

Assessment Tips

The [Real Food Guide](#) will be your central reference tool for researching whether a product qualifies as Real Food. This document outlines helpful tips as you go through the research process.

The first question to ask is: *Do you have reason to believe this product could qualify as Real Food?*

Possible reasons include:

- a. The product carries a third party certification
- b. The vendor is regionally based
- c. The product is advertised as sustainable
- d. Dining staff have suggested that the product may qualify as Real Food

If you think this product *could* qualify as Real Food, it's time to start researching! Here are a few guiding questions:

1. ***Does the product come from a farm or business in your area? Does the product come from a regional distributor?*** If so, look to the criteria for Local & Community Based products.
2. ***Does the product carry a third-party certification?*** If so, look to the list of certifications recognized as Fair, Ecologically Sound, and Humane.
3. ***Does the product meet any of the disqualifying characteristics?*** If so, the product cannot qualify as Real Food (unless certified through a worker-driven social responsibility program)



LOCAL & COMMUNITY BASED

Tip #1: Products that cannot be grown locally cannot qualify as Local & Community Based. *This means that coffee cannot qualify even if it is locally roasted!*

Tip #2: Check distance first! This should be the easiest criteria to research, and can indicate whether it's necessary to research the other criteria

Tip #3: Be sure to check for Disqualifiers! Even local farms and businesses can be considered CAFOs, use GMOs (especially zucchini and summer squash), or have Labor Violations.

How do I determine distance?

Distance refers to the driving distance between your institution and the location of the producer, processor, or distributor. You can use a mapping software (i.e. Google Maps) to estimate the driving distance. In order to determine distance, you will need to be able to identify the

How do I determine private or cooperative ownership?

Try an online search for the producer name and see if there are any hits on the search results that connect it to a multinational food corporation. Is the vendor connected to a large parent or family company? If the online search does not yield any clear results, search the vendor's website for details regarding its ownership status. If the ownership status is not clearly stated on the website, search for any contact information to reach the vendor directly.

How do I determine size?

Most small local operations will be under the revenue caps. If you have reason to believe that it is a medium to large farm or business, there are a few different ways to check. You can google the company and see if they have released any recent reports including revenue. You can research the company on www.manta.com, a small business directory that often lists the estimated revenue of small farms and businesses. If either of those searches reveal a number close to the revenue caps, or if you cannot find any information online, call the business and ask them directly.

What are examples of a single-ingredient and multi-ingredient products?

Single-Ingredient: *Whole apples, sliced carrots, fluid milk, fish, eggs, beef*

Multi-Ingredient: *Bread, cookies, ice cream*

What does it mean for a product to be aggregated?

This means that the product comes from multiple producers and is processed or sold together. Examples include milk sourced from more than one dairy farm, vegetables aggregated from multiple farms through a cooperative, and fish coming from many small boats.



FAIR

Tip #1: First, check for any third party certifications that are recognized in the Guide! They will likely advertise these certifications on their packaging or their website.

Tip #2: Common products that are sourced internationally and may carry fair trade certifications include coffee, tea, bananas, and chocolate

Tip #3: If you are looking at tomatoes and your campus is contracted through Aramark, Sodexo, Chartwells or Bon Appétit, the tomatoes may be certified by the Fair Food Program! Check whether the tomatoes are coming from Florida, which would mean that they must come from farms participating in the program.

Tip #4: Fairtrade America licenses the use of the fairtrade mark by the Fair Labeling Organization (FLO). If you come across a product that is certified by Fairtrade America, you should mark them as Fairtrade International Certified by Fair Labeling Organization.

Tip #5: Remember that Worker-Driven Social Responsibility Programs are exempt from Disqualifiers! **Note:** *If workers are actively organizing around a Disqualifier (e.g. Labor Violations), then the exemption no longer applies.*

ECOLOGICALLY SOUND

Tip #1: First, check for any third party certifications that are recognized in the Guide! They will likely advertise these certifications on their packaging or their website.

Tip #2: Remember that only wild-caught seafood can count as real food!

Tip #3: If you are looking to the Marine Stewardship Council Blue Eco Label, make sure that your distributor and your campus carries the Chain of Custody certification.

Tip #4: Reaching out to producers and distributors that commonly provide an institution with goods can often speed up the researching process. Companies may use different codes to label their organic and ecologically sound products within their invoices. It may also be worthwhile to see if distributors know of any unlabeled products to which real food certifications apply!

Tip #5: Be sure to check for the presence of Disqualifier, especially Labor Violations

HUMANE

Tip #1: Check for any third party certifications that are recognized in the Guide! They will likely advertise these certifications on their packaging or their website.

Tip #2: You can use the certifier's website to track down farmers and producers that carry their certification.



Egregious Human Rights Violations

Tip #1: Google the company! Criminal charges of forced labor are fairly unusual, so you should not have to do more than an initial online search to identify them.

Labor Violations

Tip #1: Google the company! These labor issues are fairly unusual, so you should not have to do more than an initial online search to identify them.

Tip #2: Remember that this standard does not disqualify “accidental” or “other” violations; it only pertains to “willful, repeat, and serious OSHA violations.” Look here for a definition!

<https://www.osha.gov/Publications/fedrites.html>.

Tip #3: If an OSHA violation is suspected, it is important to research more:

- OSHA citations can be found in the [“Establishment Search”](#) section of the OSHA’s website by typing in the name of the company and looking for violations in the column labeled “vio.”

Tip #4: If the producer **has under three OSHA or NLRA violations**, then there is an opportunity for them to still count as real. You will need to dig deeper using these databases:

- OSHA: Search the case in the database above. If the producer has under three “repeat, willful, or serious violations” click on each case.
 - If there is no case to click on (informal settlement) then they are disqualified.
- NLRB: Cases and settlements can be found under the [“Cases and Decisions”](#) tab on the NLRB website in PDF Format.
 - a. Settlements found for a company under any of the following three disqualify a producer: [“Board Decisions.”](#) [“Unpublished Board Decisions.”](#) or [“Administrative Judge Decisions.”](#)
 - b. Read the case to see if the worker was paid back wages (if applicable), the problem was resolved, and proper fines were paid.
 - If all above is completed, they count as “Real.”
 - If this information cannot be found, they are disqualified.

Tip #5: Wage theft violations would most commonly be found as an NLRB violation, while worker fatalities would be flagged under OSHA violations



Concentrated Animal Feeding Operations (CAFOs)

Overview

1. If a farm is permitted as a CAFO (by the EPA or a state-designated equivalent), then it will be disqualified *unless the farm can prove that it has not had a discharge within the past 3 years.
2. If a farm meets the criteria for a CAFO and has had a discharge within the past 3 years, but does not carry a permit, then it will be disqualified.
3. In the case of dairy that has been aggregated: If the average farm size is less than 200 cows, the dairy will not be disqualified regardless of CAFO designation.

Tip #1: Farms are subject to both federal and state CAFO permitting regulations and laws. A comprehensive breakdown of how AFOs (animal feeding operations) and CAFOs are defined at the federal level can be found [here](#).

How do I know if the farm is permitted as a CAFO?

Most state permitting authorities will either make this information public through a database (which allows you to search for certain farms often by county) or will respond to information requests if you call or email your state permitting authority.

- In order to find out more about the CAFO laws and permitting process in your particular state, try searching "insert state name CAFO permit"; this should ideally direct you to the webpage for whatever governing body deals with CAFO permitting in your state. If you have questions beyond the scope of the information available to you on their website, the next recommend step is calling or emailing this office with any specific questions.
- Finding databases: Start by googling "state name here CAFO database". If this doesn't work, try calling or emailing the contact provided on your state website.
- If there isn't an online database: call or email your state permitting authority and ask them if they will tell you whether or not a certain farm is permitted as a CAFO.

How do I know if the farm has had a discharge within the past 3 years?

Contact your state permitting authority and ask if the farm is recorded as having had a discharge within the past 3 years. You can also contact the farm directly.

How do I know if the dairy is aggregated from farms with an average of 200 cows or less?

The first step is to figure out if a product is sourced from a dairy aggregator. This means that the dairy is coming from multiple farms. You can usually determine this by looking at their website. If the dairy is not aggregated, then they are subject to the CAFO disqualifier and must be researched accordingly.

If the dairy is sourced from an aggregator, then the next step is to determine the average size of their farms. Try contacting the dairy directly, either by phone or email. Below is a template for a phone call/email. If the answer is "yes," that the average farm size is fewer than 200 cows, then it will not be disqualified.

Dear _____/To whom it may concern,

My name is [insert name] and I'm a student researcher at [insert name of school conducting research] on my school's food purchasing so that my institution can work with more local, sustainable, and ethical producers. I am inquiring about the size of your dairy farms, and would appreciate if you would be willing to tell me the average size of your farms. If you know off the top of your head that the number is fewer than 200 cows, then that's all the information I need. If not, then I would be grateful if you would be able to get back to me about this.

Thanks so much!



Genetically Modified Organisms (GMOs)

Overview:

Research on GMOs can be exhaustive, so only consider researching this disqualifier for products you think may qualify in one of the four real food categories. As a reminder, many of the ingredients derived from GM crops are used in very small quantities. It is not the goal of this disqualifier to discourage purchasing from producers because they use a minute amount of GM soy lecithin in their product, for example.

Disqualify a product if it contains one of the following ingredients (typically used in larger quantities), and is not listed as organic or non-GMO:

- Corn: whole corn, corn flour, corn meal, corn starch, corn syrup, vegetable oil (often a blend of soy, corn and/or canola)
- Soy: whole soy, soy flour, soy sauce, tamari, tofu, soy protein isolates, textured vegetable protein (TVP)
- Sugar: (this may come from GMO beets, unless the product specifies using “cane sugar,” “evaporated cane juice” or “palm sugar”)
- Rapeseed: Canola oil, rapeseed oil
- Papaya
- Summer squash

Tip #1: If the product has an ecologically sound certification OR a Non-GMO project project verified label, then you can assume that they are not genetically modified (all of these certifications do not allow GM products)!

Ultra-Processed Foods

Tip #1: Look at the product’s ingredient list to see if any of the ingredients below are included. You can typically find product ingredient lists through an internet search.

Disqualified ingredients: *Aspartame; Butylated hydroxyanisole (BHA); Butylated hydroxytoluene (BHT); Caramel coloring; Partially hydrogenated oil (trans-fats); Potassium bromate; Propyl gallate; rBGH/rBST; Saccharin; Sodium nitrate added, Sodium nitrite added; Dyes: Red #3, Red #40, Yellow #5, Yellow #6*



Certifications that are not in the Real Food Guide:

The following certifications and label claims have been researched for consideration in the Real Food Guide. While many of them represent a step in the right direction, they are not sufficient to qualify a product as Real Food. **If you have questions about a certification that is not in the Real Food Guide and is not in the list below, contact calculator@realfoodchallenge.org.**

- Cage Free by USDA-AMS
- Certified Naturally Grown
- Certified Responsible Antibiotic Use (CRAU)
- Certified Wildlife Friendly
- Eco Apple
- Eco Peach
- (World) Fair trade organization mark
- "Free range" by USDA-FSIS (poultry)
- "Free roaming" by USDA-FSIS (poultry)
- *Friend of the Earth*
- "Gestation Crate Free (hogs)
- Global Animal Partnership Steps 1 & 2
- "GM Free"
- "GMO Free"
- *Good Agricultural Practices (GAP Certified)* by USDA
- "Grass fed" by USDA-FSIS (ruminants)
- *Green Tick*
- Monterey Bay Aquarium Seafood Watch Guide "Avoid"
- Monterey Bay Aquarium Seafood Watch Guide "Good Alternatives"
- "Natural"
- "Naturally Raised" by USDA-FSIS
- "Never Ever 3"
- "No Antibiotics Administered"
- "Non-GMO Project Verified"
- *Process-Verified Grassfed* by USDA-FSIS
- "Raised without Antibiotics"
- "rBGH-free / rBST-free" by FDA (dairy)
- "Soil Association Ethical Trade" {Soil Association Organic}
- *Starbucks C.A.F.E. Practices*

