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Integrating social impacts into life cycle assessment: S-LCA and SMEs in the food sector.

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Abstract

Purpose: SMEs account for 99 per cent of companies operating in the European food and drink industry and, often, are part of highly fragmented and complex food chains. The article develops and elaborates an S-LCA for SMEs in the food sector using a top-down and bottom-up approach, with labour standards/employment conditions along the supply chain as a key social indicator.

Methods: The article reviews both academic and 'grey' literature on life cycle thinking and its relationship to S-LCA and SMEs at the beginning of 2013. It includes case study evidence from the food sector (aquaculture and fruit juice). Findings from a pilot questionnaire survey sent to European food sector SMEs and trade associations (as partners in the SENSE project) about their knowledge, experience and engagement with social impacts along their supply chains are analysed and discussed. Proposals for an S-LCA methodology, designed for incorporation in a self-administered software tool, are elaborated.

Discussion: The literature reveals the complexity of the S-LCA approach as it aims to unite disparate and often conflicting interests. A paucity of literature on SMEs and S-LCA is noted. A *lead firm* S-LCA is proposed that addresses industry specific impacts. Using a top-down and bottom-up approach, the methodology assesses data from SMEs along the supply chain in order to gauge improvements in the management of labour-related issues for the product sector. Issues relating to how 'scoring' is interpreted and reported and what the intended effect of its use will be are also raised.

Conclusions: Whilst recognising the difficulty of devising a robust S-LCA for SMEs in the food sector, recent interest in life cycle sustainability assessment suggests that this is an important emerging field to which this proposed methodology makes a useful contribution.

Key words: S-LCA . food sector . SMEs . social impacts . methodologies . life cycle assessment

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1. Introduction

Public awareness and campaigning activity about social impacts linked to product life cycles and company responsibilities are increasing, including demand for more ecological and ethical standards when selecting food (e.g. fair trade labelling; followthethings.com). This article reviews recent developments, examines the context for integrating social impacts into life cycle assessment (LCA) and makes proposals for methodological development within the food sector. The article has a specific emphasis on how social impact assessment applies to small and medium enterprises (SMEs) – the focus of the EU FP7 SENSE project (HarmoniSed ENvironmental Sustainability in the European food and drink chain)¹.

2. Materials and methods

The article first reviews academic and ‘grey’ literature on S-LCA at the beginning of 2013. Key issues are identified, discussed, developed and then drawn on to help shape an S-LCA methodology for SMEs in the food sector. The findings are probed further by devising and analysing responses to a pilot questionnaire sent to a small selection of SMEs and trade associations (as partners in the SENSE project). The questionnaire aimed to investigate the feasibility of i.) integrating social impacts into life cycle thinking for SMEs using labour standards/employment conditions at mid-points along the product supply chain as a key social indicator, and with workers/employees and local communities impacted by the product life cycle as key stakeholder categories; and ii.) of implementing a scoring system that benchmarks progress (meaning improved labour-rights/working conditions at mid-points in the product life cycle) for the key stakeholder categories, using baseline data from the last financial year.

Based on the review and questionnaire survey findings, proposals for developing a social impact assessment for SMEs, as part of a software tool for environmental (E)LCA, are elaborated and discussed; there follows concluding remarks about future research needs.

3. Results

¹ SENSE (<http://www.senseproject.eu>) is evaluating existing relevant environmental impact assessment methodologies and considering socio-economic, quality and safety aspects as they affect small and medium sized enterprises (SMEs) in the European food and drink industry. The project aims to deliver a new integral system that can be linked to monitoring and traceability data and specifically focuses on creating a methodology to be applied to the juice, dairy, meat and aquaculture sectors.

3.1 Current methodological developments for S-LCA and SMEs in the food sector

Research developments and methodologies for integrating social (and socio-economic) impacts into LCA suggest that no single line of investigation or agreed approach has emerged to date and the review process brings some specific issues to the fore. For example, although S-LCA follows the same procedural steps as an environmental (E-)LCA i.e. a goal and scope definition, inventory analysis, impact assessment and interpretation, there are clear differences between environmental impacts that are related to *process*, and social impacts that tend to be related to the conduct of the company carrying out the process. This includes the fact that social impacts do not have quantifiable 'zero' targets, in contrast to those associated with environmental emissions or impacts on resources (Jorgensen 2012; Dreyer et al. 2006). Current debates about life cycle sustainability assessment (LCSA), that combines S-LCA with LCA and Life Cycle Costing (LCC), also raise issues about system boundaries and whether these are/can be identical, or should be constructed as separate analyses (Klopffer, 2003; Valdivia et al, 2011; Parent et al, 2012). The review process also underlines the need for agreement over which social impacts (stakeholder and indicator categories) are the most relevant to include if S-LCA is to capture impact transfers along the product life cycle that are *intrinsic* to the value of the product (Benoit & Mazijn, 2009; Parent et al, 2012) and unite disparate and often conflicting interests for the various actors and stakeholders that are implicated in the chain (Jorgensen, 2012; Macombe et al, 2011).

More particular issues arise for the development of an LCA methodology that integrates social impacts in the *food* chain because of the large numbers of agents involved, the need for different indicators depending on the food sector, regional differences etc. It is also noted that although most agricultural *commodity* roundtables are applying LCA approaches, many *businesses* continue to use corporate and supply chain-focused metrics, and sector specific guidance can be very different between the two approaches depending on the circumstances (Kissinger, 2012; see also De Camillis et al. (2012) on the new ENVIFOOD protocol and the European Sustainable Production and Consumption Roundtable at <http://www.food-scp.eu>). These methodological differences are compounded for SMEs, where awareness of life cycle thinking and in particular, of social impacts in the product life cycle are low. Furthermore, SMEs interest and, more importantly, their ability to address such impacts is also likely to be low, as may be their ability to get data beyond first up- or down-stream tiers in the product supply chain.

The review findings suggest that the usefulness of S-LCA depends on its ability to solve or mitigate a problem(s) and improve the social conditions for stakeholders implicated in the product life cycle. In order to achieve these aims, methodological development should provide clarity about: what the S-LCA aims to support; who the user is; and what the intended effect of its use will be (Jorgensen et al, 2012). Consequently, for SMEs in the food sector, it is suggested that the S-LCA should aim to support social improvements in the supply chain that relate to workers/employees and local communities – which is where the product supply chain ‘touches down’ – as key stakeholder categories. Labour-rights and employment conditions are identified as a key social indicator, so defined by using a relevant range of sub-categories; see for example, the methodological sheets developed by UNEP/SETAC (Benoît-Norris et al. 2011a.). The logic behind this is that consumer awareness of social/ethical impacts related to food production is increasing, and social auditing (through existing public and private social impact interventions) is already part of the corporate social responsibility (CSR) agenda for many companies (see Barrientos et al. (2008) for an in-depth review of existing schemes of social impact assessment in supply chain management). It is also noted that those interventions that relate to *measurable* labour standards, such as health and safety and written employment conditions (contracts etc.), appear to have more impact than qualitative standards (freedom of association etc.) (Barrientos, 2006).

When it comes to the system boundary, as Reitinger et al. (2011) observe, some approaches narrow their focus to those parts of the life cycle that the company performing the assessment can influence directly in order to support management decisions (i.e. only the company and its closest suppliers and distributors are assessed). Given the restrictions posed on data collection for SMEs due to both their scale and the complexity of their supply chains, this definition is adopted for the proposed SME methodology. A system boundary is suggested that narrows its focus to those parts of the product life cycle where the greatest social improvements can be made, with the social impact indicator assessed at mid-point level by *internal* decision-makers (managers). The logic behind this is that mid-point indicators are more understandable (and thus likely to be implemented) because they are closer to the managers’ own experience than end² goals (Jorgensen, 2010).

² Some S-LCA approaches use mid-point indicators and others use end-point indicators. The difference refers to the location of the indicators in the impact pathway. For example, job creation is not generally considered a goal in itself but, through contributing to the family income and subsequent poverty reduction, it may improve the family's

The review of current methodological development for data-gathering suggests a hybrid *top-down and bottom-up* approach be developed for SMEs, where generic data (designed to take into account the location, sector, scale and ownership of a company) is combined for assessment with site-specific data (to provide accuracy and inform decision-making). This is based on case study evidence from product life cycles for relevant food sectors. Firstly, a methodology to identify socio-economic indicators in the salmon production cycle, combines (quantifiable) and descriptive *general* indicators (ILO standards, UN Global Compact, ISOs etc.) with descriptive *specific* indicators that are product or process specific (Kruse et al, 2009). Secondly, Benoît et al. (2012) have used social scoping to model social impacts and identify hotspots in the orange juice supply chain. Social scoping uses two models: i.) the social hotspots database (SHDB <http://socialhotspot.org>) to prioritize and/or identify potential social hotspots in the chain by using the share of worker hours by country specific sector (CSS) necessary to produce \$1m of orange juice in the U.S.; and ii.) a literature review to identify the supply chain's main production activities and their locations. The review aims to validate the SHDB modelling results and provides additional information on the most relevant social impacts for inclusion to ensure that more accurate assessment takes place.

Thus, findings from the review process suggest the following: that a methodology for integrating social impacts into life cycle thinking for SMEs in the food sector should be a product specific, decision support tool, with workers/employees and local communities impacted by the product supply chain as key stakeholder categories, using labour-rights and employment conditions along the product supply chain as the key social indicator. The system boundary should identify mid-points along the product supply chain that the SME can influence directly and where the greatest improvements can be made. Data-gathering should combine a top-down (general indicators – core labour standards, sector guidelines etc.) and a bottom-up (product/process and site specific indicators) approach to assessment.

With very limited case study evidence, proposing a mechanism that interprets the results for the evaluation process is more difficult. In this early stage of development, a benchmark (data from the last

health conditions and be considered an end goal. In this example, the job creation could thus be considered a mid-point indicator and the health condition as the end-point indicator (Jorgensen et al., 2008).

financial year) is proposed to enable SMEs to gauge future improvements in their management of labour-related issues along the product supply chain - this is elaborated in the next section.

3.2 Integrating social impacts into life cycle thinking for SMEs in the food sector

To probe the feasibility of this emerging social impact LCA methodology, a pilot questionnaire was devised and sent to SMEs and trade associations and relevant project partners (13 in total). The questionnaire was divided into three sections and asked questions about: i.) pay and conditions for workers/employees in the product life cycle; ii.) knowledge of working conditions along supply chains; and iii.) perceptions of what positive (and negative) impacts production activities may have on local communities, and how the companies engaged with these issues. Four questionnaires were returned (from the fruit juice, dairy and meat sectors) and useful comments were also received from project partners.

The questionnaire asked for data about pay and conditions in the supply chain, specific to the *largest* category of workers employed by the SME i.e. the category of worker employed for the greatest number of hours per week in the previous financial year. This was based on the assumption that these workers are likely to be on the lowest pay and conditions and are thus a good benchmark for company improvement. Although there was some confusion over definition of the largest category of worker (a proposed solution is to supply a set of multiple choice options, tailored to each sector as part of the tool) respondents were able to supply data up to the first-tier of operations. This indicates that these questions cover issues that are already part of other reporting requirements for SMEs and could act as a benchmark for measuring social improvement.

The response to questions on SME involvement with local communities impacted by the product life cycle reveal this is something that SMEs are also already committed to. The data showed support for local community programmes, education initiatives and positive local procurement strategies, suggesting that this is a viable stakeholder category for social impact assessment.

3.3 Proposals for assessment: questions and scoring.

The methodology is based on the premise of breaking the supply chain into blocks or modules with various SMEs completing the self-administered software tool at each level of activity along the supply chain. The findings suggest that the assessment (to be completed by SME managers, as internal decision-makers) should cover the following areas: i.) *policies on supply chain labour standards* – do they cover everything required? Do they meet the standards laid down by each sector ? ; ii.) *management of these policies* – how are they managed? Are robust systems in place? ; and iii.) *evidence of good/best practice* – how are these policies communicated to suppliers? How far does company commitment extend (first-tier or beyond)? Are public commitments made (via company web-site/labelling)?

Table 1 provides a brief summary of how this could be constructed using the top-down and bottom-up approach. In the top-down section, a key question asks for the name of a senior manager /board member (and their role and responsibilities for labour issues, including supply chain operations) because it is suggested that involvement and commitment of senior management is critical for social impact improvements (Barrientos et al, 2008; Fox & Vorley, 2002). ILO core labour standards³ are proposed as the basis for assessing the proposed social impact indicator, combined with awareness (and management/monitoring) of sector-specific standards/codes/guidelines. For the bottom-up approach, identifying the largest category of worker (by total number of hours worked each week) is a key criterion. Sector-specific questions are then posed that relate to: employment conditions (written), working hours, wages and health and safety conditions as labour standards that are central to good practice (see Ethical Trading Initiative (ETI) base code⁴). Questions also reflect the existence of sector specific codes and guidelines with regard to social and economic sustainability and draw on existing inspection and certification schemes. This will account for the various economic, social and cultural conditions in different countries - as is already reflected in existing sector guidelines (see for example, fruit juice - SGF/IRMA Code of Conduct⁵ and ASC, 2012; Standards for Responsible Salmon Aquaculture, 2012).

**** Table 1: Top down and bottom-up approach to S-LCA (source: authors) ABOUT HERE ****
The weighting between top-down and bottom-up is equal, and it is suggested that the scoring mechanism should establish a starting point for continuous improvement over time using baseline data from the last

³ Information on ILO core labour standards can be found at: <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

⁴ Full details of the ETI base code can be found at: <http://www.ethicaltrade.org/resources/key-eti-resources/eti-base-code>

⁵ Full details of the SGF/IRMA CoC at: <http://www.sgf.org/en/home/fks/nachhaltige-produkte/>

financial year, updated each new financial year. The scoring would provide a ‘rating’ for each SME using the following categories:

- **No evidence** – the SME provides no evidence of awareness of supply chain labour standards (*baseline*)
- **Limited awareness** – the SME is aware of core labour standards and/or sector code or guidelines
- **Managing** – the SME has adopted policies to manage labour standards in-house
- **Good practice** – the SME has policies on labour standards in place **and** has a formal management system in-house, **and** its policies are communicated at least as far as first-tier suppliers
- **Best practice** – good management systems for labour standards are in place along the supply chain (beyond first-tier suppliers) **and** the SME has made public statements of commitment (e.g. on website/labelling)

It is recommended that supplying evidence (for example, attaching policies, name and responsibilities of senior manager entrusted with this work etc.) is one way of making the system more robust.

Assessment ‘scores’ for SMEs *at each level* of the product supply chain (i.e. producers, processors, distributors, retailers) would be analysed to provide an iterative process that aims to capture *impact transfers at key points along* the products’ life cycle. Analysis of data from individual SMEs will provide a category rating for each section of the supply chain (i.e. producers, processors etc.) and an overall rating for the sector. An example of one sector scenario could be: rating for producers – ‘*limited awareness*’; rating for processors – ‘*managing*’; rating for distributors – ‘*managing*’; **overall rating for sector – ‘*managing*’**.

4. Discussion

Following what Jorgensen et al. (2012) refer to as the *lead firm* S-LCA, the reporting and decision-making for this proposed methodology falls internally within the reporting company, and assessment aims to improve social conditions within the *existing supply chain for each SME* along the production chain. Thus, the proposed social impact assessment tool will go beyond ‘normal’ CSR reporting tools and initiatives that focus on the individual company by using these various company based processes (employment conditions etc.) as a proxy measurement for a product-based calculation. ‘Various companies’ are defined as those SMEs who have contributed to the final product along the entire supply chain up to the retail stage. This ability to include up-stream and down-stream effects by assessing the impact of these SMEs at various stages along the production chain will provide a better understanding of the full product life cycle in a social perspective. Developing the tool in this way will also help ensure that if one SME chooses to ‘overlook’ principal social impacts, these are picked up elsewhere either up-stream or down-stream using data from other SMEs in the life cycle assessment process. Furthermore,

by breaking the supply chain down in this way, site-specific data-collection is more feasible and is thus more likely to be achievable.

The proposed methodology also needs to both identify common factors for all food sector SMEs *and* address industry specific impacts. It is important that ‘tools’/supporting documentation are made available for those filling in the assessment that explain the *sector* standards/guidelines, alongside national laws, local and industrial regulations and ILO standards etc. For example, the SHDB has social theme tables and UNEP/SETAC have produced methodological sheets (Benoît-Norris et al, 2011b). These are important factors to consider because, as has been widely noted, limitations of time, funds or data access could lead those reporting for companies to take short-cuts, exclude processes and provide incomplete data which will lead to inaccurate results. There is also a need to be mindful of how the magnitude (scoring) of the social impacts is interpreted and reported, including being clear about what the intended effect of its use will be.

5. Conclusions

It is recognised that existing S-LCA case studies only focus on one or very few life cycle stages and data availability is a major problem, as is the lack of proven effect of using S-LCA for decision support (Jorgensen, 2012). It is also acknowledged that adapting life cycle assessment for small-scale businesses in the food sector magnifies these issues. It is imperative, therefore, that SMEs can practically manage data requirements tailored to non-industrial food production processes; that is, the efficacy of ‘translating’ normative values into quantifiable assessments (Freidberg, 2009).

These are key issues for methodological development, as social impact assessment becomes a more mainstream part of life-cycle thinking. At a recent workshop on life cycle sustainability assessment (LCSA), Cinelli et al. (2013) comment on how although interest in LCSA is booming, there is a need for further conceptual and methodological thought. It is hoped that these proposals for integrating social impact assessment into LCA in the food sector make a further contribution to this important emerging field and, in particular, for how it effects SMEs as a vital part of the food production sector.

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References

Aquaculture Stewardship Council (2012) ASC Farm Certification and Accreditation Requirements. Version 1.0. Utrecht.

Barrientos S and Smith S (2006) *The ETI Code of Labour Practice: Do Workers Really Benefit?* Institute of Development Studies, University of Sussex, 2006.

Barrientos S, Gereffi G and Rossi A (2008) What Are the Challenges and Opportunities for Economic and Social Upgrading? Concept Note. 'Capturing the Gains' workshop. University of Manchester.

Benoît C and Mazijn B Eds (2009) Guidelines for Social Life Cycle Assessment of Products. Paris, UNEP/SETAC Life Cycle Initiative.

Benoît-Norris C, Vickery-Niederman G, Valdivia S, Franze J, Traverso M, Ciroth A, and Mazijn B (2011a.) Introducing the UNEP/SETAC methodological sheets for subcategories of social LCA. *Int J Life Cycle Assess* 16, 682–690.

Benoît-Norris C, Cavan DA and Norris G (2011b.) Identifying social impacts in product supply chains: overview and application of the social hotspots database. 1st World Sustainability Forum, 1-30 November 2011.

Benoît C, Aulisio D, Niederman GV, Overakker S, and Hallisey-Kepka C (2012) Social Scoping Prototype: Report Product Category 2: Orange Juice Sustainability Consortium, Arizona State University and University of Arkansas.

Cinelli M, Coles SR, Jorgensen A, Zamagni A, Fernando C and Kirwan K (2013) Workshop on life cycle sustainability assessment: the state of the art and research needs – Nov. 26, 2012, Copenhagen, Denmark. *Int J Life Cycle Assessment, published online: 6 April, 2013.*

De Camillis C, Blighy JC, Pennington D and Palyi B (2012) Outcomes of the second workshop of the Food Sustainable Consumption and Production Round Table Working Group 1: deriving scientifically sound rules for a sector-specific environmental assessment methodology. *Int J Life Cycle Assessment*, 17, 511-515.

Dreyer L, Hauschild M and Schierbeck J (2006) A Framework for Social Life Cycle Impact Assessment. *Int J Life Cycle Assess* 11 (2), 88-97.

Fox T and Vorley B (2004) *Corporate accountability in the UK supermarket sector*. Final report of the Race to the Top project, London, IIED.

Freidberg S (2009) Hotspots in a cold chain: A life-cycle assessment of Loki fish. Environmental studies paper, Dartmouth College <http://www.lokifish.com/freidbergpaper.pdf> . accessed 5 Sept, 2013.

Jorgensen A, Le Bocq A, Nazarkina L and Hauschild M J (2008) Methodologies for Life Cycle Assessment. *Int J Life Cycle Assess*, 13, 96-103.

Jorgensen A (2010) Developing the Social Life Cycle Assessment: addressing issues of validity and usability. *PhD thesis. DTU Management Engineering.*

Jorgensen A (2012) Social LCA - a way ahead? *Int J Life Cycle Assess.*

Jorgensen A, Dreyer LC and Wangel A (2012) Addressing the effect of social life cycle assessments. *Int J Life Cycle Assess*, 17, 828-839.

Kissinger G (2012) Corporate social responsibility and supply agreements in the agricultural sector: Decreasing land and climate pressures. *CCAFS Working Paper no. 14*. Copenhagen, CGIAR Research Program on Climate Change, Agriculture and Food Security (CCAFS).

Klopffer W (2003) Life-cycle base methods for sustainable product development. *Int J Life Cycle Assess*, 8, 157-159.

Kruse SA, Flysjo A, Kasperczyk N and Scholz AJ (2009) Socioeconomic indicators as a complement to life cycle assessment - an application to salmon production systems. *Int J Life Cycle Assess*, 14, 8 - 18.

Macombe C, Feschet P, Garrabe M and Loeillet D (2011) 2nd International Seminar in Social Life Cycle Assessment - recent developments in assessing the social impacts of product life cycles. *Int J Life Cycle Assess*, 16, 940-943.

Parent J, Cucuzzella C and Reveret J (2012) Revisiting the role of LCA and SLCA in the transition towards sustainable production and consumption. *Int J Life Cycle Assess*.

Reitinger C, Dumke M, Barosevic M and Hillerbrand R (2011) A conceptual framework of impact assessment within SLCA. *Int J Life Cycle Assess*, 16, 380-388.

Steering Committee of the Salmon Aquaculture Dialogue (2012) Final standards for responsible salmon aquaculture, June 2012.

Valdivia S, Ugaya C, Sonnemann G and Hildenbrand J (2011) Towards a life cycle sustainability assessment. Making informed choices on products. Paris, UNEP/SETAC.

Table 1: Top down and bottom-up approach to S-LCA (source: authors)

Top-down	Monitoring/management systems
Named board member/senior manager: with responsibility for implementing policy on labour standards within the company.	Responsibilities including supply chain management, are laid out as part of job description.
ILO core labour standards: Freedom of association/collective bargaining; no forced labour; no child labour; and equal opportunities. AND/OR Sector standards /codes and guidelines (where these exist).	Awareness of core labour standards; communicated at least within company; may extend to first tier suppliers and beyond. Can provide evidence of awareness/managing/monitoring. AND/OR awareness of sector specific standards/codes; communicated within company; to first tier suppliers with evidence of awareness/ managing/monitoring.
Bottom-up approach	
Largest category of worker employed (by total nos hours worked each week) – specific to each sector	Can identify this category of worker using data from last financial year.
Written employment conditions	Systems in place to ensure workers receive written information about their employment conditions and wages they will receive.
Working hours	Systems in place to ensure working hours comply with national laws, and that workers are not required to work in excess of 48 hours per week on a regular basis.
Wages	Systems in place to ensure wages and benefits paid meet, at a minimum, national legal standards or industry benchmark standards.
Health and safety	Systems in place to ensure working conditions are safe and hygienic. Training is in place and is regularly monitored by a senior manager.