

Spring 2020

# Real Food Challenge

## University of North Carolina at Chapel Hill

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## Introduction

**Peter Cohen, Andrew Montross, Daniel Yoon, Carl Hilbrands**

UNC's campus food system allows us to better understand the connections between production, distribution, consumption and sustainability. The Real Food Challenge is a national organization that provides institutions with tools and strategies that support and promote the development of real food systems. Carolina Dining Services has made the commitment to using twenty percent of its budget to purchase local & community based, fair, ecologically sound, and humane food sources -- what real food is. Real food has a concern for producers, consumers, communities, and the earth.

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## **I. Executive Summary**

The purpose of the Real Food Calculator (RFC) is to track, and ultimately increase the percentage of “real food” in Carolina Dining Halls. Real Food, according to RFC, is defined as food that is local and community based, fair, ecologically sound, and humane. After our semester-long audit, we found that UNC purchased 21.40 percent real food for the month of September 2019, meeting their goal of twenty percent..

## **II. Real Food Challenge (RFC) and Internship Overview**

The Real Food Calculator Challenge was created in 2008 when they launched their first campaign. It set out to build fair and sustainable food systems at colleges and universities. Their goal was to end higher education’s support of Big Food corporations and white supremacy in the food system, as well as to direct efforts and energy towards food sovereignty. RFC trains, educates, and supports students from different schools to encourage the shift to create a healthier, more fair, and more sustainable food system. Below we have defined each of the categories based on RFC standards. Please refer to the appendix for more details.

- 1) Local and Community based foods can be traced back to nearby farms, ranches, boats, and businesses that are locally-owned and operated.
- 2) Fair foods ensure that individuals involved in the production work in safe and fair conditions, receive fair compensation, are ensured the right to organize and the right to a grievance process while having an equal opportunity for employment.
- 3) Ecologically sound foods ensure that farms, ranches, boats and other operations involved with food production practice environmental stewardship that conserves biodiversity and ecosystem resilience. This will preserve natural resources, including energy, wildlife, water, air, and soil. Production practices should minimize toxic

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substances, greenhouse gas emissions, natural resource depletion and environmental degradation.

- 4) Humane foods make sure that animals have their mental, physical and behavioral needs met in a low-stress environment and throughout their lives are only administered drugs for treatment of diagnosed illness or disease.

There are some immediate disqualifiers to real food and a few are listed below. If a producer commits any of these violations, their products cannot be counted as real food, regardless of meeting any other criteria.

- 1) Human rights violations such as forced labor
- 2) Labor violations such that the producer has been found guilty or has been cited for three or more cases relating to serious, repeat, or willful Occupational Safety and Health Administration (OSHA), National Labor Relations Board (NLRB), or Fair Labor Standards (FLSA) violations within the last three years.
- 3) Concentrated Animal Feeding Operations (CAFOs) with an exception
- 4) Genetically modified organisms (GMOs)
- 5) Ultra-processed food

Throughout the semester, we analyzed every vendors' websites and reached out to farmers and owners via email and phone. In the end, we concluded that CDS purchased 21.40 percent real food for the month of September 2019. This percentage may not be entirely accurate due to sources of error that we will later describe as well as difficulties and challenges that we faced with gathering the information.

### **III. Importance of RFC in Carolina Dining**

The Real Food Calculator Internship is used to verify that Carolina Dining Services (CDS) meets its commitment of purchasing twenty percent real food. Every semester, CDS completes their own real food audit for every month so the interns serve to verify their audit to ensure that CDS is meeting that percentage. Given an entire semester, interns are

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able to research information that may be difficult and more time consuming. The interns also serve as liaisons between the national Real Food Challenge organization and CDS.

This internship ensures that the university upholds its commitment to purchasing a substantial percentage of real food. The challenge as a whole strives to push university spending to food that is more equitable and sustainable. As a large, visible, public university, UNC can influence the food system with their purchases. RFC is student-driven as students are increasingly becoming more aware of what they are eating and are demanding that dining halls serve more real food.

#### **IV. Calculator Methodology**

Our research this semester took place beginning from the last week of January until April 2020. CDS provided us with all the information of food purchases from September 2019. They gave us redacted invoices of every purchase made during the month of September via digital files and physical receipts.

To begin our research, we uploaded all of the purchases into one spreadsheet. Each food was described into one row while each row contained headers for the following categories: item name, category, product code, product code type, label/brand, vendor, calculator rating version, along with columns that indicate whether or not they were local, ecologically sound, humane, fair or automatically disqualified. Once we had all of our data into one spreadsheet, we began going through each product to see if it met any of the real food categories. In order to qualify as real food, it needed to meet one of the four categories. For some purchases, we could immediately disqualify the items because they were ultra-processed. Some purchases were not so easy to determine, and required significant research on our end to see if it held any certifications. Information for many of the purchases were hard to find. Foods that had no label or brand were especially hard to research as we had to personally reach out to the vendors to see if they could provide us with the information we needed.

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To determine if the product qualified as real food, we had to research each of the real food categories (local, ecologically sound, humane and fair). We looked at ingredient lists and vendor and company websites. Understanding the origin of some products proved to be very difficult as vendors had to research their own supply chain.

After compiling the spreadsheet, we had to figure out what percentage of the CDS budget was spent on real food. We had to break things down by category, to see if there were any areas that they could easily increase their spending on real food.

## V. Final Results

Figure 1

<b>Type of Food</b>	<b>Amount Spent</b>	<b>Percentage of Total Food Purchased</b>
Conventional	\$ 779,281.69	78.60%
Real Food A	\$ 37,113.37	3.74%
Real Food B	\$ 175,108.14	17.66%
Total	\$ 991,503.20	100%

Figure 1. Total amount spent and percentage of the total for each type of food (conventional, Real Food A, and Real Food B).

Figure 2

Food Type	Total Spent	% of Total	\$ Spent on RF	% of RF Total
Eggs	\$ 44,365.02	4.47%	\$ 42,918.20	20.22%
Baked	\$ 37,772.83	3.81%	\$ -	0.00%
Dairy	\$ 117,957.79	11.90%	\$ 2,505.30	1.18%
Meat	\$ 171,626.30	17.31%	\$ 15,333.67	7.23%
Poultry	\$ 80,672.81	8.14%	\$ 75,535.70	35.60%
Fish	\$ 67,415.73	6.80%	\$ 44,418.27	20.93%
Produce	\$ 257,695.94	25.99%	\$ 10,038.29	4.73%
Tea and Coffee	\$ 11,805.52	1.19%	\$ 10,427.92	4.91%
Grocery	\$ 196,020.18	19.77%	\$ 11,044.02	5.20%
Beverages	\$ 6110.85	.62%	\$ -	0.00%

Figure 2. Total amount of food type purchased compared to amount of real food purchased per food type.

Figure 3

Type of Food	Percentage of Total Real Food



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Eggs	20.22%
Baked	0.00%
Dairy	1.18%
Meat	7.23%
Poultry	35.60%
Fish	20.93%
Produce	4.73%
Tea and Coffee	4.91%
Grocery	5.20%
Beverages	0.00%

Figure 3. The percentage of each type of real food that was purchased (no conventional food purchases included). The percentage is calculated from the total amount of real food purchased.

Figure 4

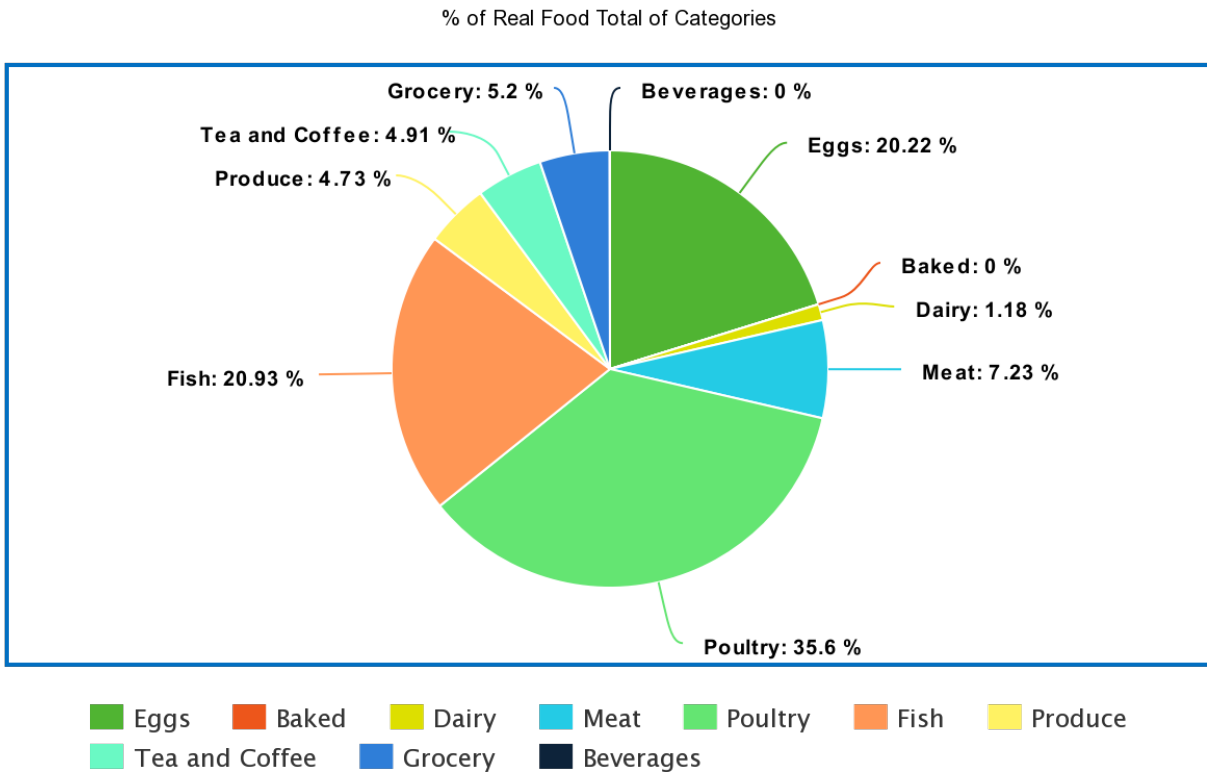
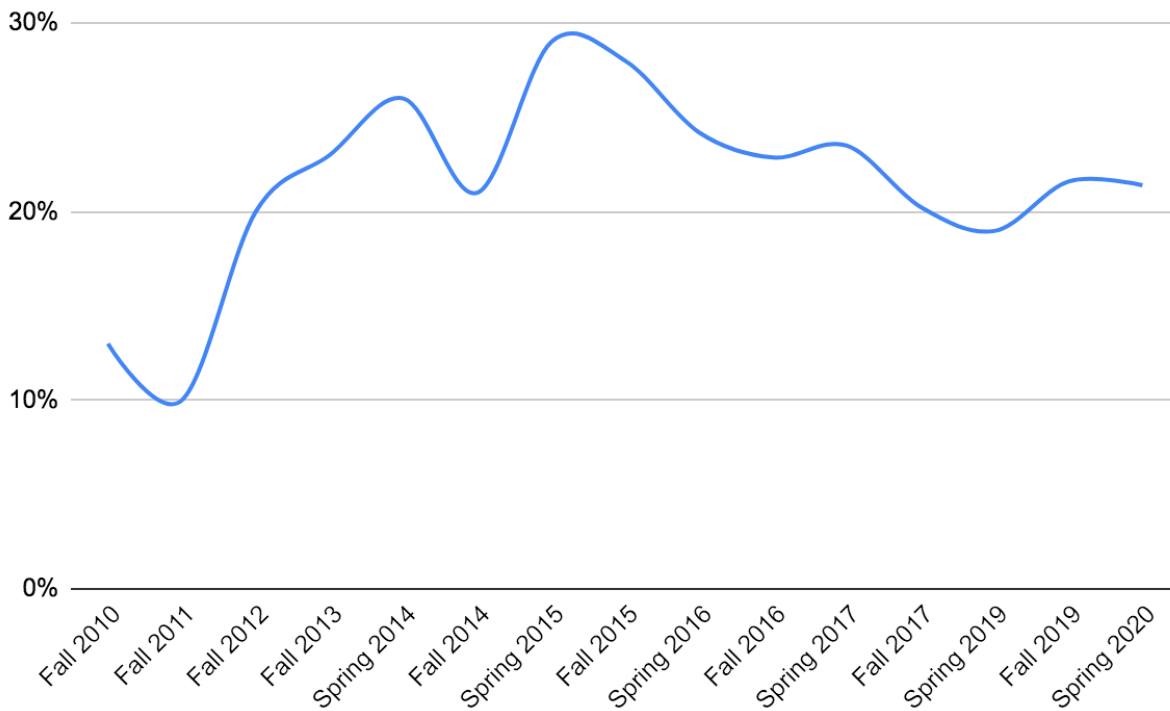


Figure 4. Graphical representation of real food purchases. The percentage of each type of food is based on the total amount of real food purchased, no conventional food is included.

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## VI. Comparison to Previous Years

Figure 5



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Figure 5. Percentage of Real Food purchased by Carolina Dining Services.

The percentage of Real Food purchased by Carolina Dining Services has fluctuated throughout the years. A large reason for this fluctuation, particularly the decrease after 2015, is a result of the change in RFC Standards from 1.0 to 2.1/2. In changing the criteria for “local” food to include a gross revenue of less than \$50 million, several large previously real food suppliers were disqualified. However, it seems as though levels have stayed fairly stable for the past few audit cycles.

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## VII. What Changed?

It does not seem like there were a ton of changes between the Fall 2019 audit and the Spring 2020 audit. Their final number of 21.60 percent is not that far off from our final number of 21.40 percent. Any differences can likely be attributed to the inherent ambiguity that comes with different groups of students having to make judgement calls about whether or not an ingredient or product would qualify as real food.

Previous audits have mentioned the fluctuation of the amount of tea and coffee purchased as an area that determines the amount of money spent on real food, since most of the money spent on tea and coffee is spent on real food. In the data that the Fall 2018 used, CDS purchased tea/coffee from Larry's Beans and Sysco's Folgers and Lipton totaling about \$14,546. Of that amount, about \$2,297 of it counting as real food, which generated about 18% of tea and coffee to the real food calculation. The spring 2019 group found that CDS purchased tea and coffee from Larry's and Sysco's Bigelow and Lipton totaling about \$4,380, with \$3,690 of it counting as real food. In our audit, we found that CDS spent \$11,805 on coffee and tea, with \$10,427 of it counting as real food. This is a high percentage of the spending on coffee and tea that counts as real food. We are not sure how much of CDS' coffee and tea purchasing depends on student demand or why the purchasing seems to fluctuate so much, but it seems like this is an area in which they are regularly purchasing ingredients that qualify as real food. As long as they continue to keep spending on tea somewhat stable, or even increase it, they will continue to boost the percentage of money spent on real food.

Additionally, we saw a slight increase in the amount of dairy products purchased that qualified as real food. The Fall 2019 audit did not find any dairy purchases that met the RFC criteria, so even though we only found roughly two percent of dairy purchases going to real food, that is still an area of improvement.

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## VIII. Sources of Error

There were a few sources of errors that we encountered. The first and main one was having to count some producers as not qualifying as real food because they never responded to our questions and we couldn't find a lot of information on the company or its products. Although this does not mean they aren't Real Food, we just didn't have enough data to be 100 percent sure, so we thought the best answer in this situation was labeling them as no. Additionally, there were some brands that simply did not have much information on their website, and we were unable to reach out to them. Many of the companies weren't very transparent with their products, certifications, size or amount of capital, being afraid of giving away "industry secrets."

We also realized just how complex the food system is, and felt like many of the real food guidelines did not really allow for nuance or gray areas. For example, we realized that several small farms were actually outsourced from other farms. This led to a lot of ambiguity and again made it difficult to be 100 percent sure that these farms met the Real Food Standard.

Additionally, attempting to complete this audit during the Covid-19 outbreak made it more difficult than the previous audits. For starters, we did not have easy access to CDS and their employees if we had questions come up during our research. It was also much harder to get in contact with producers to ask questions, since their priorities were elsewhere. As a result, there were likely producers who would have qualified as real food who we could not count because we never heard back from them and could not verify any information with CDS.

## IX. Challenges

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One of the biggest challenges with this project was the lack of communication between us and the various companies. There were multiple companies that stated they were “sustainably certified” but there were no further details on what type of certification they had. There was never any mention of any of the certifications listed by the RFC. In addition, when we tried to ask for further clarification from the company by either emailing or calling we would often get no response. From the 15-20 companies I tried to communicate with, none provided any clarification. This made it much more difficult to decide whether or not a company could be classified as real food, and while we wanted to include as many companies as possible in the real food calculations, if they did not meet the standards outlined in the Real Food Guidelines, ultimately we couldn’t include them.

The Covid-19 outbreak affected virtually every facet of the semester, and this audit was no different. Not only did we not have access to CDS to ask questions anymore, we were completing the audit remotely, from around the country. Not being able to meet and talk in person made it difficult to ensure that we were all applying the same criteria to the products, as well as generally making the process take longer.

In addition to the difficulty of working remotely, we also had some challenges concerning communication and a lack of transparency among producers. There was some miscommunication between all parties involved in this process. For instance, we all communicated through email and sometimes it would take a bit longer than expected for everyone to get back to us. Aside from that, we would have a lot of questions in our emails and only a few of those questions would get answered and the rest would be ignored or missed. We spent a lot of time playing email tag back and forth until we got an answer, since we did not have the option of talking to anyone in person for the second half of the semester. Another issue was the lack of information on multiple companies’ websites. A lot of them did not list their certifications or revenue, which was important to verify their standing as a real food producer. We had to do a lot of research and sometimes we came up empty, so we also tried sending emails, but those would be ignored as well. Lastly, we wanted to make sure the work that we were doing held up to previous audits, so we did

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use prior semesters' work to compare numbers and make estimates. While this was helpful for us, it could potentially result in a cycle of the same mistakes being made over and over again, since we had no real point of contact for the previous RFC group.

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## X. Recommendations

In efforts to provide a holistic recommendation we prepared 3 sets of recommendations including for RFC, CDS, and future interns.

### Real Food Calculator

- **Provide researchers with category definitions:** To eliminate potential confusion and error, RFC should define what constitutes a product to fall under the different categories. This was an area where we occasionally struggled throughout the audit. Defining each category will assist students in categorizing products. Placing products in categories is significant because it determines the analyses and recommendations. For example, the researchers' ability to identify positive changes in egg purchases and key changes in dairy allows them to see where improvements can be made, and where attention should be focused. However, if the researchers were unsure if liquid eggs belong in the dairy or egg category and they wrongly input that data, the recommendations and analyses would be false.
- **Remove revenue cap for "local" food:** To encourage institutions and organizations to pursue the real food challenge, RFC should reevaluate their current criteria for "local" food. Currently, the revenue cap excludes and victimizes companies that are large, successful, and sustainable companies. Ultimately, there are certain suppliers that CDS continues to use that are within the radius to be considered "local," but because of the revenue cap they cannot count. This harms business and makes it seem like CDS is prioritizing profit over sustainability, which is not always the case.
- **Broaden the range of certifications that qualify:** More and more producers are interested in producing their food more sustainably, and pursuing real food qualifications. However, many farmers and small business owners cannot afford USDA Organic certifications, or they do not meet the particular qualifications. That said, there are other certifications that are cheaper or easier to obtain, like the Global GAP (Good Agricultural Practices), FARM (Farmers Assuring Responsible



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Management), or B Corp Certification. An example of a company operating sustainably and ethically while not qualifying as real food is Manhattan Bakery. A previous RFC group researched Manhattan Bakery as a potential vendor, but it did not count as real because it purchases its flour from King Arthur Flour, which was not local. However, King Arthur Flour is a certified B Corporation and they practice fair labor practices. Thus, to expand and become more inclusive, RFC should increase the liberty in researching different certifications that can count for real food.

### Carolina Dining Services

- **Purchase more USDA Organic food:** Echoing the recommendation of many previous RFC groups, we recommend that CDS should purchase more products that are USDA organic certified because it is an easily certifiable Real Food approved benchmark that is well advertised and well known. Additionally, produce is an area where purchasing USDA Organic could be improved as it made up roughly 25 percent of all food spending but very little of that was spent on real food.
- **CIW Tomatoes:** Coalition of Immokalee Workers certified tomatoes are the gold standard. Purchasing more when available could greatly increase the produce percentage. These are also a hot-button issue for students, as there are typically semi-regular protests of the Wendy's in the Union due to Wendy's refusal to purchase CIW tomatoes. This could be a good way to boost the visibility of CDS' pursuit of the real food agenda, because many students are already familiar with CIW tomatoes.
- **Include the Real Food Challenge in promotional materials:** CDS is one of the most visible entities on campus, responsible for serving thousands of students a day. By having CDS and RFC interns table in the Bottom of Lenoir or including information about the real food standards in presentations at New Student Orientation, CDS can frame their purchasing in a more nuanced way.

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## Future Interns

- **Continue to maintain the database:** We benefited greatly from the work that previous interns had done, particularly with the disruption to our semester. This is an incredibly valuable resource that can help mitigate inherent student turnover. Maintaining this database will help future interns and keep up to date on “real” vendors.
- **Social Media Campaign with other student groups:** Few students around campus are aware of RFC in the dining halls. We wanted to try and do more work this semester to make RFC more mainstream on campus, but ultimately we did not get the chance to. A social media campaign could help inform students and encourage involvement in what food they are eating and supporting - particularly if the RFC interns partner with other student groups who are focused on sustainability, food access, or social justice.

## **XI. Conclusions and Take Away**

Because of UNC’s visibility and presence at the forefront of higher education, committing to the Real Food Challenge can help pave the way for other universities to evaluate their own dining purchases. The Real Food Challenge is a helpful tool that allows universities to track how successful they are at shifting their purchasing to sustainable suppliers. With the tools that RFC provides to their researchers, dining services employees on college campuses can continue to work toward a more just and sustainable pattern of purchasing. Although much of CDS’ purchasing comes from large corporations like Sysco, they continue to explore healthy alternatives to highly processed foods. CDS is looking for more local based produce. Through this audit process, we have learned that if we want to have a better system that promotes better food and nutrition in our schools, we need a major shift in food sources. It can often be difficult to convince big operations to provide “real food” but the commitment to RFC is promoting local businesses by creating awareness and a movement on campuses across the nation. Ultimately, this generation of college students

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will soon be the ones making purchasing decisions at all levels, and continuing to put pressure on producers is one way to reach a more equitable and just food system.

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## References

"About B Corps." *About B Corps | Certified B Corporation*, <https://bcorporation.net/about-b-corps>.

"Good Agricultural Practices (GAP) & Good Handling Practices (GHP)." *Good Agricultural Practices (GAP) & Good Handling Practices (GHP) | Agricultural Marketing Service*, <https://www.ams.usda.gov/services/auditing/gap-ghp>.

*What Is FARM?*, <https://nationaldairyfarm.com/what-is-farm/>.

## XII. Appendix

Version 2.1 | Fall 2018



The Real Food Guide			
Local & Community Based	Fair	Ecologically Sound	Humane
<p>These foods can be traced to nearby farms, ranches, boats, and businesses that are locally owned and operated. Supporting small and mid-size food businesses challenges trends towards consolidation in the food industry and supports local economies.</p>	<p>Individuals involved in food production work in safe and fair conditions, receive fair compensation, are ensured the right to organize and the right to a grievance process, and have equal opportunity for employment.</p>	<p>Farms, ranches, boats, and other operations involved with food production practice environmental stewardship that conserves biodiversity and ecosystem resilience and preserves natural resources, including energy, wildlife, water, air, and soil. Production practices minimize toxic substances, greenhouse gas emissions, natural resource depletion, and environmental degradation.</p>	<p>Animals have their mental, physical, and behavioral needs met in a low-stress environment and throughout their life are only administered drugs for treatment of diagnosed illness or disease.</p>
<p><b>GREEN LIGHT:</b> Products meeting these criteria or certifications qualify as Real Food and best represent the standard</p>			
<p><b>Single-ingredient products:</b> A product must meet ALL the following criteria:</p> <p><b>A. Ownership:</b> Producer must be a privately or cooperatively owned enterprise.   <i>Wild-caught seafood must come from owner-operated boats.</i></p> <p><b>B. Size:</b></p> <ul style="list-style-type: none"> <li><b>Produce:</b> Individual farms must gross \$5 million/year or less</li> <li><b>Baked goods, beverages, dairy, eggs, grocery, meat, poultry, seafood:</b> Company or cooperative must gross \$50 million/year or less</li> </ul> <p><b>C. Distance:</b> All production, processing, and distribution facilities must be within a 250 mile radius of the institution.   <i>This radius is extended to 500 miles for Meat, Poultry, and Seafood.</i></p> <p><b>Single-ingredient products (aggregated):</b> 100% of the products must meet the criteria for Ownership, Size, and Distance</p> <p><b>Multi-ingredient product:</b> The company and at least 95% of the ingredients by volume must meet the criteria for Ownership, Size, and Distance</p>	<p><b>A single-ingredient product must be certified by ONE of the following approved certifications or criteria:</b></p> <p><b>International products:</b></p> <ul style="list-style-type: none"> <li>• <i>Eccert Fair Trade Certified</i></li> <li>• <i>Fair for Life Certified</i> by Institute for Marketecology (IMO)</li> <li>• <i>Fairtrade America (Fairtrade International FLO)</i></li> <li>• <i>FairWild</i></li> <li>• <i>Hand in Hand</i></li> <li>• <i>Small Producer Symbol</i></li> </ul> <p><b>Domestic products:</b></p> <ul style="list-style-type: none"> <li>• <i>Equitable Food Initiative (EFI)</i></li> <li>• <i>Food Justice Certified</i> by Agricultural Justice Project</li> <li>• Farms unionized through FLOC (AFL-CIO), FUJ, PCUN, UFW</li> </ul> <p><b>Worker-driven Social Responsibility programs*:</b></p> <ul style="list-style-type: none"> <li>• <i>Fair Food Program</i> by the Coalition of Immokalee Workers</li> <li>• <i>Milk with Dignity</i> by Migrant Justice</li> </ul>	<p><b>A product must be certified by ONE of the following approved certifications:</b></p> <p><b>Single-ingredient products:</b></p> <ul style="list-style-type: none"> <li>• <i>Biodynamic Certified</i> by Demeter</li> <li>• <i>FairWild</i></li> <li>• <i>Food Alliance Certified</i> (produce and grocery only)</li> <li>• <i>Rainforest Alliance Certified</i></li> <li>• <i>Regenerative Organic Certified</i></li> <li>• <i>Salmon Safe</i></li> <li>• <i>USDA Organic</i> and approved certifiers</li> </ul> <p><b>Coffee only:</b></p> <ul style="list-style-type: none"> <li>• <i>Bird Friendly</i> by Smithsonian</li> </ul> <p><b>Produce only:</b> Produce grown in a farm or garden at the institution, in which the researcher can confirm the use of organic practices</p>	<p><b>A product must be certified by ONE of the following approved certifications**:</b></p> <p><b>All products:</b></p> <ul style="list-style-type: none"> <li>• <i>Animal Welfare Approved/Certified (AWA)</i> by A Greener World</li> <li>• <i>AWA Grassfed</i> by A Greener World</li> <li>• <i>Biodynamic Certified</i> by Demeter</li> <li>• <i>Global Animal Partnership Steps 4-5+</i></li> </ul>


**YELLOW LIGHT: Products meeting these criteria or certifications qualify as Real Food but do not represent the *fullest* expression of the standard**

<p><b>Multi-ingredient products:</b> Company must meet ALL the following criteria:</p> <p>A. <b>Ownership:</b> Company must be a privately or cooperatively owned enterprise</p> <p>B. <b>Size:</b> Company or cooperative must gross \$50 million/year or less</p> <p>C. <b>Distance:</b> All processing and distribution facilities must be within a 250 mile radius of the institution.</p> <p><b>-AND-</b></p> <p>At least half (50%) of the ingredients by volume must come from farms meeting ALL the following criteria:</p> <p>A. <b>Ownership:</b> Company must be a privately or cooperatively owned enterprise</p> <p>B. <b>Size:</b></p> <ul style="list-style-type: none"> <li>• <b>Produce:</b> Individual farms must gross \$5 million/year or less</li> <li>• <b>Baked goods, beverages, dairy, eggs, grocery, meat, poultry, seafood:</b> Company or cooperative must gross \$50 million/year or less</li> </ul> <p>C. <b>Distance:</b> All production facilities must be within a 250 mile radius of the institution</p> <p><b>Single-ingredient products (aggregated):</b> At least three-quarters (75%) of the product (by volume) must meet the criteria for Ownership, Size, and Distance</p>	<p><b>A product must meet ONE of the following criteria:</b></p> <p><b>All products:</b></p> <ul style="list-style-type: none"> <li>• <i>Fair Trade USA</i></li> </ul> <p><b>Multi-ingredient products:</b></p> <ul style="list-style-type: none"> <li>• At least one of the primary ingredients (20% by volume) meets the Green Light criteria</li> </ul>	<p><b>A product must meet ONE of the following criteria:</b></p> <p><b>Single-ingredient products:</b> Be certified by one of the following approved certifications:</p> <ul style="list-style-type: none"> <li>• <i>ANSI/LEO-4000</i> (gold- or platinum-certified) by Leonardo Academy</li> <li>• <i>Bee Better Certified</i></li> <li>• <i>Certified Sustainably Grown</i></li> <li>• <i>Fair Trade USA</i></li> <li>• <i>LEAF Marque</i> (Linking Environment and Farming)</li> <li>• <i>USDA Transitional Organic</i></li> </ul> <p><b>Multi-ingredient products:</b></p> <ul style="list-style-type: none"> <li>• At least half (50% by volume) of the ingredients meet the Green Light criteria</li> </ul> <p><b>Seafood (wild-caught only):</b></p> <ul style="list-style-type: none"> <li>• <i>Marine Stewardship Council (MSC) Blue Eco Label</i> paired with the <i>MSC Chain of Custody Certification</i></li> <li>• <i>Monterey Bay Aquarium Seafood Watch Guide</i> "Best Choices" and "Good Alternatives"</li> </ul>	<p><b>A product must be certified by ONE of the following approved certifications:</b></p> <p><b>Broiler chickens:</b></p> <ul style="list-style-type: none"> <li>• <i>Certified Humane Free Range/Pasture Raised</i></li> <li>• <i>Global Animal Partnership Step 3</i></li> </ul> <p><b>Laying hens:</b></p> <ul style="list-style-type: none"> <li>• <i>American Humane Certified Free Range / Pasture Raised</i></li> <li>• <i>Certified Humane Free Range / Pasture Raised</i></li> <li>• <i>Global Animal Partnership Step 3</i></li> </ul> <p><b>Swine:</b></p> <ul style="list-style-type: none"> <li>• <i>Global Animal Partnership Step 3</i></li> </ul>
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**DISQUALIFICATIONS: Products containing disqualifying characteristics cannot count as Real Food in any category**

- **Egregious human rights violations**
  - **Forced labor** (including **Prison labor**): Producers have been found guilty of criminal charges of forced labor within the previous 10 years OR products that have been produced in prisons or using prison labor (through state or county correctional industries or through lease to, or partnership with, private agricultural or food processing companies).
- **Labor violations:** Producer has been found guilty of or has been cited for three or more cases relating to serious, repeat, or willful Occupational Safety and Health Administration (OSHA), National Labor Relations Board (NLRB), or Fair Labor Standards Act (FLSA) violations within the last three years.
- **Concentrated Animal Feeding Operations (CAFOs):** Producer is a Concentrated Animal Feeding Operation (CAFO)
  - | *Except for dairy that has been aggregated from multiple farms if the average farm size is less than 200 cows*
- **Genetically Modified Organisms (GMOs):** Products made with genetically engineered ingredients (including corn, soy, rapeseed, beet sugar, papayas and summer squash) and their derivatives
  - | *Unless these ingredients are used in trace amounts or the product carries a certification that precludes the presence of GMOs (Non-GMO Project Verified or any of the certifications that qualify as Ecologically Sound)*
- **Ultra-processed foods:** Products made with the following ingredients: Aspartame; Butylated hydroxyanisole (BHA), Butylated hydroxytoluene (BHT); Caramel coloring; Partially hydrogenated oil (trans-fats); Potassium bromate; Propyl gallate; rBGH/rBST; Saccharine; Sodium nitrate added; Sodium nitrite added; Dyes: Red #3, Red #40, Yellow #5, Yellow #6.

*\*Worker-Driven Social Responsibility Programs are exempt from Disqualifiers and can count as Real Food even if they have a disqualifying characteristic.*

*\*\*Animal products that meet the certifications in the "Green Light" Humane category are exempt from the CAFO disqualifier. All other animal products should be researched for the CAFO disqualifier.*

