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<https://escholarship.org/uc/item/0vt502rp>

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Publication Date

2024-08-23

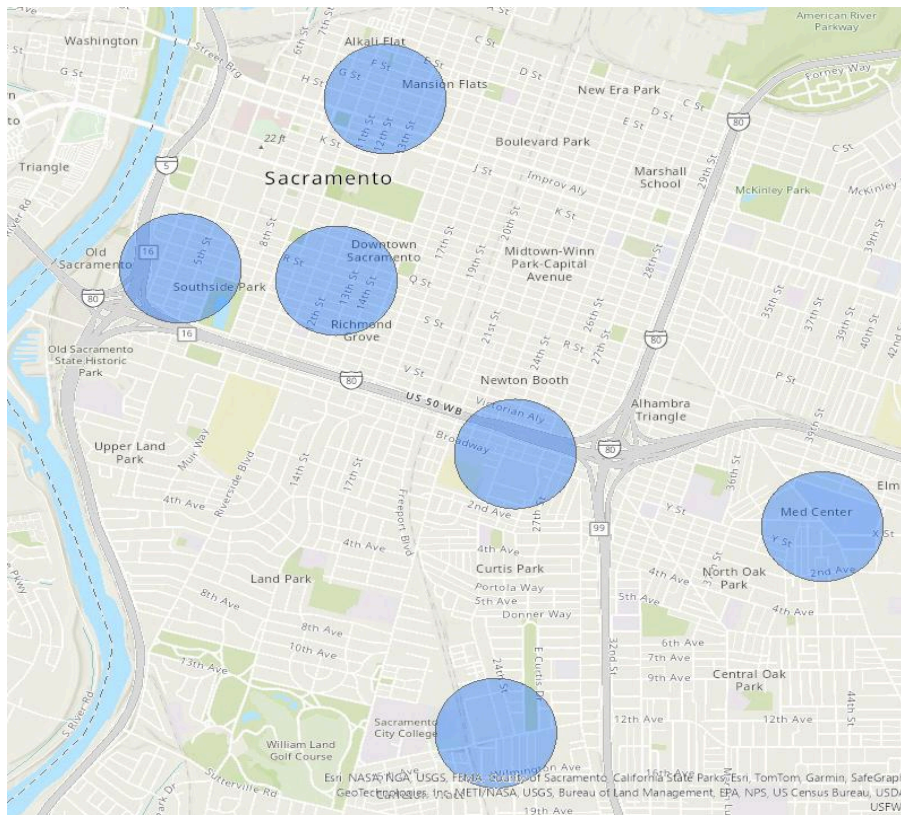
Exploring Barriers to Waste Reduction in Small Restaurants: Recommendations for CalRecycle

Executive Summary and Background

California is a leading state in Extended Producer Responsibility (EPR) laws. Despite a growing body of literature on reuse systems, few studies are California-specific and discuss local barriers to implementing reusable systems in small, independently owned restaurants. As CalRecycle implements [SB 54 \(Allen, Chapter 75, Statutes of 2022\)](#), which requires drastic waste reduction by 2032, the needs of small restaurants must be considered during the Needs Assessment process and enforcement of the law. While originally focused on plastic reduction and reusable systems, this research also covers organics and waste reduction more generally. This policy memo discusses the findings of six interviews with restaurant owners and managers in the Sacramento area, ranging from brief conversations to hour-long interviews discussing barriers to waste reduction. This memo provides recommendations for the CalRecycle SB 54 Needs Assessment, the Zero Waste Plan, and CalRecycle in general.

Research Findings

Figure 1. Neighborhoods of Restaurants Visited



Each circle contains one restaurant visited. 0.25 mile radius.

Existing Waste Reduction Efforts at Restaurants Interviewed:

Back of house:

- Seasonal ingredients and menu
- Limiting operations (small staff)
- Reach-in refrigerator as opposed to walk-in → allows staff to see all ingredients and what needs to be used up
- Running specials to use up ingredients
- Making seasonal preserves/fermentation for ingredients nearing end of shelf life
- Taking donations from local urban farmers, friends, and family
- Bringing food scraps to local farmers

Front of house:

- Using compostable serveware
- Using secondhand mugs, silverware, dishware, etc.
- Encouraging customers to bring their own cups or tumblers
 - Providing a discount
 - Offering to wash customers' reusable cups
- Encouraging customers to take used coffee grounds to use for compost
- Selling reusable bags

Main Barriers Identified:

Cost: The cost of using non-plastic food service ware (FSW) was the most prevalent reason given for either currently using plastic FSW or not being able to use alternatives. Several restaurants emphasized having slim profit margins since the pandemic. Several restaurants expressed willingness to pass additional costs onto the customer.

“You know compostable and recyclable stuff is just already expensive, so I assume the beginning stages of this implementation will make things a little bit more expensive, and it sucks but you know we have to put that cost onto the customer... So I worry you know about a little bit about that price being passed on to the customer because it will be passed on to me, but that's what has to be done. I think other people would be really upset.”

Convenience: Restaurants emphasized limiting the steps of service needed to get customers out the door as a barrier to implementing a reusable system. For example, explaining the reusable system to customers or requiring customers to use an app to track their container¹ adds steps to the transaction. Additionally, convenience for staff was also a theme, especially as some restaurants had to downsize their staff due to the pandemic.

“We changed point of sale companies once already because it was just too slow and too many buttons needed to be pushed on the register operator's side, and then on the guest

¹ Example: [Foodware To Go mobile app system](#)

side just to finish a transaction. So adding another step into the 'I'm just here to get a cup of coffee,' or 'I just want a soup and the coffee and I gotta go.' Adding another thing where technology you know their phone is involved and some kind of payment additional transaction is off-putting to most people, even though they're on their phones all day."

Customer experience: One restaurant manager said customers prefer a disposable FSW option, even for dining in, because it is easy and customers believe it is more sanitary.

Education: Several restaurants identified the need for educational efforts, for both staff and customers. For example, it is difficult to train staff how to sort waste properly. Signage for initiatives like bring your own cup has worked well for some restaurants.

Knowledge of Policy:

None of the restaurant managers and owners interviewed had heard of SB 54, though they all described themselves as personally valuing sustainability. When asked if they believed their restaurant should be completely exempt from SB 54, the majority said yes:

"Nothing the state does is realistic for small businesses."

However, the restaurant with the most existing waste reduction efforts was on the opposite side of the spectrum:

"People who don't value this kind of thing will be angry, but if they don't like it then they can close up shop, I say change or get out of the way."

While this study is focused on small restaurants, I interviewed one manager at a larger chain company for a different perspective:

"I think for [restaurant name], I think definitely we will achieve [SB 54 compliance]. Whenever something like this comes out, [restaurant name] does a really good job of kind of being on the ball to just like get it nipped in the bud before it's a problem, you know? So while I don't know if the intentions of [restaurant name] as a company is well-intentioned, I know that they will meet those requirements well before 2032, which is great."

Recommendations and Ideas

Overall, the barriers to waste reduction identified through this research are already well-documented in the current literature.² However, there are several ways CalRecycle can support small restaurants in transitioning away from single-use plastic FSW.

² Example: [How will restaurants adapt and succeed in a world without plastics?](#)

Ideas for the Zero Waste Plan:

Zero Waste Plan case studies: This policy memo recommends that CalRecycle work with the Zero Waste Plan contractor, Accenture, in developing multiple case studies specific to small and independently owned restaurants. While highlighting emerging zero waste technologies and large-scale strategies should remain a significant part of the Plan, local and community-based efforts were a theme in this research (e.g. giving food scraps to local farmers to feed to their livestock, taking donations from neighbors and family, giving away coffee grounds to be used for compost) and should be highlighted. Small businesses looking to reduce their waste can look to these case studies as a model, for both plastics and organics. Additionally, this policy memo recommends that these case studies include restaurants from a range of geographic regions in California and restaurants owned and/or managed by immigrants and people of color to increase accessibility to waste reduction initiatives.

Highlighting small companies focused on reusable systems: In addition to larger zero waste technology companies, this policy memo recommends that small companies and startups be included in the Plan. Accenture should collaborate with the SB 54 Needs Assessment Team to highlight as many small startups on their systems list as possible in order to increase awareness of smaller reusable systems.

Ideas for the SB 54 Needs Assessment Team:

Under the statute, CalRecycle must perform analyses on many different topics for inclusion in the Needs Assessment, including:

- Design of materials covered by SB 54
- Source reduction, reuse, and refill
- Collection
- Processing for recycling
- Processing for organics recycling
- Responsible end markets
- Consumer education
- Public health and environmental justice
- Funding needs and actions to meet goals

Source: <https://calrecycle.ca.gov/packaging/packaging-epr/needs-assessment/>

Provide clarity on producer exemptions based on size: Pursuant to PRC § 42060(a)(5), CalRecycle shall establish a process to exempt producers based on size. Specifically, it exempts producers, retailers, and wholesalers that, in the most recent calendar year, had

gross sales of less than one million dollars in the state.³ While it is likely that many small restaurants will be exempt from producer status due to gross annual sales of less than one million dollars, this policy memo recommends that the Needs Assessment Team discuss whether a Producer Responsibility Organization (PRO) specific to small restaurants is necessary.

Provide guidance and best practices for PRO outreach to small restaurants: As the Needs Assessment Team outlines requirements for PRO plans related to environmental justice, best practices for outreach to small restaurants should also be outlined. For example, ensuring language accessibility in outreach materials, conducting in-person outreach during slower business hours, and having one-on-one conversations with stakeholders should be requirements outlined in CalRecycle's oversight of PROs.

Create a compliance certification system for small businesses: One restaurant owner interviewed mentioned that educating customers on SB 54 could be helpful. For example, restaurants could display a sign or poster indicating that they are SB 54 compliant or include links to educational materials on their websites. This restaurant owner indicated that showing compliance with SB 54 could be helpful for businesses, as customers also value sustainability and waste reduction. CalRecycle could create a formal certification system for small businesses that would allow them to advertise their sustainability values in their branding.

Areas for Further Research and Discussion

Many studies show a disconnect between valuing sustainability and actually practicing sustainability strategies.⁴ It is clear that this theme is also true in waste reduction for small restaurants specifically, as everyone interviewed described themselves as valuing sustainability and was very open to speaking with me despite a range of waste reduction efforts actually in place. In addition to the recommendations outlined above, further research should explore outreach to harder-to-reach small restaurants, such as restaurants owned by immigrants, family-owned restaurants, and restaurants where English is not the dominant language spoken in both front and back of house. This research will further ensure that no one is left behind in California's zero waste transition, as outlined in CalRecycle's commitment to environmental justice.⁵

³ <https://www2.calrecycle.ca.gov/Docs/Web/123864>

⁴ Example: [Tackling the plastic problem: A review on perceptions, behaviors, and interventions](#)

⁵ <https://calrecycle.ca.gov/envjustice/>