



Our Seas, Our Fish, Our Food

Sustainability Report, April 2014



What's for dinner?

A thought on most peoples' mind when they are travelling home from a long day at work.

Whether you stop off for a filet of fish at a restaurant or choose cod baked in the oven at home, fish provides a source of high quality protein to your diet.

Espersen's 'Our Seas, Our Fish, Our Food' programme is designed to drive progress towards healthy seas and healthy fish stocks to provide healthy food for you.



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The Seafood Supply Chain

As the global population rises, the dynamics of the population are changing.

Over the last half a century we have seen an unprecedented increase in global fish consumption, which is projected to continue rising due to an increasing global middle income group seeking seafood as a high quality protein source¹.

The seafood industry plays a key role in food security and supports the livelihoods of millions of people. Currently, fish represents approximately

16.7% of all animal protein supply globally (Figure 1²) and this number is significantly higher in developing regions, such as Asia (23.2% in 2010²). By 2030, Asia's population is expected to represent 70% of global fish consumption¹.

Meeting the demands of a rising population requires innovation, development and implementation of new technology. This will help us to unlock the solutions to the seafood industry's greatest challenges and ensure we can serve delicious seafood to future generations.

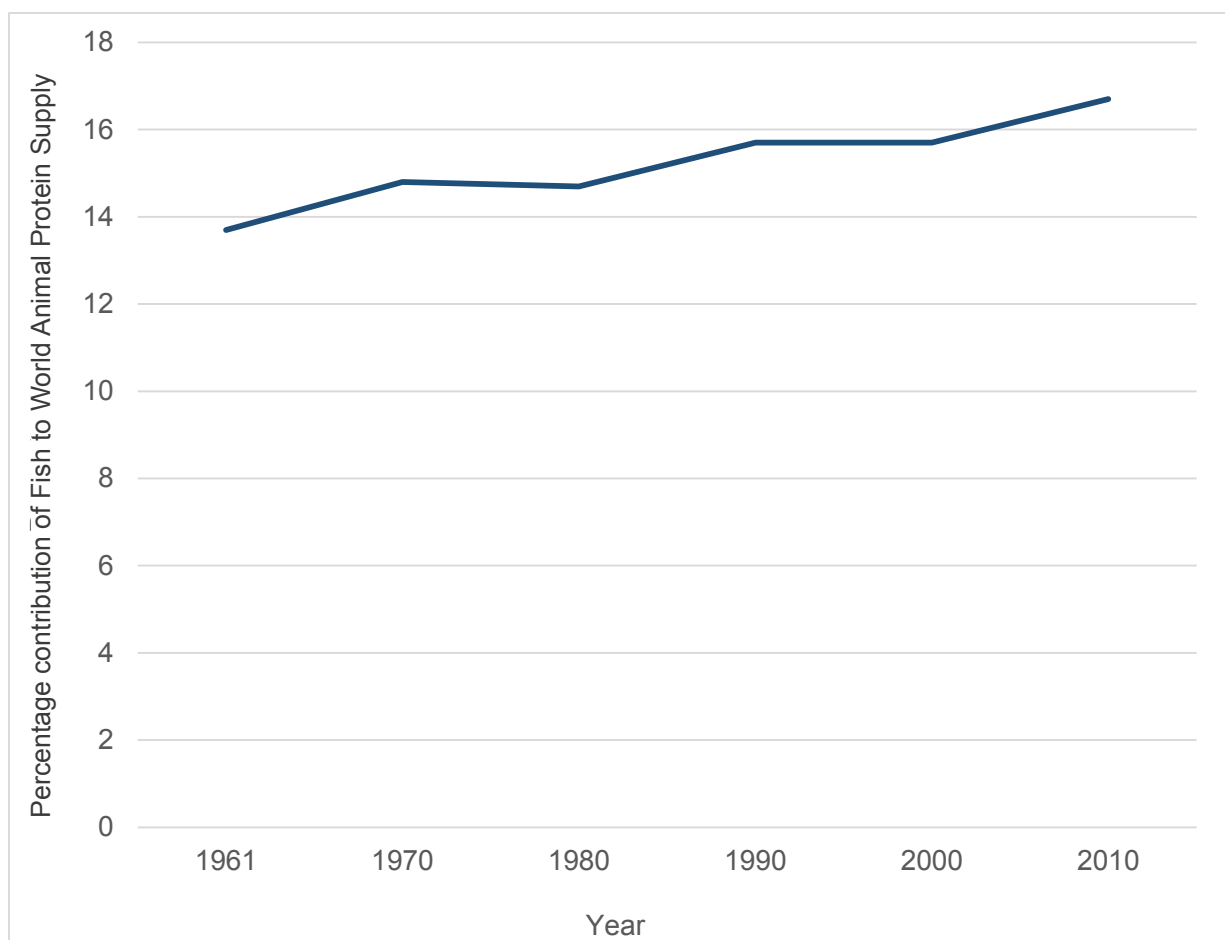


Figure 1. Contribution of Fish to World Animal Protein Supply (%)²

¹ World Bank (2013) Fish to 2030: Prospects for Fisheries and Aquaculture; ² FAO (2010) Impact Assessment of Discard Reducing Policies





Espersen

We are a world leader in the processing of frozen fish blocks, frozen fillets, special cuts and breaded fish products with production units in Denmark, Poland, Lithuania, Russia, China and Vietnam.

As a company we rely on the raw materials we source, which are predominantly white fish species such as cod, haddock, hoki, pollock and saithe.

Quality

The seafood we produce is recognised for being high quality and you may well be familiar with some of the finished products such as fish fingers, fish nuggets, fish cubes and finger foods. The majority of these products are tailor made, private label products for our customers.

We also have our own local branded products, Rahbek. Our focus for the Rahbek brand is centred around new product development, refinement and marketing to consumers, internationally renowned retail chains and companies around the world.

At Espersen we have a fully integrated quality and food safety system which is audited by our Quality Team and recognised through a number of certifications including HACCP, ISO 22.000, BRC, IFS, and chain of custody for MSC and ASC products.

Sustainability pathway

Everything we do is geared towards continued access to fish resources, so carefully managed fisheries are vital to us.

We recognised the opportunity to partner with an organisation to help develop and deliver our bespoke sustainability programme. *trie*SM our partner, based in Oxford (UK) are a team of scientists, consultants and producers who are leaders in their field.

Our role as a global market leader in the seafood industry provides us with an opportunity to address the sustainability challenges presented. We have the ability to drive positive change through our on-going commitment to our staff, fishermen, partners and customers.

Developing a Sustainability Programme

trieSM applies a design process, acknowledging that sustainability isn't something that we finish but rather something we continue to do.

The diagram (below) illustrates how Espersen is working in partnership with trieSM to develop, implement, measure and review a bespoke sustainability programme. In 'scope' we identified the sustainability issues affecting our industry, with particular focus on issues most relevant to our business using the trieSM 3Es (Economics, Ethics & Environment) framework.

The issues surrounding Espersen were put into context alongside a stakeholder analysis.

Understanding how our internal and external stakeholders prioritise the issues has helped us align evidence and support, forming the structure of our programme. Stakeholder expectations and aspirations have also helped us to identify what might need to be considered in the future development of the programme.

We validated our programme by cross referencing our business and stakeholder analysis against a review of published science relating to each issue. The science review also helped to inform the actions required to implement the programme.

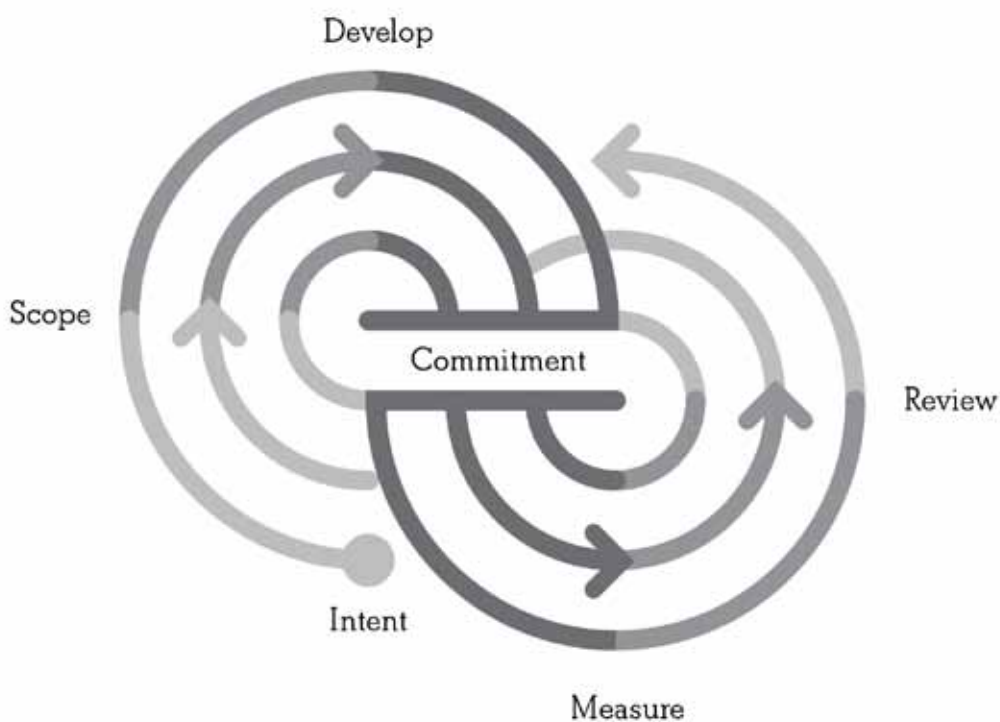


Figure 2. trieSM process

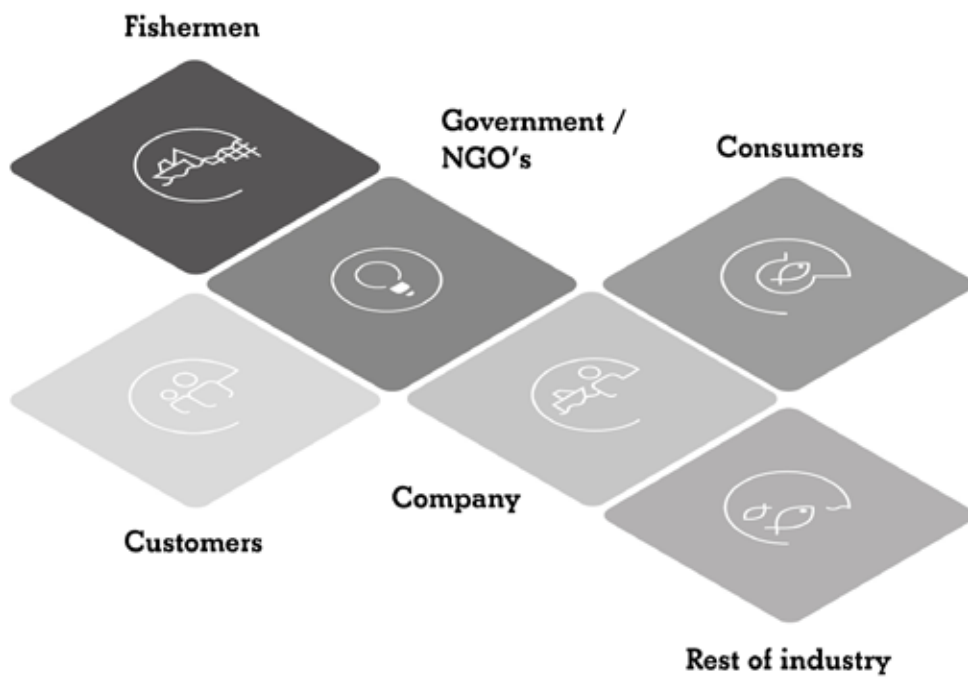


Figure 3. Stakeholders

Our Programme

Our Sustainability Programme consists of five Programme Areas each addressing a number of sustainability issues (Figure 3). The programme areas were developed from the issues identified by internal stakeholders, external stakeholders and the scientific review.

The primary issue identified by all stakeholders and the science review was the availability of fish, followed closely by marine biodiversity. The Trawler Gear Technology and Fish Stock Management workstreams were composed to tackle these key issues.

A programme aimed at the management of the marine ecosystem was also important because of clear scientific evidence that marine biodiversity is threatened, posing a serious threat to the marine environment and our business.

Our fourth programme area, Energy & Waste, was developed in response to climate change and the rising costs of energy.

The fifth area, Worker Welfare, was developed to focus on the health, wealth and education of all of our people across the world.

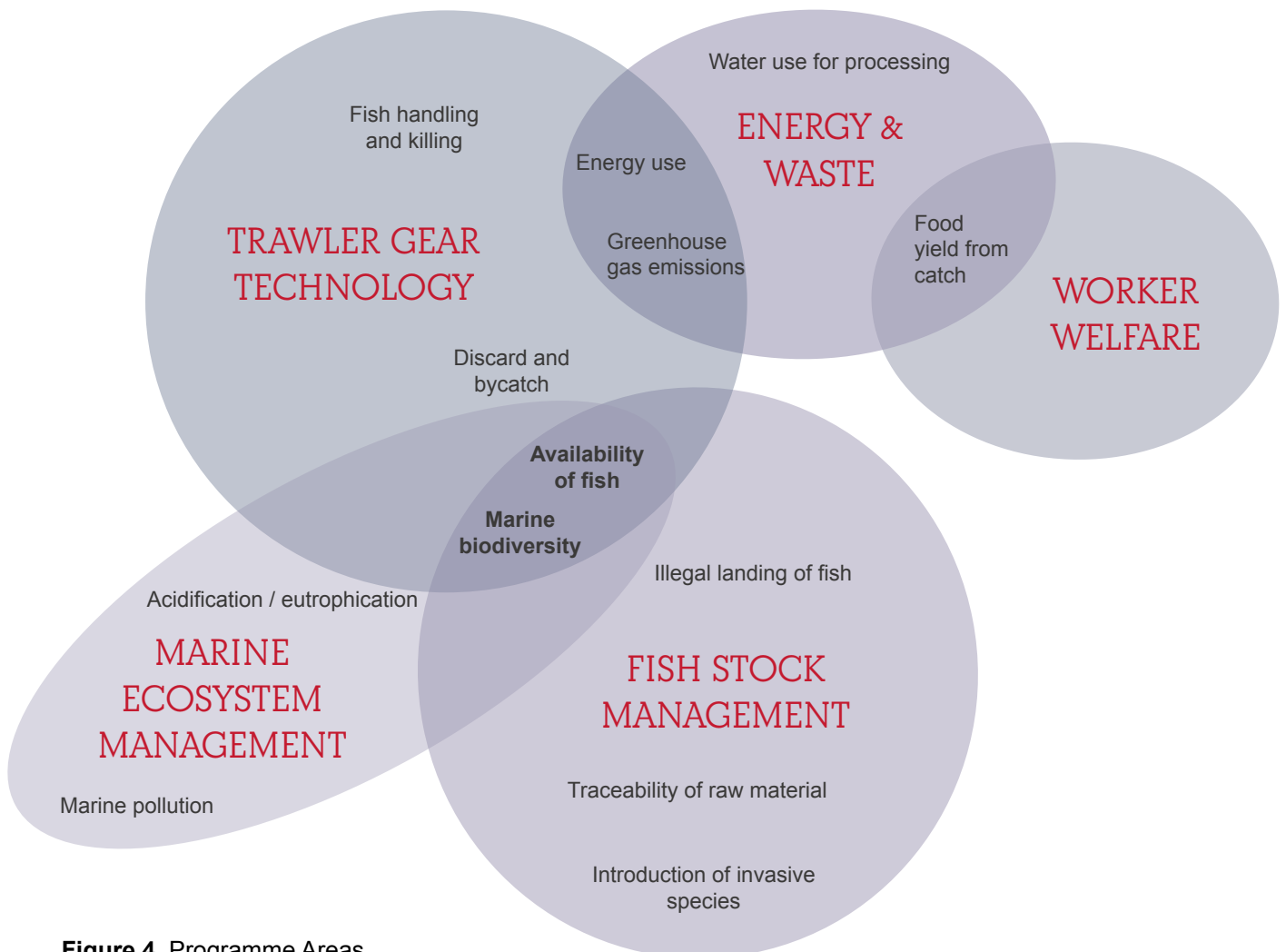


Figure 4. Programme Areas

Our Goals



Trawler Gear Technology

Gear and nets that minimise impact on the environment and fish welfare and ensure the selection of target species



Fish Stock Management

To ensure viable fish stocks through evidence based sourcing decisions



Marine Ecosystem Management

Engaging, influencing and supporting policies that promote a healthy marine ecosystem



Energy and Waste

Fish processing using all renewable energy and generating zero waste



Worker Welfare

All our employees recognise Espersen as a good employer, wherever we are in the world

The following pages outline each of these Programme Areas; our objectives, what we are doing and what has been done.



Trawler Gear Technology



Gear and nets that minimise impact on the environment and fish welfare and ensure the selection of target species

The process by which we remove fish from the sea is of great importance - from fuel inputs to yield from catch.

Discards and bycatch account for significant mortality in marine fisheries, contribute to waste and increase the challenge of assessing available stocks. On average, discards account for 8% of total catch globally³. However, EU studies have reported that discard rates for bottom trawling can be up to 70% of total catch. This variation is due to specific characteristics of each gear, such as mesh size and selectivity modifications³.

The focus of the Trawler Gear Technology programme is to minimise the impact of fishing on the marine environment, to ensure the selection of target species whilst considering fish handling and to support the development of fuel efficient gear design.

³European Commission (2011) Impact Assessment of Discard Reducing Policies

Objectives

1. Identify and promote new gear technology with improved fish handling, selectivity and reduced environmental impact
2. Identify and promote trawler equipment and practices that reduce fuel consumption per kilogram of fish catch

‘Modern consumers are concerned not only about the quality of fish they eat, but also about the environmental impact as a result of fishing and the quality of life of the people who depend on the industry for a living’.

**- Alex Olsen, Espersen
Head of Sustainability**

What we're doing



- We are designing a workshop for key stakeholders on trawler technology which is committed to finding solutions that ensure the impact of marine fishing is minimised whilst providing the benefit of marine fish as a high quality protein source in the human diet. Through such workshops our aim is to instigate the development of sustainable trawler gear.
- We continue our financial support to the scientific study on best practice on bottom trawling - "Trawling: Finding Common Ground on the Scientific Knowledge Regarding Best Practice".

What we've done

- In April 2014, we won a McDonald's Global "Best of Sustainable Supply" award for our partnership project on trawling technology. The project demonstrated that fuel consumption per kg of cod can be reduced by 35%, which lowered fuel costs, impact on the environment and increased yield.
- We co-chaired a working group with Seafish to assess the opportunity to reduce greenhouse gas emissions within the marine fishing sector.
- We were engaged in an FAO led initiative, working with experts and scientists to establish opportunities to reduce greenhouse gas reductions in the seafood sector.
- We joined the executive committee of the Baltic Sea Regional Advisory Council. The Council has assessed, identified and proposed key research projects to the European Commission for improved gear technology.



**Espersen recognised by McDonald’s as
“Best of Sustainable Supply” award winner**

McDonald’s has announced its “2014 Best of Sustainable Supply” award winners in a report highlighting how suppliers achieved significant results by identifying opportunities and applying sustainable solutions in diverse places across the world. More than 600 entries were submitted, with Espersen earning a prestigious place alongside 50 other leading projects.

Accompanying each Programme Area is a trieSM Sustainability Barcode (below). This helps to communicate and categorise which issues are addressed by that Programme Area.

trieSM Sustainability Barcode

Ethics

- Traceability of raw material
- Fish handling and killing
- Worker welfare

Environment

- Marine biodiversity
- Introduction of invasive species
- Greenhouse gas emissions
- Marine pollution
- Acidification / eutrophication

Economics

- Availability of fish
- Illegal landing of fish
- Discard and bycatch
- Energy use
- Water use for processing
- Food yield from catch



Fish Stock Management



To ensure viable fish stocks through evidence based sourcing decisions

The availability of fish was identified as a key issue for the marine sector by our internal and external stakeholder questionnaires and our science review.

Recent studies suggest that the global human population will reach around 9 billion by 2050⁴. The FAO state that the fishery sector plays a key role in food security. However, most of the stocks of the top ten species of the world marine fisheries are fully exploited.⁵

The Fish Stock Management programme addresses the fundamentals of securing fish for our future by monitoring our fish stocks and tracing the sources of our catch.

⁴ United Nations (2011) World Population Prospects

⁵FAO (2012) The State of World Fisheries and Aquaculture

Objectives

1. Develop a database to monitor the annual volume of sourced fish (wild and farmed) and to ensure purchasing decisions are based on robust sustainability criteria for fisheries
2. Implement electronic traceability systems throughout the supply chain such that all stock can be traced back to source

‘Providing communities around the world with greater access to fishery management tools will make it easier to set responsible fishing targets that satisfy the needs of both people and the marine ecosystem’

**- Ray Hilborn, Professor,
Aquatic & Fishery
Sciences ; University of
Washington**

What we're doing



- We are a member of the Global Sustainable Seafood Initiative (GSSI) expert working group to define the process and criteria by which seafood certification programmes become certified. The purpose of the GSSI is to translate principles and requirements of the FAO guidelines into usable and practical indicators and criteria.
- We are continuously updating our fisheries database, 'CatchIT' with new data to assess the sustainability of the fisheries we are buying from. The system uses robust criteria and scientific data to assess whether a fishery is healthy, requires an action plan or is to be declined by our purchasing team.
- We are integrating electronic traceability data from catches to our production system across all of our production facilities in Europe. To help us to achieve this we have collaborated with the Danish Fishermen's Producer Organisation to expand their electronic traceability system (SIF) throughout the Baltic Region.

What we've done




- We were a member of the GlobalG.A.P. Sector Committee for Aquaculture where we provided our expertise, with particular focus on the sustainable development of aquaculture worldwide.
- We worked in collaboration with the Danish Fishermen's Association to gain MSC certification for East Baltic cod. This was the first cod population to receive an MSC certificate in the EU.
- We have chaired a sustainability group for the European Fish Processors Association and European Federation of National Organisations of Importers and Exporters of Fish which compiled and published guidelines for the responsible sourcing of fish.
- We have supported Lithuanian and Latvian authorities to move to MSC certification.








Catch IT is Espersen's bespoke fish stock management database which utilises the best scientific data available in order to inform all of Espersen's fishery purchasing decisions.

trieSM Sustainability Barcode







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Worker welfare 

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Economics

Availability of fish 
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Energy use 
Water use for processing 
Food yield from catch 



Marine Ecosystem Management



Engaging, influencing and supporting policies that promote a healthy marine ecosystem

We believe that in order to effectively tackle our sustainability challenges we need to understand our role in relation to each issue.

Espersen are not directly responsible for some of the issues threatening biodiversity, such as acidification and eutrophication, which is why these issues were not recognised by our stakeholders. The seafood sector supports the livelihoods of over 54 million fishers and fish farmers and any issues associated with the marine environment can pose a threat to our business too⁶.

The Marine Ecosystem Management programme supports our drive towards a healthy marine ecosystem and focuses on our opportunities to inform key decision makers.

⁶FAO (2012) The State of World Fisheries and Aquaculture

Objectives

1. To effectively communicate Espersen's awareness and concern about the negative impacts and risks to business associated with acidification and eutrophication in the marine environment
2. To communicate Espersen's support for a balanced ecosystem approach in stakeholder forums to address issues that can negatively impact the marine environment e.g. illegal fishing, seal populations, invasive species

'The task of mapping environmental characteristics and species distribution, ecosystem goods and services, ecosystem vulnerabilities, the impacts of human activities and so on, often proves hugely problematic. The circumstances are further complicated these days in cases where traditional uses (shipping, fisheries etc.) come up against new and emerging economic activities such as off-shore wind farms, mining or deep-sea oil and gas drilling operations'.

- Barrie Stevens, Head of OECD International Futures Programme

What we're doing



- We are a key stakeholder in an OECD project “Future of the Ocean Economy” and will provide expertise in a workshop in 2015 on marine spatial planning and marine ecosystem management.
- Using the very best science, technical expertise and practical knowledge we are committed to communicate a clear overview of the risks a compromised marine ecosystem would bring to livelihoods and the food chain.

What we've done

As a key stakeholder in the Baltic Sea region and as a member of the executive committee for the Baltic Sea Advisory Council we have engaged with several stakeholders and projects including:

- ‘Decision Making Management Procedures in Environment and Fisheries’ funded by the Nordic Council. The objective of this project was to identify robust procedures to roll out fisheries management measures in protected areas.
- MYFISH, an EU Commission funded research project. The project objective is to define maximum sustainable yield (MSY) variants and constraints including ecosystem concerns to integrate the MSY concept with the overarching principles of the Common Fisheries Policy.
- ODEMM (Options for Delivering Ecosystem Based Marine Management), an EU project to identify how ecosystem based management can become part of the governance system for EU fisheries.
- Baltic Sea Scenario Planning, a WWF workshop to define the commitments and actions needed to balance economic and social uses with the protection of the Baltic Sea.
- Sustainable Fisheries Partnership (SFP) where we have provided sponsorship to support SFP’s mission to engage and catalyse global seafood supply chains in rebuilding depleted fish stocks and reducing the environmental impacts of fishing and fish farming.



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Energy use
Water use for processing
Food yield from catch



Energy and Waste



Fish processing using all renewable energy and generating zero waste

Energy costs are rising and there is growing concern over the effect of climate change on global temperatures and sea levels. Each of the last three decades has been successively warmer at the Earth's surface than any preceding decade since 1850. It is extremely likely that human influence has been the dominant cause of observed warming since the mid-20th century⁷.

From a supply chain perspective, we have the opportunity to reduce our emissions and control our waste beginning with the fuel that we use for our trawlers to the energy which powers the machinery in our factories.

The Energy and Waste programme is about waste, pollution and the use of water and energy. Controlling utilisation of these resources will have both economic and environmental benefits by lowering costs and reducing greenhouse gas emissions (GHGE).

⁷ IPCC (2014) Climate Change 2013: The Physical Science Basis

Objectives

1. Reduce potable water intake by 10% over 3 years
2. Cap greenhouse gas emissions at current level within the Espersen group
3. Increase the amount of renewable energy used in production
4. Reduce the overall cost of waste handling by 15% within the next 3 years

'There is a clear message from science: To avoid dangerous interference with the climate system, we need to move away from business as usual'.

- Ottmar Edenhofer, IPCC Working Group III co-chair

What we're doing



- In 2014 we are investing in an extra line of conveyor defrosting in our processing factory in Poland. To date the two current conveyor defrosters have reduced water usage by 30% and increased product quality.
- To reduce our CO₂ emissions, all of our fish from Asia and nearly 100% of our Norwegian Cod and Haddock will be transported on container ships. 95% of our frozen fish will be transported by rail as an alternative to road and air freight.
- We are in the process of gaining 3rd party certification for our production facilities to the ISO 14001:2015 standard on environmental management.
- We are piloting a project to engage with our employees to identify opportunities for resource saving initiatives across our production facilities.

What we've done

- In August 2013 we installed solar energy cells on two sites; the Espersen consumer production unit in Hasle and cold store in Rønne. The cells have supplied us with 8% of our total electricity usage over the first five months.
- We have reduced the amount of water used for washing fish storage boxes in our production facilities by 71% (220 litres to 63 litres). This has saved us approximately 19,000 Euros.
- In our processing factories in Denmark, we send zero waste to landfill.
- We contributed to the development of the PAS2050 addendum for fish products. The PAS2050 fish standard was published by the British Standards Institution to help our industry reduce greenhouse gas emissions from our activities all along the supply chain.
- Examples of our water, waste and energy data for the last three years are shown on the following pages.

Water

Water per ton of product has reduced by 15% over 3 years (2011 – 2013)

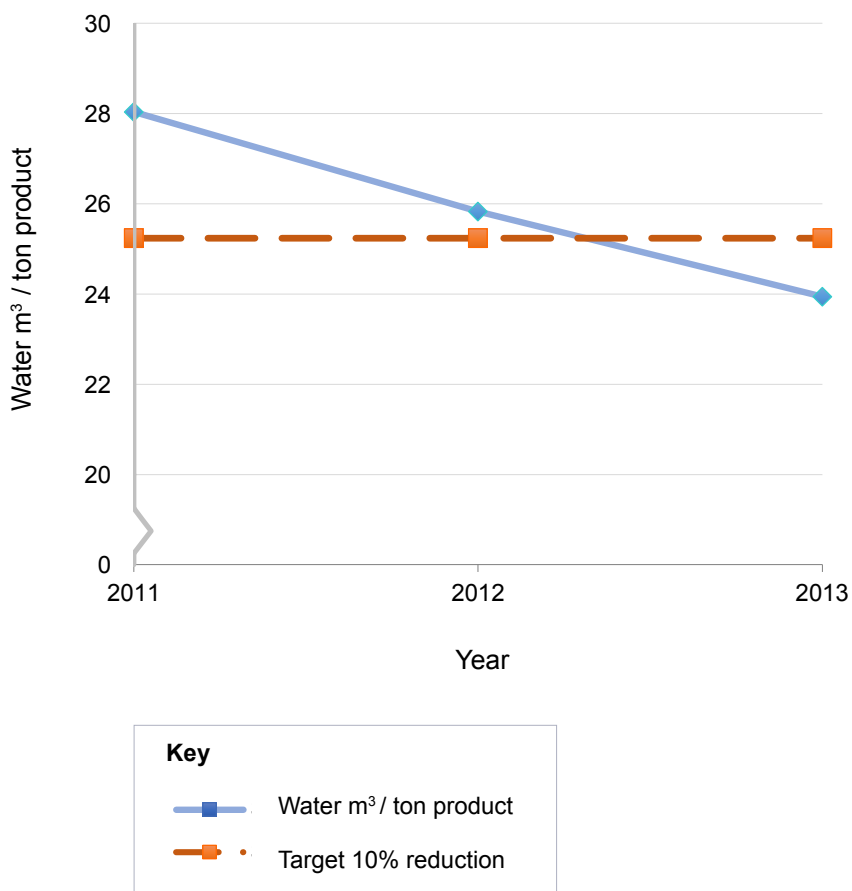


Figure 5. Espersen Group - water per ton of product

trieSM Sustainability Barcode

Ethics

- Traceability of raw material
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- Worker welfare

Environment

- Marine biodiversity
- Introduction of invasive species
- Greenhouse gas emissions
- Marine pollution
- Acidification / eutrophication

Economics

- Availability of fish
- Illegal landing of fish
- Discard and bycatch
- Energy use
- Water use for processing
- Food yield from catch

Waste



Waste to landfill for the processing of Espersen Consumer products has decreased by 44% over the last three years (2011 – 2013)

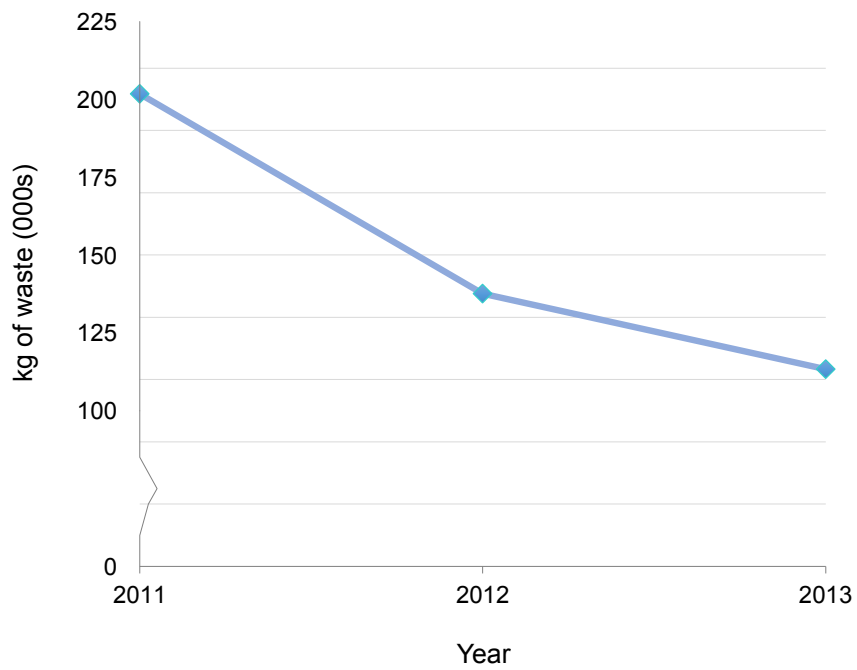


Figure 6. Espersen Consumer - kg waste to landfill

We have reduced our cost of waste at our Koszalin factory by 58% over a two year period (2011 – 2012)

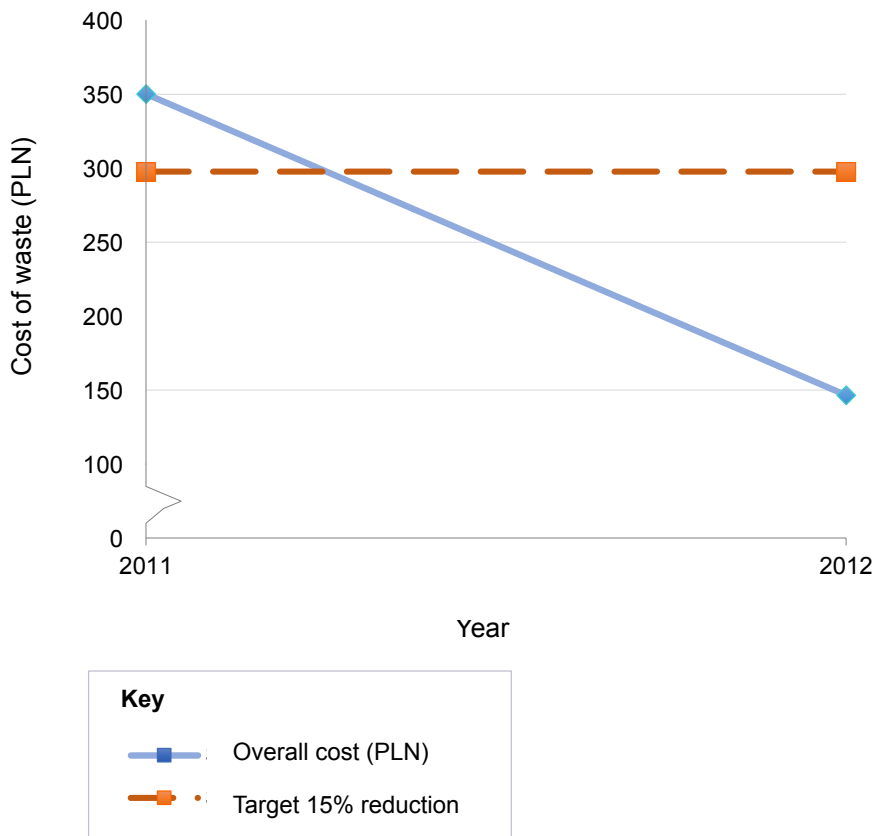


Figure 7. Koszalin - cost of waste (PLN)

Energy



Energy usage per kg of product across the Espersen Group has reduced by 11% over three years (2011 – 2013)

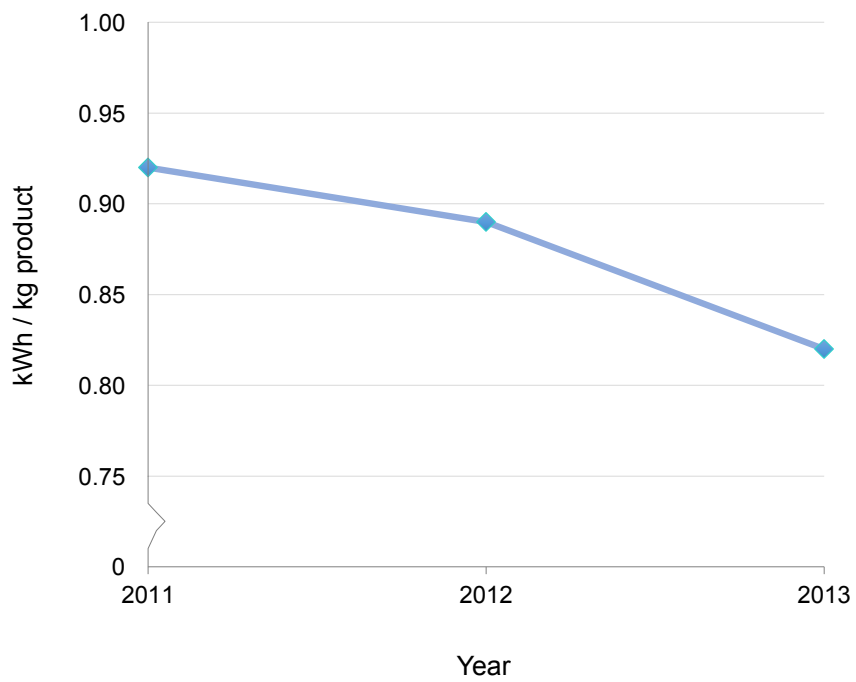


Figure 8. Espersen Group - energy use per kg of product

CO₂ emissions

Over three years (2011 – 2013) we have reduced our CO₂ emissions by 3.1% whilst production has increased by 3.7% across the Espersen Group. We have therefore met our objective to cap greenhouse gas emissions at current level (2011).

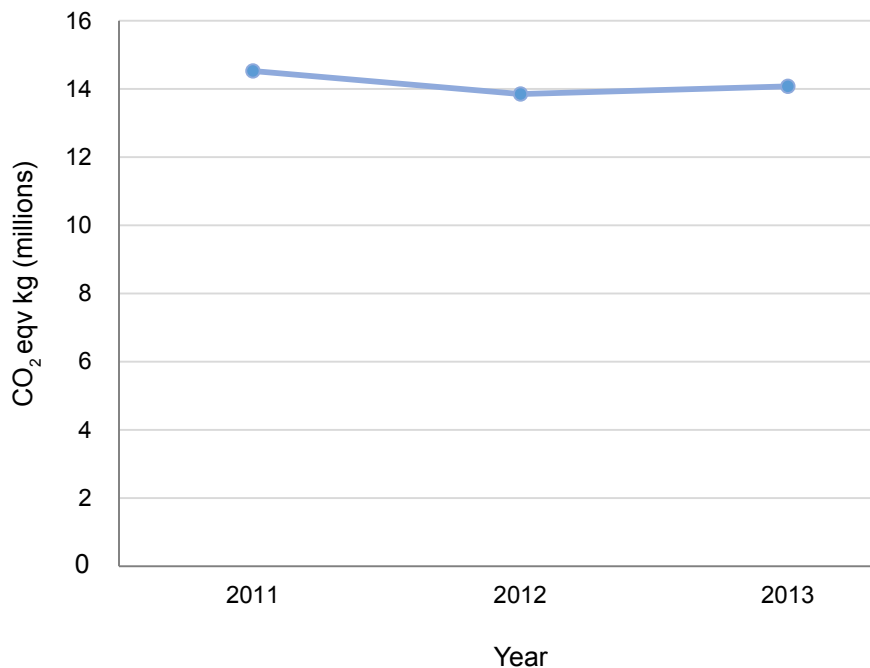


Figure 9. Espersen Group - CO₂ emissions (filet & consumer production)

Espersen factory CO₂ emissions have been calculated based on official EU statistics for energy supply by country. Scope 1 & 2 emissions are calculated for our production facilities and data is collected from the following sources:

- Energy used on-site in stationary combustion (energy from fuel and gas)
- Energy used in mobile combustion sources (energy from freight for own vehicles only)
- Purchased electricity, heating and cooling
- Fugitive sources or industrial processes (refrigerants and any other industrial processes)
- Waste water treatment



Worker Welfare



All our employees recognise Espersen as a good employer, wherever we are in the world

We are a modern fish producer with factories across the world which enables us to compete in the global market. Our workforce is therefore made up of people from different cultures but ultimately they all have the same fundamental needs.

The welfare of our workers is an intrinsic part of our business.

The Worker Welfare programme is focussed on three key areas: health, wealth and education and it is run by our dedicated People Team.

Objectives

1. Create a human-centred strategy for worker welfare (under the framework of health, wealth and education) that can be applied in all countries where Espersen work
2. Maintain a baseline standard such as the Ethical Trading Initiative (ETI) code and review regularly

'We are building our People Programme to ensure that Espersen continues to be an employer of choice wherever we are in the world'.

- **Max Sørensen;**
Executive Vice President
COO

What we're doing

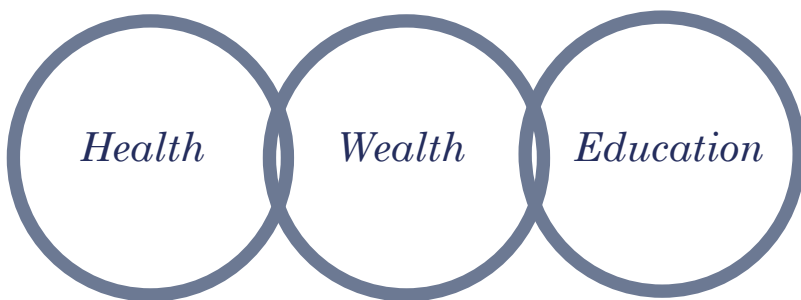


- As part of our cross company People Programme, we are developing a tool to assess the living wage in each of the locations we operate to help us to identify opportunities to improve the health, wealth and education of our employees.
- We currently have a number of People Programme initiatives tailored to locations across the group including the implementation of personal development modules, providing bus transport to and from work (Lithuania and Poland), subsidising food product sales (Poland, Denmark and Lithuania) and contributing financially to fitness activities for employees (Denmark and Poland).
- We also provide support for employees to take part in finance, IT, mathematics, Danish and English lessons. In our facility in Poland more than 60 factory and office workers have participated in English lessons.

What we've done

- We have developed and launched the Espersen Leadership Programme (ELP). The programme was created to develop our People Managers and create a common platform to align Espersen's Leadership qualities.
- We have developed an employee engagement survey to form the basis of our 'Kompas' programme in Poland which defines Espersen's values. More than 200 employees participated in a team building exercise as part of the 'Kompas' programme.
- We have run a dedicated programme to develop ergonomically designed equipment to improve the health, safety and comfort for our workers. Knives developed from employee ideas in our filleting factory to reduce RSI are now patented and used in filleting factories around the world.
- 90% of employees take part in our job rotation scheme to avoid repetitive work.

Espersen People Programme



trieSM Sustainability Barcode

Ethics

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Worker welfare

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Water use for processing
Food yield from catch

Esperen People Programme



For every location where we operate we use a three tiered framework (bronze, silver & gold) for monitoring our progress against our three People Programme pillars (health, wealth & education).

All sites will meet a minimum of the Bronze requirements which correlate with the Ethical Trading Initiative standards.

Below is a summary table with examples of practices that fall into each tier.

	<i>Health</i>	<i>Wealth</i>	<i>Education</i>
Gold	Ergonomic innovations e.g. equipment design Financial support for a physiotherapist	Social fund for employees 'outside of work' activities	Classes in work time e.g. English, finance, maths Support by allowing free time for studies
Silver	On site medical equipment / care & training (above national requirement) Job rotation Out of office team activities e.g. organised cycling event on Bornholm	Competitive salaries Esperen food products subsidised for employees Subsidised transport to and from work	Regular employee performance appraisals to identify staff training and support needs A range of courses are provided for specific issue training e.g. VAT, Codes of Practice, technical training
Bronze	Ensuring all key employee training and compliance requirements e.g. health & safety, risk assessments and first aid courses	Ensuring all legal requirements relating to working hours, sick pay and minimum wages are met	All new employees receive induction training All employees are trained to meet legal requirements in relation to food safety / hygiene and good manufacturing practice
Compliance with ETI standards			





Sustainability Programme Accreditation, trieSM

trieSM actively partner with Espersen to support the development and implementation of projects based on evidence based science. Together we systematically review and update the programme to address evolving stakeholder interests and integrate new scientific understanding and developments.

Espersen continue to demonstrate their on-going commitment to developing a sustainable seafood industry and continue to deliver against their sustainability objectives.

Roland Bonney, Director, trieSM



trieSM Accredited



Klaus B. Nielsen (CEO)

Sustainability is at the core of our company's activities and we are proud of the work we have done in this field so far. Fish processing is now a truly global industry and alongside the issue of fish stock management, we also have to address climate change, worker welfare and marine ecosystem impact. Society's concern for the issue of sustainability is driving demand for greater levels of accountability and so we need to increasingly develop the tools of transparency. We have a shared responsibility to maintain our fish stocks in a healthy state. Implementing good fisheries management is resulting in stocks that are healthier has now allowed quotas for cod to increase.

At Espersen we continually engage with our stakeholders through the work streams of our sustainability programme; it is no longer a question about whether to establish sustainability initiatives, but rather how. We achieve this in three ways. Firstly, we ensure that our programmes of work and investments align with stakeholder interests to deliver progress against the ethical, environmental and economic benefits that all stakeholders want. Secondly, through collaboration with suppliers, customers and regulators we are able to bring the necessary resource, focus and critical mass to address the challenges facing our sector. Thirdly, we inform and support the development of new equipment, procedures and management practices with the very best science and technical expertise.

There are still many opportunities to drive improvements in our sector building on our growing understanding of how to successfully manage our fisheries and our resource use so that marine caught fish can continue to play an important role in securing a high quality protein for humanity. We take pride in the food we produce for the world's mums, dads and children to enjoy.

Appendix A: Espersen Key Figures

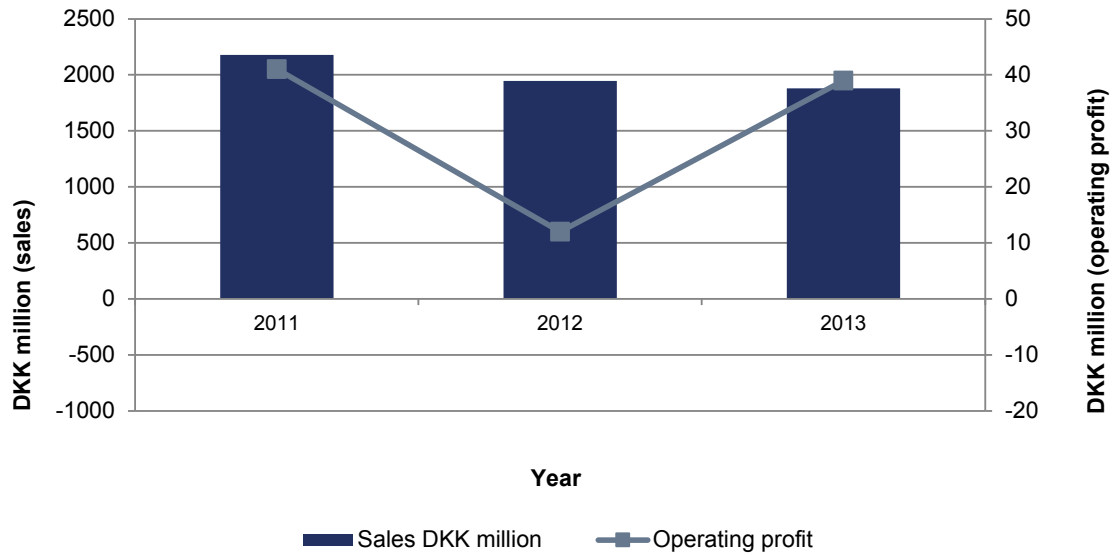


Figure 10. Sales and operating profit (2011 - 2013)

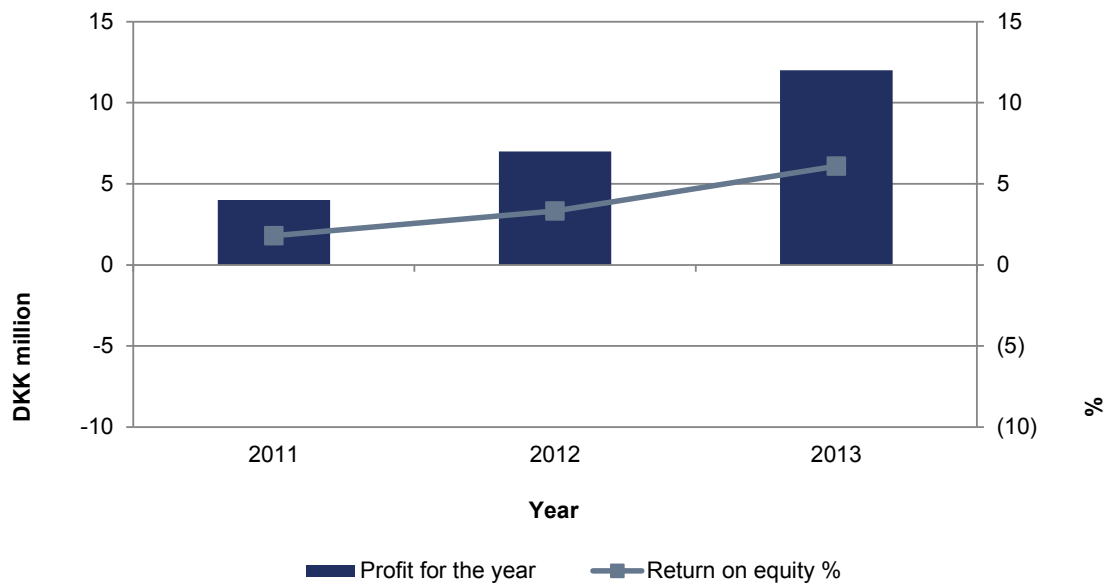


Figure 11. Profit for the year and return on equity (2011 - 2013)

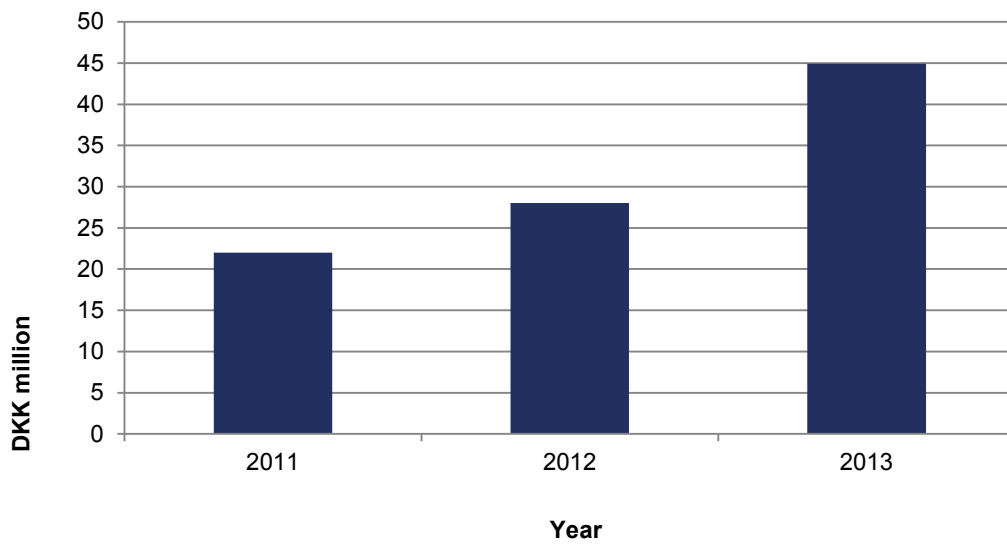


Figure 12. Investments (2011 - 2013)

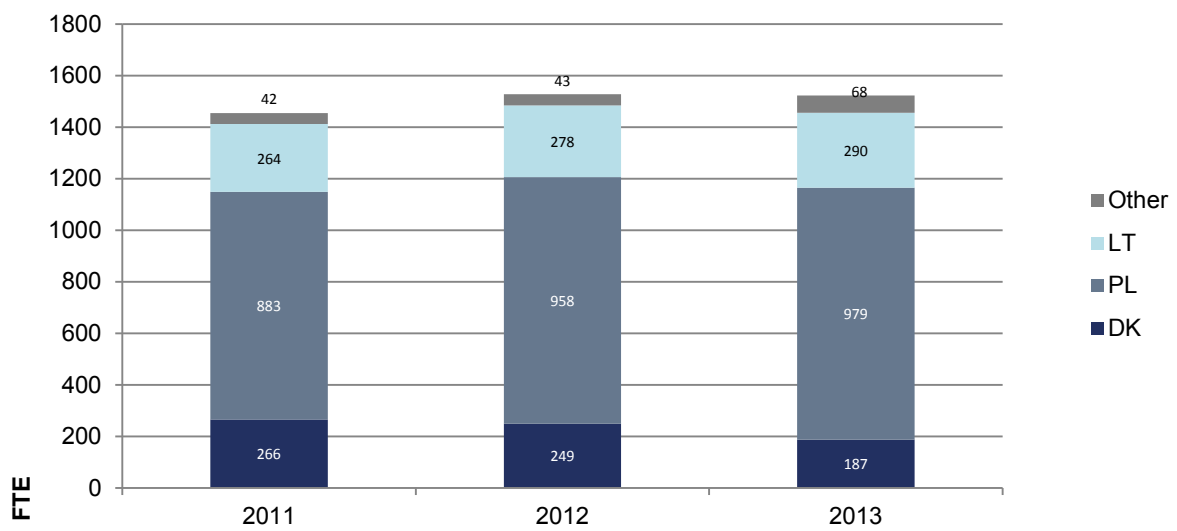


Figure 13. Full time employees (2011 - 2013)

Appendix B: Science Review

Availability of marine wild caught fish

COLL, M., LIBRALATO, S., TUDELA, S., PALOMERA, I. and PRANOVI, F., 2008. Ecosystem Overfishing in the Ocean. *PLoS ONE*, **3**(12), pp. e3881.

FAO, 2010. *The state of World Fisheries and Aquaculture*. Rome, Italy: FAO.

FAO, 2010. Yearbook of Fishery Statistics Summary tables: world apparent consumption per product. FAO

FAO, 2012. *The state of World Fisheries and Aquaculture*. Rome, Italy: FAO.

HEYMANS, J.J., MACKINSON, S., SUMALIA, U.R., DYCK, A. and LITTLE, A., 2011. The impact of subsidies on the ecological sustainability and future profits from North Sea Fisheries. *PLOS ONE*, **6**(5),.

WORLD BANK and FAO, 2009. *The Sunken Billions: The Economic Justification for Fisheries Reform*. Washington: The World Bank.

WORLD BANK, 2013. Fish to 2030: Prospects for Fisheries and Aquaculture. Washington: The World Bank

Breadcrumb production

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Appendix C: Sustainability Measures

Here we provide some examples of the measures for each programme area: the measures are as simple as possible, directly relevant to the issue, practical to undertake and validated through science.

- Energy use per mile/catch/tonne
- % of supply coming from certified sources such as Marine Stewardship Council (MSC) or GlobalG.A.P
- % of fisheries meeting Espersen's manager's compliance
- Cubic m of potable water use total and per unit of finished product
- CO₂ emissions
- % of water recycled
- kWh renewable energy used
- % energy used from renewables
- Overtime worked per head
- Absence / sick leave
- On going compliance with ETI



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