

# Catering and Host Facilities

JOEL WRIGHT, REHS  
COUNTY OF SAN DIEGO

DEPARTMENT OF ENVIRONMENTAL HEALTH





# San Diego's Catering Ordinance and Assembly Bill 2524

A Unique Challenge



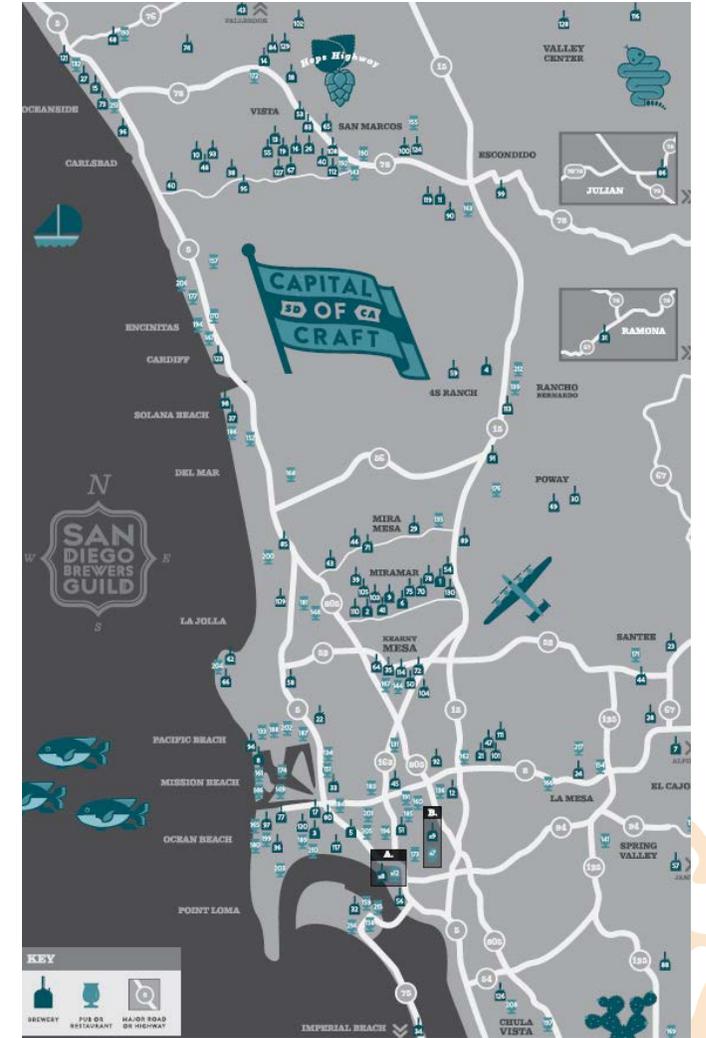
# Overview of presentation

- Growing Trends in SD lead to public health concern
- Political interest in trend
- Pilot Project
- One County approach, TEAM approach
- Creation of an ordinance
- Implementation
- State AB created
- Lessons learned
- Next steps

# Exploding Craft Brewery Industry



[www.bitterbrothers.com](http://www.bitterbrothers.com)



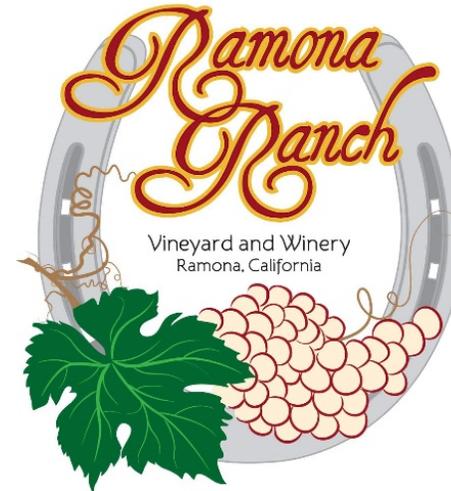
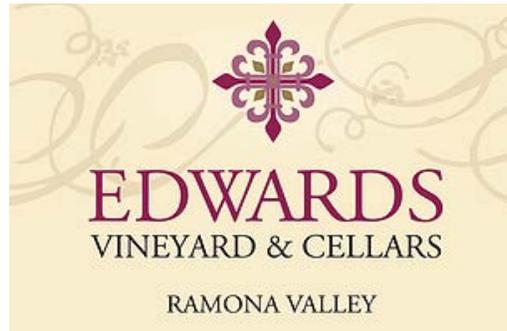
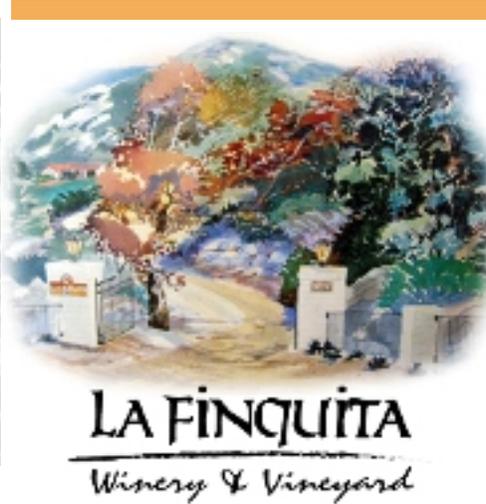


# Exploding Craft Brewery Industry

- Over 200 Breweries in San Diego County
- Calcode's Food Facility Exemption for breweries
- Brewery Customers wanted food!



# Local Agricultural Ordinance Allows New Wineries





# Local Agricultural Ordinance Allows New Wineries

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- Ordinance loosened Zoning and Code restrictions
- CRFC exemption for winery tasting rooms
- Winery customers wanted food!



# Catering Wasn't Previously Defined in CRFC

113737 Definition of  $a_w$

113739 Definition of Beverage

113740 Definition of CCR

← CATERING?



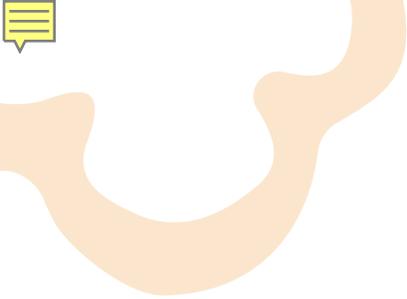


# Board Direction

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- 1** | **Conduct pilot project to study catered food service for public events held at local breweries and wineries.**
- 2** | **Explore options for developing a catering ordinance setting clear rules and food safety standards for catering.**
- 3** | **Return to the Board within 210 days with pilot project results and recommendations for a local catering ordinance that would implement food safety standards in alignment with the CRFC.**



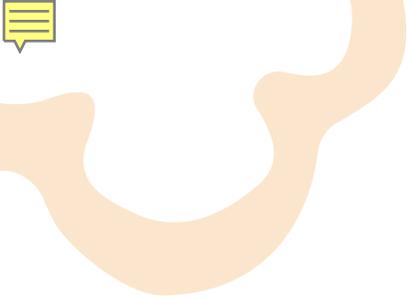
# Pilot Project Initiation

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- Break up time – 3 months for study and 3 months to analyze
- First month, met with stakeholders, Building and Codes
- Breweries/wineries apprehensive of regulation
- Zoning
  
- Illegal operations
- Food trucks didn't work

Game Plan – Observe, Educate, Address





# Pilot Project

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- Couldn't get volunteers
- Only able to do 3 inspections in the first month
- Soft Approach
- Unannounced Inspections

Inspected 13 breweries and 12 wineries



# Pilot Project Results: Food Safety

## Most common risk factor violations observed:



### Cold Holding Temperatures

84% of cold holding violations were found in ice chests, not refrigeration



### Food Contact Surfaces

Only 44% of foodhandlers had access to a sink to wash and sanitize utensils that could become contaminated



### Handwashing

50% of foodhandlers did not have access to a hand sink





# Pilot Project Results: Sales Model



- Direct Food Sales Model
- Participant Feedback
- Most food was sold directly to the public instead of to a pre-determined number of guests
- Risk factors did not increase with direct sales

# Creation of an Ordinance

**TEAM  
WORK**

Subject Matter Experts



Food Vendors



Zoning, Building  
and Codes

Brewery and Winery  
Stakeholders



Cities



County Counsel

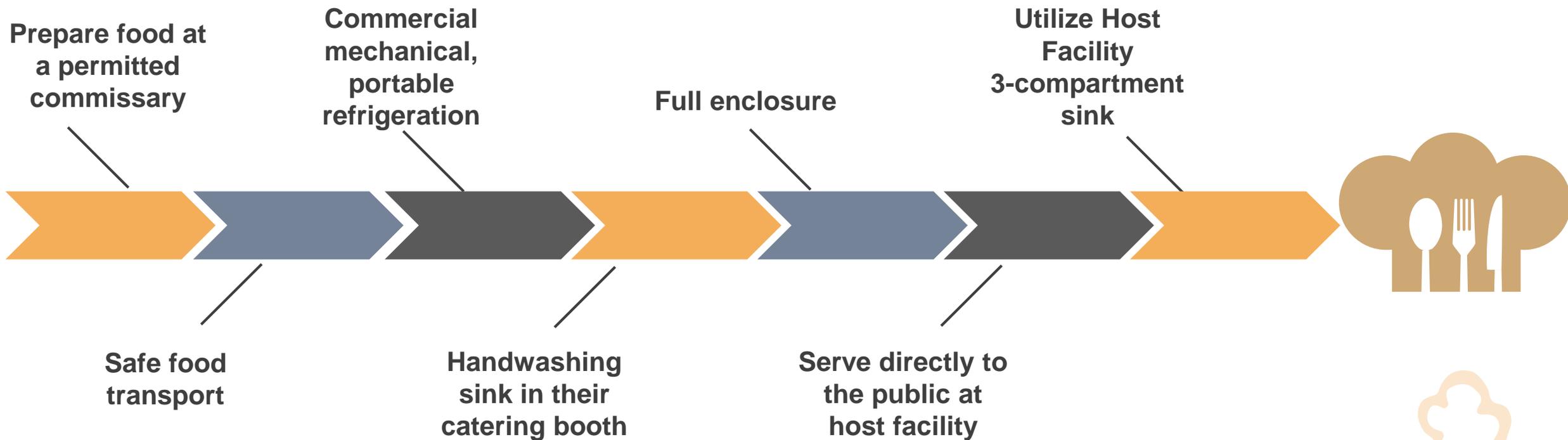


Board Aids and  
County Executive  
Groups



# San Diego County Ordinance

Direct Sales Catering and Host Facility Must Operate in Conjunction



Direct Sales Caterer



# San Diego County Ordinance

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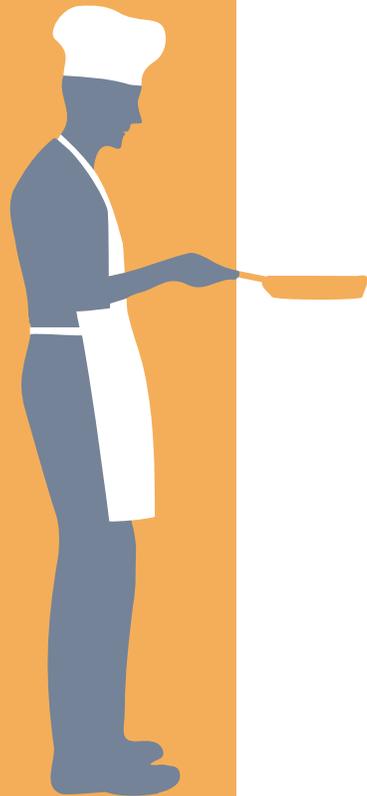
## Direct Sales Catering and Host Facility Must Operate in Conjunction

- Host Facility provides infrastructure to support Direct Sales Caterer
    - Potable water
    - 3-compartment sink
    - Water heater
    - Mop sink
    - Hand sink
    - Electricity
    - Commercial restroom
  - Brewery or Winery
  - Undergo plan review
- 



## IMPROVEMENTS

# Modernize Existing Catering Program



- 1 Use of commercial refrigeration
- 2 Commissary and field food safety inspections
- 3 Provide food safety instructions when only delivering food
- 4 Retention of records help food traceback

# Implementation

The ordinance was unanimously approved!

- Educational approach
- Development of guidelines
- Forms
- Website
- More outreach

## Catering Publications

Catering Ordinance Clean Version: [PDF](#)  
County News Center: [Article](#)  
Catering Pilot Study Findings and Recommendations: [PDF](#)  
Commissary Letter of Agreement Form: [PDF](#)  
Food Options at Breweries and Urban Wineries: [PDF](#)  
Food Options at Unincorporated Wineries: [PDF](#)  
Host Facility Requirements for Breweries: [PDF](#)  
Host Facility Plan Check Flow Chart: [PDF](#)  
Host Facility Plan Submittal Guidance and Checklist: [PDF](#)  
Direct Sales Catering - Standard Operating Procedures Worksheet: [PDF](#)



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH  
FOOD AND HOUSING DIVISION  
P.O. BOX 129261, SAN DIEGO, CA 92112-9261  
(858) 505-6900 • 1 (800) 253-9933 • Fax: (858) 505-6848 • [www.sdcdeh.org](http://www.sdcdeh.org)  
Plan Check Scheduling Line: (858) 505-6860



### Direct-Sales Catering Standard Operating Procedures

This document will help you prepare the required written description of your proposed catering activities and the equipment and standard operating procedures that you propose to use for your Direct-Sales Catering business. All required documents will be reviewed during an in-office consultation. Once these procedures are approved, a field consultation will be required for an onsite evaluation at the proposed commissary location. A signed and APPROVED copy of this document must be maintained with your Direct-Sales Catering operation during all operating hours.

Please note that any changes to the menu, equipment, or procedures listed on your approved form will require another review and written approval by the Food and Housing Division of the Department of Environmental Health (FHD-DEH).

Direct-Sales Catering Name: \_\_\_\_\_ Health Permit #: \_\_\_\_\_

Business Owner Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

E-mail: \_\_\_\_\_ Fax #: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

### Documents to Include

Documents to Include	
✓	Check the following items as you include them with this document.
	Application- Complete and submit the <a href="#">plan check application</a> . Ensure that all information is legible.
	Commissary Agreement- The Direct-Sales Caterer must prepare and store all food and equipment at a commissary kitchen (permitted food facility). The Direct-Sales Caterer and their proposed commissary must complete and sign the <a href="#">commissary agreement</a> .
	Specification Sheets- Submit specification or cut sheets for your equipment, including the <a href="#">portable mechanical refrigeration, overhead protection/enclosure, and portable hand-washing sink(s) carts</a> that will be utilized during a Direct-Sales Catering event. Provide documentation that shows the certification for sanitation and electrical standards by an American National Standards Institute (ANSI) accredited certification program such as NSF, UL, ETL, etc. for all equipment and refrigeration.
	Menu- Include any menus. List all food and beverages items to be sold. (Refer to page 2 & 5)
	Food Protection Manager Certification- Provide proof that an owner or employee has a valid <a href="#">Food Protection Manager</a> certificate or card.
	County Food Handler Card- Provide documentation that all employees have a valid <a href="#">County of San Diego Food Handler Card</a> .
	Log- A written log must be maintained for a minimum of 90 days after each private event to include the event organizer name and contact information, menu of foods and beverages served. When operating at a host facility, the log shall include your menu and location/date/time of operation. Please describe how you will log this information (i.e. What type of database) and provide a sample of that log.



# Implementation of the Program

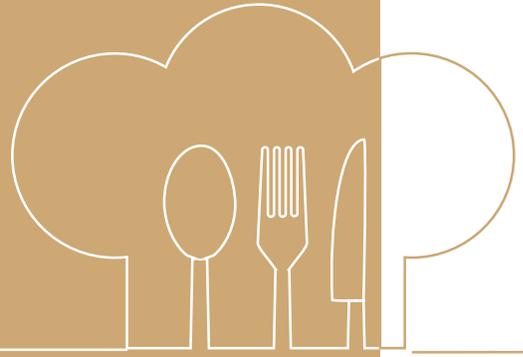
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- Soft rollout for 6 months
- <https://www.sandiegocounty.gov/content/sdc/deh/fhd/food/catering.html>
- Posted documents
- Meetings with stakeholders, Brewery Guild, operators
  
- Grease trap problem
- Warewashing sink





# Direct Sales Caterers



A photograph of a group of people sitting at a dark wooden table in a bar or pub. In the foreground, there are several glasses of beer: a tall glass of golden beer with a thick head of foam on the left, a dark stout in a glass mug in the center, another tall glass of golden beer to the right, and a smaller glass of beer on the far right. A black cast-iron skillet filled with various fried foods, including chicken, sausages, and breaded items, sits on the table. A glass of breadsticks is also visible. A hand is seen holding a fork over the food. The background shows the dark clothing of the people sitting at the table. The text 'Assembly Bill 2524' is overlaid in large white font across the center of the image.

# Assembly Bill 2524



# AB 2524 – Catering and Host Facilities

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- Statewide issue
- Assembly Bill (AB) sponsored by CA State Assemblyman Wood
- Catering Working Group
  - How long could the caterers operate?
  - Level of food preparation?
  - Host facility business type?
- Bill passed in September, 2018
- Went into effect January 1, 2019





# Catering and Host Facilities

- Catering Operation is now defined in CRFC!
  - §113739.1 – a food service that is **conducted by a permanent food facility** approved for food preparation where food is served, or **limited food preparation** is conducted, **at a location other than its permitted location**, in either of the following circumstances:
    - (1) As part of a contracted offsite food service event
    - (2) **When operating in conjunction with a host facility with direct food sales**
  - §113789 – Catering Operation added to definition of a Food Facility

**AB 2524**



# Limited Food Preparation §113818

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YES:

- Heat, fry, bake, roast, pop corn, shave ice, blend, steam/boil hot dogs, assemble food
  - Dispense and portion nonpotentially hazardous food
  - Hold, portion and dispense foods for Satellite Food Service
  - Slice and chop on heated cooking surface only
  - Cook to order
  - Beverages for immediate service (no frozen milk)
- 



# Limited Food Preparation §113818

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NO:

- Slice and chop food, unless on heated cooking surface only
  - Thaw
  - Cooling potentially hazardous food (PHF)
  - Grinding raw PHF
  - Reheat PHF for hot holding, except hot dogs and tamales
  - Wash food
  - Cook PHF for later use
  - Frozen milk products
- 



# Catering and Host Facilities

- Host Facility also defined in CRFC
  - §113806.1 – a facility located in a **brewery, winery, commercial building, or another location as approved by the local enforcement agency**, that meets applicable requirements to **support a catering operation that provides food directly to individual consumers** for a limited period of time, **up to four hours**, in any one 12-hour period and that has a permit pursuant to Section 114328.1.
  - §113789 – Host Facility also added to definition of a Food Facility

**AB 2524**



# Catering and Host Facilities

- Catering Operation must provide written SOPs – §114328
  - Transportation of Food
  - Food types – Limited Food Preparation
  - Holding temperatures
  - Cleaning
  - Trash
  - Handwashing

**AB 2524**



# Host Facility (CRFC §114328.1)

- Show locations of:
  - Food service operation
  - Handsinks
  - Restrooms
  - Garbage
  - Waste water disposal facilities

Plan  
Review



## HOST FACILITY REQUIREMENTS

A brewery, winery, commercial building or other location approved by Environmental Health that meets specified infrastructure and operational requirements has the option to obtain a Host Facility Permit. This permit allows for expanded food options by hosting a catering operation who can sell and serve food at this approved site. A Host Facility Permit is not required for sites that only utilize catering for private events or that only host food trucks.

### Operational Requirements for a Host Facility Permit

**RESTROOMS (TOILET AND HANDWASHING):** An approved restroom facility in the Host Facility that the catering operation will be using is required. The restroom must be located within 200 feet of the area where the catering operation prepares the food and must be accessible to all food handlers. The restroom must meet all local building and plumbing code standards. A common use restroom agreement must be submitted if a restroom is to be utilized outside of the Host Facility.

**ADDITIONAL HANDWASHING:** A permanently plumbed handwashing sink, in addition to the restroom handsink, for Caterer's use may be required. All handwashing sinks shall have a minimum of 100°F-108°F warm water under pressure for a minimum of 15 seconds. Handsinks must have hand soap and single use paper towels in dispensers.

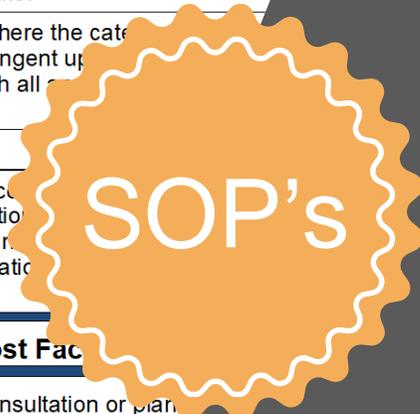
**REFUSE AND LIQUID WASTE:** The Host Facility must have approved methods for disposal of refuse and liquid waste. A curbed janitorial sink equipped with hot and cold water and an atmospheric vacuum breaker or other approved backflow device at the faucet may be required.

**POTABLE HOT AND COLD WATER:** Host facility must have a hot water heater that consistently supplies hot water at a minimum 120°F, and that is available at one of the sink fixtures at a peak demand rate.

**LOCATION FOR CATERING OPERATION:** Host facility must provide a suitable location where the catering operation will set up their equipment. The type of food service provided by the catering operation is contingent upon the location. The Host facility must ensure that operations comply with all applicable local, state and federal jurisdiction, including but not limited to Zoning and Fire Department.

**ANNUAL INSPECTION:** Host facilities are inspected annually by Environmental Health.

**STANDARD OPERATIONAL PROCEDURES:** Host Facilities must maintain operating procedures, methods, and schedules for cleaning food related equipment; specifications for cleaning equipment and structures, and for disposal of refuse; and a list of catering operations that will be maintained and how you will maintain a list of catering operations. Host Facility with their menus, dates and times of their operations.



### Plan Check and Permit Application Process for a Host Facility

1. Use the Host Facility Flow Chart to determine if your facility is eligible for a consultation or plan submission.
2. Once you determine whether you qualify for a consultation or plan submission, complete the consultation or plan application and submit to the appropriate Environmental Health office.
3. Include with submission, a Standard Operating Procedure that includes: procedures, methods and schedules for cleaning equipment and structures, and for disposal of refuse; and a list of catering operations that will be maintained and how you will maintain a list of catering operations. Host Facility with their menus, dates and times of their operations.
4. If your application is for plan submission, include three (3) sets of plans with your application.
5. After receiving approval from Environmental Health, you may then apply for your Host Facility Permit.

### Contact Information

For more information regarding options to serve food at your brewery/winery, please contact our offices during business hours.

# Host Facility – §114328.1

- Temperature Holding
- Cleaning
- Garbage



# Host Facility – §114328.1

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- Provide list of Catering Operations supported by Host Facility

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- Enforcement Agency may establish additional structural or operational requirements (fryers, etc...)

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- 4 hours max in 12 hour period

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- Food, utensils, equipment, tableware and linen returned to Catering Operation for cleaning, sanitizing and storage

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- Toilet and handwashing within 200 feet of food service





# Catering Operations



May use open-air  
barbecues  
(CRFC §113843)  
or Outdoor wood-  
burning ovens  
(CRFC §113846)



# CCDEH Model Forms



## County of California

### ENVIRONMENTAL HEALTH DEPARTMENT

123 Main Street  
Sacramento, CA 99999



## COUNTY OF CALIFORNIA ENVIRONMENTAL HEALTH DIVISION/DEPARTMENT



## COUNTY OF CALIFORNIA ENVIRONMENTAL HEALTH DIVISION/DEPARTMENT

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This document will help you prepare the required written description of your proposed catering activities and the equipment and standard operating procedures that you propose to use for your catering operation. All required documents will be reviewed and when these procedures and commissary are approved, a field inspection will be required at the proposed Host facility location. A signed and APPROVED copy of this document must be maintained with your catering operation during all operating hours.

Please note that any changes to the menu, equipment, or procedures listed on your approved form will require another review and written approval by Environmental Health.

Catering Operation Name: \_\_\_\_\_ Health Permit #: \_\_\_\_\_

Business Owner Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

E-mail: \_\_\_\_\_ Fax #: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

### Documents to Include

<input checked="" type="checkbox"/>	<b>Check the following items as you include them with this document.</b>
<input type="checkbox"/>	Complete and submit an application. Ensure that all information is legible.
<input type="checkbox"/>	<b>Commissary Agreement-</b> The Caterer must prepare and store all food and equipment at a commissary kitchen (permitted food facility). The Caterer and the proposed commissary must complete and sign a commissary agreement form. Caterers operating at host facilities are subject to limited food preparation only (HSC 113818).
<input type="checkbox"/>	<b>Specification Sheets-</b> Submit specification or cut sheets for your equipment, including the portable mechanical refrigeration, overhead protection/enclosure, and portable hand-washing sink(s) carts that will be utilized during a Catering event. Provide documentation that shows the certification for sanitation and electrical standards by an American National Standards Institute (ANSI) accredited certification program such as NSF, UL, ETL, etc. for all equipment and refrigeration.
<input type="checkbox"/>	<b>Menu-</b> Include any menus. List all food and beverages items to be served or sold. (Refer to page 2 & 5)
<input type="checkbox"/>	<b>Food Protection Manager Certification-</b> Provide proof that an owner or employee has a valid Food Protection Manager certificate or card.
<input type="checkbox"/>	<b>Food Handler Card-</b> Provide documentation that all employees have a valid food handler card.
<input type="checkbox"/>	<b>Log-</b> A written log must be maintained for a minimum of 90 days after each operation to include the event organizer name and contact information, location of service, menu of foods and beverages served. When operating at a host facility, the log shall include your menu and location/date/time of operation. Please

### HOST FACILITY REQUIREMENTS

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**ANNUAL INSPECTION:** Host facilities are inspected annually by Environmental Health.

**STANDARD OPERATIONAL PROCEDURES:** Host Facilities must maintain operating procedures that describes the procedures, methods, and schedules for cleaning food related equipment; specifications for equipment that will be provided by the Host Facility to support the catering operation and how it will be maintained in good repair; how potentially hazardous foods will be maintained and how you will maintain a list of catering operations that will operate at the Host Facility with their menus, dates and times of their operations.

#### Plan Check and Permit Application Process for a Host Facility Permit

1. Use the Host Facility Flow Chart to determine if your facility is eligible for a consultation or plan submission.
2. Once you determine whether you qualify for a consultation or plan submission, complete the corresponding application and submit to the appropriate Environmental Health office.
3. Include with submission, a Standard Operating Procedure that includes: procedures, methods and schedule for cleaning equipment and structures, and for disposal of refuse; and a list of catering operations that will be supported by the Host Facility with proposed menus.
4. If your application is for plan submission, include three (3) sets of plans with your application.
5. After receiving approval from Environmental Health, you may then apply for your Host Facility Permit.

#### Contact Information

For more information regarding options to serve food at your brewery/winery, please contact our offices during normal business hours or by email at [info@nameyourcounty.us](mailto:info@nameyourcounty.us). You can also visit Environmental Health's website at

<https://www.generic.gov.us/catering>

### FOOD DISTRIBUTION AT WINERIES & BREWERIES Frequently Asked Questions

**Does my winery or brewery need a Health Permit from Environmental Health?**

It depends....

- **NO**, if you do not exceed 25 sq. ft. of non-perishable, pre-packaged food items and crackers/pretzels that are served to accompany beer or wine. The California Retail Food Code (CRFC) exempts this small level of food distribution.
- **YES**, if you exceed 25 sq. ft. of pre-packaged food (perishable and non-perishable food allowed) to be sold or served at your winery or brewery. The proposed area must meet all CRFC construction and equipment standards and be approved by Environmental Health plan check. Examples of allowable foods include: **prepackaged foods** like cheese, sandwiches, meat, and salads, as well as bottled beverages. All foods must come from an approved source, such as a permitted food distributor, permitted market, or a cottage food operator.
- **YES**, if you are a Host Facility for Caterers. Your establishment must meet all construction and equipment standards of the CRFC and be approved by Environmental Health with a service request for plan check.
- **YES**, if you are a winery or brewery with an Environmental Health plan check-approved commercial kitchen for full food preparation installed.

**Can my customers bring in their own food or have food delivered from a permitted restaurant?**

**YES**, with your permission, customers can bring in prepared food for their own consumption or order food and have it delivered to them at your location (for example, pizza delivery).

**Can I sell Cottage Food at my winery or brewery?**

**YES**, permitted cottage food operators produce pre-packaged, non-perishable foods that can be sold at wineries and breweries. A health permit from Environmental Health will be required for the Cottage Food Operator **and** for the winery or brewery.

**Are Temporary Food Vendors or Caterers allowed to sell food outside of my winery or brewery?**

- **Temporary Food Vendors** are allowed to operate at permitted **community events** on the winery or brewery's property in conjunction with a Temporary Event sponsor. A **community event** is defined as an event that is of civic, political, public, or educational nature as approved by Environmental Health. **Please check with the County or City Building and Planning Department for any additional permits, zoning requirements or code ordinances for events.**
- **Catering Operations** that meet the requirements to operate at permitted **Host Facilities** are allowed to serve food directly to tasting room customers for up to 4 hours in a 12-hour period. All catering dishes and equipment shall be properly washed and stored at the catering commissary.

**Are mobile food facilities (food trucks or food carts) allowed to sell food outside my winery or brewery?**

**YES**, Environmental Health -permitted mobile food facilities are allowed to operate outside during your operational hours, or as allowed by local zoning and code ordinances. The mobile unit must display a current Environmental Health permit. Vendors operating the unit must have access to a commercial restroom during the time period they operate.

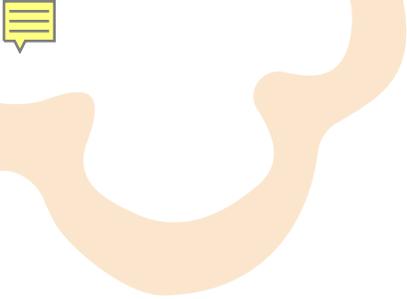
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For more information regarding options to serve food at your location, please contact our offices during normal business hours or by email at [info@nameyourcounty.us](mailto:info@nameyourcounty.us). You can also visit Environmental Health's website at

<https://www.generic.gov.us/catering>



Lessons learned



# Lessons Learned

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- Include State and other jurisdictions earlier
- Grease trap issue
- Mop sink
- Limited Food Preparation
- Getting SOP's





What's  
next

PHOTOS.





**NEW MINDSET**

**NEW RESULTS**



Questions?



# Thank you!

Joel Wright

County of San Diego

Department of Environmental Health

[joel.wright@sdcounty.ca.gov](mailto:joel.wright@sdcounty.ca.gov)

(858) 505-6879

