Appendix I

Consultation Feedback Details for Proposed Food Service Establishment Environmental Code of Practice

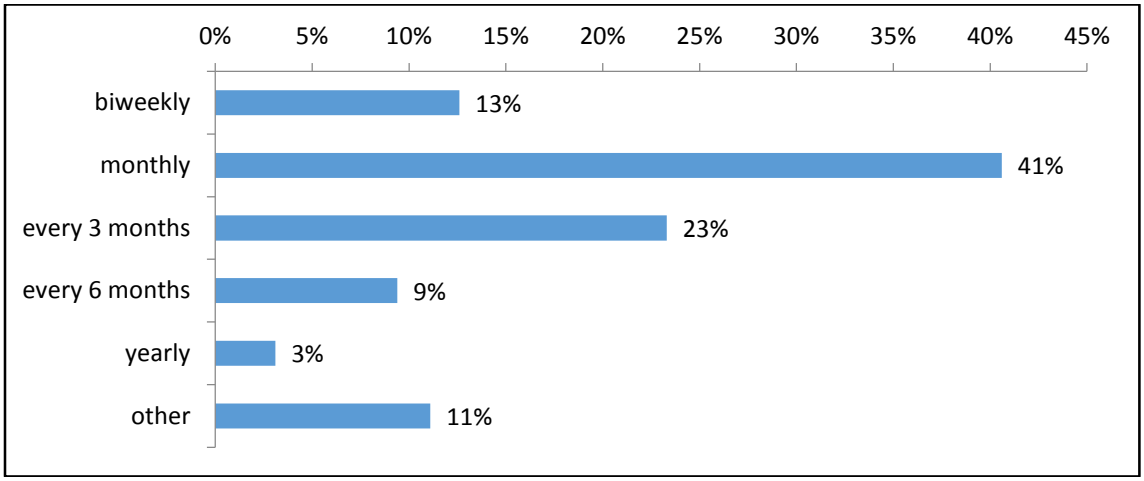
Survey Results

Nearly 800 paper surveys received provided valuable information regarding current practices and the need for an educational component due to the high-level of turn-over in the food service establishment (FSE) industry. Of the 800 responses, 88% have a grease interceptor in their food premise and a little over half (58%) currently clean their grease interceptor(s) within one month (13% clean biweekly, 41% clean monthly and 4% clean weekly or every 3 weeks). Majority (89%) decide when to clean their grease interceptor(s) by using a preplanned schedule and 75% use a Ministry of the Environment and Climate Change (MOECC) certified waste carrier to perform the clean-out. Additionally, it was discovered that approximately two thirds (63%) are aware of the CSA Standard B481. Comments consisted of numerous FSEs providing reasons for not requiring a grease interceptor such as; they have a small operation, they do not fry food or produce grease, there is limited space, it is too costly and they are not aware of the requirement.

Highlights:

- 10% response rate (approximately 800)
- 88% of food service establishment owners/operators have a grease interceptor in the food premise
- 58% clean their grease interceptor within one month (13% clean biweekly, 41% monthly and 4% of "other responses" clean weekly or every 3 weeks) (see below graph)
- 75% use a MOECC certified waste carrier to maintain the grease interceptor and 20% self-clean
- 89% are proactive by using a pre-planned schedule to clean the grease interceptor
- 75% do not use bacterial and/or enzyme products in the grease interceptor
- 63% are aware of the CSA Standard B481Series-12 Grease Interceptors
- 15% have experienced sewage blockages at the food service establishment
- 39% chose email as the preferred communication method and 61% chose regular mail

Figure 1: Responses Regarding Frequency of Grease Interceptor Cleaning Practiced at Food Service Establishments



Comments:

Reasons for not having a Grease Interceptor

"There has never been one in this pre-existing restaurant space. It's an old house converted into a restaurant years before us and I'm not sure if there is space for a trap."
"No fat, oil or grease produced on premises - we brew coffee and sell product baked off-site."

"No food manufacturing is conducted on site. All food items are prepared offsite. Only assembly of some items conducted (E.g. Sandwiches)"

"When we purchased (2013) the restaurant, it didn't have it. When we learned about the grease trap we didn't know who to contact and/or approximate cost of the installation and also we hadn't budgeted for it."

General Comments on Proposed Environmental Code of Practice

"My 30 years in the industry means that I understand that standard. But a lot of new restaurant owners do not know why this needs to be in place at their business - City needs to educate operators. Also you need to inform home owners because they dump oil down the drains."

"We have already switched to an environmental grease interceptor system few years ago and it worked well. It was very expensive the initial payment, but save on maintenance cost in the long term and very green."

"It is very good to have grease cleaning requirements. However, you should also consider small healthy food companies that hardly use fat/oil, especially my food shop where we have green bin to capture food waste, grease (if any) waste. To demand small companies to cleanup grease is adding unnecessary financial burden. Please consider."

Industry Feedback

Food service establishment (FSE) stakeholders generally expressed concern with the FSE Environmental Code of Practice, particularly regarding:

- the frequency of clean-outs mandated by the CSA Standard B481 of every 4 weeks, minimum
- the requirement for every FSE to have a grease interceptor no matter the size of the facility or scale of operation
- the requirement to have a MOECC certified waste carrier to conduct clean-outs
- the cost associated with acquiring and installing a grease interceptor and the more frequent clean-out

To accommodate some of the concerns expressed by stakeholders Toronto Water modified the FSE Environmental Code of Practice in the following manner:

- new installations triggered by a significant change in operation (e.g. expansion, remodeling), new businesses, new buildings and any existing grease interceptors causing negative effects on a sewer line, by interfering with water flow or drainage, require a Toronto Building permit (incorporating the most recent Ontario Building Code (OBC) requirements) but must also be accessible for maintenance and inspection

- all existing FSEs (not causing a negative effect) will be required to follow the maintenance practices but will not be required to upgrade to more current OBC requirements as previous requirements will be accepted
- the service requirement of every 4 weeks will apply, unless the volume of grease and solids does not exceed 25% of the liquid in the interceptor (within the 4 week period), then service must occur when the 25% volume is reached and no later than 8 weeks, however proof that the 25% was not reached at 4 weeks must be kept on site (e.g. pictures)
- the manual clean-out of the grease interceptor is permitted for FSEs without onsite stove or fryer but
    - weekly bail-outs and monthly vacuuming must occur;
    - proof of maintenance and log sheets shall be kept on site; and
    - installation of a manhole (or alternative device approved by the General Manager) may also be required.

Regarding the cost of installing and maintaining a grease interceptor, Toronto Water consulted with the grease interceptor manufacturers and found that on average, average sized grease interceptors, ranging from 7GPM (gallons per minute) to 50 GPM, cost between $350 to $600 for the unit, depending on size and approximately $1,800 to $2,500 to install, depending on the type of installation (under the sink or in-ground). Installation is a one-time expense. A reoccurring expense is the clean-out, which cost on average $70 to $150, depending on the volume removed. A monthly clean-out schedule would cost $840 to $1,800, yearly. Depending on the FSEs current maintenance schedule of the grease interceptor (according to the survey 58% perform clean-outs within the month), this cost may be increased but all FSEs were already mandated to have grease interceptors installed, hence this cost is not considered a new cost. Further, it is well known in this sector that an emergency plumbing call for a grease blocked sewage line on the private side would be very expensive and Toronto's approach to the grease issue is prevention and mitigation according to a set schedule of maintenance.

The Ontario Restaurant Hotel and Motel Association (ORHMA) "is supportive of the proposed recommendation in creating a Code of Practice as long as it stays voluntary" and "is supportive of complying with the CSA Standard in the sewers By-law strictly for new build or ones undertaking extensive plumbing system renovation projects (Table 1). Exemption (grandfathering) must be made for existing business not meeting the desired standard." The CSA Standard B481was incorporated into the Ontario Building Code and made effective January 1, 2014 and this FSE Environmental Code or Practice (and associated by-law amendments) will align the Sewers By-law with the Ontario Building Code.

Additionally, the current Sewers By-law requires that every restaurant or other industrial, commercial or institutional premises where food is cooked, processed or prepared shall install, operate and properly maintain a grease interceptor, hence any businesses that fall into this category are already mandated to have a grease interceptor and to properly maintain it. The CSA Standard, which is referenced in the FSE Environmental Code of Practice, provides maintenance guidelines to standardize the existing Sewers By-law requirements for grease interceptor maintenance.

The Toronto Association of Business Improvement Areas (TABIA) supports the concept but has concerns that all restaurants are being lumped into one group (small and large-scale operations)

and wishes to work with Toronto Water on education though training sessions. The Building Owners and Managers Association (BOMA) invited Toronto Water to present the prosed FSE Environmental Code of Practice at their March 2015 BOMA Breakfast Session and also asked for workshops detailing the requirements being asked of the food sector.

Table 1: Ontario Restaurant Hotel and Motel Association (ORHMA) Recommendations and Toronto Water Responses

ORHMA Recommendation	Toronto Water Response
'The ORHMA is supportive of the proposed recommendation in creating a Code of Practice as long as it stays voluntary.'	The CSA Standard B481Series-12 Grease Interceptors was incorporated into the Ontario Building Code and made effective January 1, 2014. The Sewers Bylaw will be aligned to the Ontario Building Code with respect to grease interceptor sizing and installation. For your reference, the Sewers Bylaw, Chapter 681 of the Municipal Code can be found at http://www.toronto.ca/legdocs/bylaws/lawmcode.htm and the Ontario Building Code at http://www.elaws.gov.on.ca/html/regs/english/elaws_regs_120332_e.htm. Section 10 of the Sewers Bylaw states that every owner or operator of a restaurant or other industrial, commercial or institutional premises where food is cooked, processed or prepared shall install, operate and properly maintain a grease interceptor, hence any businesses that fall into this category are already mandated to have a grease interceptor and to properly maintain it. The CSA Standard provides maintenance guidelines to standardize the existing Sewers Bylaw requirements for grease interceptors and its maintenance. Other municipalities that have enacted the CSA Standard in their Bylaws include, but not limited to, York Region, Markham, Durham, Hamilton and Brantford.
'The ORHMA is supportive of complying with the CSA standards in the sewers By-law strictly for new build or ones undertaking extensive plumbing system renovation projects. Exemption (grandfathering) must be made for existing business not meeting the desired standard.'	The sizing and installation component of the CSA Standard will be made mandatory for new businesses, new installations and new buildings to align with the Ontario Building Code. City inspectors that come across food service establishments without grease interceptors will require the grease interceptor be installed with proof of Building Permit being applied, obtained and final approval granted for Permit closure. Additionally, if City inspectors determine a grease problem to the City sewer system is occurring or exists, the City may require additional action up to and including the installation of a new grease interceptor, under a Building Permit. The maintenance component of the CSA Standard will apply to existing and new businesses, installations and buildings.
'We call for the City of Toronto to work with the ORHMA in analyzing and testing natural bacteria products which are “enzyme free” offering positive results. We have done much testing work in this area	The City recommends that the ORHMA should present its findings on enzyme free products to the CSA Technical Committee on Drains and Interceptors. The City of Toronto did not establish the CSA Standard and is incorporating the Standard to align the Sewers Bylaw with the Ontario Building Code and protect the City's sewer infrastructure from damage and blockages. Additionally, the Province of Ontario did not create the CSA Standard however it found merit in incorporating the

realizing the issues approaching the industry.'	CSA Standard for Grease Interceptors within the Ontario Building Code.
'We believe that a campaign geared at industry training combined with research to validate a grease trap product that works will add considerable improvements to the City's sewage system.'	The City would welcome the opportunity to work on outreach materials for ORHMA members and the food service industry as a whole. Please note that the City does not nor cannot recommend products. Any new information related to grease interceptor products or ancillary products should be addressed through the CSA Technical Committee on Drains and Interceptors.

Education

The topic of education arose throughout the consultation (i.e. in the survey comments, at the meetings and in the ORHMA recommendations). Particularly, ORHMA requested an education piece with a check list of tips that can be posted in kitchen areas. Toronto Water revised its current grease interceptor education piece to include the requested check list and sent it out during the consultation process with the update packages in May to over 7,000 FSEs. Due to this educational piece, Toronto Water received more calls/emails about the current grease interceptor requirements than the proposed FSE Environmental Code of Practice.

The revised grease interceptor education piece, titled "Grease Traps – Helping Restaurants and Food Service Establishment Owners Protect Properties, Businesses, Public Health and the Environment" can be found:
http://www1.toronto.ca/City%20Of%20Toronto/Toronto%20Water/Files/pdf/EMP%20folder/A1502321_GreaseTrap_Web%20FINAL.pdf

During the consultation, it was realized that mobile food vendors and the festivals they participate in needed to be included but treated differently due to their mobile nature. Toronto Water met with Toronto Public Health (TPH) to clarify the operational requirements of mobile food vendors from a public health perspective and the proper wastewater disposal options from a Sewers By-law perspective, particularly regarding grease.

Meetings with Exhibition Place and the Canadian National Exhibition (CNE) also took place to walk-through the process involved in setting-up and operating large-scale festivals and to review the proper wastewater disposal options available to mobile food vendors and festival organizers. It was identified that an educational component was needed specifically for this audience and the "Proper Disposal of Wastewater for All Mobile Food Vendors" education piece was developed and circulated to TPH to include in their routine food truck inspections and to Economic Development, Parks, Forestry and Recreation, Transportation Services, Exhibition Place and the CNE to communicate with festival organizers when completing the required application forms to conduct festivals on public property. The proper disposal options provided include:

- bringing wastewater to a home base where a grease interceptor is attached to an indoor sink/drain
- install a grease interceptor in the mobile food truck (recommended for operations that produce large volumes of grease)
- dispose of food solids and grease in a green bin and/or oil bin that is on site

- bring utensils/containers to a designated wash area that is connected to a grease interceptor (more applicable to large-scale festivals)

The newly created mobile food vendor education piece, titled "Proper Disposal of Wastewater for All Mobile Food Vendors" can be found: http://www1.toronto.ca/City%20Of%20Toronto/Toronto%20Water/Files/pdf/EMP%20folder/A1502803_MobileFoodTruckDisposal-WebFinal.pdf