Food, Beverage & Retail Sustainability Road Map

Mitigating Our Environmental Impact

**July 2023**

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Food, Beverage & Retail Sustainability Road Map

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# Introduction | **01**

University of Birmingham

## Sustainability is defined as the avoidance of the depletion of natural resources in order to maintain an ecological balance; and meeting our own needs without compromising the ability of future generations to meet theirs by the most efficient use of resources, by minimising carbon emissions and by reducing impact on the local environment.

Food, Beverage and Retail (FB&R) services within the University of Birmingham (UoB) have been identified as a key area for reducing emissions by using current internal policies to favour local produce and reduce waste. As part of the University’s commitment to reach net zero carbon, Scope 1&2 by 2035 and scope 3 by 2045, the department is striving to map and reduce scope 3 carbon emissions that emerge from food and catering practices. For the 2020/21 academic year, food and catering operations were estimated to have produced 271 tonnes of CO2e.

This document seeks to outline initiatives and special projects that will demonstrate our passionate attitude, and bold ambitions in reducing our impact on the environment. To achieve our goals, a structured and managed approach to sustainability within the food and beverage operation at the University of Birmingham will align to the three pillars that underpin the University Food Story: Inclusivity, Sustainability and Authenticity.

The sustainable food agenda has always been important to the University of Birmingham, we recognise the importance of providing healthy food and the environmental, economic, and social impacts surrounding food systems. Moving to more sustainable food systems will have a positive impact on the current ‘climate’ and ‘biodiversity’ and meet the needs and expectations of our stakeholders, this approach will hopefully address the wider impacts of our food systems and address the positive contribution we can make in this area.

The quality, nutritional value and sustainability of food has an increasingly high public profile and will become one of the factors by which students and staff exercise choice when selecting their food choices. Healthier, more sustainable food may help to encourage positive lifestyle changes outside the University for both students and staff, leading to a positive impact on health and well-being, and on our environment.

# Introduction | **02**

## Food systems are inherently connected to the wellbeing of individuals and communities involved in production and consumption of food and more broadly, the wellbeing of ecosystems and non-human communities. These are also interconnected with climate change, as food systems are both affected by and can impact climate change, and this will have an impact on the health and wellbeing of individuals and communities.

Campus Services recognises its responsibility to the environment and carries out its activities in an environmentally and socially responsible manner as we strive to incorporate sustainability into all operations.

## Key sustainability drivers are:

* To deliver an accessible, affordable, healthy and sustainable food offering to the highest standard
* Maintain our reputation as a sustainable and socially responsible organisation
* Maintain legislative, regulatory and stakeholder compliance
* To show continued leadership through the delivery and maintenance of our Fairtrade University status, and other sustainable food accreditation schemes

We believe that fostering fair and sustainable food for all is a powerful way to tackle the environmental crisis and we are committed to ensuring that this remains a core focus across all areas of our work. Campus Services is therefore committed to providing sustainable food in line with these values and environmental and ethical commitments as outlined in our *Food Story* and *Food and Beverage Sustainability Roadmap* and action plan.

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# Food Story | **01**

Vision

## The purpose of our Food Story is to deliver the framework in which to align with when we conceptualise, design and mobilise food and beverage operations throughout the University campus.

It supports the attainment of optimal wellbeing, social, ecological, operational and commercial outcomes for the outlets themselves and the University as a whole which will include its Guild of Students. Creating a sustainable food business is at its heart.

## Our Food Story is defined as:

The overarching ethos that will define and drive all food and beverage concepts, operations and delivery across the University of Birmingham.

## We will realise the Food Story through our vision:

With a respect for the environment and a considerate approach to customer needs, our dedicated team will deliver authentic, sustainable, and inclusive food experiences across campus and the local community

# Food Story | **02**

Pillars

## Our Vision is underpinned by three key values, or what we call Pillars:

1. **| Inclusive**

Food at the University of Birmingham is accessible, considerate and affordable. Through tolerance and consideration, we will seek to understand how our communities develop their food attitudes, behaviours and beliefs. The University of Birmingham will respond accordingly to these evolving food needs and will be driven by considerations relating to culture, religion, activity levels, allergen needs, dietary preferences and diverse lifestyle choices.

## | Authentic

To be authentic is to be original, genuine and honest. The food experience at the University of Birmingham will echo these values through the dining concepts, menu composition and food delivery across campus. The culinary team will engage with local food partners and subject experts to guide, discover and drive knowledge and diversity. In-house learning and development programs will deliver an inspirational food experience to continually develop a culture that fosters passion and innovation.

## | Sustainability

Food production at University of Birmingham will be aligned with the green values we know our customers and community share. Our kitchens will use the latest technology to measure and monitor food waste and deliver farm-to-fork provenance through online app platforms. We will nurture a sustainable workforce through training, empowerment and career pathways advancement. Finally, the University of Birmingham, supported by expert procurement partners, will continue to develop local supply partnerships and put seasonality to the forefront of our food sourcing approach.

# The Sustainability, Ethics and Security Committee

## As we strive to provide a structured and open forum to evaluate and review policy, direction and operational aspects provided by the University’s Food Waste Agenda, we have established our Sustainability, Ethics and Security Committee with its purpose being to:

* Bring ideas to the group while sharing knowledge with our peers
* Collaborate and share best sustainability practice

## The committee objectives are:

* To monitor the quality of food service operations by developing and evaluating audit tools such as customer surveys, benchmarking, mystery shopping etc
* To bring forward ideas around environmental sustainability of food service operations
* To discuss ideas for outreach and programming activities, and/or participate in the planning of such activities (e.g., cooking classes, cultural events involving/highlighting our food services, etc.)
* To ensure an open channel of communication for members of the University community to register their concerns and/or suggestions in relation to food on campus
* To receive and discuss requests and suggestions made by students/schools / colleges /staff with regards to food services at UoB
* Advise the Director of Business and Operations on the issuance of tenders, requests for proposal and selection of vendors for services on campus

The terms of reference can be found [here](https://bham-my.sharepoint.com/personal/s_davies_8_bham_ac_uk/Documents/SUSTAINABILITY/Sustainable%20FBR%20ToR.docx?web=1)

# Procurement | **01**

## Food Miles

We estimate that food supply Green House Gas emissions are approximately 80% production, 10% transport and 10% storage, at wholesale and retail level. Transport emissions are dominated by the upstream emissions of moving foodstuffs to production facilities, with the remainder of transport emissions coming from the delivery of final products to wholesalers and retailers.

Reducing these transport emissions can help reduce total emissions, but only if it makes sense in the context of the food’s entire footprint. Foods for which transport is a significant factor are often those which are shipped by air because they perish quickly and have a high value per unit weight. This leads to the notion that seasonal products will be considered where possible and be sourced as close to the University site as possible. At present, over 50% of the University’s food suppliers are within 30 miles of the campus.

## Local Produce

Local sourcing will be the driver of our procurement strategy. Supporting our local producers and suppliers creates a sustainable economy, benefits the community through job creation, and critically reduces food miles. UoB will positively encourage local suppliers to compete for its business by developing a simple and transparent procurement process that is not only driven on price alone - and will identify and create opportunities for local sustainable businesses to secure opportunities to supply the University.

The UoB procurement team will support developing long-term symbiotic partnership relationships with our local supply chain by investing in and developing local food and beverage suppliers and producers though supply chain integration and ongoing contractual commitments.

# Procurement | **02**

## Animal Welfare Pledge

* Meat – All fresh meat used in our kitchens is British. It is also accredited up to and above Red Tractor status, which means a good standard of animal welfare
* Eggs – All eggs used are British Free Range. The University has been awarded a Good Egg Award by Compassion in World Farming.
* Fish – We aim for all our fresh and frozen fish to meet sustainability standards such as Marine Stewardship Council Certification
* Milk – All milk purchased by the University is of Red Tractor status and will be sourced locally and sustainably

## Fair Trade

Fairtrade protects the livelihoods of small-scale producers from the developing world. It offers protection for their income against the financial pressures of international trade by guaranteeing them a fair price for their products. Premiums are also paid to the community - which means schools, hospitals and clean water. Fairtrade foods are available for sale in all campus shops and they are used in all cafés, restaurants and bars on campus.

Fairtrade products are served at all meetings hosted by the University and the Guild – and in all University and Guild management offices. Used Fairtrade coffee grounds from our outlets are recycled into heating logs.

UoB has been a Fairtrade University since 2003 and we are committed to campaigning for increased Fairtrade consumption on campus. Our Fairtrade Steering Group meets regularly to discuss how we can increase sales and we also host an annual 'Fairtrade Fortnight' event on campus.

While unsustainable palm oil farming is environmentally destructive, sustainable palm oil is an extremely useful natural oil and more efficient than other similar oils. We will work on reducing unhealthy oils and fats and replace with more sustainable healthy options.

# Procurement | **03**

## Industry Awards & Accreditation

Our procurement partners will continually review and implement new sustainable food accreditation schemes and ensure we maintain existing sustainable food and animal welfare accreditations by maintaining our status as:

* Fairtrade University
* Good Egg Awards
* MSC accreditation

We will also work towards developing a range of recipes across the various outlets to obtain the Soil Association’s “Food for Life” accreditation in 2023. We will strive for accreditation of groups and bodies that encourage the continual improvement of sustainable practices

## Reverse Logistics

Efforts to reduce supply chain packaging will be realised through the re-designed of food delivery and production methods and implementation of returnable/reusable logistics solutions. It is intended the principle of Reverse Logistics will be adopted so that any packaging utilised during the delivery process is removed, recycled and environmentally disposed of by the supplier. This includes items such as bulk cardboard, foam protection, thick plastic sheeting, metal strapping and pallets. The Reverse Logistic requirement will be a mandatory component of the University procurement process.

# Food Waste

## The UK generates in excess of 19 million tonnes of food waste annually, with businesses accounting for just under half of this. A large proportion of this food waste is still sent to landfill sites where it is broken down into methane and carbon dioxide – both of which are greenhouse gases.

Large-scale food service operations such as ours have the potential to produce a huge amount of organic waste. However, with smart technology and by rethinking production methodology, much of this can be prevented or minimalised. At the simplest level, this could be the effective management of food stocks to ensure all foods is used before end dates and avoiding lost costs - a core requirement of the management of a F&B operation. Significant progress has been made over the last academic year **to reduce our food waste** **from 6% to 1.2%** (as a percentage of sales)**.** Food Fellows aims to maintain its low percentage of wastage.

A key tool in the fight to reduce our food waste will be the implementation of automated waste tracking systems, such as **Winnow**. This technology is highly efficient at monitoring food waste in real time, so we can be agile and avoid wasting food during production, ensuring sustainable standards are being fulfilled without compromising productivity.

Managing products that are close to end of shelf-life dates will be though 3rd party app provider – **Too Good to Go**. This simple click-and-collect ordering platform allows our FB&R outlets across campus to connect with students online and offer them great discounts on fresh food that would ordinarily be discarded at the end of the day. We sell an average of 112 “surprise bags” per month.

Despite best efforts, an element of food waste will always be inevitable. Since 2016 we’ve mitigated this though the collection and treatment of kitchen organic waste though **anaerobic digestion**. In 2024 we’ll be trialing new food waste bins in the Fellows Coffee Shops too. We aim to ensure that 100% of our food waste is captured and treated via anaerobic digestion in 2024. The University currently sends over 70 tonnes of food waste to anaerobic digestion per year.

# Waste Segregation

## The effective collection and disposal of waste sustainability is achieved through the efficient, simple and achievable waste streaming. This is the separation of waste into defined categories to aid removal off-site to be reused, recycled and recovered. The actual waste streams adopted by UoB will be influenced by the sustainability approaches and credentials of the appointed third-party waste contractor but, as a guide, will fall under the following four waste segregation streams:

* Organic
* Mixed recyclable
* Residuals
* Paper and Cardboard

The aspiration for the FB&R Packaging Approach is to ensure packaging waste is not residual waste and is recyclable. Best practice dictates we use colour-coded bins for both back and front of house with clear signage, and it is desirable that all front of house packaging will feature on-pack disposal icons, to stimulate correct streaming and avoid waste contamination.

It is important that FB&R staff are educated, trained and monitored on the importance of adhering to the segregation of waste without contamination. A similar approach of clear messaging and education of all UoB management, staff and visitors about the importance of correct, uncontaminated waste is vital.

## Coffee

Coffee grounds will continue to be collected from all outlets and recycled to create fuel logs.

# Packaging | **01**

## The Waste Hierarchy, the principles of which have been adopted internationally, provides a recognised graduating framework to help determine the approach to sustainable FB&R packaging at UoB:

* **Avoid** – strive to omit unnecessary packaging
* **Reduce** – use less material, considering size, weight and thickness
* **Reuse** – packaging to be used for multiple use
* **Recycle** – packaging to be easily recycled
* **Recoverable** – transformed into energy, water and compost
* **Dispose** – a last resort to be used to incinerate to create heat (or landfill)

The first two levels relate to the avoidance and reduction of waste, the final four levels consider the disposal of waste sustainably, where waste is unavoidable.

The hierarchy follows an order of sustainable preference applicable to the desirability of types of packaging. Reusable packaging should be considered first, followed by recyclable, then recoverable (compostable), and as a last resort packaging and consumables recoverable via waste-to-energy technologies.

Single-use plastics will be phased out by 2023 in ‘eat in’ retail outlets on campus with the introduction of ‘keep cup’ returnable and reusable cups and containers encouraged across all FB&R outlets to further reduce residual waste and reducing the need for recycling processes. Compostable packaging materials will only be procured if an effective waste collection and treatment journey can be identified.

# Packaging | **02**

## Pre-packaged Products

Some FB&R products are procured and sold, pre-packed to the end user, such as drinks, snacks and sweets. The packaging for these products will adhere to national regulatory controls, including labelling. However, most pre-packaged FB&R products are likely to be established, national and international foodstuff brands that will already comply with guidelines and legislation.

## Consumables Packaging

The UoB procurement team will sustainably source and acquire consumable packaging that will align to the designated waste streams. The following gives an example of these types of items grouped into seven sub-categories:

## Subcategory Examples

Carriers Paper bags, trays, pizza boxes

Condiments Napkins, sugar sachets, salt sachets, pepper sachets, sauce sachets

Containers Plastic bowl with lid and/or fork, plastic cup with lid and/or fork, sushi box, generic box, noodle box Crockery Plates, bowls, boards

Cutlery Knife, fork, spoon, combi package, stirrer

Drinkware Hot cup, cup sleeve, cup lids, plastic glasses, plastic tumblers, goblets, straws, sleeve carrier Wrapping Baguette collar, tortilla sleeve, sandwich triangle, parchment

The design of the packaging needs to be storage efficient, reflecting the constraints on storage within most of our F&B operational areas. Furthermore, the packaging consumable items will feature clearly visible and internationally understandable disposable icons, directly linked to the waste streaming options.

Food | **01**

## Menu Composition

The UoB culinary team has developed menus that deliver a portfolio of seasonal cuisine, offering customers a full choice across a range of food encounters, avoiding repetition and rotation fatigue. There is a strong ambition to satisfy multiple customer preferences, taking into account modern lifestyle choices, with health, wellbeing and food provenance to the fore.

Furthermore, we ensure menu design and food production is underpinned by the desire to serve optimum portion sizes. There is even scope to offer the concept of a “Go Less” portion approach, acting as a direct counterpoint to the “Go Large” philosophy prevalent within modern fast-food culture, and directly contributing to reducing food waste and promoting healthy lifestyles and nutritionally balanced meals.

## Local Food Ingredients

Modern lifestyles now equate the terms "local food” with “sustainable food”. This makes “local” a synonym for characteristics such as fresh, healthy, and produced in an environmentally and socially responsible manner. “Local” has no legal definition but is often thought as food which has been produced relatively close to where it’s sold. Nonetheless, the term doesn’t provide any indication of carbon footprint of production practices and can’t be used as a reliable indicator of sustainability. A more useful indicator for sustainability in this instance would be seasonal fruit, vegetables and grain-based produce.

Food | **02**

## Animal-derived Protein

Agriculture’s overwhelming "sustainable hotspots" are red meat and dairy production. This is due to the inefficiency of eating higher up on the food chain. It takes more energy, and generates more greenhouse gas (GHG) emissions, to grow grain, to feed it to cows, and produce meat or dairy products for human consumption, than to feed grain to humans directly.

A large portion of GHG emissions associated with meat and dairy production takes the form of methane and nitrous oxide, greenhouse gases that are respectively 23 and 296 times as potent as carbon dioxide. Methane is produced by ruminant animals (cows, goats, sheep, and the like) as a by- product of digestion, and is also released by the breakdown of all types of animal manure. Nitrous oxide also comes from the breakdown of manure, as well as the production and breakdown of fertilizers.

No matter how it is measured, on average red meat is more GHG-intensive than all other forms of food, responsible for about 150 percent more emissions than chicken or fish. In this same study the second-largest contributor to emissions was the dairy industry. **With that in mind we aim to reduce animal-derived protein in all our recipes by 50% in 2024.**

## Plant-based Options

Certain lifestyle choices and food trends will not dictate our approach to developing recipes which don’t include animal-derived protein. While our focus has been on increasing our vegan and vegetarian offer, the environmental and nutritional impact of our decisions are the driver as we increase the use of pulses, beans, legumes and natural soya-based ingredients in our recipes.

Food | **03**

## An Edible Campus

The University campus covers an area over 26 acres with considerable green space. As landscaping continues, we will weave into the green strategy edible planting such as fruit trees, herbs and heritage vegetables. We already build on our community kitchen gardens at Winterbourne House using seasonal produce in our recipes and menus.

## Organic Food

Organic agriculture reduces non-renewable energy use by decreasing agrochemical needs. These require high quantities of fossil fuels to be produced) and contributes to mitigating the greenhouse effect and global warming through its ability to sequester carbon in the soil. Wherever possible, and provided sustainable practices are adopted, we will source and use organically produced ingredients.

## Dairy-free products

Plant based “milk” drinks offer an alternative to dairy and we will stock a range of ‘free of charge’ lactose free and plant-based alternatives in all our UoB and branded outlets.

# People

## Team Enrichment

As we deliver our successful FB&R sustainability plan, we continually train our teams to both understand the meaning of sustainability and, critically, empower them to actively achieve our goals in day-to-day operations. Our culinary training and team development academy will focus on ensuring our workforce are skilled and confident in their duties, whilst delivering the sustainability message to our guests and stakeholders.

## Sustainable Workforce

By creating career and personal advancement opportunities we will develop our people and, in shaping a positive workplace culture, will create and nurture a loyal team. We will focus on building our team skills set and encouraging further education through specialist qualifications. Flexible working hours for all will deliver a work-life balance, and ensuring open and confidential access to physical and mental health support will give our colleagues confidence and reassurance that we genuinely value their hard work, contributions and personal wellbeing.

## Student Food Experiences & Knowledge

The continued health and wellbeing of our UoB family is paramount and we will seek to educate and develop our students’ skills through “cook at home” food and recipe boxes supported by online cooking videos. Also, to increase transparency and champion traceability, we will develop an online nutritional, allergen and “farm to fork” provenance information portal where information on our production methods, procurement strategy and supply chain partners is available, open and honest.

# Equipment & Resource

## Food Production

Any approach to sustainability within a food operation needs to include the impact of kitchen equipment. The following recommendations will be considered as a checklist for any future FB&R equipment purchases:

* Equipment in commercial kitchens is often only 50% energy efficient. Low capital cost can drive the choice of equipment with little consideration for the whole lifecycle cost of the product
* The procurement team must examine the use of more energy-efficient equipment and cooking techniques to innovations in food preparation and storage
* When selecting equipment, we’ll consider less-obvious factors which influence energy consumption such as preheat energy utilisation, idle energy rate usage, production capacity, operating hours per day and maintenance and disposal costs
* Before the implementation of energy saving strategies, measurements should be set in place to monitor and target energy usage
* The production and evaluation of benchmarks provides a mechanism for the long-term management of energy use, and the ability to identify underperforming areas that can be targeted for action

## Energy and Water

The team will seek to work with the Estates team to assess how much energy and water is used within the department and establish a plan for how this level could be reduced each year, and:

* Ensure that all new equipment purchased for the department is assessed on “full life cost”
* Provide free drinking water to customers where possible, and signpost to [free utilities on campus](https://intranet.birmingham.ac.uk/student/free-utilities-on-campus.aspx#:~:text=Main%20Library%20%2D%20water%20fountains%20outside,in%20mezzanine%20and%20second%20floor).

# Food & Beverage Sustainability Action Plan Timeline

# A Call-to-Action Timeline of Key Sustainable Initiatives

|  |  |
| --- | --- |
| 2018 | Send all kitchen food waste to anaerobic digestion |
| 2023 | All of our dishes and recipes requiring whole raw egg will be made using free-range eggs |
| 2023 | Develop a Strategy for reducing waste |
| 2023 | Introduce Too Good To Go across our outlets |
| 2024 | Install waste management technology into all student restaurants |
| 2024 | Reducing ruminant (lamb and beef) meat from all our menus by 50% |
| 2024 | Ensure ‘eat in retail units with zero single use packaging for fresh food offerings |
| 2024 | 50% of dishes offered in cafes and outlets will be plant-based |

# Food & Beverage Sustainability Action Plan | **01**

|  |  |
| --- | --- |
| **Food & Beverage Sustainability Action Plan** | **To be Implemented** |
| **2022/23** | **2023/24** | **2024/25** |
| **Our Food** |
| * Minimise unsustainable products and set targets for the removal of single use plastics
 |  |  |  |
| * Introduce milk substitutes free of charge in all Food Fellows outlets
 |  |  |  |
| * Reduce the sugar in the foods we retail, prepare and serve by 10%
 |  |  |  |
| * Reducing ruminant (lamb and beef) meat from all our menus by 50%
 |  |  |  |
| **Single Use Packaging** |
| * Developed a single use action plan that covers all our Food and Beverage operations
 |  |  |  |
| * Ensure ‘eat in’ retail units with zero single use packaging for fresh food offerings
 |  |  |  |
| * Implement the use of ‘Keep Cups’ across all our outlets to reduce waste associated with disposable cups
 |  |  |  |
| * Providing water stations for customers, and ensuring that soft drinks are provided in glass bottles or aluminium cans rather than plastic bottles
 |  |  |  |
| **Plant based food** |
| * We will aim to increase by 10% our vegan and vegetarian offer by 2022
 |  |  |  |
| **Managing food waste** |
| * Ensure our suppliers remove packaging to be recycled
 |  |  |  |
| * Separate 100% of our kitchen food waste for anaerobic digestion
 |  |  |  |
| * All coffee grounds recycled to create fuel logs
 |  |  |  |
| * Install waste management technology into all Student restaurants
 |  |  |  |
| * Introduce Too Good To Go across our outlets
 |  |  |  |

# Food & Beverage Sustainability Action Plan | **02**

|  |  |
| --- | --- |
| **Food & Beverage Sustainability Action Plan** | **To be Implemented** |
| **2021/22** | **2022/23** | **2023/24** |
| **Establish a Food - Sustainability, Ethics and Security Committee** |  |  |  |
| **Seasonal Change** |
| * Seasonal fruit will always be stocked in preference to non-seasonal fruit
 |  |  |  |
| * We will use Fairtrade bananas in our outlets
 |  |  |  |
| **Fresh Meat** |
| * Minimum standard for all meat purchases will be Farm Assured meat provided by local producers and butchers
 |  |  |  |
| * All our pork and chicken meat will be free range
 |  |  |  |
| **Fish** |
| * We will only serve fish which is not on the Marine Conservation Society’s “fish to avoid” list.
 |  |  |  |
| * We will only procure fish carrying the MSC accreditation
 |  |  |  |
| * All tinned tuna will be pole and line caught skipjack and/or yellowfin as a minimum
 |  |  |  |
| **Dairy and Eggs** |
| * All our dishes and recipes requiring whole raw egg will be made using free-range eggs
 |  |  |  |
| **Bread** |
| * We will introduce baked goods, including breads, which do not feature unnecessary ingredients and additives
 |  |  |  |

# Food & Beverage Sustainability Action Plan | **03**

|  |  |
| --- | --- |
| **Food & Beverage Sustainability Action Plan** | **To be Implemented** |
| **2021/22** | **2022/23** | **2023/24** |
| **Energy and Water** |
| * The team will seek to work with the Estates team to assess how much energy and water is used within the department and establish a reduction plan
 |  |  |  |
| * Ensure that all new equipment purchased for the department is assessed on “full life cost”
 |  |  |  |
| **Waste and Recycling** |
| * We will work with suppliers to reduce packaging and use reusable packaging wherever practical
 |  |  |  |
| * We will regularly monitor the food waste whilst seeking to reduce it by 40%
 |  |  |  |
| * Develop a strategy for reducing waste
 |  |  |  |
| * We will send all kitchen food waste to anaerobic digestion
* We’re trailing sending customer waste food from cafes to anaerobic digesion in 2024
 |  |  |  |
| * We will reduce the amount of waste from all sources and send all general waste to Energy Recovery
 |  |  |  |

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