

# **Guidance Document – Preventing Food Waste in the School Kitchen Setting**

## *Safety Guidelines for Child Nutrition Programs and School Kitchen Staff*

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### **Purpose**

The purpose of this document is to provide guidance on increasing waste prevention in a school kitchen/cafeteria setting, while addressing health and safety concerns related to handled, but unconsumed, food and milk products. In addition, this document will provide guidance as to how the above acts can be achieved, while also maintaining a reimbursable meal status.

### **Background – The Hillsboro School District Experience**

This document reflects a partnership between the Hillsboro School District (HSD) and both the Washington County Solid Waste & Recycling program and the Washington County Environmental Health program.

As part of a waste prevention effort during the 2011-2012 school year, the Hillsboro School District partnered with the Washington County Solid Waste & Recycling program to establish milk carton recycling at 26 of the school district's 35 schools. Presently, the HSD purchases upwards of three million milk cartons per year, equating to nearly 48 tons of material.

Under the program, county and school district staff train on-site janitorial staff and school volunteers on how to operate the comprehensive disposal/collection system, which involves (in this order):

- Kids disposing of excess milk in an available pail or bucket. All collected milk is disposed of in the kitchen/janitor mop sink area by the school's janitorial staff (never the student volunteers).
- Disposing of the empty milk carton in a lined bin.
- Placing used silverware in a bin of soapy water.
- Placing accepted recyclables (e.g., beverage and yogurt containers) in a clearly-marked "recycling only" Rubbermaid Brute container.
- Chip bags and juice pouches being placed in separate Central Collection Containers clearly marked for collection of chip bags and juice pouches destined for Terra Cycle.
- All other material being disposed in a Rubbermaid Brute container clearly marked for garbage.
- When provided, trays are placed at a drop-off window, where they are then handled by that school's kitchen staff.

The eliminating of milk cartons alone from the waste stream, in addition to the elimination of the wet weight of leftover milk, allowed HSD to decrease service pick-ups at literally all the schools visited, translating to a garbage cost savings of \$62,846 for the 2011-2012 school year.

However, based on observations gleaned from overseeing the consumption behaviors of HSD students during the rollout of the milk carton recycling program, staff noticed large amounts of edible food, as well as handled but unconsumed milk, being thrown away at many of the Hillsboro School District schools visited. Some of this disposal was unnecessary.

Additionally, inconsistent health and safety practices concerning the redistribution of handled milk products, fruits and vegetables, and pre-packaged entrees and snacks were observed by both Washington County Solid Waste & Recycling Program and Washington County Environmental Health Program staff. This is largely due to misconceptions about the health and safety requirements related to redistribution of food in school cafeterias, as well as concerns regarding the U.S. Department of Agriculture's (USDA) "Offer Versus Serve" (OVS) concept and what qualifies as a "reimbursable meal."

The following provides guidance on what food products can and cannot be redistributed in a school cafeteria

and kitchen setting. It also addresses the “Offer Versus Serve” and “reimbursable meal” concepts, with the hope that a better understanding of these two concepts will lead to less waste generation in schools located throughout Washington County.

## **REDISTRIBUTION OF FOOD IN SCHOOL CAFETERIAS**

What food products can and cannot be redistributed in a school’s cafeteria and kitchen settings?

### **Foods that “CAN” be Redistributed**

According to section § 3-306.14 (A) of the Oregon Department of Education (ODE) School Food Safety Inspection Requirements – *Returned Food and Reservice of Food* – after being served or sold and in the possession of a consumer, [non-packaged and/or prepared] food that is unused or returned by the consumer may not be offered as food for human consumption.

However, as stated under section § 3-306.14 (B) of the ODE Food Code, food that is not potentially hazardous and in an unopened original package, and maintained in sound condition, such as crackers and condiments, may be re-served or resold. This rule also applies to food that is dispensed so that it is protected from contamination and the container is closed between uses, such as a narrow-neck bottle containing ketchup or steak sauce.

As for other pre-packaged products, such as pre-packaged vegetables (e.g., carrots) and sandwiches (e.g., Smuckers Uncrustables peanut butter and jelly sandwiches), these products can also be recovered for redistribution, as long as they are not potentially hazardous. If in doubt, the packaging on a potentially hazardous product will almost always indicate whether or not a food item needs to remain refrigerated at “all times” or “after opening” (indicating the food is potentially hazardous and thus, not allowed to be re-served/resold). There is also no expiration on non-potentially hazardous foods – the food and packaging just need to remain in sound condition.

### **How to capture eligible food items**

Capturing products that are eligible for recovery can be as easy as supplying a tray to capture unopened, packaged goods, or a basket to capture packaged, unopened items, such as crackers. A basket or tray could also be used to recover fruits, such as oranges and bananas. Containers used to recover packaged, unused food items can be located in a station area where milk carton recycling is occurring.

### **Foods that “CANNOT” be Redistributed**

#### *Milk*

Once a milk product (whether it is packaged in a plastic or paper container) has left its designated refrigerated unit, it cannot be redistributed for human consumption, even if the container has been unopened. Thus, the product becomes waste.

#### *Unpackaged Foods*

Any unpackaged foods, even bakery goods in a breadbasket that are not potentially hazardous and that have been served to a consumer, but not eaten, can become vehicles for transmitting pathogenic microorganisms from the initial consumer to the next if the food is served again. These items, too, would become waste.

## **HOW “OFFER VERSUS SERVE” CAN HELP PREVENT FOOD WASTE**

Administered by The U.S. Department of Agriculture, “Offer Versus Serve” (OVS) applies to meal service and to the determination of reimbursable school meals. OVS is an option listed within the National School Lunch Program and the National School Breakfast Program infrastructure that allows students to decline certain meal options offered during both breakfast and lunch-time periods.

According to the USDA, the goals of OVS are:

- (1) To reduce food waste in the school meals programs.
- (2) To permit students choices to select the foods they prefer.

Implementing OVS for lunch is mandatory at the high school level and optional at the elementary and middle school levels. Implementing OVS for breakfast is optional at all levels. The decision of whether or not to put “Offer Versus Serve” into practice is made by a school district’s School Board. But, by offering food choices, students are more likely to eat food items they prefer, rather than throwing away unwanted food. And, as a result, OVS can save school districts money through avoided purchasing and waste disposal costs.

### **Reimbursable Meal Requirements**

According to the USDA, reimbursable meals have specific requirements based on the meal pattern . A reimbursable meal must contain a specified quantity, by grade group, for each of the food components:

- (1) Meat or meat alternate
- (2) Vegetable
- (3) Fruit
- (3) Grains
- (5) Milk

The portion size and crediting contribution toward the food components are determined by the menu planner.

### **Preventing Food Waste at Breakfast, but Maintaining Reimbursable Meal Status**

For breakfast meals offered under the National School Breakfast Program, OVS allows a student to decline one of the four food components offered in a reimbursable breakfast. These items include:

- 1 serving of juice/fruit/vegetable
- 1 serving of milk
- 2 servings of grains OR
- 2 servings of meat/meat alternate OR
- 1 serving of meat/meat alternate and 1 serving of grains OR an equivalent combination of meat/meat alternate//grains

The child must select at least three of the four components for the breakfast to be considered reimbursable.

### **Preventing Waste at Lunch, but Maintaining Reimbursable Meal Status**

For lunches offered under the National School Lunch Program, OVS allows a student to decline two of the five food components offered in conjunction with a reimbursable lunch.. These items include:

- Meat/meat alternate
- Grains
- Vegetables
- Fruit
- Milk.

At the senior high school level, the school food authority must permit students to decline up to two of the five food items. Below the senior high school level, the school food authority has the option to permit students to decline one or two of the five food items offered.

A child must select at least three of the five food components for the lunch with one of the selection being ½ cup of Fruit, ½ cup vegetable or a combination of fruits and vegetable to equal ½ cup to be considered reimbursable. Fortunately, the main entrée usually has two of the five components needed, those being meats and grains. Thus, a child has the option to select a vegetable, fruit or milk, or any combination of the three for the meal to become reimbursable.

## UNDER “OFFER VERSUS SERVE,” STUDENTS MAY DECLINE CERTAIN MENU ITEMS, INCLUDING MILK

The key to preventing unwanted milk from being thrown away, while still being in compliance with food safety regulations, is to ask the student if s/he wants it before removing it from its designated refrigerated unit. If the student declines, the unwanted milk remains in the refrigerated unit, and can be served to another student.

As previously stated, over the course of an average school year, the Hillsboro School District purchases and distributes approximately 2.5 million milk containers (roughly 48 tons) for its schools’ breakfast and lunch programs. Though the school district has a program in place to capture the post-consumer milk cartons generated, the focus should also be upstream in order to prevent unwanted milk from being thrown away. And, any effort to lessen the overall volume of liquid/container waste being generated should be welcomed by all parties involved.

### Notes:

According to the USDA, Congress authorized the use of OVS for middle/junior high schools in 1977 and for elementary schools in 1981. The statutory provision for OVS is found in Section 9(a)(3) of the Richard B. Russell National School Lunch Act. OVS was extended to the School Breakfast Program (SBP) in 1985 in Section 4(e)(2) of the Child Nutrition Act of 1966. The regulations on OVS for the NSLP are found at 7 CFR 210.10 and for the SBP at 7 CFR 220.8.

Food waste generation in the U.S. is a growing problem. According to the U.S. Environmental Protection Agency, over 34 million tons of food waste was generated in 2010, more than any other material category but paper. In fact, food waste accounted for almost 14 percent of the nation’s total municipal solid waste stream, and only 2.8 percent of the material stream was recovered in 2010. Unfortunately, the rest of the material stream, 33 million tons, was thrown away, making food waste the single largest component of municipal solid waste reaching landfills and incinerators.

According to LeanPath, a Portland-based company that provides food waste tracking systems to the hospitality, foodservice and restaurant industries, 45 percent of all waste generated by the average K-6 school is food related, with that number decreasing to 31 percent for the average middle and high school.

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For food code-related questions, please contact Washington County Environmental Health at (503) 846-8881. For recycling-related questions, please contact Washington County’s Solid Waste & Recycling program at (503) 846-8609. For school nutrition program questions, please contact your ODE CNP county specialist.

