area may not be cleaned with running water
- Kitchen mats may not be cleaned outside the facility; the water must be routed to a sanitary sewer
- Rooftop vent must have catchment, and be covered from rain
- Rooftop catchment must be cleaned regularly, especially before and after rains
- Facility must have adequate sized grease trap installed
- Grease trap must be cleaned and maintained regularly
- Records of grease trap cleaning must be maintained
- Grease trap pumping must be supervised to ensure pumping of entire contents
- Cleaning water must be routed to sanitary sewer
- Avoid storm drain contamination through improper cleaning practices: First clean sidewalks, outside walls and windows, parking lots, floor mats, and dumpsters with dry methods (sweeping, vacuuming, blowing) then use damp mopping or wiping or a certified cleaner to finish the job. Avoid cleaning methods that cause dirty water to flow to the bay, creeks, storm drains, gutters or street. Any used cleaning water must be disposed to a sanitary sewer.

Response:

Water catchment has been added as a means to achieve credit for silver or gold certification. Dry cleaning was already included in the water conservation section, but clarified by putting into a checklist requirement.

3.3.9 Water Recycling - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|-----------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>Rainwater is collected on-site and used for allowed non-potable water needs.</i> | <i>Facility water is recycled onsite and used for allowed non-potable water needs.</i> |

3.3.3 Water Conservation Checklist - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|--------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a water conservation checklist and records of inspections that include at least the following:</i> | | |

- *Turn off faucets not in use.*
- *Regularly check for and repair all leaks.*
- *Maintain toilets and urinals.*
- *For full-service operations, serve customers drinking water and refill drinking water only upon request.*
- *Do not use running water to melt ice in sinks.*
- *Hand-scrape dishes before loading into dishwasher.*
- *Use 1.6 gpm or less pre-rinse spray valve.*
- *Operate dishwashers when full, whenever possible.*
- *Use dry floor and outdoor cleaning methods, followed by damp mopping, rather than spraying or hosing with water.*
- *Dishwasher temperature shall be set to the lowest temperature allowed by health regulations and consistent with the type of sanitizing system used.*

3.4.2 Water Use Tracking

BRONZE, SILVER, GOLD:

The operation shall monitor water bills at least quarterly with the ENERGY STAR portfolio manager or an equivalent energy management or documentation system (e.g., utility's software or Excel spreadsheet) that tracks utilization and costs, benchmarks these factors relative to past performance, and determines percent improvement or energy savings.

Comment:

I would put metrics in here for Y/Y savings. At least 1% for bronze, 2% for silver and 3% for gold?

This type of savings could result in real environmental impact, so it's worth pushing people on it.

Comment:

A great deal of water is used in manual cleaning. Misuse of cleaning materials can impact water usage. What methods are used to track the solution/water changes every day?

Response:

Water use tracking will be required on a monthly basis. More regular monitoring was included in the checklist/water management plan. Water use should be normalized for sales volume, so operations are not penalized for increases in business or rewarded for decreases in business. When water conservation efforts lead to substantial decreases, this will be recognized through the requirements option for the silver and gold levels of achievement.

3.3.2 Water Use Tracking - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall monitor water bills monthly with the ENERGY STAR portfolio manager³ or an equivalent utility management or documentation system (e.g., utility’s software or Excel spreadsheet) that tracks utilization and costs, benchmarks these factors relative to past performance (may be normalized to sales volume), and determines percent improvement or savings.</i> | | |

3.3.8 Water Conservation Performance, Where Applies - Option. *Water conservation measures shall achieve:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>A 10% improvement from baseline (no less than one year ago, no greater than 3 years ago), as described in 3.3.2.</i> | <i>A 20% improvement from baseline (no less than one year ago, no greater than 3 years ago), as described in 3.3.2.</i> |

3.3.3 Water Conservation Checklist - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a water conservation checklist and records of inspections that include at least the following:</i> | | |
| <ul style="list-style-type: none"> <i>• Turn off faucets not in use.</i> <i>• Regularly check for and repair all leaks.</i> <i>• Maintain toilets and urinals.</i> <i>• For full-service operations, serve customers drinking water and refill drinking water only upon request.</i> <i>• Do not use running water to melt ice in sinks.</i> <i>• Hand-scrape dishes before loading into dishwasher.</i> <i>• Use 1.6 gpm or less pre-rinse spray valve.</i> <i>• Operate dishwashers when full, whenever possible.</i> <i>• Use dry floor and outdoor cleaning methods, followed by damp mopping, rather than spraying or hosing with water.</i> <i>• Dishwasher temperature shall be set to the lowest temperature allowed by health regulations and consistent with the type of sanitizing system used.</i> | | |

3.4.3 Water-Efficient Appliances and Fixtures

Any existing faucets, valves, aerators that exceed the required pressure or flow rates

³Portfolio Manager offers a way for restaurants to track their weather-normalized energy and water use. Portfolio Manager allows certain commercial buildings (e.g., office buildings, warehouses) to obtain an ENERGY STAR label; restaurants, unfortunately, are not eligible for this label. Portfolio Manager can still be a very useful tool for restaurants to track energy and use, reduction in carbon dioxide emissions from saving energy as well as communicate these savings to EPA and customers.

shall be on a schedule for replacement within two years. Toilets shall be replaced in conjunction with major renovations, where applies. Higher flow toilets may be exempt from the flow rate requirement if the plumbing infrastructure will not adequately function with lower flow rates.

BRONZE:

No requirement.

SILVER:

Install low-flow aerators and restroom fixtures: 2.2 gpm or less for lavatory sinks; 2.0 gpm or less for kitchen sinks; toilets 1.6 gpf or less; urinals with 1.0 gallon or less or install new waterless types; use 1.6 gpm or less pre-rinse spray valves to rinse dishes.

GOLD meets the SILVER requirements plus:

WaterSense, water-efficient, or equivalent, faucets, toilets, and urinals shall be used and non-potable water used for plant and landscape irrigation for at least 50% of water needs. Install hands-free taps (electronic or foot peddle operated) in all hand and kitchen sinks.

Comment:

1. Bronze should have a requirement. This is not difficult to do and all organizations should have some requirement.
2. Gold should be obligated to have a rainwater catchment or recycled water usage program for landscaping needs.

Comment:

Low-flow aerators are very easy to purchase and install. Perhaps it should be a percentage of fixtures and not 100%.

At the Gold level, landscape irrigation is really a separate category and shouldn't fall under appliances and fixtures. Some felt it shouldn't be in this standard at all. Gray-water reuse is very strict under City Code and will be different across the U.S.

Response:

The water efficiency national code requirements have been used for the mandatory level, followed by higher water-efficiency options for the silver and gold levels of achievement. In addition, a water reduction option has been added for the silver and gold levels. Water catchment has been added as one of six means to achieve water conservation credit for silver or gold certification.

3.3.4 Water-Efficiency - Mandatory. *The operation shall have water fixtures that meet the specifications outlined below. Any existing toilets and urnials that exceed the required pressure or flow rates shall be on a schedule for replacement within two years. An exception is permitted if the plumbing infrastructure will not adequately function with lower flow rates.*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD:</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|--------------|
| <ul style="list-style-type: none"> • 2.2 gpm or less for kitchen faucet • 0.5 gpm or less for lavatory faucet • 1.6 gpf or less for toilets • 1.0 gallon or less or waterless for urinals | | |

3.3.5 Restroom Water-Efficiency - Option. The operation shall have water fixtures that meet the specifications:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------|-----------------------------------------------------------------------------------------|-------------|
| <i>No requirement.</i> | <i>Dual flush toilets (e.g., 1.6/0.8 gpf) or other fixture with 1.28 gpf or better.</i> | |

3.3.6 Kitchen Water-Efficiency - Option. The operation shall have water fixtures and appliances that meet the specifications:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement.</i> | <ul style="list-style-type: none"> • 1.28 gpm or less for spray valve • 1.5 gpm or less for kitchen faucet • Water-conserving or ENERGY STAR dishwasher and ice maker, if available (Note: ENERGY STAR does not currently address conveyor machines). | |

3.3.7 Water Controls - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement.</i> | <i>The operation shall have hands-free taps (electronic or foot peddle operated) or sensors for all hand and kitchen sinks.</i> | |

3.3.9 Water Recycling - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|-----------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>Rainwater is collected on-site and used for allowed non-potable water needs.</i> | <i>Facility water is recycled onsite and used for allowed non-potable water needs.</i> |

3.4.4 Ware Washing

BRONZE, SILVER:

Dishwasher temperature shall be set to the lowest temperature allowed by health regulations and consistent with the type of sanitizing system used.

GOLD:

A water-conserving or ENERGY STAR dishwasher shall be used, if available (Note: ENERGY STAR does not currently address conveyor machines).

Comment:

Should this section include something about chemical use, in addition to water and energy use?

Response:

Food-contact cleaning is regulated and thus not included in this standard.

3.6.1 Waste Audit

The operation shall audit/track both pre-consumer waste and post-consumer waste and maintain records on amount (e.g. pounds) and type based on category (e.g. food, cardboard packaging, aluminum packaging, plastic packaging, office paper, etc.) according to:

BRONZE:

Pre-consumer at least quarterly and post-consumer at least annually.

SILVER:

Pre-consumer waste at least monthly and post-consumer at least quarterly.

GOLD:

Pre-consumer waste at least weekly and post-consumer at least monthly.

Post-consumer waste not in facility does not need to be counted, such as when the consumer takes the food out of the facility to eat it or for drop-off catering services.

Comment:

The idea behind an audit is to make it actionable. The Bronze level should only be required to separate co-mingled, cardboard, landfill, and organics. Requiring each commodity to be separated and weighed beyond those categories is too demanding. The goal is to reduce the overall waste stream.

What is the benefit of ever doing a waste audit weekly? If a restaurant only does a profit and loss statement once per month why would they consider measuring their waste stream more than that? This is really counter-productive as it can be a time-consuming

process.

If the action resulting from the audit is to reduce the overall waste stream then the audit should be conducted over a period of 3-5 days to account for daily fluctuations. For example, a catering company has very high daily fluctuations.

Response:

These changes have been made to ensure the waste audit provides the intended benefit of reducing waste and the amount of discarded material ended up in the landfill. Additional tracking measures taken by and operation can be recognized for the higher levels of achievement.

3.4.2 Total Waste Audit - Mandatory. *The operation shall track total waste, including both pre-consumer waste and post-consumer waste, normalized to sales volume. The operation shall maintain records on amount (e.g., pounds) and type based on category (e.g., food, recyclable material, solid waste, etc.) over a period of at least three days of normal operations; tracking shall be conducted at the following frequency:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------|
| <i>Pre-consumer at least quarterly and post-consumer at least annually.</i> | <i>Pre-consumer waste at least monthly and post-consumer at least quarterly.</i> | |

Post-consumer waste not in facility does not need to be counted, such as when the consumer takes the food out of the facility to eat it or for drop-off catering services.

3.4.15 Ongoing Pre-Consumer Waste Monitoring - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Pre-consumer waste is monitored on an ongoing basis (e.g., daily) and the operation demonstrates that this activity drives operational change.</i> | |

3.6.2 Waste Diversion

The operation shall divert waste, based on weight, from the landfill based on the most recent waste audit conducted during normal operations according to 3.6.1:

BRONZE:

40%

SILVER:

70%

**GOLD:
90%**

Comment:

If a restaurant already diverts 60%-75% according to their most recent waste audit, and the only thing preventing them from being zero-waste is the lack of a commercial composting facility, how can they reduce their waste 40% on top of what they already do? This should be based on total divertible waste.

Response:

The diversion requirement is based on total waste, thus an operation that already diverts 75% of its waste from the landfill would meet the silver requirement. To clarify this, a definition for waste has been added.

Waste. All discarded material including recyclable material, compostable material, food for donation, and material sent to the landfill.

3.6.3 Waste Reduction

BRONZE:

No requirement.

SILVER, GOLD:

The operations shall demonstrate total waste reduction, based on weight, by comparing the most recent audit from 3.6.1 to the baseline. The baseline shall be the beginning amount of waste after the first audit or, if audits have been conducted for more than one year, the waste level as of one-year prior.

Comment:

If someone already meets this criteria, as explained above in 3.6.2, how does this apply? Wording is confusing as it is based on the most recent audit. What is total waste reduction?

Comment:

Suggested Addition: Operations using point of sales systems shall use programming to reduce paper use. (reduce tail on receipts, not printing voided items, etc.)

Response:

The waste reduction requirement is based on total waste. To clarify this, a definition for waste has been added. To determine if waste was reduced one does an audit. That result is then compared to the amount of waste produced to a baseline (a time in the past). Waste generation shall be normalized to sales so such comparisons are feasible. Specific actions to enable total waste reduction included in the standard needed to be limited to the most effective approaches and flexible enough to almost be universal options available to the many types of

operations included in this standard. So the sales system paper reduction was not included.

Waste. All discarded material including recyclable material, compostable material, food for donation, and material sent to the landfill.

3.4.3 Total Waste Reduction - Mandatory.

| <i>BRONZE</i> | <i>SILVER: Meet the bronze requirement plus:</i> | <i>GOLD: Meet the bronze requirement plus:</i> |
|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| <i>The waste plan in 3.4.1 shall include priority for waste reduction, above other goals.</i> | <i>The operations shall demonstrate total waste reduction, normalized for sales volume, by comparing the most recent audit from 3.4.2 to the baseline. The baseline shall be the beginning amount of waste after the first audit or, if audits have been conducted for more than one year, the waste level no greater than 3 years ago.</i> | |

3.6.4 Forecasting

The operation shall conduct food production forecasting that includes at least the following elements:

BRONZE:

Written recipes, written menus, and written daily production sheets.

SILVER, GOLD must meet BRONZE requirements plus:

Record of actual production levels, and record of unsalvageable portions leftover after a specific meal period.

Comment:

How is this being recorded? By weight? Are unsalvageable portions pre-consumer or post-consumer?

Comment:

This section does not seem necessary. Every restaurant has posted menus; and their operations dictate proper estimating of each day's output--which only has a marginal impact on sustainability.

Response:

Waste reduction, especially food waste reduction, is the primary goal of this section. To ensure that this is implemented, a waste reduction and management plan was added. This will enable an operation to look at their specific business and identify opportunities for waste reduction. Forecasting would be one of the ways to reduce waste, and thus was removed as a separate requirement.

3.4.1 Waste Reduction and Management Plan - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a documented waste management plan with goals for waste reduction, an action plan to meet the goals, documented monitoring of progress against the goals, and an operating plan to support the goals (including forecasting, production records, yield testing, inventory management, alternate uses of food inventory, and reusable service ware).</i> | | |

3.6.5 Yield Tests

Yield tests shall be conducted and documented to determine trim waste efficiency levels and compare to published levels in the Chef’s Book of Formulas, Yields, and Sizes by Arno Schmidt and published by Wiley at the following frequency:

BRONZE:
Annually

SILVER:
Quarterly

GOLD:
Monthly

Comment:

Focusing on high-cost high-production items will have the greatest benefit to the restaurant.

Response:

Waste reduction, especially food waste reduction, is the primary goal of this section. To ensure that this is implemented, a waste reduction and management plan was added. This will enable an operation to look at their specific business and identify opportunities for waste reduction. Yield testing would be one of the ways to reduce waste, and thus was removed as a separate requirement.

3.4.1 Waste Reduction and Management Plan - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a documented waste management plan with goals for waste reduction, an action plan to meet the goals, documented monitoring of progress against the goals, and an operating plan to support the goals (including forecasting, production records, yield testing, inventory management, alternate uses of food inventory, and reusable service ware).</i> | | |

3.6.6 Inventory Management

BRONZE:

An inventory management system with first-in, first-out procedures shall be practiced and documented.

SILVER, GOLD must meet BRONZE requirements plus:

The operation shall have a plan for alternate uses of food inventory when the food may not be used for its intended primary purpose.

Comment:

I would add that, where possible, that management plan includes giving unused product towards food donations.

Comment:

Among food-service operators with numerous and diverse menus that change frequently, using “inventory turnover” is most effective form of management. This measure is food cost for the period divided by the period's average inventory value which equals inventory turnover. All restaurants are doing the silver and gold requirement, a kind of “restaurant 101” as it will save the restaurant money.

Response:

Waste reduction, especially food waste reduction, is the primary goal of this section. To ensure that this is implemented, a waste reduction and management plan was added. This will enable an operation to look at their specific business and identify opportunities for waste reduction. Inventory management would be one of the ways to reduce waste, and thus was removed as a separate requirement.

3.4.1 Waste Reduction and Management Plan - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a documented waste management plan with goals for waste reduction, an action plan to meet the goals, documented monitoring of progress against the goals, and an operating plan to support the goals (including forecasting, production records, yield testing, inventory management, alternate uses of food inventory, and reusable service ware).</i> | | |

3.6.7 Food Donations

BRONZE, SILVER, GOLD:

Food donations shall be done on a regular basis, and recorded, and operators shall have a documented policy of what food can be safely donated, to which facilities, and how.

Comment:

Designate % of edible leftovers donated by Bronze (50%), Silver (70%), Gold (90%). Specificity is important.

Comment:

There are a lot of laws that prohibit food donations.

Comment:

define regular basis

Response:

The waste hierarchy was used to outline the waste requirements, and will be used to evaluate implementation. First on the hierarchy is source reduction; followed by using the waste to feed people, then animals. Thus food donations should be done with all the possible food that can be donated to people first, then for animal feed. Since this amount varies day to day, a specific percentage of waste that should be donated will not be used. Any regulations that apply, would take precedent.

3.4.5 Food Donations - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall research and document local food donation options. Where available, food donations shall be done on a regular basis, and recorded. Operators shall have a documented policy of what food can be safely donated, to which facilities, and how. Priority shall be to donations for human consumption (not including employee meals), followed by animal feed. Food that can be donated should not be composted or sent to the landfill.</i> | | |

3.6.8 Food Merchandising

BRONZE:

A food merchandising policy shall be practiced and documented to minimize food waste.

SILVER must meet BRONZE requirements plus:

Buffet/cafeteria and salad bar operations shall implement merchandising change procedures to minimize food volumes leading up to closing/transition periods without reducing selection or quality of presentation.

GOLD must meet SILVER requirements plus:

All-you-care-to-eat operations shall not provide trays to customers.

Comment:

“Food Merchandising” needs to be defined in the definitions. We didn’t know what a food merchandising policy was.

Comment:

This should not be part of the standard; it should be the option of each restaurant operator to perform these functions and should not be dictated by the standard.

Response:

A definition for merchandising has been added. This requirement was moved to be an option for silver and gold, thus not dictated.

Merchandising. Displaying products or items for sale and viewable by the customer.

3.4.II Food Merchandising, Where Applies - Option.

| <i>BRONZE</i> | <i>SILVER: Meet the bronze requirements plus:</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement.</i> | <ul style="list-style-type: none"> • <i>All-you-care-to-eat operations shall implement merchandising change procedures to minimize food volumes leading up to closing/transition periods without reducing selection or quality of presentation.</i> • <i>Full-service operations shall not serve non-alcoholic beverages in cans or bottles, unless it was packaged on-site or locally.</i> | <ul style="list-style-type: none"> • <i>All-you-care-to-eat operations shall not provide trays to customers.</i> • <i>Full-service operations shall offer half-portion options for entrees on the menu.</i> |

3.6.9 Fat, Oils, and Grease Recycling

The operation shall research and document local fat, oil, and grease recycling options. Where available, used frying oil and oil from grease recovery devices shall be:

BRONZE:

Recycled with proven partnerships for using the oil for such uses as biodiesel production, other means of replacing fossil fuel use, or rendering.

SILVER, GOLD:

Recycled with proven partnerships for using the oil for biodiesel production or other means of replacing fossil fuel use.

Comment:

It seems to me that at this point everyone should be able to recycle their waste grease somewhere. I think it should be a basic requirement.

Response:

After discussing this with a range of operations, it was determined that this could be required for all operations, provided such recycling is available geographically. So, this change was made.

3.4.6 Fat, Oils, and Grease Recycling - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall research and document local fat, oil, and grease recycling options. Where available, used frying oil and oil from grease recovery devices shall be recycled with proven partnerships for using the oil for biodiesel production or other means of replacing fossil fuel use.</i> | | |

3.6.10 Composting

BRONZE:

The operation shall research and document local composting options. The operation shall compost all pre-consumer food waste and post-consumer food waste and other compostable material such as service ware. If it isn't available, the food waste shall be donated to a farm. The operation shall have clearly marked sorting mechanisms (e.g. bins) in areas waste is collected.

SILVER, GOLD meet BRONZE requirements plus:

If composting is not available, the waste shall be compacted with pulping equipment or other acceptable means to reduce waste volume and weight.

Comment:

The bronze, silver, and gold categories appear arbitrary for composting. Documenting local composting and/or farm donation options as a bronze makes sense. If composting is not available, nearby farms also might not be available.

Pulpers might make sense even if composting is available as it can decrease truck trips. Perhaps instead of specifying how the food waste is reduced, documenting available options and a percentage reduction is a more feasible strategy?

Comment:

This kind of pulping equipment is VERY expensive and could cost \$15,000. We feel if a restaurant can meet 3.6.11, and composting is not available by law, then they are doing everything in their means to divert their waste stream.

Comment:

Under Bronze: the waste could be used to feed animals as well as composting on farms. Silver, Gold: I don't know the final answer to this, but I question the use of pulpers because they reduce garbage volume (and hauling costs) at the expense of water and energy use. Depending on where the facility is, landfill space could or could not be limited. Areas such as the Southwest have no lack of area for landfills, but they do have a lack of water.

At a minimum, you should require that the pulpers are new water efficient units and that garbage disposers are not allowed.

Comment:

3.6.10 Many facilities do not have space for pulping equipment. Option of donating food waste to a farm depends on the acceptability of the waste for animal food and must consider animal health. Also urban area facilities are many times a long distance from farming areas. Another concern may be the food safety risk of having food waste (either composting or pulping) on the same site that prepares and serves food. It may pose a cross-contamination risk.

Response:

The waste hierarchy was used to outline the waste requirements. After source reduction and donating food to humans and animals, composting is the preferred route of disposing organic waste, like food, that otherwise cannot be used. Composting and farm donation options must be researched to understand the best route to take. Feeding animals food waste was captured in food denotations, this was made clearer. Pulping was removed from this requirement since it is an expensive or infeasible (space limitations) option for some operations. Instead it was made an option for additional credit for silver or gold. Other similar means of managing waste were also included as options.

3.4.7 Composting - Mandatory. *The operation shall research and document local composting options (including farms). Where composting is available, the operation shall have clearly marked sorting mechanisms (e.g., bins) in areas waste is collected and:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>Compost all pre-consumer food waste.</i> | <i>Compost all pre-consumer food waste, post-consumer food waste, and other compostable material, such as service ware.</i> | |

3.4.13 On-Site Waste Conversion - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|-----------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>The operation uses an on-site composter or digester for all organic waste.</i> | |

3.4.14 On-Site Waste Processing - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>The operation reduces waste volume and weight through processing with pulping or other available methods, when the municipality can manage such processing.</i> | |

3.4.5 Food Donations - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall research and document local food donation options. Where available, food donations shall be done on a regular basis, and recorded. Operators shall have a documented policy of what food can be safely donated, to which facilities, and how. Priority shall be to donations for human consumption (not including employee meals), followed by animal feed. Food that can be donated should not be composted or sent to the landfill.</i> | | |

**3.6.11 Solid Waste Recycling
BRONZE, SILVER, GOLD:**

The operation shall maintain a recycling program for materials that are cost-effective for the operation locally and have clearly marked sorting mechanisms (e.g. bins) in areas waste is collected. Materials may include, but are not limited to, aluminum, plastic (1-5), steel, glass, cardboard, newspaper, mixed paper, electronics, batteries, inkjet and toner cartridges, paint, batteries, and CFLs.

Comment:

This needs gradations for Bronze, Silver, and Gold. This should be pretty easy to achieve so a minimum level for Bronze should be in there, with increasing accreditation for more items recycled. There must be a base line % for recycled goods. This is low hanging fruit for these restaurants seeking the seal.

Comment:

3.6.11 Solid Waste Recycling

Batteries is listed twice. Also, you should list all fluorescent lights including CFLs.

Comment:

3.6.11 Recycling capabilities of individual facilities is possible or prudent only if the local municipality has matching capabilities to recycle.

Response:

Recycling of all possible material that remains after source reduction, donations, and composting is a fundamentally responsible practice and will remain a

mandatory requirement. Some adjustments were made to be clearer about what material should be recycled.

Solid Waste. Material that is discarded and not donated or composted, such as packaging, supplies, and equipment.

3.4.8 Solid Waste Recycling - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall research and document local solid waste recycling options. The operation shall maintain a recycling program for materials for which recycling is locally available and have clearly marked sorting mechanisms (e.g., bins) in areas waste is collected. Materials may include, but are not limited to, aluminum, plastic (1-5), steel, glass, cardboard, newspaper, mixed paper, electronics, inkjet and toner cartridges, paint, batteries, and fluorescent lights like CFLs.</i></p> | | |

3.6.12 Packaging and Disposable Products

General comments regarding packaging and disposable products shall go here.

Comment:

Should a foodservice operator choose to become Green Seal certified, according to the proposed GS-46 standard, all disposable or single use tabletop products are forbidden. This includes items such as napkins, placemats, doilies, coasters, tray mats and liners, and tablecovers. Green Seal is essentially stating that all disposable single-use products are worse for the environment than reusable products. We urge Green Seal to reevaluate their stance. This is simply incorrect and misleading to the public. This perception is based solely on the solid waste generated and not the full life cycle analysis of a reusable or disposable product in terms of water, energy, chemicals, transportation, as well as solid waste.

Additionally, according to the Standard’s Background regarding Solid Waste Reduction, “full-service operations do not need to use disposable or single-use utensils or serving ware, including napkins, except for take-out food.” Items such as doilies and tray liners were referred to as “unnecessary.” Disposable products have been used in foodservice for over 100 years for a reason. Disposable paper placemats and tray covers provide a more sanitary eating surface and deter the spread of infectious and contagious diseases. Also, the U.S. Food and Drug Administration require foodservice operations to use single-use products when a facility’s dishwasher is not operational. The Background document also states that wasteful portioning of disposable items should be controlled. We are a large supporter of reducing waste. That is why we believe that using one quality napkin will reduce waste at the table because stacks of napkins will not need to be placed down. It is absurd that Green Seal Certified napkins would not be allowed in a Green Seal Certified restaurant.

We believe that Green Seal should implement foodservice supplier requirements for

disposable products such as making sure the paper is sourced from Sustainable Forestry Initiatives (SFI) or Forest Stewardship Council (FSC) certified forests. We also encourage the use of 100% recycled paper products with a high post-consumer content requirement and processed chlorine free. There are a lot of new product innovations in the marketplace for disposable products such as cutlery made from potatoes and paper made from sugar cane. It would be a shame for Green Seal to limit this. Green Seal has an opportunity to educate the foodservice industry as to the true benefits of disposable products, both in terms of sanitation and an overall reduction in waste.

We have a large network of interested parties in this proposed standard should Green Seal be interested in further discussing the benefits of disposable products please feel free to contact us.

Comment:

In reading through the proposed standard referenced above, one gets the feeling that your organization doesn't like single-use foodservice packaging products. That's fine; everyone is allowed to have their own biases. But one has to be careful not to fall into the trap of sacrificing the sanitation and public health protection benefits of single-use packaging products, in the single-minded pursuit of "environmental friendliness," and without a weighing of the relative merits of these two important societal values. Green Seal seems to lack an understanding or appreciation of why we've had such products around for the last 100 years.

Single-use products came into use as the answer to the spread of infectious and contagious diseases at a time when common drinking cups, plates and utensils were the norm in society. In fact, the first single-use foodservice product was called the Health Cup, a name that described the cup's primary benefit and value. It was sold to schools, hospitals, tubercular facilities and other places where infectious diseases could be communicated through unsanitary reusables.

Today, a hundred years after the invention of the Health Cup, the U.S. FDA's Food Code requires foodservice operations to use single-use products whenever a facility's dishwashing capability is compromised by equipment breakage, power failures, or inadequate dishwashing (such as low water temperature, weak detergent, etc.). For this reason alone all foodservice operators need to have a supply of single-use foodservice packaging products on hand.

The sanitary benefits of single-use products have been proven in many studies over the years, and most recently in two studies: one in 2003 in Las Vegas conducted for the Institute by the Clark County Public Health District that compared the sanitary aspects single-use and permanent ware items in Las Vegas eating establishments; and most recently in 2006 in Oshkosh, Wisconsin, conducted for the Institute by the University of Wisconsin that studied table top bacterial contamination of restaurants that used placemats versus uncovered tables.

The Las Vegas study found "reusable foodservice items had higher microbiological

levels than disposable items” and the Wisconsin study found that “single-use placemats were shown, on average, to have over seven times fewer bacteria than uncovered tables in restaurants.”

The reason that single-use products are more sanitary than their reusable counterpart is simple: very often dishwashers don’t heat water to 140° C the temperature necessary to assure sanitation. In some instances the water is hot enough, but not enough detergent is added. In other cases permanent ware is re-contaminated by workers when they place items back into storage.

Those very same sanitation issues are the same issues that arise when doing a life cycle environmental analysis comparing single-use products with their permanent ware counterparts. In 2009 we will commission just such a life cycle assessment to update a now 15-year-old LCA data conducted for us in 1993 by Arthur D. Little. But the LCA environmental inputs and through-puts of that long-ago study will most likely be the same today:

- ? the environmental footprints of base materials for single-use and permanent ware items
- ? the transportation energy consumed, and emissions expended in distributing single-use items versus their permanent ware counterparts that, on average, weigh 10 times more
 - ° the amount of energy required to operate a dishwasher
 - ? the amount of energy required to heat dishwasher water to 140° C
 - ? the amount of energy required to dry dishwashed permanent ware
 - ? the amount of water used in each dishwashing cycle
 - ? the amount of detergent used and discharged in each dishwashing cycle

The itemized listing above is a short list. It doesn’t factor in breakage, theft and replacement of permanent ware, a common occurrence that ends up doubling an item’s environmental footprint. Also, the listing doesn’t address the environmental footprints of ancillary equipment that permanent ware requires such as racks, carts, reinforced shelving, special storage bins, etc.

And, of course, the key thing to remember about the energy and water usage cited above is that it gets repeated again and again throughout the day as permanent ware items get used, rewashed, stored, etc. In some restaurants that reuse cycle might occur three, four or more times a day. That adds up to a lot of energy, a lot of water, a lot of detergent and a permanent ware environmental footprint surprisingly larger than its single-use counterpart.

I won’t prejudge what the 2009 LCA study conducted with today’s sophistication and knowledge might produce, but I would certainly be surprised if the conclusions are substantively different from those of 15 years ago, and that is, single-use products environmental footprints measure up quite well against those of their permanent ware

counterparts.

Let me move on to some other parts of your proposed standard that merit comment:

3.6.12.2.1: this section would require that all foodservice packaging be third-party certified compostable. That's fine. But what's missing is a requirement that the operator source-separate compostables and then see that they are actually sent to a composting facility as opposed to just discarding them normally into the municipal solid waste-landfill stream. Not assuring ahead of time that compostables are actually composted causes operators to lose an environmental benefit for which they probably paid a premium.

3.6.12.2.4: this section would require operators to take back dirty, contaminated used packaging into their stores. Not a good or sanitary idea, and one that guarantees a citation from the operator's local public health inspector. Remember, used foodservice can be recycled, but usually isn't because it's contaminated by human bodily fluids, and the viruses and bacteria they contain. In those few localities (Los Angeles and New York City) where foodservice packaging products are being recycled in pilot programs, the recycling is carried out in a closed loop system which assures a high volume capture rate for the discarded packaging, and cleaning of the used material before it is reprocessed. Such programs are logistically challenging and marginally cost neutral, the minimum standard for any recycling effort.

3.6.12.4: this section would prohibit operators from using polystyrene foam foodservice packaging products. We continue to be mystified by the environmental movement's 20 year attack on polystyrene. PS products have been in the market nearly 40 years and deemed safe for use by the FDA all that time. Of all the foodservice packaging products, they are the only ones that are five percent material (resin) and 95% air/blowing agent, which means they are very resource-light. And, finally, PS products do an excellent job at keeping hot things hot and cold things cold, a major health/sanitation benefit for takeout applications.

3.6.12.5: this section requires operators to use compostable serving ware. See remarks for 3.6.12.2.1. As for portion-controlled items, there are many one-at-a time dispensers in the market for napkins, cutlery, etc. The problem is getting consumers to take just one. Anyone with children knows that using just one napkin for a QSR meal just isn't going to work.

3.6.12.8: this section would prohibit operators from using doilies. Operators use doilies for a variety of reasons – noise reduction; coffee spillage control; grease control, etc. But the primary contribution of doilies, once again is sanitation. They keep service ware and table tops clean and cut down on breeding grounds for bacteria, just like placemats and tray liners.

3.6.12.9: this section prohibits operators from using coasters. Just like doilies and placemats, coasters keep glasses from spilling and protect table tops from beverage

container condensation that acts as a breeding ground for microbes. Coasters play a significant, yet obviously under- appreciated, role in table top sanitation.

3.6.12.10: this section prohibits operators from using tray liners. From a sanitation standpoint that prohibition just doesn't make any sense. See comments on the University of Wisconsin study cited on page one of this commentary.

3.6.12.11: this section would require operators to use table covers that contain 100% recovered, or 50% post-consumer material. There are products of this type in the marketplace, but getting FDA to issue a non-objection letter for direct-food contact materials containing post-consumer content is always problematical.

As for products that are 100% tree-free fiber, that again is problematical because it limits operators to using paper made from grass, bamboo or kenaf, materials that are in limited supply in the marketplace.

As for process chlorine-free paper, we assume you mean elemental-chlorine free. Most paper producers stopped using elemental-chlorine for bleaching more than 10 years ago. This comment holds true for the towel and tissue requirements in section 3.8.3 "Sanitary Paper Products," and 3.8.4 "Paper." [Another thing where Green Seal seems to be off target is in its preference for cloth napkins and table covers over their single-use, paper, counterparts. While we don't have any particular studies to back up our position, rational thinking tells us that a 6 foot by 4 foot cloth table cloth or one foot square napkin has to use more water, more detergent and more energy to sanitize it for re-use than its single-use counterpart...and, a cloth napkin or table covering would need to be ironed before being used again, driving its energy-use profile even higher. That conclusion is prima facie.]

3.8.8.1: this section would prohibit operators from using disposable hats and aprons. Single-use clothing made from paper or resins are used in hospital surgical suites and foodservice operations for the same reason – sanitation. They cut down on the spread of infectious agents and protect workers, and customers, alike. From an environmental footprint standpoint washing and sanitizing aprons has to use more water, energy to heat that water, and more detergent than their single-use counterparts.

Those are just a few of many sections of Green Seal's Proposed Environmental Standard for Restaurants and Food Service Operations that reflect an uncalled for bias against single-use products that seem to reflect Green Seal's lack of appreciation for the proven environmental advantages of single-use foodservice items over their permanent ware counterparts.

Comment:

3.6.12.10 Tray Liners - We agree to use less materials but based on sanitary requirements and the full lifecycle costs of washing trays in terms of water, energy and chemicals is this the least impactful path?

Comment:

3.6.12.4 Polystyrene

Is it possible to buy plastic utensils that are not #6?

Suggested Addition: Operations using point of sales systems shall use programming to reduce paper use. (reduce tail on receipts, not printing voided items, etc.)

Response:

Waste reduction and diversion performance was a mandatory requirement. Thus, specific actions to enable total waste reduction included in the standard were limited to be the most effective approaches and those that are universal options available to the many types of operations included in this standard. So the sales system paper reduction was not included. Given the sanitary benefits of some disposal products, and limited benefit of not using them, disposable sanitary products, like tray liners, will be permitted provided they are environmentally preferable versions. Polystyrene will continue to be prohibited. Polystyrene is not recyclable and thus would need to be sent to the landfill. It also has environmental concerns related to its production/material base (including benzene which EPA has classified as a carcinogen and ozone-depleting chlorofluorocarbons). As a result, many municipalities have banned the use of polystyrene in food service operations. However, it is understood that there some products like hot cup lids that are not widely available in other materials yet. So these types of products, those with no cost-effective alternatives, would be permitted. This has been clarified in the standard.

Disposable service ware products can be a significant source of environmental impact for a food service operation. For example, in the life cycle research conducted by Green Seal the use of plastic utensils at limited service operations could be larger environmental impact than energy use at the facility. As a result, reduction in their use is important. Full-service operations do not need to use them, since their customers are eating in their facility. Other operation types where customers take the food away from the operation to eat may need to provide disposable service ware. These options should be dispensed in a way that minimizes waste. There are a variety options available and have been used widely. However, it is noted that biobased options may not be as preferable as other options when they are not composted. Thus, certified compostable products should be used when composing of those items is done. Otherwise, environmentally preferable products should be used, such as products with post-consumer content. Finally, the take-back or reusable package programs are options for silver and gold levels of achievement and thus can be done when it is available to the operation.

3.4.9 Disposable Products - Mandatory. *The operation shall eliminate non-essential disposable products and the following:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin</i> | | |

- code #6 products (e.g., utensils) shall not be used.*
- *Except for trash can liners, plastic bags shall not be used.*
 - *Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines, and processed chlorine free; Or 100% agricultural residue fiber.*
 - *Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.*
 - *Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.*
 - *Operations shall not procure waxed cardboard packaging for use in operations.*
 - *Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.*

3.4.12 Disposable Food Service Products - Option. *Containers, utensils, cups, plates, straws, and other disposable food service items shall be:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Environmentally-preferable (see Appendix A); biobased and certified compostable by a third-party certification program (see Appendix B); OR contain the maximum amount of recovered and post-consumer content feasible and processed chlorine free.¹</i> | |

¹*Certified compostable products should be used when such products can be composted*

3.4.16 Reusable Service Ware, Where Applies - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Limited service operations shall provide reusable service ware for dine-in customers, including plates, bowls, cups, and utensils.</i> | |

3.6.12.1 Beverage Cans and Bottles
BRONZE, SILVER, GOLD:

Full-service operations shall not serve non-alcoholic beverages in cans or bottles. All operations shall have a recycling channel for all canned and bottled beverages served; an exception is permitted for drop-off catering events.

Comment:

Does this mean that paper cups are ok but beverage cans and bottles are not?

Response:

This limitation was directed to full-service operations. Full-service operations are also not permitted to single-use products for dine-in customers. This requirement was moved into the food merchandising requirement option, to consolidate the various options.

3.4.11 Food Merchandising, Where Applies - Option.

| <i>BRONZE</i> | <i>SILVER: Meet the bronze requirements plus:</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>No requirement.</i> | <ul style="list-style-type: none"> • <i>All-you-care-to-eat operations shall implement merchandising change procedures to minimize food volumes leading up to closing/transition periods without reducing selection or quality of presentation.</i> • <i>Full-service operations shall not serve non-alcoholic beverages in cans or bottles, unless it was packaged on-site or locally.</i> | <ul style="list-style-type: none"> • <i>All-you-care-to-eat operations shall not provide trays to customers.</i> • <i>Full-service operations shall offer half-portion options for entrees on the menu.</i> |

3.6.12.2.1

BRONZE, SILVER:

No Requirement.

GOLD:

Packaging for served food shall be certified compostable by a third-party or contain at least 45% recovered material, where available.

Comment:

Gold standard is too lenient. Bronze and silver need SOME requirement. Again, this is low hanging fruit. It's about supplier choices, not even cost.

Comment:

What about recyclable as a Bronze and Silver level? Better than styrafoam.

Comment:

I haven't seen too many food contact products made from recovered material-could count on one hand. Though maybe you are referring to paper bags and paper based to go containers. Think bronze level should be that that plastic and plastic coated paper

products are certified compostable by third party. Also maybe add something in this overall section about using foil when possible. This is usually what I ask for when getting none liquid food items to go. Then I wash and recycle.

Response:

This requirement does not include bags (bags are covered in a separate requirement), but includes utensils, cups, plates, and straws. It is an option for silver and gold. It is noted that biobased options (commonly certified compostable) may not be as preferable as other options when they are not composted. Certified compostable products should be used when composing of those items is done. However, other more preferable products might be better when not composted, such as products with post-consumer content. Given these options, there are many sources available that operations are already using.

3.4.12 Disposable Food Service Products - Option. Containers, utensils, cups, plates, straws, and other disposable food service items shall be:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>Environmentally-preferable (see Appendix A); biobased and certified compostable by a third-party certification program (see Appendix B); OR contain the maximum amount of recovered and post-consumer content feasible and processed chlorine free.¹</i> | |

¹*Certified compostable products should be used when such products can be composted*

3.6.12.2.2

BRONZE, SILVER:

No requirement.

GOLD:

When paper packaging is used for served food, it shall contain either 100% non-tree fiber or 10% post-consumer material and process chlorine-free, where available.

Comment:

Bronze and Silver some need requirements.

Comment:

This should be for all levels.

Response:

After discussing this with a range of operations, it was determined that there is broad availability of these product and could be required for all levels. As a result, paper products will need to be environmentally preferable (certified as such), or an equivalent, for all levels. This is included in the disposable products requirements.

3.4.9 Disposable Products - Mandatory. *The operation shall eliminate non-essential disposable products and the following:*

| BRONZE | SILVER | GOLD |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin code #6 products (e.g., utensils) shall not be used.</i> • <i>Except for trash can liners, plastic bags shall not be used.</i> • <i>Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines, and processed chlorine free; Or 100% agricultural residue fiber.</i> • <i>Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.</i> • <i>Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.</i> • <i>Operations shall not procure waxed cardboard packaging for use in operations.</i> • <i>Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.</i> | | |

3.6.12.2.3

BRONZE, SILVER, GOLD:

Bags used for items carried-out (left-over food or take-out food) shall be provided only upon customer request and not double-bagged.

Comment:

Gold and silver should require NO PLASTIC BAGS use at all.

Response:

Plastic bags will not be permitted. An exception to this is for plastic bags used as trash can liners, with preference for compostable bags when used for composting.

3.4.9 Disposable Products - Mandatory. *The operation shall eliminate non-essential disposable products and the following:*

| BRONZE | SILVER | GOLD |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin code #6 products (e.g., utensils) shall not be used.</i> • <i>Except for trash can liners, plastic bags shall not be used.</i> • <i>Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines, and processed</i> | | |

- chlorine free; Or 100% agricultural residue fiber.*
- *Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.*
 - *Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.*
 - *Operations shall not procure waxed cardboard packaging for use in operations.*
 - *Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.*

3.6.12.2.4

BRONZE:

No requirement.

SILVER, GOLD:

The operation shall have a take-back program or a reusable container program for take-out packaging.

Comment:

Need a requirement for Bronze.

For gold, what if you added something about giving consumers an incentive for bringing back their containers?

Comment:

Define what is a “reusable container” (i.e. wicker basket). There are strict sanitation codes that prohibit the take back of food-service ware. Is a reusable container for takeout packaging really better than recyclable? Microwaveable packaging is often non-recyclable but is reusable if the customer chooses. Which is better if it is left up to the customer to decide what they do with it?

Response:

The take-back or reusable package programs are options for silver and gold levels of achievement and thus can be done when it is available to the operation.

3.4.18 Reusable Take-Out Container, Where Applies - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <i>The operation has a take-back program or a reusable container program for take-out packaging.</i> | |

3.6.12.3 Transport Packaging

BRONZE:

No requirement.

SILVER, GOLD:

Operations shall use reusable transport packaging instead of one-time (or limited-use) when transporting food off-site, an exception is permitted for drop-off catering events.

Comment:

Should be a prerequisite.

Response:

This change has been made. A definition for transport packaging was added for clarity.

***Transport Packaging.** Packaging use to carry food from the operation to another location. This includes packages in direct contact with the food such as trays or bowls and packages used to carry such items like totes and bags.*

***3.4.9 Disposable Products - Mandatory.** The operation shall eliminate non-essential disposable products and the following:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin code #6 products (e.g., utensils) shall not be used.</i> • <i>Except for trash can liners, plastic bags shall not be used.</i> • <i>Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines, and processed chlorine free; Or 100% agricultural residue fiber.</i> • <i>Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.</i> • <i>Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.</i> • <i>Operations shall not procure waxed cardboard packaging for use in operations.</i> • <i>Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.</i> | | |

3.6.12.3.1

BRONZE:

No requirement.

SILVER, GOLD:

Operations shall not procure waxed cardboard packaging for use in operations.

Comment:

Clarification – this is referring to packaging purchased for use in the restaurant, not packaged delivered (aka the romaine lettuce that is delivered to the restaurant in a waxed container).

Response:

This was referring to the packaging used in the restaurant.

3.6.12.4 Polystyrene

BRONZE, SILVER, GOLD:

Polystyrene products, such as cups, utensils, and packaging recognized by the Society of the Plastics Industry resin code #6, shall not be used.

Comment:

We felt that polystyrene is so widely used in the industry that this is really a much bigger deal than one might think. Expanded polystyrene should be the bronze level. If we could eliminate this alone it would make a HUGE impact. The silver level should require the elimination of polystyrene and #6 plastics when there is an available substitute. For example, there is no substitute for a hot coffee cup lid on the market. As far as we know they are all #6. This means at the Gold level you would no longer serve coffee to-go. This should be left up to greeniest of greenies.

Comment:

3.6.12.4 Polystyrene

Is it possible to buy plastic utensils that are not #6?

Response:

Polystyrene will continue to be prohibited at all levels. However, it is understood that there some products like hot cup lids that are not widely available in other materials yet (there are some alternatives for utensils). So these types of products, those with no cost-effective alternatives, would be permitted. This has been clarified in the standard.

3.4.9 Disposable Products - Mandatory. *The operation shall eliminate non-essential disposable products and the following:*

| BRONZE | SILVER | GOLD |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin code #6 products (e.g., utensils) shall not be used.</i> • <i>Except for trash can liners, plastic bags shall not be used.</i> • <i>Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer</i> | | |

- content outlined in the EPA Comprehensive Procurement Guidelines, and processed chlorine free; Or 100% agricultural residue fiber.*
- *Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.*
 - *Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.*
 - *Operations shall not procure waxed cardboard packaging for use in operations.*
 - *Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.*

3.6.12.5 Disposable Utensils, Table Ware, and Service Items

BRONZE:

Full-service operations shall not use disposable or single-use utensils or serving ware, including napkins; an exception is permitted for take-out food.

SILVER, GOLD:

All disposable utensils, serving ware, table ware and plastic bags shall be recyclable or certified compostable by a third-party. Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers.

Comment:

These seemed backwards to us. It is easier to convert to recyclable or composted disposables rather than eliminate them completely. If disposable napkins are not allowed to be used, are restaurants to use cloth napkins? Please show proof that 100% post-consumer, unbleached compostable napkins are worse than using 7cents/piece cloth, bleached, commercially laundered and transported napkins.... We can't figure out which is actually better.

Response:

The bronze level was limited to full-service operations, and remains a mandatory requirement, with napkins removed (napkins must be environmentally preferable, certified options).

3.4.9 Disposable Products - Mandatory. *The operation shall eliminate non-essential disposable products and the following:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin code #6 products (e.g., utensils) shall not be used.</i> • <i>Except for trash can liners, plastic bags shall not be used.</i> | | |

- *Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines, and processed chlorine free; Or 100% agricultural residue fiber.*
- *Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.*
- *Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.*
- *Operations shall not procure waxed cardboard packaging for use in operations.*
- *Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.*

**3.6.12.11 Table Covers
BRONZE, SILVER, GOLD:**

Paper table coverings shall contain 100% recovered material, 50% post-consumer material, and process chlorine-free, or made from 100% tree-free fiber.

Comment:

Gold should not be allowed to have paper coverings on their tables at all.

There needs to be a provision for washing of cloth tablecloths -- detergents used, organic methods of laundering/dry cleaning.

Response:

Paper coverings can be environmentally preferable options and in some operation styles (e.g. barbecue) it is more sanitary. Thus, they will be permitted, if they are environmentally preferable. Linen laundering was included, prohibiting the use of perchloroethylene.

3.4.9 Disposable Products - Mandatory. *The operation shall eliminate non-essential disposable products and the following:*

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <ul style="list-style-type: none"> • <i>Polystyrene packaging and cups shall not be used.</i> • <i>When cost-effective alternatives are available, Society of the Plastics Industry resin code #6 products (e.g., utensils) shall not be used.</i> • <i>Except for trash can liners, plastic bags shall not be used.</i> • <i>Disposable paper and tissue products shall be environmentally-preferable (see Appendix A); 100% recovered content, the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines, and processed chlorine free; Or 100% agricultural residue fiber.</i> | | |

- *Full-service operations shall not use disposable or single-use utensils or serving ware: an exception is permitted for take-out food.*
- *Portion-controlled condiments and disposable napkins, utensils, and straws shall be provided upon customer request or with single-serve dispensers, where applies.*
- *Operations shall not procure waxed cardboard packaging for use in operations.*
- *Operations shall use reusable transport packaging instead of one-time (or limited-use): an exception is permitted for packages directly containing food for delivery or drop-off service.*

3.7.9.1 Linen and Uniform Cleaning, Where Applies – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------------------------------------------------------------------------------|---------------|-------------|
| <i>Linen and uniform cleaning shall be performed without using perchloroethylene.</i> | | |

3.6.12.12 Customer Receipts

BRONZE, SILVER, GOLD:

Limited-service operations shall print receipts only upon customer request.

Comment:

Gold & silver should be required to print receipts on recycled paper.

You need to specify inks as well for cash registers. Some are more harmful than others.

Response:

Silver and gold levels of achievement can earn credit for other means of reducing waste through the waste innovation option.

3.7.1

For non-food contact surfaces, the operation shall:

BRONZE, SILVER, GOLD:

- **Use cleaning concentrates and dilution control systems to minimize chemical use when possible.**
- **Use durable, reusable cloths and mops.**
- **Use environmentally-preferable cleaning products for glass cleaners, floor cleaners, toilet and restroom cleaners, and general purpose cleaners.**
- **Not use antibacterial hand cleaners in customer restrooms and they shall be environmentally-preferable products.**

Comment:

Most important from our viewpoint--3.7.1 Non-food contact sanitizers--" Antibacterial Cleaners-Many times restaurants do not have a separate restroom facility for employees.

Antibacterial hand cleaners are a significant intervention product to prevent the spread of foodborne disease via the hands of foodservice workers. To not allow the use of these type of products is contrary to best practices for prevention of foodborne disease.

Response:

This was clarified in the standard, by requiring the environmentally preferable hand cleaners when separate restrooms (for employees and customers) are available.

3.6.1 Cleaning - Mandatory. For non-food contact surfaces, the operation shall:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <ul style="list-style-type: none"> • <i>Use cleaning concentrates and dilution control systems to minimize chemical use, when possible.</i> • <i>Use durable, reusable cloths and mops.</i> • <i>Use environmentally-preferable cleaning products for glass cleaners, floor cleaners, toilet and restroom cleaners, and general purpose cleaners.</i> • <i>Use environmentally-preferable hand cleaners that are not antibacterial in customer restrooms, when they are separate from employee restrooms.</i> | | |

3.7.5

BRONZE:

No requirement.

SILVER, GOLD:

Where applies, the operation shall use plants and trees tolerant of the local climate, soils and natural water availability. Landscape shall be watered where necessary in the early morning or at night to minimize evaporation, soaker hoses used for plant beds, and plant beds mulched to retain water. Grasses used that require irrigation shall be limited to areas where direct business activities take place.

Comment:

Gold standard should require limited water-conserving landscaping with irrigation through recycled water/rainwater catchment systems

Response:

This has been added as an option.

3.3.9 Water Recycling - Option.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet the silver requirements plus:</i> |
|-----------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| <i>No requirement</i> | <i>Rainwater is collected on-site and used for allowed non-potable water needs.</i> | <i>Facility water is recycled on-site and used for allowed non-potable water needs.</i> |

**3.8.1 Environmentally and Socially Sensitive Purchasing Policy
BRONZE, SILVER, GOLD:**

The operation shall implement a documented environmentally and socially sensitive purchasing policy, which shall include the following:

- Incorporation of environmental preferences into purchasing documents and discussions with suppliers and vendors.
- Consider the life-cycle costs of buying environmentally responsible products and services. Information from all available sources shall be used, including manufacturer information and third-party certifications.
- The testing of potential environmentally responsible products and services.
- Regular evaluation and modification, if necessary, of the environmentally and socially responsible purchasing policy to help ensure maximum benefits.

Comment:

You need different standards for bronze, silver and gold, with quantifiable levels.

You can quantify by impact to the environment and the community:

Think about the impact of the restaurant buying shade grown coffee. If you can determine the quantity they buy, you can quantify those effects.

What about the effects of not using plastic bags in carry out?

The standards should set goals for each level. specificity is important on this and CAN be quantified.

Response:

Quantifying the impact of various practices on the environment and the community, in a valid way, requires technical staff that conducts the evaluation according to internationally accepted methods. When Green Seal conducts such assessments, following the international standards, experienced life cycle professionals do this work and the results are validated by external experts. As a result, Green Seal will provide such information, generalized according to the requirements in the standard.

Comment:

The operation shall implement a documented environmentally and socially sensitive purchasing policy, which shall include the following:

- Consider the life-cycle costs of buying environmentally responsible products and services.
- Incorporation of environmental preferences into purchasing documents and discussions

with suppliers and vendors.

When available, products with third party certification (i.e. Green Seal, Eco-Logo) shall be used.

- The *pilot use* of potential environmentally responsible products and services. Annual evaluation and modification, if necessary, of the environmentally and socially responsible purchasing policy to help ensure maximum benefits.

Explanation: we moved “consider the life-cycle costs...” to the first bullet. We felt that this was the most important point. The other changes were clarifications.

Response:
These changes were made.

3.7.1 Environmentally and Socially Sensitive Purchasing Policy – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall implement a documented environmentally and socially sensitive purchasing policy, which shall include the following:</i></p> <ul style="list-style-type: none"> • <i>Consider the life-cycle costs of buying products and services. Information from all available sources shall be used.</i> • <i>Incorporation of environmental and social preferences into purchasing actions and discussions with suppliers and vendors on such preferences (see 3.7.1.1).</i> • <i>The trial of potential environmentally and socially responsible products and services.</i> • <i>When available, environmentally-preferable products should be used.</i> • <i>Annual evaluation and modification, if necessary, of the environmentally and socially responsible purchasing policy to help ensure maximum benefit (including checking most recent fish/seafood lists and availability of responsible food options).</i> | | |

3.8.2.2. Coffee Filters

BRONZE:
No requirement.

SILVER, GOLD:
Coffee filters shall not be bleached or whitened with chlorine.

Comment:
Consider adding for Gold: "reusable filters are used when possible"

Response:
These changes were made.

3.7.2 Products for Food Preparation, Where Applies – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <i>No requirement</i> | <ul style="list-style-type: none"> • <i>Ethanol-based gel or wick chafing fuels shall be used.</i> • <i>Coffee filters shall be reusable or be processed chlorine free or not be bleached.</i> | |

**3.8.3 Sanitary Paper Products
BRONZE, SILVER, GOLD:**

Sanitary paper products shall be Green Seal certified or the following:

- **Restroom Hand Towels:**100% recycled content, at least 40% post-consumer material and process chlorine-free.
- **Napkins:**100% recycled content, at least 30% post-consumer material and process chlorine-free.
- **Toilet Tissue:**100% recycled content, at least 20% post-consumer material and process chlorine-free.
- **Facial Tissue:**100% recycled content, at least 10% post-consumer material and process chlorine-free.

Comment:

Could there be an addition to ensure that touchless restroom hand towel dispensers are used. The touchless dispensers reduce the amount of paper used.

Comment:

We have been made to believe that Eco-Logo and Green Seal are equivalent certifications. If not, please explain. Also, we were wondering why there is no mention of hand dryers or reusable linens...would either of these be equivalent substitutes?

Response:

This requirement has been modified to allow for products that are certified by credible ecolabel programs (using the term environmentally-preferable that is defined to be ecolabel certified products). The appendix provides examples of programs that meet this requirement including the US program, Green Seal, and the Canadian program, EcoLogo. Different waste-reduction measures for hand drying have been included as an option for earning waste reduction credit for silver and gold levels of achievement

3.7.3 Sanitary Paper Products – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>Sanitary paper products (such as restroom towels, napkins, bathroom tissue, and facial tissue) shall be environmentally-preferable (see Appendix A) or contain 100% recovered content, processed chlorine free, and the minimum amount of post-consumer content outlined in the EPA Comprehensive Procurement Guidelines.</i> | | |

3.4.17 Hand Drying - Option.

| BRONZE | SILVER | GOLD |
|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| No requirement | The operation shall have automatic towel dispensers proven to reduce towel waste; paper-free hand dryers; Or durable, reusable towels at all hand sink locations. | |

3.8.5 Printed Paper
BRONZE, SILVER:
No requirement.

GOLD:
Additional paper or printed material, not covered in 3.8.4 such as printed marketing information, shall be minimized. When additional paper is used or printed it shall be:

- **Paper with at least 30% post-consumer material or on environmentally-preferable paper or tree-free fiber.**
- **Processed without chlorine**
- **Double-sided printed**
- **Use vegetable-based inks**
- **Waterless lithography printing service and alcohol-free printing or evidence that it is not available.**

Comment:
 This is such low hanging fruit for companies. Paper with recycled content is everywhere. There MUST be requirements for Bronze and Silver. This lets them off too easily and for no good reason.

Comment:
 We felt that the gold qualifications could easily be done for bronze and silver. You can easily purchase post-consumer paper, print double sided and process chlorine-free whether you are printing in a personal office, or outsourcing. Also, there are enough printing companies offering vegetable/soy based inks so we added “when outsourced”. This would be difficult to achieve in an office as we are unaware whether the public can purchase this at an office supply store.

Response:
 Paper for printing and writing will be required for all levels, given its widespread availability. Printing services was clarified, to apply to external/outsource printing.

3.7.4 Printing and Writing Paper – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>Paper menus shall be printed on and office paper shall be environmentally preferable (see Appendix A); Or contain 100% post-consumer material and processed chlorine free; Or made from 100% agricultural residue fiber.</i> | | |

3.7.4.1 Printing – Mandatory. Paper or printed material not covered in 3.7.4 such as printed marketing information, shall be minimized and:

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meets bronze requirements plus:</i> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>The default setting for copying and printing shall be double-sided and paper printed on one side shall be used for internal copies/printouts/notepads, if available.</i> | | <i>For external/outsourced printing:</i> <ul style="list-style-type: none"> • <i>Paper meets the requirements in 3.7.4</i> • <i>Double-sided printed</i> • <i>Use vegetable-based inks</i> • <i>Use waterless lithography printing service and alcohol-free printing or evidence that it is not available.</i> |

3.8.6.3

BRONZE:

No requirement.

SILVER, GOLD:

Rechargeable batteries shall be used for battery-powered devices including flashlights, handheld vacuums, and other battery-powered equipment.

Comment:

Bronze should require a battery recycling plan.

Comment:

Rechargeable batteries shall be used for battery-powered devices including flashlights, handheld vacuums, and other battery-powered equipment.

Explanation: We felt both were easily achievable at the bronze level.

Response:

Battery recycling was included in the recycling requirement. Rechargeable battery use will be required for all levels, given its widespread availability.

3.7.5 Office Electronics – Mandatory.

| <i>BRONZE</i> | <i>SILVER: Meet bronze requirements plus:</i> | <i>GOLD: Meet bronze requirements plus:</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| <ul style="list-style-type: none"> • <i>Rechargeable batteries shall be used for battery-powered devices including flashlights, handheld vacuums, and other battery-powered equipment.</i> • <i>Printers and copiers replaced or purchased shall have the ability to print double-sided.</i> | <ul style="list-style-type: none"> • <i>Computers or monitors replaced or purchased shall be Bronze registered or higher under EPEAT (in compliance with the IEEE Standard 1680 for the Environmental Assessment of Personal Computer Products).</i> • <i>Office printers, copiers, fax machines, and scanners replaced or purchased shall have evidence that they are ENERGY STAR compliant, or equivalent.</i> | |

3.8.7.2

When furniture is purchased it shall either contain a minimum of 10% post-consumer material or 20% recovered material, be remanufactured, or environmentally-preferable products according to the following:

BRONZE:

No requirement.

SILVER:

30% of total cost.

GOLD:

50% of total cost.

Comment:

3.8.7.2 When furniture is purchased it shall either contain a minimum of 10% post-consumer material or 20% recovered material, be remanufactured, *reclaimed, reused* or environmentally-preferable products according to the following:

Bronze: No Requirement.

Silver: 30% of total cost.

Gold: 50% of total cost.

Explanation: reclaimed and reused are different than your definition of remanufactured. We felt these were equally acceptable.

Response:

This requirement was simplified to require the purchase of durable products in the first place, to reduce the purchase of new items. When new furniture items are purchased, they should not contain the known indoor air pollutant urea formaldehyde.

3.7.6 Furnishings – Mandatory. *Furnishings, such as tables, chairs, and carpet shall be durable products that can be repaired, when possible, and:*

| <i>BRONZE</i> | <i>SILVER: Meet bronze requirements plus:</i> | <i>GOLD: Meet bronze requirements plus:</i> |
|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <i>When furniture is purchased it shall not contain added urea formaldehyde.</i> | <i>Carpet shall be environmentally-preferable (see Appendix A) or low-emitting.</i> | |

3.8.7.5 Candles

BRONZE, SILVER, GOLD:

Scented candles shall not be used.

Comment:

For Silver and Gold, I recommend putting in standards for recycling the aluminum bottoms of tealight and glass candles. They are widely used in restaurants and recycling them could reduce landfill waste in a significant way.

Response:

Aluminum recycling was included in the waste recycling requirement.

3.9.3 Employee Commuting

BRONZE:

No requirement.

SILVER:

No requirement.

GOLD:

The operation shall subsidize employee’s public transit commuting expenses, by covering at least 50% of the expense.

Comment:

Silver and gold should potentially include incentives for employees who carpool to work.

Response:

This requirement was removed since it did not fairly apply to all geographic regions. There are urban areas when nearly all employees use public transit and other areas where public transit is not available.

3.10 Administration

General comments regarding administration shall go here.

Comment:

It is unrealistic to assume that all procurement transactions can be conducted without paper. It is typically the vendor that drives this. Also, it is such a miniscule part of sustainability that it should not be part of this standard.

Response:

This requirement was moved to the vendor preference requirement, as a means to choose vendors, but not a requirement.

3.7.1.1 Vendor Preference – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall document and show evidence of practicing a vendor policy that includes at least the following preference given to vendors that:</i></p> <ul style="list-style-type: none"> <i>• Provide environmentally-preferable products (e.g., certified products).</i> <i>• Use efficient transportation.</i> <i>• Do not require paper for ordering.</i> <i>• Provide items in bulk.</i> <i>• Take-back and reuse delivery containers, approved for commercial food use.</i> | | |

4.1.2.1 Vendor Code of Conduct

BRONZE, SILVER, GOLD:

There shall be a vendor code of conduct in practice that includes social and environmental guidelines.

Comment:

Add to all that there should also be a commitment not to work with other suppliers who violate the code of conduct.

Comment:

Silver: There shall be a vendor code of conduct in practice *that requires 50% of vendors to includes social and environmental guidelines.*

Gold: There shall be a vendor code of conduct in practice *that requires all vendors to includes social and environmental guidelines*

Explanation: It is very difficult to enforce this if you work with upwards of 5-10 different vendors. We thought Bronze should be easier to achieve. Also, is Green Seal going to post examples of “vedor codes of conduct” and “environmental and social responsibility plan”? There is a lot of written requirements for this section that most people are not familiar with.

Response:

This requirement was intended for an operation to establish a vendor code of conduct and implement it with its vendors as is appropriate for the business.

4.1.2.1 Vendor Code of Conduct - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a vendor code of conduct in practice that includes social and environmental guidelines and vendor preferences outlined in 3.7.1.1.</i> | | |

4.1.2.1.1

BRONZE, SILVER, GOLD:

Preference shall be given to suppliers who provide bulk items and returnable, reusable or recyclable containers approved for commercial use in food establishments.

Comment:

4.1.2.1.1 Many foodservice facilities do not have sufficient space to receive many items in bulk.

Response:

This requirement was moved to the vendor preference requirement, as a means to choose vendors, but not a requirement.

3.7.1.1 Vendor Preference – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall document and show evidence of practicing a vendor policy that includes at least the following preference given to vendors that:</i></p> <ul style="list-style-type: none"> <i>• Provide environmentally-preferable products (e.g., certified products).</i> <i>• Use efficient transportation.</i> <i>• Do not require paper for ordering.</i> <i>• Provide items in bulk.</i> <i>• Take-back and reuse delivery containers, approved for commercial food use.</i> | | |

4.1.2.2 Environmental and Social Responsibility Committee

BRONZE, SILVER, GOLD:

There shall be a committee, which includes staff responsible for overseeing the environmental and social responsibility plan that meets at a minimum quarterly.

Comment:

Once again this should not be dictated by the standard or required.

Comment:

There shall be a committee, which includes staff responsible for overseeing the environmental and social responsibility plan

Explanation: We felt meeting quarterly was too frequent.

Response:

This requirement was removed since it was already captured under the environmental and social responsibility plan requirement.

4.1.2 Environmental and Social Responsibility Plan - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have an environmental and social responsibility plan that includes goals and an action plan related to the criteria of this standard and is updated annually.</i> | | |

4.3 Training

BRONZE, SILVER, GOLD:

New employees shall receive a minimum of two hours (paid) of documented training on the company’s environmental and social responsibility plan (4.1.2) and operating procedures (4.2) within the first week of employment and all employees shall receive a minimum of four hours (paid) of documented training on the company’s environmental and social responsibility plan (4.1.2) and operating procedures (4.2).

Comment:

This is too stringent.

I think Bronze should require 1 hour of training. Silver 1.5 hours and Gold 2 hours.

Comment:

New employees shall receive a minimum of two hours (paid) of documented training on the company’s environmental and social responsibility plan (4.1.2) and operating procedures (4.2) within the first week of employment and all employees, *as applicable to their duties*, shall receive a minimum of four hours (paid) of documented training on the

company’s environmental and social responsibility plan (4.1.2) and operating procedures (4.2).

Response:

These adjustments were made.

4.3 Environmental and Social Responsibility Training - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>New employees shall receive a minimum of one hour (paid) of documented training on the company’s environmental and social responsibility plan (4.1.2) and operating procedures (4.2) within the first week of employment, as applicable to their duties, and all employees shall receive a minimum of two hours (paid) of documented training, beyond the initial training, on the company’s environmental and social responsibility plan (4.1.2) and operating procedures (4.2).</i> | | |

4.3.1 Employee Reward Program

BRONZE, SILVER, GOLD:

The operation shall have an employee reward program to reinforce accountability and commitment to implementing the company's environmental and social responsibility plan (4.1.2) and operating procedures (4.2).

Comment:

This should be based on following the training set forth in 4.3. Carpooling should be part of this.

Comment:

These programs should be left up to the restaurant operators and marketing teams to implement, not dicatated as mandatory in the Standard.

Comment:

Remover from standard.

Explanation: A reward of any kind, especially monetary, would give an employee the impression that the companies commitment is in some ways optional or not expected. Environmental commitment, especially if it is written in a company charter, should be an ethical and expected attribute. If a boss chooses to reward his employees for any reason that is his/her prerogative.

Response:

This requirement was removed since each company has its own means of rewarding employees.

4.5.1

BRONZE, SILVER, GOLD:

The operation shall have information accessible (web site, brochures, etc.) to customers about its environmentally and socially responsible practices in order for customers to learn about what practices are done and why the practices are done.

Comment:

I think this should be more specific. It's part of community responsibility -- part of the triple bottom line.

Bronze should require only a statement about their practices in general format

Silver should require specifics about programs embarked upon to foster these practices.

Gold should have a statement of full disclosure about everything that they are doing -- a Sustainability Report to go along with the annual report.

Response:

The gold level of achievement will require more comprehensive reporting. Such reporting will communicate the many accomplishments made the operation and empower more operations to make similar efforts towards environmental responsibility.

4.4 Communication - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meet bronze requirements plus:</i> |
|---------------------------------------------------------------------------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------|
| <i>The menu shall identify items that include the responsible food purchases included in 3.1.</i> | | <i>The operation shall have an environmental and social responsibility report available to the public, updated annually.</i> |

4.5.2

BRONZE:

No requirement.

SILVER, GOLD:

The operation shall extend its environmentally responsible practices beyond its direct business to engage the community. This shall include at least 50% of the employees, at least twice a year, and can be done with educational classes for children, volunteering within the community, or other similar activities or comprise of a donation to the community greater than 10% of its profits.

Comment:

Bronze should include a requirement for management to engage.

Silver should be only 1 time per year.

Gold should be 2 times per year.

The donation of 10% of profits is really excessive and will not be feasible for many restaurateurs. Consider lowering it.

Comment:

This is an area that should not be mandated by the standard. It is excessive and will not be embraced by restaurant operators.

Comment:

Silver/Gold: The operation shall extend its environmentally responsible practices beyond its direct business to engage the community. This shall include at least 50% of the employees, at least once a year, and can be done with educational classes for children, volunteering within the community, or other similar activities or comprise of a donation to the community greater than 10% of its profits..

Explanation: We felt once a year was more realistic to demand from your staff.

Response:

Community engagement is an important component to expanding the effects of any environmentally responsible operation. The requirement for gold was modified to be more aligned with business practicality.

4.5 Education - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD: Meets bronze requirements plus:</i> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>The operation shall have information accessible (e.g., web site, brochures, etc.) to customers about its environmentally and socially responsible practices in order for customers to learn about the practices that are carried out and the reasons for them.</i> | | <i>The operation shall extend its environmentally responsible practices beyond its direct business to engage the community. This shall include the employees, at least once a year, and can be done with educational classes for children, volunteering within the community, or other similar activities.</i> |

5.0 CONTINUOUS IMPROVEMENT

General comments regarding continuous improvement shall go here.

Comment:

It was unanimous to throw out the requirement that an operation must move up a level after a year under the threat to lose their certification. Achieving ANY kind of green certification is a huge accomplishment.

The requirement might be to “improve in one area of operation in each category (i.e. food, energy, water)” – again, something achievable.

Response:

This standard outlines a number of areas for an operation to set goals for environmental improvement. Certification to this standard would recognize the leaders in the marketplace, and is a significant and important accomplishment. Such recognition has shown to provide incentive for more of the market to improve and be able to compete with such leaders. This process causes continuous improvement, industry-wide. This process of continuous improvement would lead to advancement from bronze to silver in approximately three years. Further advancement, from silver to gold is more of a stretch given the capital investment necessary for such achievement.

6.0 GOLD ADDITIONAL REQUIREMENTS

General comments regarding Gold addition requirements shall be made here.

Comment:

Add: "Maintain relationships only with vendors that comply with a code of conduct that promotes the triple bottom line"

Response:

Vendor preference and code of conduct were included in other requirements.

3.7.1.1 Vendor Preference – Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <p><i>The operation shall document and show evidence of practicing a vendor policy that includes at least the following preference given to vendors that:</i></p> <ul style="list-style-type: none"> <i>• Provide environmentally-preferable products (e.g., certified products).</i> <i>• Use efficient transportation.</i> <i>• Do not require paper for ordering.</i> <i>• Provide items in bulk.</i> <i>• Take-back and reuse delivery containers, approved for commercial food use.</i> | | |

4.1.2.1 Vendor Code of Conduct - Mandatory.

| <i>BRONZE</i> | <i>SILVER</i> | <i>GOLD</i> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------|
| <i>The operation shall have a vendor code of conduct in practice that includes social and environmental guidelines and vendor preferences outlined in 3.7.1.1.</i> | | |

6.7 Innovative Resource Reduction

The operation utilizes unique or new technology or approaches to eliminate resource needs for aspects of the operation covered in this standard, such as a greywater recovery system for reuse or a heat/steam recovery for climate control or water heating.

Comment:

Innovative Credit.

There are restaurants all over the country using creative and unprecedented technologies (i.e. an organic farm rooftop – the first certified restaurant). There should be room for this in the certification to not only award those businesses but to encourage this innovation. Perhaps it could come as a form of extra credit or to compensate for other criteria un-met. A point system would allow for the additional credit.

Response:

Innovation credit has been added to the standard to provide credit for other initiatives and leadership methods not specified or covered elsewhere by other requirements.

6.8 Seasonal Menu

The operation provides seasonal food options for 60% of the menu year-round, based on cost, and determined by purchases made within 200 miles of the operation.

Comment:

Restaurants should not be told when to implement menus and to tie them to seasonality; a restaurant's menu should be the responsibility of the management based on a variety of factors, primarily those of guest appeal, cost and concept fit.

Response:

This was an option provided for gold certification, not a mandatory requirement since such an approach does need to fit the business.