

Corporate Social Responsibility, Contract Caterers and Public Sector Food Procurement

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Abstract

Leading contract caterers are adopting corporate social responsibility as an important part of their operational approach, and sustainability is accepted as being integral to their operations. DEFRA's Public Sector Food Procurement Initiative aims to use public sector catering to support the UK Government's policy for Farming and Food. However, research amongst public sector catering providers in Berkshire, Buckinghamshire and Oxfordshire found only limited evidence of current sustainable practice.

Leading contract caterers worked with the Centre for Environmental Studies in the Hospitality Industry at Oxford Brookes University to develop principles and indicators which will provide specific operational and measurement guidelines to encourage and monitor further progress in sustainable food procurement.

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Introduction

Catering services within the public sector are found in higher and further education institutions, schools, Ministry of Defence establishments, the National Health Service, prisons, police, and local government offices. Catering in the public sector is provided both directly (direct control by the public sector body itself) and through the use of contract caterers¹.

For the UK contract catering sector, turnover in 2004 was £3.89 billion, (British Hospitality Association, 2005) of which food represented just over 33%. The big four contract caterers are

¹ Contract catering has been defined as the part of the foodservice industry that is handed over to a third party organisation to provide (MINTeL, 2002, p2). "The main characteristic of contract catering is that it generally constitutes food and beverage provision for companies and organizations for whom catering is not their primary activity. Contract caterers provide the skills, equipment and personnel, and sometimes investment in premises, to operate the catering function, allowing the company or organization to concentrate on its core activity".

all multinational and have a combined worldwide turnover of £26 billion. Within the UK market, the big four together account for 99% of the market.

Food procurement by public sector catering services in the UK has been estimated to be worth £1.8 billion per year by the Department of the Environment Food and Rural Affairs (DEFRA) (2002). These services therefore represent an opportunity to target expenditure in ways that will support Government policy. According to DEFRA, 2002, p1, introducing its Public Sector Sustainable Food Procurement Initiative,

"the Government wants buyers and their internal customers to use this buying power to help deliver the principle aims of the Government's Strategy for Sustainable Farming and Food in England".

The broad benefits of sustainable food procurement have already been articulated by Morgan and Morley (2002), particularly with respect to the potential for locally oriented supply chains supporting local economies. Recent research by the New Economics Foundation (2005) has also emphasised the economic as well as environmental benefits that such locally oriented sustainable supply chains can bring.

The Research Context

Research previously carried out by the authors in the three counties of Berkshire Buckinghamshire and Oxfordshire estimated that the overall value of public sector food procurement was £62 million per annum (see Table 1), a figure that is broadly in line with the DEFRA national estimate. The estimate is based upon underpinning research conducted to support a conference, Good Food on the Public Plate, held in March 2004².

Table 1 - Public Sector Catering Food Procurement in Berks, Bucks and Oxon

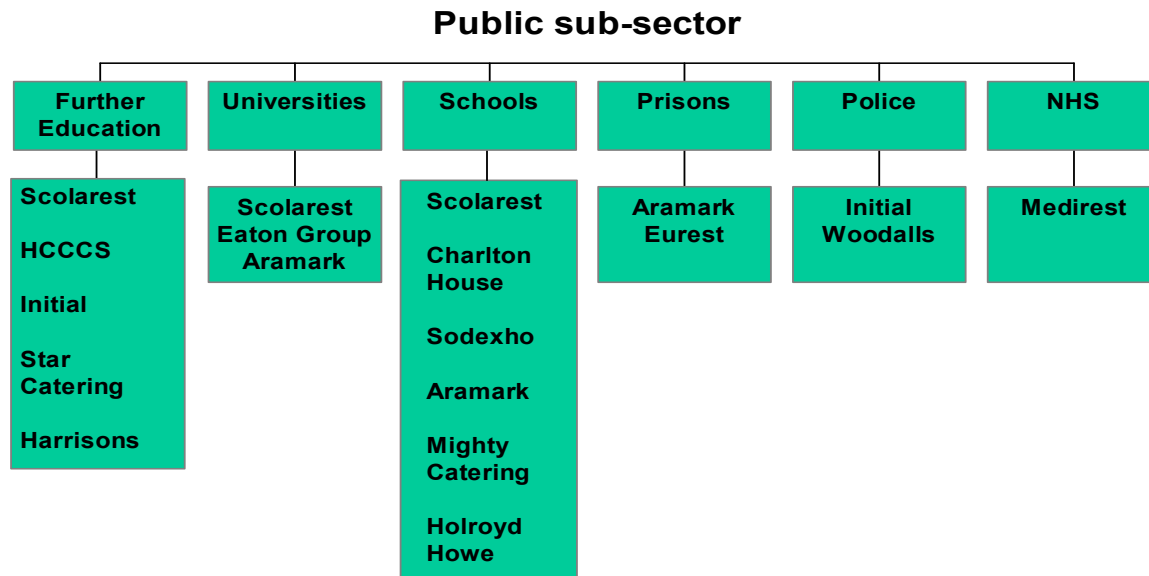
Sector	£ Million Annual Value
Universities	22.0
Ministry of Defence	16.0
National Health Service	10.3
Schools	7.5
Further Education	2.2
Prisons	2.2
Police and Local Authority	1.7
Total	61.9

The research confirmed that catering provision in the public sector involves both public sector and contract caterers and a sophisticated supply chain. In an effort to secure best value effective provision, public sector catering has been significantly penetrated by contract caterers.

² The conference was funded by Food from Britain, organised by Berkshire, Buckinghamshire and Milton Keynes and Oxfordshire Food Groups and held at Oxford Brookes University. It attracted over 90 delegates, including producers and suppliers as well as caterers.

Multinational companies such as Compass Group, Sodexo and Aramark are prominent in this geographic region of the public sector, alongside a number of independent regional caterers (see Table 2).

Table 2 - Catering Contractors in Public Sector Catering within Berks, Bucks and Oxon



Particular sub sectors included both directly operated and contracted out provision.

Schools sector

In Oxfordshire, catering in Schools is managed by County Facilities Management, a direct service organisation; in Berkshire, each unitary authority has a separate agreement with contractors (different contractors for each authority); in Buckinghamshire, each school is free to make its own contract arrangements. A small number of Oxfordshire schools have opted out and operate an individual school catering service. Overall governance and control of catering services in schools is therefore complex and a move towards a more sustainable food supply would involve working with different arrangements for provision.

Higher Education

The University of Oxford and University of Reading directly operate their own catering services, whereas Oxford Brookes University catering services are contracted out to Scolarest (Compass Group's education catering division).

Hospital Catering

This has both directly operated and contracted out provision. For example, in Oxfordshire, the largest trust is contracted out to Medirest (a division of Compass Group), but another large trust

directly operates its own catering services. Overall, just less than half of provision has been placed with contract caterers.

Currently catering services at one of the counties' six **Prisons** are contracted out, while the rest are operated directly.

MOD catering

This is still operated 'in house' within the three counties considered, but in other areas of the country there have been high profile Private Finance Initiatives with contractors, to provide contemporary catering facilities offering greater choice and variety. The Ministry of Defence also has a sole supply agreement with 3663, the largest catering supplies distributor, which set up a separate division to handle this contract.

Overall, the public sector catering services are therefore provided by a combination of direct service organisations and large and small contractors. To transform the way these function therefore demands all parties to pursue the sustainability agenda.

Sustainability and Sustainable Food

Sustainability is a simple concept to define: "*to meet the needs of the present without compromising the ability of future generations to meet their own needs*" (World Commission on Environment and Development, 1987), but complex to put into practice.

Sunderlin (95) and Selman (98) identify the abstract nature of sustainability as a concept and the need to build progressively from small tangible beginnings to a fuller sustainability agenda. Since it is difficult to secure consensus amongst different stakeholders, well researched guidance is necessary.

Lawrence (97) agrees that there are many issues and obstacles that must be addressed if the sustainability concept is to be translated into practical implementation strategies. A process of defining sustainability in its context and identifying its limits must then be converted into needs, aspirations and principles. These should be put into operation by strategies and frameworks encompassing relevant instruments, procedures and processes. Graedel, 2003, p48 states that few sustainability guidelines are available for service industries wishing to green their operations and that

In a world where 'what gets measured gets managed,' unless suitable indicators and approaches for measuring environmental responsibility are developed, the environmental implications of a possible service sector transformation cannot be assessed.

Sustainability with regards to food has been defined by organisations such as DEFRA, the UK Sustainable Development Commission and Sustain. It is generally considered to cover the aspects in Table 3.

Table 3 - Criteria for Defining Sustainable Food

- Promoting good health through a balanced diet and safe food.
- Accessible; socially inclusive, affordable and reflecting local communities, culture and seasonality.
- Supporting the local economy by buying food from as close by as possible.
- Sustainable farming, involving high environmental standards and reduced energy consumption.
- Promoting animal welfare and valuing nature and biodiversity.
- Fair prices, fair trade and ethical employment in UK and Overseas.

Sources: Derived from Sustainable Development Commission, 2003a, Sustain 2002 and DEFRA, 2004

DEFRA's interpretation of sustainable food has led to the adoption of five priority objectives for the Public Sector Food Procurement Initiative (PSFPI). These are: to raise production and process standards; increase tenders from small and local producers; increase consumption of healthy and nutritious food; reduce adverse environmental impacts of production and supply; and increase capacity of small and local suppliers to meet demand (DEFRA, 2002). These objectives are broadly in line with the sustainability criteria, but do not include fair trade and social dimensions. They also do not explicitly identify increasing public catering services' procurement of *organic* food, though it may be considered included by implication. Objectives are aspirational, rather than in the form of specific performance targets.

There is therefore considerable overall consistency in defining what constitutes sustainable food. However, some of these criteria may conflict in practice. For example, is local conventionally produced food preferable to food produced following the stricter environmental controls involved in organic production, but in another country, requiring thousands of air miles to import it? Is fair trade food desirable, despite the air miles involved? Can varied food preferences, religious food requirements and the requirements of a healthy diet all be satisfied in large-scale public sector catering systems? Does this mean processing, preserving and regenerating food in ways that might be considered out of kilter with sustainable practice? Does opening the door to small producers mean losing the economies of scale that make food accessible at a lower cost and also some of the environmental benefits of efficient multiple drop distribution³?

³ Large food distributors such as Brakes and 3663 operate out of central distribution hubs and carry multi-product lines that are required by caterers and that can be dropped off in one delivery from fuel efficient vehicles following well planned distribution routes that minimise mileage.

As part of the work of the PSFPI, DEFRA (2005) have devised draft sustainability clauses to place in contracts and tender documents, alongside some suggested performance indicators, all contained within a toolkit⁴ for procurement officers in the public sector.

Research in Berks, Bucks and Oxon showed that, despite the above activities, there was only limited evidence of sustainable practice impacting upon operations at unit level. Interviews with contract caterers confirmed confusion about different dimensions of the sustainable food agenda and a view that the agenda needed to be moved onto a more specific footing.

However, contract caterers considered that progressing the sustainable food agenda was an important signal of their corporate responsibility and they would welcome developments that would help its progress. Significant shifts have already been made in some areas. For example, across the food service sector as a whole, 99% of eggs, 70% of dairy products and 40% of meat is sourced in the UK. There is, however, significant variance in these figures with a high proportion of all pork being sourced in the UK, but only 13% of bacon.⁵

Sustainability Research with Contract Caterers

Considering this research context, the Centre for Environmental Studies in the Hospitality Industry (CESHI) developed a proposal to work with the caterers themselves and obtained funding support from the Esmee Fairbairn Foundation to

"stimulate demand within the catering sector for food produced using sustainable methods, by illustrating market opportunities, identifying barriers, highlighting best practice and producing training materials."

A key aspect of the research was to work with contract caterers to establish specific operating principles and to determine how progress against these principles could be reported and measured. There was agreement amongst the contract caterers that the development of principles for sustainable food procurement, which could form the basis for more sustainable practice and reporting within the framework of Corporate Social Responsibility, could be a fruitful approach.

Research Methodology

Having secured the agreement of contract caterers to participate in the project and to the general approach to be adopted, secondary research was carried out to aid the development of draft principles of sustainable procurement. The contextual background and key priorities for action were identified from a broad trawl of literature and web sources encompassing academic, government, NGO and other organisations. The barriers to sustainable food procurement were then discussed at separate meetings with contract catering businesses, selected to represent the market leaders, and one regional operator which had already begun to tackle the issue of sustainable food. This methodology was considered to be the best way of both researching

⁴ Catering Services and Food Procurement Toolkit

⁵ Presentation by Paul Kelly, Corporate Affairs Director, Compass to "Westminster Diet and Health Forum Seminar on Corporate Social Responsibility and the Food Industry", 9 March 2005.

important features and the practicability of their implementation. Following these informal discussions, nine draft principles were prepared.

An "Expert Panel" was then formed and a panel meeting was attended by senior managers from the four top contract catering businesses, a regional public sector contract caterer and representatives from DEFRA, the British Hospitality Association (BHA) and Hotel and Catering International Management Association (HCIMA). Following a presentation on current definitions of "sustainable food", operational implications and consumer recognition, there was general discussion about the set of nine draft principles for sustainable food procurement and how performance against them could be measured (this included discussion of unsustainable practice).

The outcome of prolonged discussion was that the contract catering representatives agreed to take five principles back to their companies for endorsement as a workable basis to underpin sustainable procurement practice. CESH I were tasked to work up key performance indicators that would enable companies to report progress against these principles and develop a guide to reporting on sustainable procurement performance – in the context of a CSR report, annual report, or environmental report.

Development of user guide to non-statutory reporting

Based upon the five agreed principles for sustainable procurement, a guide to reporting on sustainable procurement performance was developed for food service companies, aimed primarily at contract caterers. The guide reviews and summarises the readily available guidance for businesses on sustainability and performance indicators, in the context that, with the exception of the DEFRA toolkit (DEFRA, 2005), current guidance has not specifically focused upon sustainable procurement and food supply chains. Examples of indicators from other sectors are presented, some of the indicators from Appendix D of the DEFRA toolkit are included and some new ones, developed as a result of the research, are presented for consideration.

In the published guide, the set of indicators (see Table 5) is accompanied by explanatory notes and information on their provenance (abbreviated for the purposes of this paper). Contract caterers are invited to consider using a selection of the indicators to benchmark their performance on food procurement.

Research Results

Table 4 - Agreed Five Principles of Sustainable Food Procurement

1. Selecting food products from the country in which they are to be offered, when these products are available in sufficient volume, appropriate quality and at competitive price, in preference to using imports
2. Providing appropriate menu information and food offerings to consumers so that they can make choices based on food provenance and sustainability
3. Taking relevant steps to avoid the purchase of foods in the knowledge that they have been

produced (anywhere in the world) using processes known to excessively damage human health and/or the environment
4. Working with other contract catering businesses and supply intermediaries to find ways of adapting existing centralised purchasing systems to meet the needs of smaller local and/or regional suppliers (especially by working with relevant organisations to ensure HACCP procedures are developed in a form more appropriate for small businesses while not compromising on health or safety)
5. Ensuring that food products are processed in units that are resource efficient (i.e. have a commitment to reducing energy consumption, minimising waste and reducing water consumption).

The four others, to which the companies were not yet prepared to sign up (although Compass Group has since become a signatory to the 10 principles of the UN Global Compact, which covers Principle 9) were:-

Principal 6: Ensuring that transportation systems facilitate fuel/energy efficient sourcing and distribution of food from the point of production/processing to the point of consumption.

Principal 7: Ensuring that animal food products are sourced from livestock production systems that comply with national regulatory standards and the international standards being developed by the World Organisation for Animal Health (OIE) as they emerge

Principal 8: Ensuring that foods offered to consumers are prepared with the minimum amount of additives, including salt and sugar, and working towards providing more information for the consumer on additive content (as currently done for nuts).

Principal 9: Working towards adoption of a corporate code of practice to address the issues embraced by the International Labour Organisation's Declaration on the Fundamental Principles of Human Rights at Work⁶, or an alternative, such as the Ethical Trade Initiative Base Code (of specific relevance to imported foods).

Conclusions

Initial research amongst contractors operating within public sector institutions, showed that there was widespread commitment to corporate responsibility and that sustainable practice was identified as a key component of this. However within public sector catering services operated by contract caterers in Berks, Bucks and Oxon, there was only limited evidence of sustainable practice impacting upon operations at unit level.

⁶ These are: Freedom of association and the right to collective bargaining; the elimination of forced and compulsory labour; the abolition of child labour, and; the elimination of discrimination in the workplace.

Leading contract caterers expressed a desire to move towards more tangible sustainable practice guidelines and performance indicators that would enable progress to be measured and reported. This confirms previous views by Laurence (1997) and Graedel (2003) that to progress, aspirations need to be put into operation using strategies and frameworks. These should encompass relevant instruments, procedures, and processes and measurement through performance indicators is important.

The principles of sustainable practice in contract catering and associated performance measures, developed after extensive secondary research and discussion with contractors, potentially represent a move towards more tangible expression of aspirations. However, following an expert panel discussion, only five of the nine principles were adopted by contractors. The remaining four were considered not to be feasible at the present time.

It may also be argued that the principles do not, in any case, represent sufficient progress. For example, principle four commits contract caterers to develop procurement and due diligence procedures that are more appropriate to small and local producers. However, principle one recognises that in an age of global food procurement, national supply may in itself represent a sustainability success and that even this must be tempered with requirements concerning price and quality. There is no principle explicitly representing a general commitment towards procurement of organic or food from other certification schemes, but the indicators for principle 2 do signal this.

Whilst the principles may be criticised for not going far enough, they do represent a move along the sustainability continuum and a willingness by contract caterers to adopt the food sustainability agenda in so far as operational and supply constraints permit. The creation of performance indicators also represents a further tangible development that will enable progress to be measured.

Table 5 – Suggested Key Performance Indicators for reporting on sustainable food procurement

Principle 1: Selecting food products from the county in which they are to be offered, when these products are available in sufficient volume, appropriate quality and at competitive price, in preference to using imports	
Suggested indicators (in order of rigour)	Definitions
1. % of food supplied (by resale value) from local/UK sources	<p>There is a significant level of debate about a realistic definition of “local”⁷ and about the desire or ability of food service companies to change their centralised purchasing and distribution systems to accommodate a large number of local suppliers. Such an action would reverse the trends of recent years, where the number of suppliers has gradually been rationalised, largely for logistical and financial reasons.</p> <p>For practical purposes, it is likely that large food service companies will be able to report on national food purchases in the short to medium term. Given the volume of products purchased by food service companies, even a shift to national as opposed to international supply chains will have a significant impact on transport emissions and the farming economy.</p> <p>Clearly when dealing with raw and processed food products, it is important to define precisely what comprises UK produce. We would suggest that the raw materials in any food purchased in processed form must have originated from the UK (e.g. chips made from British potatoes would qualify as UK sourced, but chips manufactured in Britain from Dutch potatoes would not). For some products (for example, ready made lasagna) it will be difficult to assess the UK component and so we would suggest that businesses target specific fresh food commodity groups (e.g. pork, fresh fruit) for reporting.</p>
2. % food by each commodity group purchased that is UK sourced	Indicators 1 & 2 are alternatives, as indicator 2 may be easier to implement when first beginning the process of reporting.
3. % of catering outlets offering a seasonal menu choice	Seasonal menu choices go hand in hand with a Buy British policy and – theoretically at least – purchasing foodstuffs which are plentiful should make good economic sense.

⁷ Which can mean anything from “produced within a 30 mile radius” to produced in the UK. DEFRA defines “local food sourcing” as food produced and sold within a limited geographical radius but which does not necessarily have any distinctive quality (thereby differentiating it from “regional food” which has a distinctive quality because of the area in or the method by which it is produced).

Suggested indicators	Definitions
4. % of local purchasing in emerging countries	Although only relevant in an international context, this indicator is shown here for interest, as published by Sodexho in their 2003 booklet "Ethical Principles – Sustainable Development Contract".
Principle 2: Take relevant steps to avoid the purchase of foods <u>in the knowledge that</u> they have been produced (anywhere in the world) using processes known to excessively damage human health and/or the environment	
Suggested indicators	Definitions
5. % of food supplied (by resale value) that meets criteria for environmental assured standards, e.g. Red Tractor, LEAF, organic	As for principle 1 above, with the possible exception of organic food purchases that make up only a tiny percentage of food sales, there can be significant complexities when seeking to report on food purchases across the business (including single commodities and pre-prepared meals). When reporting for the first time, some businesses may find it easier to report on specific commodities as opposed to all commodity groups. Clearly simple commodities (meat, raw vegetables) will be easier to report on than complex pre-cooked meals.
6. % of fish supplied (by resale value) which is certified by the Marine Stewardship Council (or equivalent)	
7. Number of sources of seafood used that feature on the Marine Conservation Society's Black list of locations (www.fishonline.org/advice/avoid/?item=1)	This is used by Marks and Spencer in its 2003-4 CSR Report. See www.fishonline.org/information/ for more information.
8. Purchases of approved products as a percentage of total products	Indicators 8, 9 and 10 – which are alternatives - are wide-ranging in that they have been conceived by their authors (see below) in the spirit of ethical trading in the sense of ensuring that worker exploitation is not a feature of the supply chain. They are however equally applicable to this principle of only sourcing foods which have been produced to certain environmental standards. Indicator 8 has been published by Sodexho in the 2003 Publication "Ethical Principles – Sustainable Development Contract", in support of company policy to forge balanced and long-term business relationships with suppliers and to choosing partners not only for their

Suggested indicators	Definitions
	ability to provide high quality products in the quantity needed but also for their commitment to ethical values.
9. % of purchases sourced from approved suppliers	Indicator 9 – published as 8 above - supports the development of long-term business relationships whereby suppliers are asked to pledge to support sustainable development, in particular by embracing the principles defined by the International Labour Organisation.
10. % of suppliers which follow a recognised sustainable trading code of practice	Indicator 10 is a key performance indicator suggested by the Food and Drink Federation in its Sustainable Development Report 2002. It is defined as an “additional indicator, which companies may choose to take up if it is relevant to the business”. A “recognised sustainable trading code of practice” is likely to be one such as the Ethical Trading Initiative Base Code or the Global Compact, as well as the aforementioned assurance schemes.
11. Number of suppliers engaged in environmental initiatives	For Indicator 11, three years’ data was used by J Sainsbury plc in their Environment Report 2002, not published since then. It is only suitable for direct suppliers and in this case, mainly for “own brand” suppliers. Initiatives included in the data are organics, ICM ⁸ /EUREPGAP, Farm Biodiversity Action Plans and Marine Stewardship Council.
<p>Principle 3: Working with other contract catering businesses and supply intermediaries to find ways of adapting existing centralised purchasing systems to meet the needs of smaller local and/or regional suppliers (especially by working with relevant organisations to ensure HACCP procedures are developed in a form more appropriate for small businesses while not compromising on health or safety).</p>	
Suggested indicators	Definitions
12. Published policies and procedures which facilitate access to approved lists for small suppliers	<p>Such policies/procedures would include one or more of the following:</p> <ul style="list-style-type: none"> • Information on how to gain access to the supplier list and clear information on how new suppliers are approved • Payment terms which are commercially viable for small suppliers, e.g. payment made within 30 days rather than 90 days • Evidence that HACCP audits are carried out pragmatically so that small suppliers are given a chance to meet the requirements, without any compromise on food safety

⁸ Integrated Crop Management

Suggested indicators	Definitions
	<p>issues and traceability.</p> <ul style="list-style-type: none"> Partnership work with small suppliers to develop their businesses so that they can become approved suppliers (for example the partnership between Compass Purchasing – now Sevita – and Snitterfield Fruit Farm at http://www.fruitfarm.co.uk/index.htm)
13. Average time to pay bills to suppliers	<p>Both indicators 13 and 14 – which are alternatives - reflect the fact that small suppliers are much more vulnerable to cash flow pressures and that prompt payment is a lifeline for them, as well as good business practice.</p> <p>Indicator 13 is suggested as a basic marketplace indicator by Business in the Community in its publication “Indicators that Count – social and environmental indicators – a model for reporting impact”.</p>
14. % of invoices paid to agreed terms	<p>Indicator 14 is used by the Co-op in its 2003 CSR report, for which the auditors concluded that the indicators reflect the Global Reporting Initiative’s 2002 Sustainable Reporting Guidelines and performance areas in the Business in the Community Corporate Responsibility Index.</p>
<p>Principle 4: Providing appropriate menu information and food offerings to consumers so that they can make choices based on food provenance and sustainability</p>	
Suggested indicators	Definitions
15. % of sites (units) offering sustainable choices, e.g. organic or Fair Trade	<p>Sustainable choices could include organic or Fair Trade products, product lines where the origin is known and communicated (e.g. Oxfordshire pork, Isle of Wight tomatoes), “local” or seasonal menu promotions (see indicator 3). In some cases, sustainable choices may be offered via brands.</p>
16. % of units providing information about food provenance to consumers	<p>Most contract caterers have yet to develop processes for providing menu information to consumers. This information can take two forms:</p> <ul style="list-style-type: none"> Information provided on specific products which can be communicated to clients (for example, dolphin friendly tuna from the Mediterranean, MSC certified fish, organic beef from Devon); Generic information about the company’s aspirations (e.g. wherever possible we use British meat) or adherence to the British Meat Best Practice Guidelines on labelling the

Suggested indicators	Definitions
	origin of meat on menus.
17. Number of product lines carrying information about sustainability/food provenance (including Fair Trade)	
18. Sales of product lines carrying information about sustainability/food provenance (including Fair Trade) as a % of all sales	
<p>Principle 5: Ensuring that food products are processed in units that are resource efficient (i.e. have a commitment to and procedures for reducing energy consumption, minimizing waste and reducing water consumption).</p>	
<p><i>The suggested baseline position for application of this principle is membership of Hospitable Climates, a government sponsored scheme. Advice for contract catering businesses is available in the form of user-friendly fact files and other membership benefits include the opportunity to benchmark performance against other members in the peer group.</i></p>	
Suggested indicators	Definitions
19. Number of sites/units that are enrolled into Hospitable Climates membership (on sites where energy consumption can be measured directly)	Many contract catering businesses operate almost exclusively on premises owned by other companies and do not bear direct responsibility for energy or water bills. Unless catering units are separately metered, savings from efficient energy management cannot be identified. Hospitable Climates is a partnership programme between the Government and industry (through HCIMA) which aims to help all units in contract catering businesses reduce energy consumption by targeting wastage. Evidence to date would illustrate that the programme delivers savings of circa 10% on energy consumption.
20. kWh electricity per dish served	Indicators 20 and 21 can only be measured for units which are separately metered or where a check meter is installed.
21. Water consumed per dish served	
22. Grams of residual waste per dish served (after removal of putrescibles for composting and recycling of materials such as paper, bottles, cans and plastics)	

Suggested indicators	Definitions
23. % of units which operate in accordance with corporate environmental policies on energy, waste and water	Data collection for indicators 23 and 24 would be by survey, which should be carried out annually.
24. Number/% of units which are recycling glass, cooking oil and steel cans as a minimum	
25. Number/% of units registered with an environmental management system, e.g. ISO14001.	

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