



National Packaging  
Covenant

Action Plan Report  
2006





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## **Executive Summary**

Golden Circle manufactures over 500 products including shelf stable fruit and vegetables (in cans and glass jars), fruit juices, fruit drinks, cordials, soft drinks, jams, conserves and baby food. Golden Circle is well known as a tropical fruit specialist, especially pineapple, although pineapple now only accounts for 20% of our product range. Products are packaged predominantly in steel cans, glass, aluminium, PET and polypropylene. The Company employs a large number of people from many different professional, technical, administrative and processing areas and is one of the top ten food brands in Australia. Due to the seasonal nature of the business, the total number of employees varies between 700 and 1800 people.

Golden Circle is committed to the principles of the National Packaging Covenant (NPC) and as such, has prepared this Action Plan Report for 2005-06 as an indication of the Company's continuation of efforts to reduce the volume of packaging material used in production, and reduce the amount of post-consumer materials sent to landfill. This report also includes key performance indicator and related information from the Original Juice Company to ensure that the Golden Circle Group is accounted for with regards to packaging waste reduction efforts.

## **Golden Circle - Background**

Golden Circle began on a 16.5 ha site on Brisbane's outskirts at Northgate in 1946, with the factory opening in 1947. Over 900 Queensland farmers purchased shares in the form of Certificates of Subscription, and the former Committee of Direction of Fruit Marketing backed the project. Although canned pineapple and jams were the main products, new product lines were rapidly added, and exports to the UK, Canada and New Zealand assumed considerable importance in the early years.

Golden Circle's main factory is still located at Northgate, a northern suburb of Brisbane. Golden Circle also owns the Original Juice Co. plant at Mill Park, on Melbourne's northern outskirts, and a fresh fruit packing operation in Griffith, NSW. Sales offices are located in every Australian state and New Zealand.

Golden Circle is an unlisted public company proudly owned by 850 shareholders. These farmers, plus others, supply more than 180,000 tonnes of fruit and vegetables every year to the factory for processing. The fruit crops, of which pineapple is the largest, come from the Sunshine Coast hinterland, Maryborough, Yeppoon and further north and the vegetables largely from the Lockyer Valley region, south-west of Brisbane. Crops not grown in Queensland are sourced from southern states.

Since it became a signatory of the National Packaging Covenant (NPC) in 2000, Golden Circle has invested in innovative and new technology including:

- State of the art pineapple processing technology
- A modern \$7 million can supply system has been installed



- Installation of a computerised inventory management system
- World's largest steam peeler and new beetroot processing lines installed
- A coldroom and packaging technology
- A computerised inventory management system
- A \$20m food hall enabling a move into more innovative packaging and development of products such as baby food.
- A modern Tetra Pak plant that produces more than 40 million litres (16 Olympic-sized swimming pools) of fruit juices and drinks every year
- Electronic fruit sorting and grading facilities
- Replacement of oil fired boilers with a natural gas boiler that improves energy efficiency and reduces greenhouse gas emissions and operating costs
- Utilization of biogas as a green energy source – the biogas is sourced from the upflow anaerobic sludge blanket (UASB) reactors at the wastewater treatment plant at Golden Circle and is used to generate steam for the plant via a specialized biogas boiler. This reduces the volume of coal required to power the plant thereby increasing the sustainability of the site and reducing costs.

The Golden Circle brand is among the top 15 on Australia's supermarket shelves and is one of the most recognized Australian-owned companies. The company has been a significant contributor to the social and economic fabric of Australia for the past five decades. Since its beginning, the brand has been synonymous with providing families with high quality, value-for-money products. Golden Circle continues to support the lifestyle of Australian families with innovative beverages, meals and snacks.

Golden Circle's place in the packaging chain is as packaging filler. Our packaging suppliers are numerous and include other NPC signatories such as Amcor (beverage cans and cartonboard), Visy and Tetra Pak. Golden Circle customers are predominantly the major supermarket chains.

## **Golden Circle and the Environment**

Golden Circle operates an Environmental Management System and is working towards accreditation under ISO14001. Golden Circle is committed to environmentally sound practices and has many projects aimed at reducing water through mandated water efficiency management plans (WEMP), waste through recycling and energy via ecoefficiency projects.

The four key focus area of environmental sustainability for Golden Circle are:

### Environmental Compliance:

Ensuring that Golden Circle is compliant with all environmental legislation at Federal, State and Local Government levels

### Water and Energy:

Golden Circle is continually striving to be a world's best practice leader and is committed to meeting the current water restrictions that exist in South East Queensland. This has been demonstrated in the past by posting a 15% reduction in water usage to financial



year ending 2005, when compared to the same period in 2004, which satisfied the requirements of Level 2 water restrictions. To meet Levels 3, 4 (and beyond) Golden Circle is currently implementing a tertiary treatment plant to enable the recycling of the wastewater it generates to a standard that will allow use for non-food contact applications throughout the site, thereby reducing the water used by the Company even further.

Waste and Waste Handling:

Solid waste recycling is paramount at Golden Circle's operating facilities. Golden Circle currently recycles 91% of the solid waste generated at the plant and has recently implemented colour-coding across the site to increase this figure further. Innovative uses of the solid waste generated from the fruit and vegetable waste streams include compost for pineapple (and other) farmers and as a nutritious animal feedstuff. Even the solid waste that is sent to landfill is itself used as an energy source for a neighbouring power station.

Grower Activities:

Golden Circle, in collaborative projects with the EPA, is funding research into developing the most sustainable methods of horticulture with our grower shareholders to minimise soil erosion and unnecessary pesticide and fertilizer applications. One of the key outcomes of this research is the development of an Environmental Management System specifically tailored for use on farms. This integrated environmental management system together with the Best Practice Manual for Pineapple Growers' is now available on the Golden Circle website.

## **Golden Circle Environmental Policy Statement**

Golden Circle Limited is committed to managing its operations in an environmentally responsible manner at all times and at all manufacturing facilities throughout Australia.

To ensure that this objective is achieved, Golden Circle will:

1. Ensure that all aspects of its operations comply with the relevant environmental legislation, regulations and license conditions
2. Strive for continuous improvement in environmental performance through the application of the Golden Circle Environmental Management System
3. Adopt and implement principles of eco-efficiency in its operations
4. Provide appropriate information, communication and training to build employee understanding of the Company's commitment to the environment.

All Golden Circle employees are required to comply with the policy and play their part in protecting the environment.



## **Golden Circle and the National Packaging Covenant**

Golden Circle's mission objective is to be a world competitive market-driven company, servicing our customers' needs with high quality value-for-money products, while having regard to shareholders' interests and ensuring satisfactory financial performance. The National Packaging Covenant (NPC) is recognized by Senior Management at Golden Circle as a systematic approach to conserving packaging materials. By meeting its NPC packaging objectives, Golden Circle will play an increasingly active role in the reduction of waste material to landfill.

### **Waste Reduction Achievements to Date**

Golden Circle has been endeavouring for some time to reduce the amount of waste generated as a result of its operations. All waste streams that are produced by our manufacturing operations are assessed for reduction, reuse and recycling. For example, food wastes are reused as cattle feed. Tinplate, paper, aluminium cans, glass, cartons, office paper, plastic, oil and scrap metal are all recycled.

As a result of these efforts, the amount of waste from the operations sent for disposal has already been minimised. Just over 8% of the waste generated by Golden Circle operations during the current reporting period was sent to landfill for disposal.

Golden Circle claimed the top award at the inaugural Packaging Magazine's Evolution Awards in September 2006 for the best action plan in Australia. The Company also won the Beverage Action award primarily for its move from a 1L tetra to 1L PET container.

Packaging to landfill reduction efforts have been in place for some time at Golden Circle and there are many examples of reductions in packaging materials in 2005/06. Some of these include the following:

- Most chemicals are delivered to the site in bulk amounts by tanker or returnable 1000L bulki-containers, minimising container disposal. The remaining 20 and 200 litre containers that arrive on the site are recycled after use
- Nearly all of the plastic bottles, glass bottles and empty aluminium beverage containers arrive on returnable pallets, separated by returnable layer-pads and wrapped in recyclable shrink-wrap. The associated plastic strapping is also recycled
- Due to the significant changes that are taking place in packaging via shelf ready packaging (SRP) expected by large retailers, Golden Circle is endeavouring to supply shelf ready products. These products may require less packaging than before, thereby reducing the amount of packaging to landfill – see the following section on SRP for more details



- Regular slotted carton (RSC) conversion to wraparound for transport to the Food Hall on the Golden Circle site. This impacts the 225g and 440g fruit and vegetable products. This project is now complete. The associated reduction will be included in the 2007 Action Plan Report
- At the Griffith site reusable plastic containers are being utilized for all products going to Woolworths in New South Wales. This has reduced the packaging element significantly
- Downgaging of cans at Golden Circle has reduced the thickness of the tin plate by up to 0.05mm in some products resulting in a lighter can, which generates less waste. A similar project relating to the downgaging of cardboard cartons has also resulted in reduced waste packaging to landfill
- Trials have been conducted over the past twelve months to change the paper used for Tetra Pak products from a bleached to an unbleached variety. This has several environmental benefits including the use of less chemicals and energy to manufacture the unbleached variety at the Tetra Pak facility as well as increased recycling options by making the packaging recyclable. Golden Circle commenced using the unbleached variety on 250 mL products in April 2006, with 1L & 125 mL products to follow in the next six months
- The Tetra Pak paper is sent to Golden Circle on wooden pallets. These pallets are sent to an external party for re-use.
- Golden Circle sends all beverage dumps and damages to Ipswich Waste Services - a product destruction facility that sends the residue to a composting facility whilst recycling the containers whether they are PET, polypropylene, glass, LDPE (shrink-wrap), aluminium, returnable pallets and cardboard among others
- Golden Circle Limited has deleted the Tetra 1L square container from its product range and has moved to a 1L PET container, which is more recyclable. The Tetra 1L square container used laminated paper which is non-recyclable. The new 1L PET container is now available on supermarket shelves
- Colour-coding of all skips onsite ensures that all staff are aware that solid waste streamlining is part of the overall reduction to landfill objectives and all staff know what waste to put in each skip. Segregation of recyclable material from general waste occurs via a colour-coded system consisting of red for general waste, yellow for plastic, white for paper/cardboard, dark blue for metal and green for food waste. Recycling beyond the colour-coded system takes place for glass, aluminium cans and recycled oil among others.
- Golden Circle is now sourcing all of the PET containers with 25% recycled content as part of the Environmental Purchasing Policy. A site wide conversion to 25% recycled PET is expected to be in place by the next reporting period



## **Shelf-Ready Packaging (SRP)**

As a result of customer demand, Golden Circle Limited is now undertaking shelf-ready packaging for its major customers – the supermarket chains and grocery stores. These customers have identified steps to move to a more efficient process for the receipt of goods from suppliers, such as Golden Circle Limited. The implications for this on packaging and the National Packaging Covenant requirements for Golden Circle Limited are numerous but can be summarised as follows:

1. The packaging for most SRP cartons will be the same as pre-SRP. The major difference will be the inclusion of a perforated cut-off section. This is to facilitate a more efficient receipt of goods process for Golden Circle Limited's major customers. This has the added benefit of increasing OH&S standards as knives are no longer required to open cartons to access product
2. The major customers require that order multiples are accommodated for. This means that if a particular product is not selling the customer can order the product in smaller quantities. For example, previously a carton containing 24 cans of a product would be reduced to 6 cans if the customer required this reduction. This will ultimately mean that more packaging will be required for order multiples as the cartons will contain less cans. It is a requirement of the SRP criteria that order multiples are adhered to and to remain competitive, Golden Circle Limited has adopted its packaging capabilities to meet these requirements
3. In some cases, trays will be manufactured to meet SRP requirements. These trays will use less cardboard but more LDPE or shrink-wrap. Although the LDPE is recyclable the use of paper labels on the plastic will make it less recyclable. The labelling is necessary as it is used for promotions and for bar codes that are used for stocktaking by the customer.

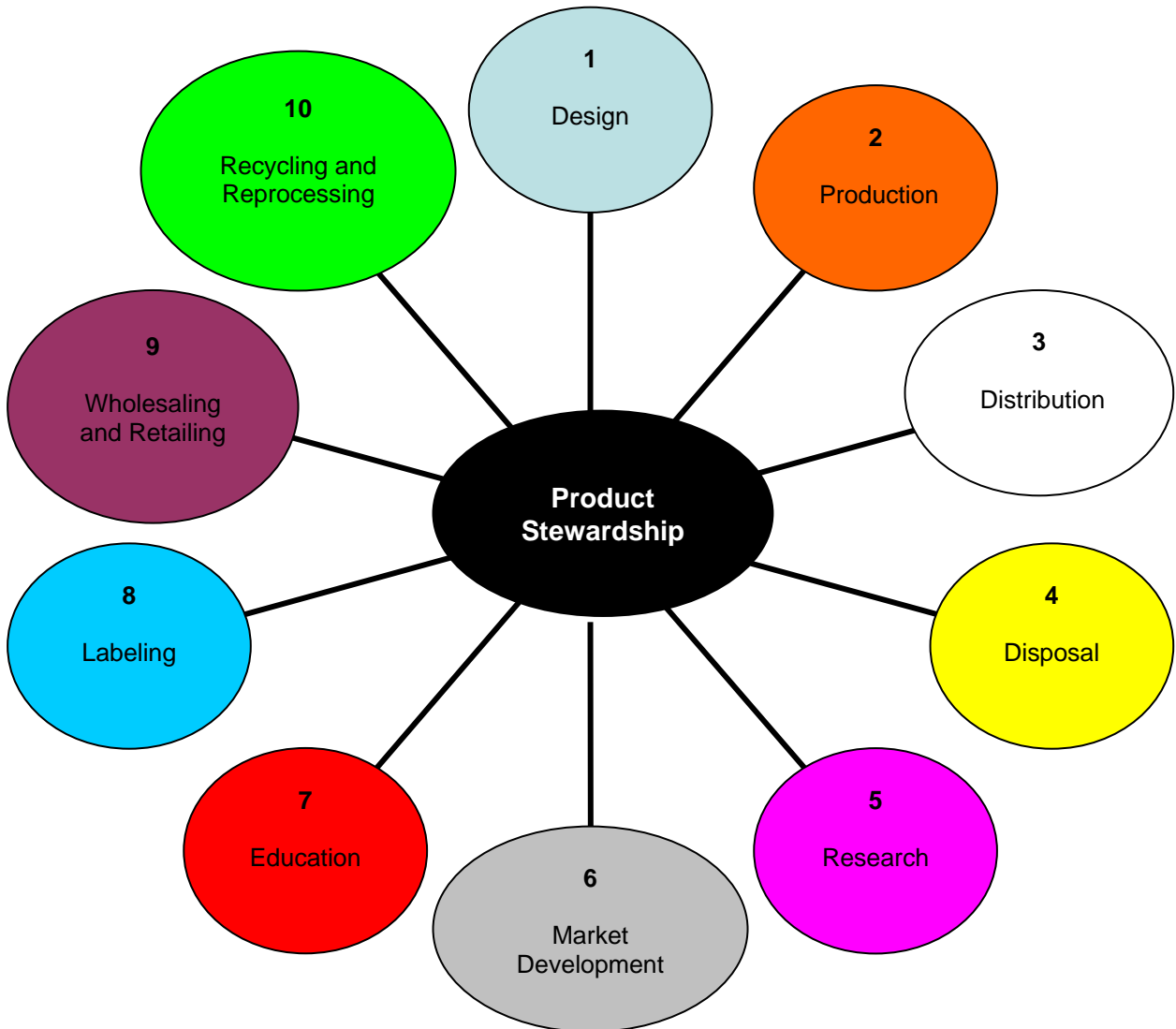
Golden Circle recognises that for its NPC Action Plan to be an effective method of reducing packaging waste, it requires the involvement of a number of different organizations. Golden Circle has therefore involved its primary and secondary packaging manufacturers and suppliers in its Action Plan to achieve the best result. Also, as members of the Australian Industry Group and the Packaging Stewardship Forum (formerly the Beverage Industry Environment Council) Golden Circle will assist in the broader aspects of these groups respective Action Plans. The Packaging Stewardship Forum operates under the Australian Food & Grocery Council, which Golden Circle is also a member of.

The Golden Circle NPC Action Plan covers steel can, glass, liquid paperboard, PET, PVC and polypropylene *primary* packaging; and, cardboard, LDPE and polystyrene *secondary* packaging.

The nominated person responsible for Golden Circle's National Packaging Covenant Action Plan is Mr. Paul Prendergast, Environmental Manager. Mr. Prendergast can be contacted on (07) 3266 0000

## Product Stewardship

The Covenant is based on the principle of product stewardship. Golden Circle Limited has taken action since its inception as a signatory to the Covenant in all of the relevant areas as outlined by the Covenant. These areas are divided into ten sections as follows:



The following table demonstrates the commitment that Golden Circle Limited has to the principles of the Covenant and outlines the progress made by the Company in all of the areas under the Product Stewardship principles. For progress made prior to NPC Mk II where it has not be included in the table below, please see the relevant Golden Circle action plan reports, available from the NPC website.



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report 2006
<p><b>Design</b></p> <p><b>Action 1.1</b></p>	<p>Incorporate NPC considerations into new product development and review existing products to ensure that products do not contravene National Packaging Covenant requirements for the Company</p>	<p>Incorporate National Packaging Covenant considerations into new product development process</p> <p>Training of all existing staff related to new product development - and new staff as they arrive – to ensure they understand Golden Circle’s NPC commitments.</p> <p>Develop method of keeping relevant employees up to date on any NPC developments</p>	<p>Golden Circle has initiated a New Product Development Team which is comprised of a cross-functional team base. The Environmental Code of Practice for Packaging (ECoPP) is fundamental to this new team which will use it as a template for the design of packaging for new products. See KPI #22 for further information on the progress of the Company’s adoption of ECoPP.</p> <p>The ECoPP is available to all employees for viewing on Golden Circle’s intranet – see Action 7.1 for more details. Presentations have been given to various parties including the NPC Committee on the NPC. The NPC website, the last two Golden Circle NPC reports and the Environmental Code of Practice for Packaging are now all available to staff via the “Environment Guide for Golden Circle Employees”, which is available on Golden Circle’s email system – see Action 7.1 for further details</p> <p>The National Packaging Covenant Committee was formulated last year and is comprised of a cross-functional team base consisting of representation from the marketing, supply, new product development (NPD), packaging and environment departments. The Committee covers all aspects of NPC commitments including the integration of the ECoPP into NPD strategies</p> <p>During 2007, the NPC Committee at Golden Circle will meet on a monthly basis to discuss progress made in projects and related topics relevant to the NPC and the ECoPP</p>



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<p><b>Design</b></p> <p><b>Action 1.2</b></p>	<p>Liaise with primary packaging suppliers to reduce the total weight of packaging per production unit.</p>	<p>Light-weighting of primary packaging material</p> <p>Use of new caps for PET products that will not require an induction seal</p> <p>Investigating the reduction of lacquer that is applied to product caps</p> <p>Investigate alternative transport packaging methods for primary packaging materials</p>	<p>The progress made in these areas can be viewed on the Action Plan Reports of Tetra Pak, ACI Glass and Amcor (beverage cans and cartonboard). One example is the new polypropylene bottle supplied by Visy which is 2g less than its predecessor. The changeover was made in September 2006 and will result in polypropylene reductions of 23 tonnes over 12 months</p> <p>During 2006, Visy commenced the supply of new caps for all PET products. These caps do not need an induction seal or white layer pad on the bottom. Traditionally, the caps were comprised of composite materials but the new polypropylene shell with PET foam will ensure the packaging material in these caps are reduced considerably and are more recyclable than previously. The volume of material reduced as a result of this action will be reported in the NPC Action Plan Report for 2007.</p> <p>New caps have now arrived for baby food with less lacquer than previously, which will decrease the overall packaging for this product. Trials were completed by January 2006 and the new caps are now being used for baby food products and are available at stores</p> <p>Researching with assistance from Visy the use of a returnable bulk bin for transporting caps. The returnable bulk bin is made of cardboard and can be reused up to 8 times. Caps are currently delivered in cartons. The bulk bin will remove the associated cardboard from this process as one bulk bin is equivalent to approximately 64 cartons. This project was trialed in July 2006 and proved successful. It is expected that the project will be fully operational in the very near future and it's status will be reported in the NPC action plan report for 2007</p>



	<p>Investigations into the use of recyclable labels from suppliers used for print and apply onto shrink and stretch plastic. This will increase the recyclability of LDPE onsite</p> <p>Downgaging of caps on 1.5 L PET carbonated soft drink and 750 mL PET cordial bottles</p> <p>Reductions in fibre board due to shelf-ready packaging for major customers</p>	<p>This has not been progressed over 2006 but Golden Circle is endeavoring to procure recyclable labels for shrink-wrap. Progress on this item will be reported in the NPC action plan report for 2007</p> <p>During 2006 the downgaging of caps on 1.5L PET carbonated soft drink and 750 mL PET cordial bottles has resulted in a one-piece cap which replaces the previously used two-piece cap. This affects all products with 28 mL closure and results in less material used in those closures. The material used for closures is currently polypropylene and new caps will be on these products by mid 2007</p> <p>Fibre board reductions of 2383.16 tonnes have resulted from the move to shelf-ready packaging. The new trays are 150g lighter than the previously used RSC. As a result, much less fibre board is used</p>
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Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
Design  Action 1.3	Review all primary packaging materials and investigate replacement with more readily recyclable materials where possible.	<p>Further examination of replacement of 2L polypropylene cordial bottle with PET alternative and trial where appropriate</p> <p>Replacement of HDPE containers at Original Juice Company</p> <p>Investigate light weighting of</p>	<p>Due to the higher specific gravity of cordial products, and the associated handling and consumer concerns, it was decided not to pursue the 2L PET cordial bottle due to problems with moulding a handle into the bottle</p> <p>All 300mL and 500mL juice containers are now made of PET instead of HDPE. The full range of HDPE at OJ is currently under review and will be reported in the Action Plan for 2007</p> <p>In September 2006, Golden Circle changed bottle suppliers from Tetra Pak to Visy.</p>



	<p>new style Tetra Pak manufactured polypropylene 2L cordial bottle</p> <p>Investigating further advances in PET manufacturing to replace PVC as a primary material</p> <p>Investigating recyclable adhesives for major production line</p> <p>Change from 1L tetra square beverage to a 1L PET package which has increased recyclability</p>	<p>A reduction of 2g has resulted in polypropylene bottles supplied by Visy for the 2L cordial range. This will result in an overall reduction of polypropylene packaging by 23 tonnes over a 12 month period</p> <p>No advances were made in this area although a Project Viability Assessment (PVA) was progressed to replace the 2L PVC diet cordial bottle with a 1.5L PET bottle</p> <p>This action was investigated but due to costs a non-recyclable adhesive has been chosen. The primary costs were in importing the recyclable variety from the UK as no similar product is currently manufactured in Australia. If this changes, Golden Circle will re-investigate the use of recyclable adhesives for the major production lines</p> <p>1L PET containers, which are more recyclable, are now on supermarket shelves replacing the 1L tetra square products</p>
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Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<b>Production</b>  <b>Action 2.1</b>	Quantify current amount of packaging used for future use as a base line	To increase the percent of readily recyclable product packaging (steel, aluminium, PET, glass, cardboard), to 92% by mass by the end of 2003 and 95% by the end of 2004	Achieved. 94.5% and 95% of packaging utilized in 2003 and 2004 respectively was steel, aluminium, PET, glass or cardboard. This is compared with 90% for 2001. 92% of packaging utilised in 2005 was steel, aluminium, PET, glass or cardboard. The non-recyclable tetra paper accounted for 8% of the total packaging utilized. The 1L square tetra has now been phased out so that the percent of readily recyclable product packaging should increase for 2005-06.



	<p>This will be quantified in the future with the use of an up-to-date and monitored database which will provide data to represent the new baseline. This data will be verified by October 2006. Also, the Original Juice Company and Golden Circle, Griffith data will be included by end October 2006</p> <p>The aim is to reduce the packaging to product ratio (see KPI # 1C) by incorporating lighter materials with more recyclable packaging</p>	<p><b>Update (2006):</b> During the current reporting period, the percent of readily recyclable product packaging increased to 99.97% for Golden Circle, Northgate with the only non-recyclable material being the composite matter that makes up the induction seals on all juice products. This amounted to 3.62 tonnes, as shown in KPI #1 and detailed in KPI #6.</p> <p>The Original Juice Company's percent of recyclable product packaging is 99.77% for the current reporting period, (5.88 tonnes), which is made up of the induction seal on juice products (5.07 tonnes) and polystyrene lids on 110 mL water and juice containers (0.81 tonnes).</p>
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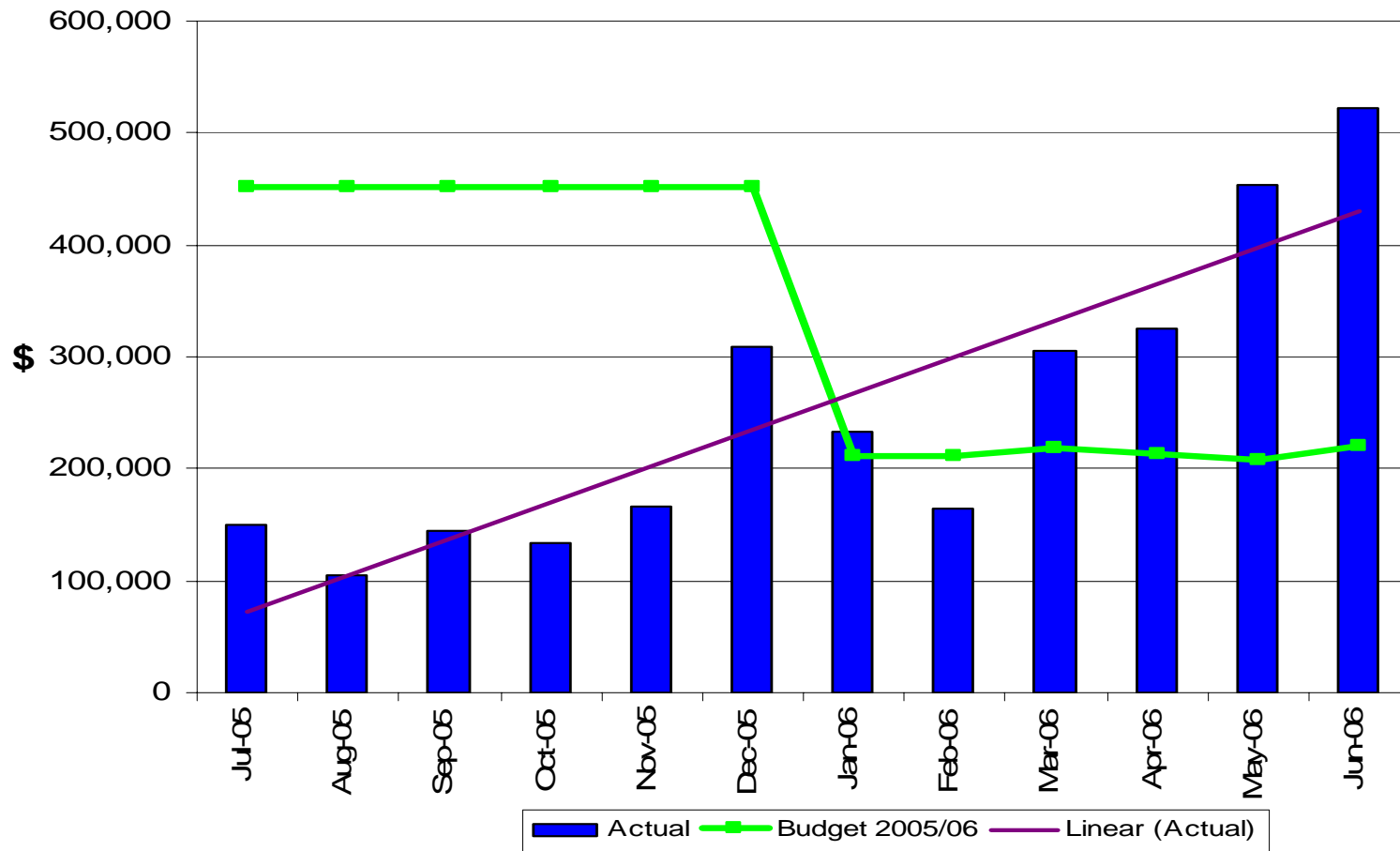
Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
Production  Action 2.2	Develop appropriate measure of packaging per product unit and implement data collection, reporting and improvement	Develop a packaging waste tracking database incorporating quantities for base line comparison for Mill Park and Griffith sites	<p>Completed: Inclusion of 2006 into existing dataset. Results for 2006 are displayed graphically at Appendix 3. This shows the tonnage of packaging sold into the Australian marketplace by material type, as per KPI # 1</p> <p>A packaging database was created from scratch. This tracks all packaging types including weights to ensure the packaging per product unit is easily derived. The data for the Original Juice Company has been included as shown in KPI #1</p>



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<p><b>Production</b></p> <p><b>Action 2.3</b></p>	<p>Identify and implement engineering solutions to reduce rejected product</p>	<p>Reduce canned product under-fill by further 15% by end of 2003.</p> <p>Reduce canned product damages by 15% by end of 2003.</p> <p>Form “Process Improvement Group” and use this forum to address other product rejection issues.</p> <p>Engineering solutions to reduce rejected product</p> <p>Investigate alternative destinations to landfill for rejected project</p>	<p>Achieved. Canned product under-fill was reduced by 16% for the last seven months of 2003. This has reduced reject product to landfill by 7.8 tonnes for this period.</p> <p>Achieved. Canned product damages have been reduced by 33% for the last seven months of 2003. This has reduced reject product to land-fill by 26 tonnes for this period.</p> <p>Completed. GCL has commenced a new Quality Focus Group whose primary objective is to reduce isolations. The improvements against budget made in this area are shown graphically below. The internal failures met budget expectations to such an extent that the budget (target) was reduced in January 2006. Having said that, isolations continued to rise during the reporting period and Golden Circle will continue to implement solutions to reduce this trend</p> <p>Self-driven footplates are now used for can closures. Trials were completed in June, 2006 so that footplates are used for all cans onsite. This reduces the rejected product substantially via reductions in ‘skidders’, which can cause leaks in cans. A ‘skidder’ occurs when an air-tight seal is not formed on the can</p> <p>GCL are currently undertaking trials in conjunction with Ipswich Waste Services (IWS) as indicated by the Action Plan submitted for the financial year ending 2005. Early results show that the trials are successful. Over the duration of the Action Plan period (2006-2008), GCL will endeavour to send dumps and damages to IWS and will report on the success of this venture.</p> <p>Update (2006): Golden Circle is now sending all rejected product from the beverage plant to IWS. Golden Circle and IWS are seeking funding that will enable them to take rejected steel product from the Company, which will mean all rejected product is diverted from landfill.</p>

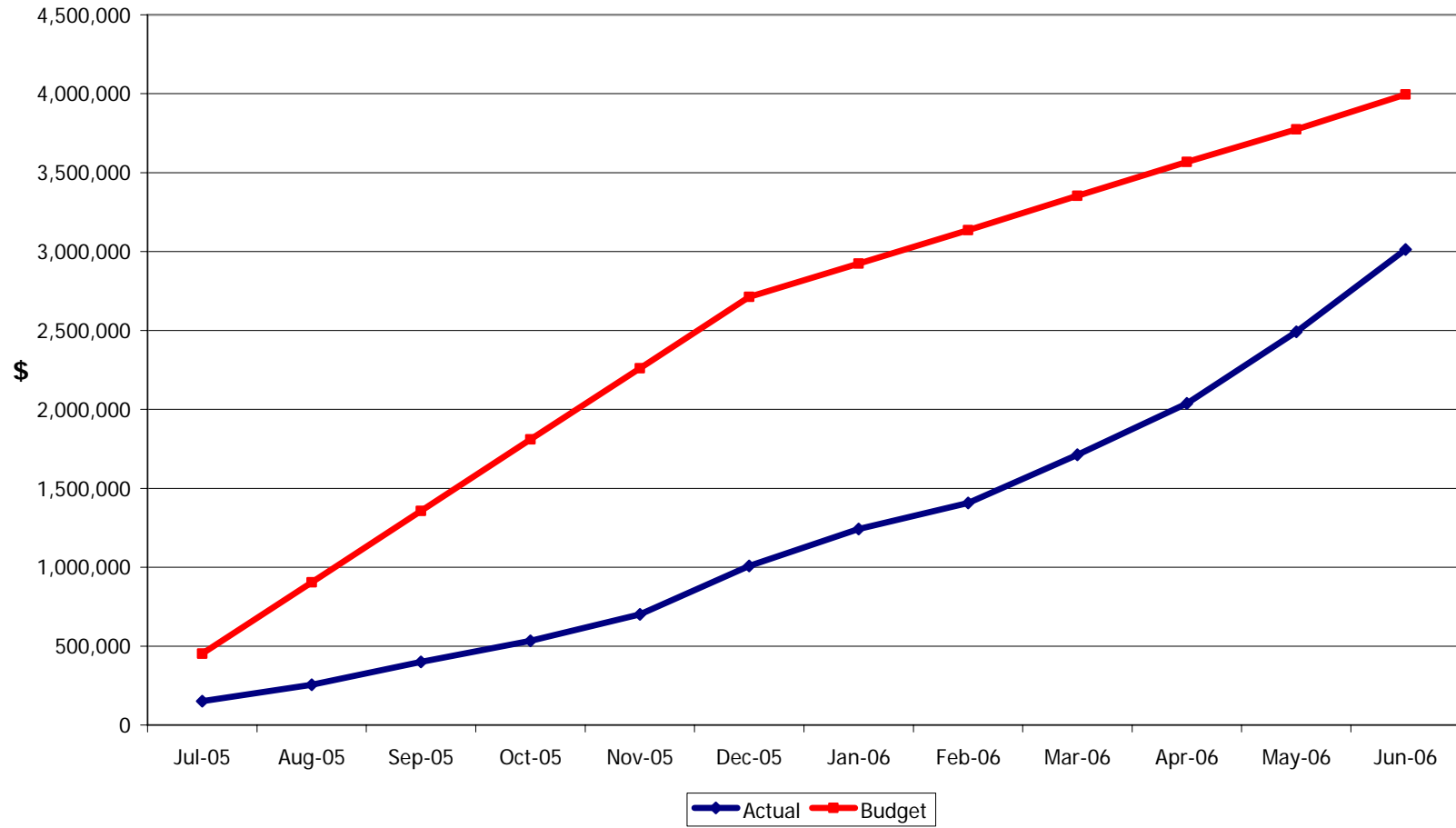


### Internal Failures for Golden Circle for FY Ending 2006





### Cumulative Internal Failures - Actual vs Target





Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<p><b>Production</b></p> <p><b>Action 2.4</b></p>	<p>Incorporate internal system for collection and recycling of raw material packaging not currently recycled</p>	<p>Provision of recycling facilities in all relevant areas on site</p> <p>Colour-coding of all skips onsite to proceed to enable staff to easily identify which bin to put waste into: affects, cardboard, paper, plastic, metal and general waste. To be completed by mid-2006</p>	<p>Completed. This initiative has been well received and has also raised the profile of recycling on the Northgate site and helped to improve response to other recycling and waste reduction efforts. The location and purpose of each bin is now universally known and accepted throughout the site.</p> <p>In addition, an office recycling procedure was initiated adding to the volume of recyclable material generated by the Company which, in turn will reduce volume of material sent to landfill</p> <p>Completed. All skips onsite are now colour-coded red for general waste, yellow for plastic (all types), green for food waste, dark blue for metal (except aluminium) and white for paper/cardboard. The recycling system currently in place and that envisaged for the future is detailed in the section on KPI data – see KPI #16</p>



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<p><b>Distribution</b></p> <p><b>Action 3.1</b></p>	<p>Investigate use of reusable and/or recyclable secondary packaging opportunities for distribution of Golden Circle product where not currently implemented.</p>	<p>Investigating the use of plastic pallets</p> <p>Use of reusable hoppers for bulk transport of caps for cordial products to Golden Circle from suppliers</p> <p>Investigating the use of slip-sheeting for export to NZ with reusable sheets and no pallets</p> <p>Investigation into the supply of 2L PVC bottles used for the diet cordial range</p> <p>Corn deliveries</p>	<p>These are recyclable HDPE and would replace the non-recyclable wooden pallets. During 2006, all non-recyclable wooden pallets and top frames that are used to transport all PET and polypropylene bottles onsite were being replaced by recyclable plastic pallets and either recyclable plastic or aluminium top frames. Full site conversion expected by the 2007 NPC report. See Visy NPC report for further details</p> <p>The target deadline for commencement of this project is June 2006 - this will considerably reduce the amount of cardboard currently used to transport the caps. This project has been delayed. It's status will be reported in the 2007 NPC report</p> <p>There was no progress made in this area during 2006. This project is expected to go ahead and progress will be reported in the NPC action plan report for 2007</p> <p>2L PVC bottles for the diet cordial range were supplied with cardboard corner posts and cardboard layer trays. The de-palletisation process at Golden Circle has been modified over 2006 so that the cardboard materials are no longer required for transportation of these bottles. This reduces the quantity of cardboard used during transportation considerably</p> <p>Corn is delivered in cardboard cartons with wooden corners for stability purposes. The cardboard is recycled and the wood is sent to a wood recycler to reuse</p>



Item	Commitment Made	Actions	Action Plan Report (2006)
Distribution  Action 3.2	Liaise with packaging suppliers to incorporate improvements made in secondary packaging as a result of respective NPC Action Plans.	Liaise with secondary packaging suppliers to implement improvements	<p>The progress made in these areas can be viewed on the Action Plan Reports of Amcor Fibre, Amcor Can, Tetra Pak, Visy, Carter Holt Harvey, Malaya Glass, ACI glass, Label Makers, Pyx and Plaspak.</p> <p>The packaging and supply departments at Golden Circle Limited meets with all of the above companies on a regular basis to discuss improvements made in secondary packaging. One outcome of these meetings is the implementation of a Buy Recycled purchasing policy, which has been adopted by the Golden Circle supply department. Details can be found at KPI #26. In addition, as detailed in KPI #26 Golden Circle is now sourcing all of their PET bottles with 25% recycled material. Site wide conversion will be reported on in the Action Plan for 2007</p>

Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
Distribution  Action 3.3	Tertiary Packaging Reduction	<p>Introduction of bulk transport of fruit juice between Golden Circle sites</p> <p>Perform trials as part of Beverages stretch-wrap reduction project</p>	<p>Complete (2004): Golden Circle continues to transport fruit juice to the OJ Company, Melbourne in tankers thereby eliminating the packaging involved</p> <p>Trials of reduced plastic product and alternate stretch pattern reducing material used to be investigated site-wide. Auditing of stretch wrappers across the site occurs on a regular basis, although these trials resulted in the project not being progressed due to the high cost of the capital equipment required</p>



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan (2006)
Disposal  Action 4.1	Develop Internal Solid Waste Tracking System to track waste types, source and volume	Continuously develop and update internal packaging waste tracking system	Completed (2002-2006): The internal solid waste tracking system has been developed and is continuously updated. It includes pertinent information on all solid waste leaving the site including the date, carrier, type, destination and tonnages. The relevant data from this database has been included in the section on KPI data under KPI # 21
Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
Disposal  Action 4.2	Audit the “waste to landfill” on a regular basis to identify recycling opportunities and implement	<p>Reassess and implement solutions to avoid high volumes of aseptic cartons being sent to landfill.</p> <p>Develop and implement strategies to improve waste segregation and reduce contamination of recyclable waste streams.</p>	<p>During 2003, a solution was found for the handling of unused obsolete carton material. These were laminated by external parties for use in other products. This saved approximately 5 tonnes of Tetra paper to landfill. The laminated paper was used in strips to make corner posts for pallet transportation. However, since the 1L Square Tetra has been deleted from GCL’s product range the laminated paper will no longer be produced.</p> <p>Colour-coding skips has been introduced sitewide – see action 2.4 for details. Reducing the waste to landfill is of paramount importance to Golden Circle for the company to operate in an ecoefficient manner. Some of the initiatives to satisfy this requirement include:</p> <ol style="list-style-type: none"> <li>1. Modifying packaging so that non-recyclable material is limited. For example: deleting the 1L square tetra thereby eliminating the non-recyclable laminated paper</li> <li>2. Colour-coding of all 1.5 m<sup>3</sup> skips onsite – see action 2.4</li> <li>3. A dedicated spill kit contractor is employed by Golden Circle to ensure that the amount of waste generated by use of the spill kits is reduced</li> <li>4. The project in conjunction with Ipswich Waste Services to send all dumps and damages to recycle – see action 2.3 for more details</li> </ol>



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<b>Research</b>  <b>Action 5</b>	To conduct and facilitate research into environmental and lifecycle issues involving the supply, use and recovery of packaging materials	Over 2006, the Beverage Industry Environment Council (BIEC) underwent a transition into the Packaging Stewardship Forum (PSF) which will operate under the Australian Food & Grocery Council (AFGC). It is through this forum that Golden Circle meets some of the research requirements of it's commitments to the National Packaging Covenant	Research requirements are met through the PSF action plan. This is primarily via programs in resource recovery: specifically away from home, domestic (kerbside) and remote area initiatives.  <u>Away from Home</u> The PSF provides research into the Commercial & Industrial sector (e.g. pubs and clubs), public place recycling. The PSF continues to provide resources to stimulate the uptake of Public Place Recycling in Local Government Authorities right across Australia) and at Special Events  <u>Domestic (kerbside)</u> involves PSF supporting Local Government initiatives to improve recovery of packaging materials through hands on collaboration and projects via the 'Recycle Right' resources available on the AFGC website  <u>Remote Area Initiatives</u> PSF continues to support training and other activities addressing litter abatement in remote communities

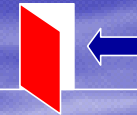
Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<b>Market Development</b>  <b>Action 6</b>	Establish frameworks to ensure that new product development using recovered materials is accelerated and that inappropriate barriers to the marketing of products with recycled content are removed	Develop and utilize a checklist for each new product being developed based on ECoPP  Implement a Buy Recycled Policy that ensures recycled containers are considered for product	Complete. The progress of the New Product Development team's adoption of the ECoPP is shown under KPI #22  The progress of the initiation of the Buy Recycled Policy at Golden Circle can be seen under KPI #26. The Buy Recycled Policy is now in use by Golden Circle's supply department



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<b>Education</b>  <b>Action 7.1</b>	Education/training program to promote a “recycling” attitude amongst Golden Circle employees to reduce contamination of recycled packaging streams, reduce volume of recyclable packaging material sent to landfill and inform relevant employees of the NPC and its implications	<p>Incorporate Environmental Responsibility module into the training and induction process</p> <p>Solid waste management as referred to in section 2.4 will include a training program to alert staff to the new colour-coding of bins system.</p> <p>Training will be also given regarding the new system for dumps and damages, as referred to at section 2.3</p> <p>Continue with waste management training using newsletter forum</p> <p>Office Recycling System</p>	<p>Complete – all new employees go through an induction process. This process now includes an environmental module on which new employees are educated and tested.</p> <p>Recycling has become part of the culture at Golden Circle through the formulation of ecoefficiency teams to reduce energy used in everyday operations. At least one article on environmental matters relating to water, packaging, solid waste and energy have been included in each issue of the Company’s internal newsletter: “The Pine Times”. The publication is available to all employees at GCL and is published on a quarterly basis. In addition, the latest NPC Annual Reports are available internally on the GCL email system via the “Environment Guide to Golden Circle Employees.” This communicative tool was developed by the Environment Department to alert staff to pertinent environmental issues, such as the NPC requirements. This section is shown below. The two latest NPC Annual Reports, along with the ECoPP (shown with an i on the front) are downloadable by any Golden Circle employee by simply clicking on the document</p> <p>A new system has been put in place over 2006 relating to the disposal of dumps and damages from the Beverage Plant to Ipswich Waste Services, as per section 2.3. It includes planning, implementation and operation, checking and management review to ensure the disposal meets Industry Standards. All relevant staff has been trained on the new system.</p> <p>Completed. Waste reduction and general environmental information is regularly presented in the company newsletter</p> <p>During 2006, a new office recycling system was set-up and training of relevant staff was undertaken to ensure the paper and cardboard streams from offices do not end up in landfill</p>



# Environment



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## National Packaging Covenant

Golden Circle is constantly striving to improve the efficiency of its operations. The National Packaging Covenant (NPC) is recognised by Senior Management at Golden Circle as achieving this in a systematic approach to conserving packaging materials.

On 3 December 2004, Ministers requested overarching targets to reduce packaging waste be developed as part of a strengthened Covenant proposal.

This proposal has now been passed and is termed NPC Mk II. It will require all companies to report on much more stringent targets.

Golden Circle's NPC Action Plan Report for 2005 was described by the National Packaging Covenant Council as: "an excellent report: well constructed and documented from an iconic Australian company."



Golden Circle's NPC Action Plan for 2006-08 has now been accepted and registered by the NPCC on the NPC website. It was described as "an exemplary plan from an Australian icon. In particular, the degree of integration of NPC Mk 2 into planning and production is remarkable. Golden Circle are to be congratulated." It also won first prize as the Best Action Plan in Australia at the Inaugural Packaging Evolution Awards for 2006 held on 13 Sep 2006



The Environmental Code of Practice for Packaging (ECoPP) is a industry self-regulatory Code that provides companies with guidelines to assist evaluate the environmental impact of new and existing packaging. The NPD process at GCL utilizes the ECoPP for every new product.





Item	Commitment Made	Action Plan Report (2006)
Action 7.2	Education and training in general public recycling and litter prevention	<p>Over 2006, the Beverage Industry Environment Council (BIEC) underwent a transition to the Packaging Stewardship Forum (PSF) which will operate under the Australian Food &amp; Grocery Council (AFGC). It is through this forum that Golden Circle meets some of the education requirements of it's commitments to the National Packaging Covenant. Some of the Programs ran by BIEC in the past which will be continued by the PSF include:</p> <ul style="list-style-type: none"> <li>• Recycle Right Council Information Kit</li> <li>• Anti-contamination education program</li> <li>• Best Practice for Waste Minimization</li> <li>• Progression of the RARE program</li> <li>• Development of TAFE recycling curriculum module</li> <li>• Special event recycling workshops</li> </ul> <p>Anti-littering campaigns have also been run by BIEC in the past and these are described in BIEC's previous NPC Reports. Golden Circle has supported BIEC in the progression of the education components of the 2004 BIEC NPC Action Plan through the involvement of the Environmental Manager who served as a Director on the Board of BIEC from 2004 until its eventual transition to the Packaging Stewardship Forum in 2006.</p> <p>Across Australia, BIEC has delivered no-cost workshops that show local governments and other stakeholders how to place bins and optimize supporting waste management infrastructure to ensure better environmental outcomes at reduced cost. BIEC's system for optimizing waste management at major public events has also been developed into training courses.</p> <p>The PSF will continue to support and sponsor Keep Australia Beautiful programs at the National and State level to address disposal behaviour and improve litter management.</p> <p>Using BInS (Bin Infrastructure Systems) and the Don't Waste Australia/Do the Right Thing campaign, the PSF will continue to form partnerships with Councils to implement infrastructure trials focused on reducing litter and Public Place Recycling.</p>



Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<b>Labelling</b>  <b>Action 8</b>	Review product labelling to aim to increase impact of existing environmental information and implement where not currently labelled.	Review Golden Circle products for prominence of recycling logo and wording of recycling messages	<p>Complete. All applicable products now have a label review to incorporate recycling messages</p> <p>During 2005 the recyclable logo was added to infant food can labels.</p> <p>Tetra Pak products bear a statement on the packaging informing consumers to “Care for your environment, please recycle” thereby communicating and encouraging responsible disposal of packaging. This message is evident on all Popper branded lines, all Golden Circle tetra drinks right across the range of different sizes, 1 L Golden Circle metallic and Original Juice Company 1 L juices</p>

Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<b>Wholesaling and Retailing</b>  <b>Action 9</b>	Data contributions on changes in packaging made in response to changes in consumer demand and educating the community on the role of packaging	<p>Implement method of capturing changes in packaging that have been made in response to changes in consumer demand</p> <p>Educating the community has taken place by ensuring that all Golden Circle products have a label review to incorporate recycling messages as per Action 8</p>	<p>The marketing and packaging departments at Golden Circle will endeavour to capture and include this information by October 2007</p> <p>Tetra Pak products bear a statement on the packaging informing consumers to “Care for your environment, please recycle” thereby communicating and encouraging responsible disposal of packaging. This message is evident on all Popper branded lines, all Golden Circle tetra drinks right across the range of different sizes, 1 L Golden Circle metallic and Original Juice Company 1 L juices</p>



		<p>Educating the community is an integral part of BIEC's (now PSF) responsibilities, as outlined under Action 7.2.</p> <p>Action 7.1 outlines the progress made by Golden Circle in educating employees internally. This culture will also spread to the local community when employees go home and because Golden Circle is located in a residential area</p>	<p>See Action 7.2 for BIEC/PSF activities in this area</p> <p>The marketing department and packaging departments at Golden Circle will endeavour to capture and include information relating to the effectiveness of point-of-sale, display and promotional materials which are designed so as to minimize the quantity of materials used and to maximize their re-utilization by October 2007</p>
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Item	Commitment Made	Action Plan (2006 – 2008)	Action Plan Report (2006)
<p><b>Recycling and Reprocessing</b></p> <p><b>Action 10</b></p>	<p>Assist the packaging supply chain by providing data on quantities of packaging recovered and design issues affecting material recoverability and report on the utilization of recovered material by secondary markets</p>	<p>Up to and including 2004, the obsolete tetra paper produced by Golden Circle was used by SMS. They laminate the paper in strips to make corner posts for pallet transportation.</p> <p>During 2005, the 1L Square Tetra was deleted from GCL's product range so that the laminated paper will no longer be produced</p>	<p>Golden Circle will continue to report on the utilization of recovered material by secondary markets, where applicable. Currently, there is no secondary market for any obsolete packaging produced by Golden Circle</p>



## KPI Data for Brand Owners

### Baseline for Financial Year Ending 2006

KPI # 1	Company information required – Golden Circle Ltd	Method
<p style="text-align: center;"><u>1</u></p> <p>Total weight of consumer packaging (domestic &amp; imported) sold per annum into the Australian market and the total weight of products packaged.</p> <p>1A Report tonnes of packaging by material type by source (local or imported)</p> <p>1B Report tonnes of packaged product sold</p> <p>1C Report ratio of product to packaging (by weight)</p>	<p style="text-align: center;"><u>1A</u></p> <ul style="list-style-type: none"> <li>• Currently, the only packaging materials that are imported directly from overseas suppliers is glass from Malaysia at 12.63 tonnes</li> </ul> <p style="text-align: center;"><u>1B</u></p> <ul style="list-style-type: none"> <li>• <b>210,731.11</b> tonnes of packaging material and product was sold for the reporting period: 1 July 2005 to 30 June 2006 into the Australian Market by Golden Circle, Northgate</li> <li>• Of this <b>194,273.30</b> tonnes was product and <b>16,457.81</b> tonnes was packaging material.</li> </ul> <p style="text-align: center;"><u>1C</u></p> <ul style="list-style-type: none"> <li>• Ratio of product to packaging for this period is <b><u>11.80: 1</u></b></li> </ul>	<p>See Appendix 2 for a table and graph of packaging sold into the Australian marketplace by material type.</p> <p>The ratio of product to packaging has decreased favourably from 9.88:1 for the financial year ending 2005 to 11.80:1 for this reporting period. This is primarily due to changing from cardboard cartons to trays with shrink-wrap to meet the criteria of shelf-ready packaging as described on page 9 of this report</p>



KPI # 1	Company information required – Original Juice Company	Method
<p style="text-align: center;"><b>1</b></p> <p>Total weight of consumer packaging (domestic &amp; imported) sold per annum into the Australian market and the total weight of products packaged.</p> <p>1A Report tonnes of packaging by material type by source (local or imported)</p> <p>1B Report tonnes of packaged product sold</p> <p>1C Report ratio of product to packaging (by weight)</p>	<p style="text-align: center;"><b>1A</b></p> <ul style="list-style-type: none"> <li>Currently, no packaging materials are imported directly from overseas suppliers.</li> </ul> <p style="text-align: center;"><b>1B</b></p> <ul style="list-style-type: none"> <li><b>44,628.75</b> tonnes of packaging material and product was sold for the reporting period: 1 July 2005 to 30 June 2006 into the Australian Market by the Original Juice Company, Melbourne</li> <li>Of this <b>42,086.27</b> tonnes was product and <b>2,542.48</b> tonnes was packaging material.</li> </ul> <p style="text-align: center;"><b>1C</b></p> <ul style="list-style-type: none"> <li>Ratio of product to packaging for this period is <b><u>16.55:1</u></b></li> </ul> <p style="text-align: center;"><i>Note</i></p> <p><i>The product to packaging ratio at Golden Circle, Northgate is greater than that at the Original Juice Company due to the volume of steel cans in use at the Northgate plant for canned vegetables</i></p>	<p>See Appendix 2 for a table and graph of packaging sold into the Australian marketplace by material type.</p> <p>A Materials Database for Golden Circle and the Original Juice Company has been developed which contains all required data to satisfy the requirements of KPI # 1 for the NPC. This has regular updates with production and sales figures to maintain an accurate monitoring system of packaging materials. The database is updated with any material changes and demonstrates any changes in package to product ratio or recyclable material percentages. As part of this project all material types will have more accurate weights and all liquid products will have specific gravity calculations to determine density and weight.</p>



KPI # 3	Improvements to Minimise the Environmental Impacts of Packaging
<p style="text-align: center;"><u>3</u></p> <p>Improvements in design, manufacture, marketing and distribution to minimise the environmental impacts of packaging</p> <p>3A Qualitative improvements 3B Quantitative improvements</p>	<p style="text-align: center;"><u>3A</u></p> <ul style="list-style-type: none"> <li>• Golden Circle has commenced sourcing of 25% recycled PET containers to replace current PET containers</li> <li>• A reduction of 2g has resulted in polypropylene bottles supplied by Visy for the 2L cordial range. This will result in an overall reduction of polypropylene packaging by 23 tonnes over a 12 month period</li> <li>• Trials have been conducted over the past twelve months to change the paper used for Tetra Pak products from a bleached to an unbleached variety. This has several environmental benefits including the use of less chemicals and energy to manufacture the unbleached variety at the Tetra Pak facility as well as increased recycling options by making the packaging recyclable. Golden Circle commenced using the unbleached variety on 250 mL products in April 2006, with 1L &amp; 125 mL products to follow in the next six months</li> </ul> <p style="text-align: center;"><u>3B</u></p> <p>As indicated under KPI # 1, Golden Circle has completed the development of a Materials Database. This database will enable quantitative improvements that minimize the environmental impacts of packaging to be recorded and utilized by the Packaging, Supply, New Product Development, Marketing and Environment Departments at Golden Circle</p>

KPI # 4	Action
<p style="text-align: center;"><u>4</u></p> <p>Changes to protection, safety, hygiene, shelf-life or supply chain considerations affecting amount &amp; type of packaging used</p>	<p>The progress made in these areas can be viewed in other sections of the report. For example under Action 1.2 it was reported that shelf-ready packaging changes include reductions of fibre board of 2383.16 tonnes. The new trays are 150g lighter than the previously used RSC. As a result, much less fibre board is used. Another action, under KPI#26 is the move by Golden Circle to a 25% recycled-content PET container.</p>



KPI # 6	Company information required	Method
<p style="text-align: center;"><b><u>6</u></b></p> <p>Total weight, by type, of “non-recyclable” consumer packaging sold per annum into the Australian market</p>	<p>For Golden Circle, the only non-recyclable material sold into the Australian marketplace was composite matter that makes up the induction seals on all juice products. This amounted to 3.62 tonnes, as shown in KPI #1.</p> <p>For the Original Juice Company, the tonnage of non-recyclable material sold into the Australian marketplace was 5.88 tonnes, which is made up of the induction seal on juice products (5.07 tonnes) and polystyrene lids on 110 mL water and juice containers (0.81 tonnes)</p>	<p>A Materials Database has been completed outlining all the requested information for all products made by Golden Circle. See KPI # 1 for more details</p>

KPI # 16	Recycling Collection Facilities at Golden Circle
<p style="text-align: center;"><b><u>16</u></b></p> <p>Percentage of signatories providing recycling collection facilities for post-consumer packaging generated on-site</p>	<p>Golden Circle has a designated recycling area which is where all recyclables are sent before being transported offsite to the various recycling destinations. The recycling area is comprised of a LDPE (shrink wrap) compactor, a 25 m<sup>3</sup> trailer for cardboard, three 25 m<sup>3</sup> scrap metal skips, a green strapping shredder and an area for storage of plastics including drums. During 2006, with the introduction of colour coding and, in particular, the introduction of yellow skips throughout the site for all types of clean plastic the LDPE compactor has been removed. All clean plastic is now sent via the yellow skips to a contractor that reuses/recycles the plastic. An additional 25 m<sup>3</sup> skip has been provided at the recycling centre just for plastics collection. The recyclable waste from the recycling centre is then transported by Golden Circle’s carrier company.</p> <p>In addition to the recycling centre, Golden Circle has dedicated contractors for certain types of recyclable waste. For example: one contractor takes paper waste, another confidential documentation, another takes glass and another aluminium cans.</p> <p>Each processing/warehouse area has a set number of skips to segregate waste: one each for general waste, cardboard, paper, scrap metal, plastic and glass. The waste is collected in 1.25 m<sup>3</sup> sized skips at the individual areas (such as the beverage plant, despatch, canned foods etc.) and transported to the much larger bins (25 m<sup>3</sup>) at the recycling centre at Golden Circle.</p>



Golden Circle has now completed colour-coding of the individual skips so that each waste stream has a designated colour: white for paper, red for general waste, dark blue for metal, yellow for plastics and green for food/compost waste. Colour coded wheelie bins are also in those production areas where skips cannot be used due to quality issues. The colour of the wheelie bins matches the corresponding skips to ease recognition of all staff onsite. The total waste generated by Golden Circle for the financial year ending 2005, the tonnages sent to recycling and that sent to landfill are all included in KPI #21

KPI # 21	Tonnages of Waste Sent to Recycling and Landfill	Method
<p style="text-align: center;"><b><u>21</u></b></p> <p>Estimated tonnage of consumer packaging sent (a) for recycling and (b) to landfill from on-site collection facilities.</p>	<p>Total waste generated by Golden Circle for Financial Year Ending 2006 = 45,285            Total waste sent to recycling = 41,243            Total waste sent to animal feed = 20,041</p> <p>(a)            Tonnage of waste sent to recycling (including feed for dairy livestock) = 41,243            Tonnage of waste sent to recycling (excluding feed for dairy livestock) = 21,202</p> <p>(b)            Tonnage of waste sent to landfill = 4,042</p> <p style="text-align: center;">***See the following table and graph for all information***</p>	<p>Golden Circle has a dedicated Waste Tracking Database. All waste that leaves the site is entered into the database as per the delivery docket number. The database tracks the following information:</p> <ul style="list-style-type: none"> <li>• Docket Number</li> <li>• Date</li> <li>• Waste Type</li> <li>• Carrier</li> <li>• Destination</li> <li>• Tonnage</li> <li>• Date</li> </ul>

The following graph shows the waste by type for the financial year ending 2006. Other waste such as glass, paper, light steel etc. have not been included as they are less than 1% of the total waste removed from the site over the reporting period. All of the waste shown in the graph is recycled except for general waste which goes to landfill. The wastewater treatment plant (WWTP) mud and the fruit and vegetable waste from the hopper are sourced from the primary treatment plant processes and are sent to a composting recycling station as well as back to the Growers' as a compost enhancer. All of the other fruit and vegetable material is sent to dairy farmers as feed for livestock.



Comparing the verified data for the financial year ending 2006 to that collected for the financial year ending 2005, there are several things to take into account:

1. Total waste has increased due to increased production
2. Increased production has also increased the volume of general waste to landfill
3. Improved wastewater treatment plant efficiencies has resulted in an increased volume of solids removal, or WWTP mud which is sent to growers and a compost recycling station
4. Improved juice presses has increased the volume of material which is sent to animal feed and also the volume of juice Golden Circle produces per tonne of incoming material
5. Colour-coding has increased the volume of cardboard considerably and also created a new waste stream - plastics. All plastics are now recycled whereas previously this was limited to LDPE and some plastic containers
6. Paper and cardboard are now collected together as part of the colour-coding solid waste streamlining. These wastes will be counted together in the next NPC report

A table showing all waste types follows the graph. This includes the information not included in the graph for clarification.

**Tonnages of Waste by Waste Type Leaving Golden Circle for the Financial Year Ending 2006**

Waste Type	Recycled	Total Tonnes
APPLE	Y	77.70
COAL ASH	Y	31.83
BEET	Y	477.56
BEET/PINE	Y	536.50
BIOMASS	Y	214.56
CARDBOARD	Y	1,204.01
CONCRETE	Y	36.00
CORN	Y	461.82
CORN CHOP	Y	268.60
CORN/PINE	Y	26.50
EMPTY DRUMS - STEEL	Y	55.64
F&V HOPPER AT WWTP	Y	9,090.24

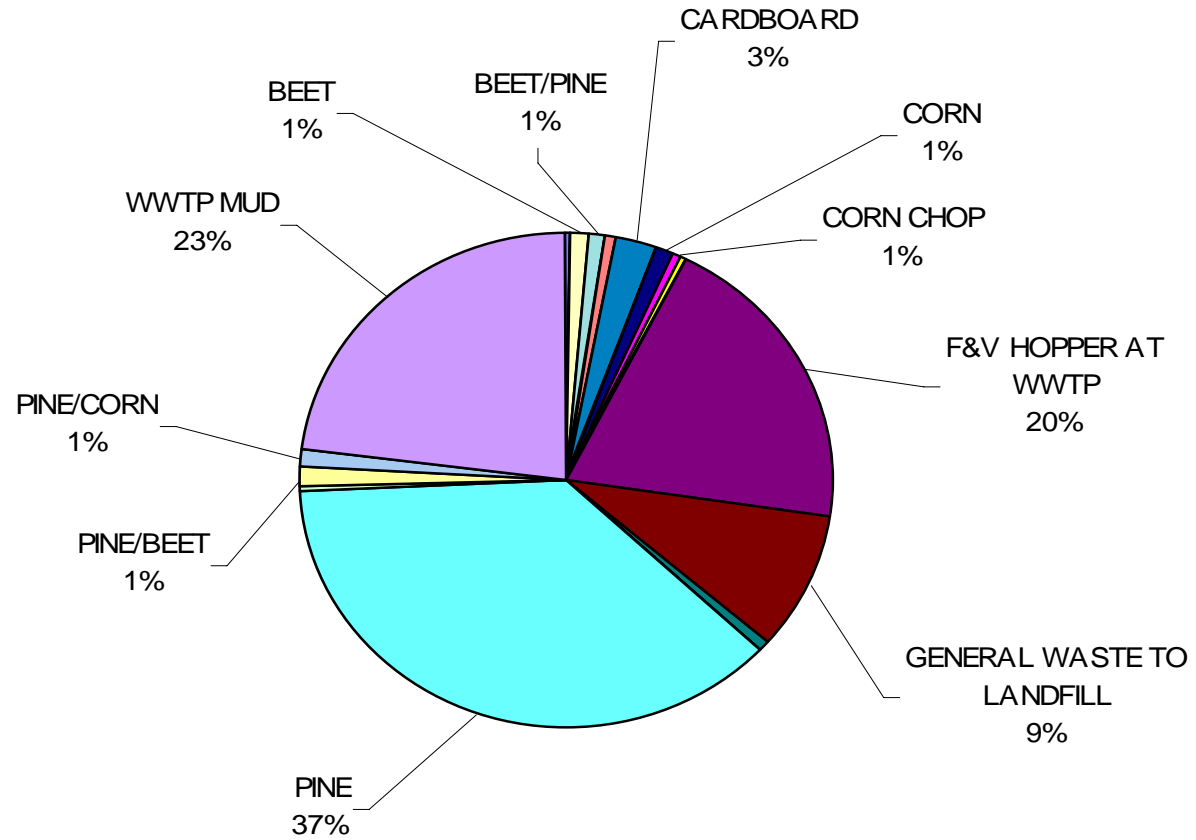


Waste Type	Recycled	Total Tonnes
<b>GENERAL WASTE TO LANDFILL</b>	<b>N</b>	<b>4,042.20</b>
LIGHT STEEL	Y	150.48
PALLETS	Y	6.08
PAPER	Y	1.68
PINE	Y	16,921.80
PINE/APPLE	Y	140.50
PINE/BEET	Y	618.48
PINE/CORN	Y	511.90
PLASTIC – ALL TYPES	Y	25.70
WWTP MUD	Y	10,385.38
<b>Total Waste</b>		<b>45,285.16</b>
<b>General Waste To Landfill</b>		<b>4,042.20</b>
<b>Total Waste to Recycling</b>		<b>41,242.96</b>
<b>Total Waste to Animal Feed</b>		<b>20,041.36</b>
<b>Total Waste to Recycling Excluding Animal Feed</b>		<b>21,201.60</b>



**Figure 1**

**Total Waste by Type for Financial Year Ending 2006**





KPI # 22	Adoption of the ECoPP
<p style="text-align: center;"><b><u>22</u></b></p> <p>Number of signatories who have formally adopted the ECoPP and developed systems for its implementation</p>	<p>All Senior Executives at Golden Circle are aware of the importance of the ECoPP and are fully supportive of it being used in all new product development decision making processes, as carried out by the New Product Development Team at Golden Circle.</p> <p>Golden Circle recognizes that the post-production and post-consumer handling of packaging is a joint responsibility for the entire community, including industry. As a result, the products the Company produces are packaged to protect and preserve the product, maintain world-class product quality whilst ensuring that consumer health and safety are of paramount importance and that the packaging waste is minimized as much as possible.</p> <p>The ECoPP is designed to provide guidelines. It is not intended to take the place of the existing legislation, regulations and relevant standards issued by Standards Australia, but where conflict exists the existing regulation, legislation and Australian Standards take precedence.</p> <p>The Project Viability Assessment (PVA) for new products at Golden Circle Limited has a number of cross-functional team members who generate, approve and sign-off on every development project prior to initiation. These functions include sales, marketing, operations, technical, new product development and innovations.</p> <p>An environmental impact assessment of product packing is taken into consideration through the ECoPP and the associated checklist. This forms part of the PVA for all new product developments prior to the project being agreed on and development work commencing.</p> <p>The ECoPP checklist is shown at appendix 4. Appendix 5 shows how the checklist was used during the PVA phase of two new products at Golden Circle during 2006. The PVA sign-off template is included to show where the ECoPP checklist forms part of the overall process.</p>



KPI # 26	Action	Target Completion
<p><b>26</b></p> <p>Implementation of Buy Recycled purchasing policy or practices</p>	<ul style="list-style-type: none"> <li>• Implement required changes to current GCL procurement, systems, policies and procedures to promote and increase the use of recycled content products</li> <li>• Review current relevant packaging spend categories and identify opportunities and project selection criteria to deliver increased recycled content objectives. This action is due to be completed for the Action Plan 2007 Report. However, Golden Circle has already commenced sourcing of PET containers with 25% recycled content through the Buy Recycled Purchasing Policy implemented by the supply department during 2006. Site wide use of 25% recycled PET is expected to be fully implemented by the Action Plan Report for 2007 and these containers will replace all PET containers that are currently used by the Company</li> <li>• Establish recycled content improvement targets for 2007/08</li> <li>• Design external supplier and internal GCL communication strategy to engage key stakeholder buy in and understanding of policy and key program improvement objectives</li> <li>• Ensure recycled content improvement is an agenda item for regular Supplier performance review meetings</li> <li>• Implement formal performance management review and reporting system to ensure the project plan is clearly defined and key actions, milestones and targets are achieved</li> <li>• Ensure recycled content criteria and relevant proactive programs are in place as part of future GCL Supplier selection policy</li> <li>• Conduct a formal review to review year to date progress and set objectives for 2008</li> </ul>	<p>Complete</p> <p>Oct 07</p> <p>Oct 07</p> <p>Oct 07</p> <p>Complete</p> <p>Oct 07</p> <p>Oct 07</p> <p>Oct 07</p>



KPI # 27	Methods for Establishing Baseline Performance Data
<p style="text-align: center;"><b><u>27</u></b></p> <p>Establishment of baseline performance data</p>	<ul style="list-style-type: none"> <li>• Waste Tracking Database for KPI # 21</li> <li>• A Materials Database has been completed which allows a more readily usable source of packaging information. This is used for KPI # 1 &amp; 6</li> </ul>
KPI # 28	Annual Reporting against Action Plan
<p style="text-align: center;"><b><u>28</u></b></p> <p>Annual reporting against action plan</p>	<ul style="list-style-type: none"> <li>• All data provided in this report has been verified</li> <li>• The action plan report for the financial year ending 2006 has been provided as per this report, as per the requirements of the Covenant</li> <li>• The NPC annual report is already incorporated into formal company reporting schedule</li> <li>• The National Packaging Covenant (NPC) is recognized by Senior Management &amp; the CEO at Golden Circle as a systematic approach to conserving packaging materials</li> </ul>
KPI # 29	Improvement and Achievements against Individual Targets & Milestones
<p style="text-align: center;"><b><u>29</u></b></p> <p>Demonstrated improvement and achievements against individual targets &amp; milestones</p>	<ul style="list-style-type: none"> <li>• Golden Circle has improved on KPI #1 – product to packaging ratio by 14% from 9.88:1 to 11.80:1, which is an excellent achievement for the Company. The Original Juice Company has posted a product to package ratio of 16.55:1 which will be used as a baseline for future data under the NPC</li> <li>• The volume of readily recyclable material used in packaging has increased to 99.97% for Golden Circle, Northgate and is 99.77% for the Original Juice Company</li> <li>• The percentage of waste going to landfill has increased from 5.88% to 8.93% (up 3.05%) due to increased production. However, the volume of waste going to recycling has also increased from 31,430 to 41,243 tonnes (a 14% increase)</li> <li>• Light-weighting of polypropylene bottles will reduce polypropylene packaging by 23 tonnes over 12 months</li> <li>• Fibre board has been reduced by 2,383.16 tonnes due to conversion to shelf-ready packaging. Each RSC carton has 150g less weight than the previously used trays</li> <li>• There are many other improvements made by the Company which are located in the relevant sections of the report</li> </ul>



## Appendix 1

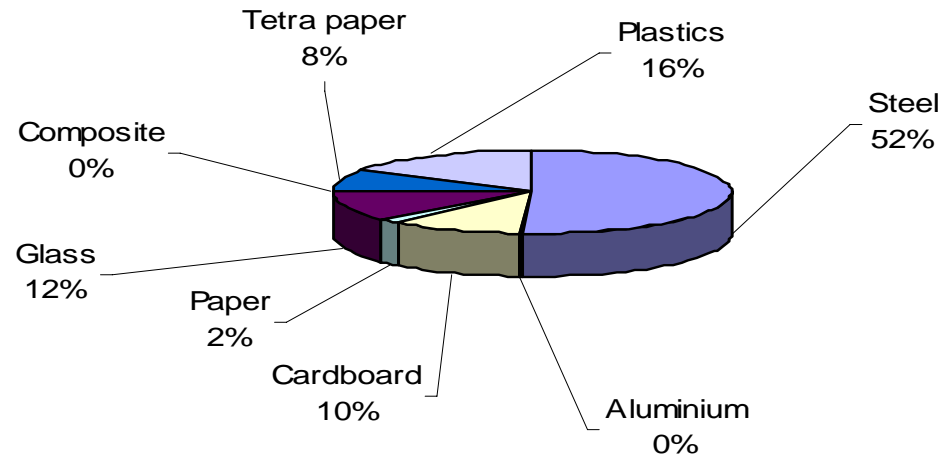
### Organizations Mentioned in this Report

- Beverage Industry Environment Council (BIEC)
- Packaging Stewardship Forum (PSF)
- Australian Food & Grocery Council (AFGC)
- Tetra Pak
- Amcor Fibre
- Amcor Can
- ACI Glass
- Carter Holt Harvey
- Woolworths
- Visy
- Advanced Manufacturing Centre (AMC)
- SMS
- Label Makers
- Pyx
- Plaspak



## Appendix 2 (i) – Supporting Data for KPI # 1B for Golden Circle

**Tonnage of Material Types Sold Last Financial Year as a Percentage of Total Packaging Sold**



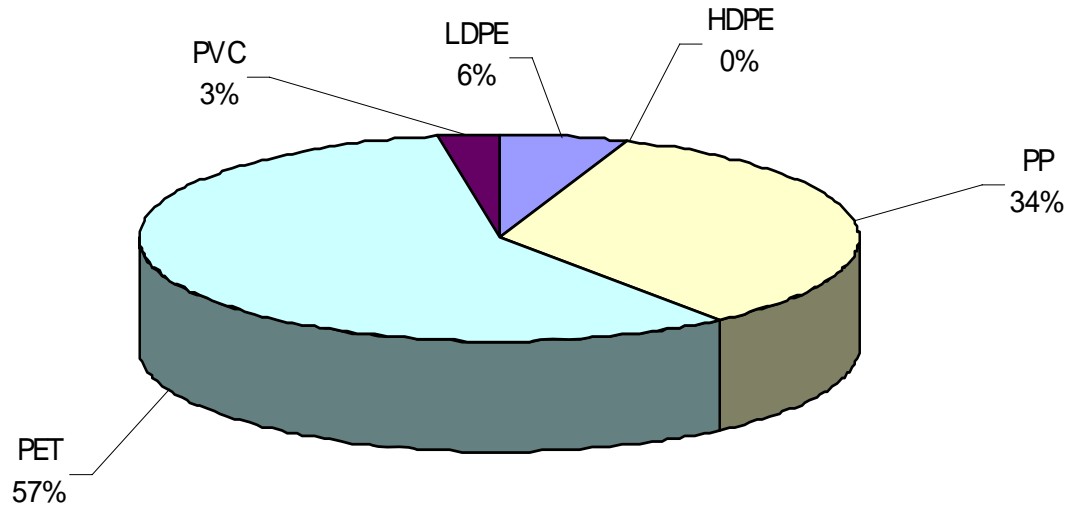
Material Type	Total Tonnage
Steel	8381.75
Aluminium	49.48
Cardboard	1709.47
Paper	335.90
Glass	1921.14
Composite	3.62
Tetra Paper	1378.11
Plastics*	2678.33
<b>Total</b>	<b>16,457.81</b>

\* The different types and percentages of plastics used at Golden Circle are shown in Appendix 2 (ii) below



## Appendix 2 (ii) – Supporting Data for KPI # 1B for Golden Circle

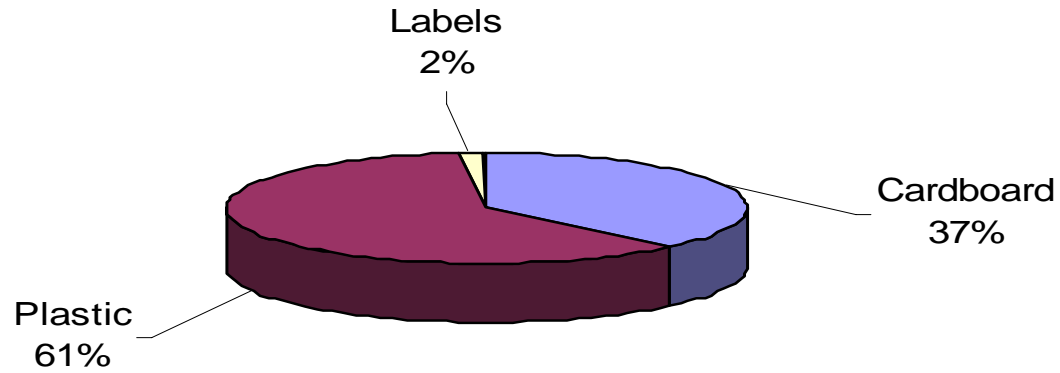
### Plastic Types Used at Golden Circle for Financial Year Ending 2006



Plastic Type	Total Tonnage
LDPE	156.98
HDPE	1.43
Polypropylene	897.63
PET	1549.75
PVC	72.55
<b>Total</b>	<b>2,678.33</b>



**Appendix 2 (iii) – Supporting Data for KPI # 1B for the Original Juice Company**  
**Tonnage of Material Types Sold Last Financial Year as a Percentage of Total Packaging Sold**



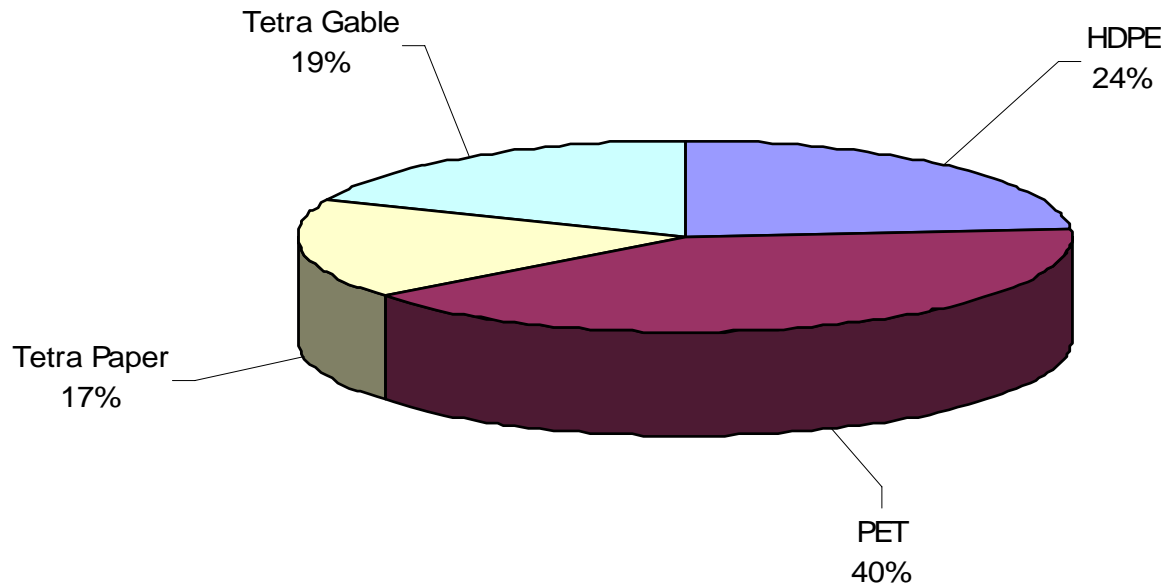
Material Type	Total Tonnage
Cardboard	950.93
Labels	38.46
Induction Seal Wad Compounds	5.07
Plastic*	1548.01
<b>Total</b>	<b>2,542.48</b>

\* The different types and percentages of plastics used at Golden Circle are shown in Appendix 2 (iv) below



## Appendix 2 (iv) – Supporting Data for KPI # 1B for the Original Juice Company

Tonnage of Plastic Types Sold Last Financial Year as a Percentage of Total Plastic Sold



Plastic Type	Total Tonnage
PET	575.83
HDPE	333.30
Tetra Paper	238.71
Tetra Gable	268.24
HIPS	0.81
Closures	131.12
<b>Total</b>	<b>1,548.01</b>



## Appendix 3

# Project Viability Assessment Template

PROJECT:  
 DATE:  
 INITIATOR:  
 PRODUCTION LINE:

### Sales Financial Assessment

	YR 1	YR 2	YR 3	Total
Cost of Goods				
Sales Volume				
Sales Value				
GM %				
GM \$				
Marketing & Promo \$				
Net \$				

### Development Costs

R&D Labour \$	
Raw materials \$	
Plant trials \$	
Total	

### Capacity Assessment

Easily accommodated	
Tight but possible	
Difficult – requires overtime	
Not possible	
Needs capital investment	

### ECoPP Assessment

Complete	
Not complete	

### Capital Expenditure required

Amount	
Installation time	

### Assessment

Star	
Cash Cow	
Problem child	
Dog	

### Approval By:

Signature

Date

NPD Manager		
GM Operations		
GM Sales & Marketing		
GM Innovation		
CEO		



## Appendix 4 (i)

### Example of Use of ECoPP Checklist

The Environmental Impact Assessment of Product Packaging is taken directly from the sample checklist of the Environmental Code of Practice for Packaging. It enables the New Product Development (NPD) Team at Golden Circle to fully consider the environmental design considerations for new packaging requirements of new products.

The NPD Team is a cross-functional group from various departments that are well versed in the implementation of the Environmental Code of Practice for Packaging and it is Golden Circle policy to ensure that the Code is used whenever new products are being developed. See KPI #22 for more details.

*Note: This checklist should be filled out for each new product.*

<b>Product: Weight Watchers Cordial – 750 mL PET</b>
--

#### 1. Environmental Design Considerations.

##### 1.1 Composition:

	<u>YES</u>	NO
Is the packaging a composite of more than one material?		
If yes state which materials: <ul style="list-style-type: none"> <li>○ Steel</li> <li>○ Aluminium</li> <li>○ Glass</li> <li>○ Paper</li> <li>○ Plastic</li> </ul>	Plastic Paper (cardboard cartons, labels)	
If package is made of plastics or contains plastics, state the polymer types	PET	
Does the package use pigments containing heavy metals in conformity with AS1647/3?	NO	
Are the inks, lacquer coatings and varnishes solvent based, UV cured or water based?		

##### 1.2 Probable size of market:

What is the probable size of the market in units per year?	720000	
What will be the quantity of the package in the waste and litter stream? What will be its effect?	NIL	
Is the market existing and currently met by other packages, or is the market entirely new?	YES	<u>NO</u>
	Is the market new or existing?	
Is a special export pack required to satisfy environmental requirements?	YES	<u>NO</u>



1.3 Design Changes:

Will the introduction of the new package require design changes at the stage of filling, transportation, storage, and retailing? If so, what changes need to be made and what will be their environmental impact?	<b><u>No</u></b>	
Does transport, storage, or retailing require refrigeration?	YES	<b><u>NO</u></b>
Has the distribution been consigned to take into account energy conservation measures?	YES	<b><u>NO</u></b>

2. Design

The package should be designed with due regard for its ultimate disposal and possible re-use and recycling where appropriate.

2.1 Avoidance

Can the package or any of its components which are not essential to the distribution, retail sale, storage or safety of the product be practically avoided?		
The package can be eliminated	YES	<b><u>NO</u></b>
A component of the package can be eliminated	YES	<b><u>NO</u></b>
What are the approximate dimensions of the package?	95mm x 70mm x 190mm High	
What is the approximate weight of the package in grams?	46 g	
If the package is to contain a liquid or other material sold by volume, state the container capacity in mL.	750 mL	
If the container is designed for material sold by mass, state the container capacity in grams.	n/a	
Can the overall packaging volume be reduced by using a different package or container?	YES	<b><u>NO</u></b>
Is it possible to increase secondary or tertiary packaging to reduce primary packaging and achieve a net overall reduction?	YES	<b><u>NO</u></b> – Retailer requires 8 pack carton
Through product design changes (e.g. liquid concentrates, improved product ruggedness); can the package be redesigned to use less material without compromising the product?	YES	<b><u>NO</u></b>
Is it feasible to replace a number of smaller packages with a single larger, more efficient package size (e.g. family size or bulk containers rather than individual portion packages)?	YES	<b><u>NO</u></b> – customer requires 750mL pack.
Does a product or package change which results in source reduction cause increased solid waste in other areas (e.g. an increased amount of food spoilage and thrown away as a result of changing from a smaller to larger packaged servings)?	<b><u>YES</u></b>	NO



Is it possible to reduce or eliminate secondary or tertiary packaging or wrapping?	YES	<b><u>NO</u></b>
Are customer suggestions on source reduction possibilities for secondary and tertiary packaging throughout the distribution system solicited and encouraged?	YES	<b><u>NO</u></b>

### 2.2 Re-use

Can the package or any of its components be designed to be safely refilled or re-used by consumers?	<b><u>YES</u></b> – provided container is washed	NO
Can it be re-used by the manufacturer for the same or similar purpose?	YES	<b><u>NO</u></b>
If so, is there an established system for collection?	<b><u>YES</u></b> – an onsite collection system ensures packaging is recycled for use offsite	NO
Would re-use of the package contravene any State or Federal health regulation, or National Health and Medical Research Council recommendation?	<b><u>YES</u></b>	NO

### 2.3 Recycling

Does the technology exist to collect packaging from consumers and recycle it commercially?	<b><u>YES</u></b>	NO
If so, is there an established system for collection?	<b><u>YES</u></b> – refer BCC website – kerbside recycling	NO
If not, is the necessary research being conducted to develop this technology – either alone or in conjunction with industry, government officials or academia?	<b><u>YES</u></b> – although kerbside recycling exists further research is carried out by SPA, PSF etc.	NO
Is there an established system for separation at source <ul style="list-style-type: none"> <li>○ In commercial premises</li> <li>○ In the home or other consumer outlets.</li> </ul>	<b><u>YES</u></b> <b><u>YES</u></b>	NO NO
Does the packaging include a recommendation to consumers to clean the package prior to disposal if it is to be recycled?	YES	<b><u>NO</u></b>
Is it possible to use a single material type for the entire package, e.g. the bottle, closure, and label.	YES	<b><u>NO</u></b>
If so is this being done	n/a	
Does the package incorporate a recycling logo?	<b><u>YES</u></b>	NO



If a plastic package, does it incorporate the PACIA's Plastic Coding System for easy identification of plastic type?	<u>YES</u>	NO
Is there advice on containers which contain toxic chemicals, or where the manufacturer has no control over the end use of the container?	YES	<u>NO</u>
<ul style="list-style-type: none"> <li>o That it should not enter the recycling system</li> <li>o Describing the most appropriate means of disposal</li> </ul>	YES	<u>NO</u>
Has an in-house or in-plant resource recovery or recycling system to use waste products generated from the manufacture of your product or package been established?		
<ul style="list-style-type: none"> <li>o Into the same product</li> <li>o Recycled into a secondary product</li> <li>o The material is sold or given to an outside vendor to be recycled.</li> </ul>	<u>YES</u>	NO
	<u>YES</u>	NO
	<u>YES</u>	NO
Are the outer and inner packaging used for shipment and distribution of goods recyclable?	<u>YES</u>	NO
Has a resource of recovery and recycling system been established in co-operation with customers to collect and re-use distribution packaging waste that does not reach the ultimate consumer?	YES	<u>NO</u>
If not, is there an active development of such a system?	YES	<u>NO</u>
If the product is being distributed in States or Territories with CDL, has the product been registered with the relevant EPA?	YES	<u>NO</u> - product is not a 'ready to drink' cordial and is exempt from registration
If not, is the container size exempt from CDL?	YES	<u>NO</u>

#### 2.4 Degradability

Is the package technically biodegradable or photodegradable?	YES	<u>NO</u>
If yes, will the intended disposal system (e.g. landfill, sewerage) provide the right environmental conditions for degradation?	n/a	
Will degradability produce any by-products which are harmful to the environment?	n/a	
Has research been undertaken to evaluate the positive and negative aspects of using degradable materials?	YES	<u>NO</u>
Has the relevant State or Territory environment protection body been consulted?	YES	<u>NO</u>



2.5 Disposal

If the package cannot be recycled, can it be treated prior to disposal to minimize its environmental impact in landfill?	YES	<b><u>NO</u></b> – package is recyclable
Can the energy content of the package be recovered by incineration?	<b><u>YES</u></b>	NO
Has the package been designed to be easily compressed prior to disposal to minimize its volume in landfill?	<b><u>YES</u></b>	NO
Does the product incorporate the 'Do the Right Thing' message to the consumers encouraging them to dispose of the product in the appropriate manner?	YES	<b><u>NO</u></b>
Does the package include any toxic materials which might leak into the environment in landfill?	YES	<b><u>NO</u></b>
If so, are these essential to the product?		n/a
If not, are steps being taken to eliminate them from the product?		n/a
Does the package contain any degradable materials?	YES	<b><u>NO</u></b>



## Appendix 4 (ii)

### Example of Use of ECoPP Checklist

**PRODUCT NAME: Party Punch 2.9 Litres**

#### 1. Environmental Design Considerations.

##### 1.1 Composition:

Is the packaging a composite of more than one material?	<b><u>YES</u></b>	NO
If yes state which materials: <ul style="list-style-type: none"> <li>○ Steel</li> <li>○ Aluminium</li> <li>○ Glass</li> <li>○ Paper</li> <li>○ Plastic</li> </ul>	Steel Paper Cardboard	
If package is made of plastics or contains plastics, state the polymer types	<b><u>N/A</u></b>	
Does the package use pigments containing heavy metals in conformity with AS1647/3?	<b><u>YES</u></b>	
Are the inks, lacquer coatings and varnishes solvent based, UV cured or water based?	<b><u>Solvent</u></b>	

##### 1.4 Probable size of market:

What is the probable size of the market in units per year?	<b><u>30,000 CASES</u></b>	
What will be the quantity of the package in the waste and litter stream? What will be its effect?	<b><u>ZERO</u></b>	
Is the market existing and currently met by other packages, or is the market entirely new?	YES	<b><u>NO</u></b>
Is a special export pack required to satisfy environmental requirements?	YES	<b><u>NO</u></b>

##### 1.5 Design Changes:

Will the introduction of the new package require design changes at the stage of filling, transportation, storage, and retailing? If so, what changes need to be made and what will be their environmental impact?	<b><u>NO</u></b>	
Does transport, storage, or retailing require refrigeration?	YES	<b><u>NO</u></b>
Has the distribution been consigned to take into account energy conservation measures?	YES	<b><u>NO</u></b>



## 2. Design

The package should be designed with due regard for its ultimate disposal and possible re-use and recycling where appropriate.

### 2.1 Avoidance

Can the package or any of its components which are not essential to the distribution, retail sale, storage or safety of the product be practically avoided?		
The package can be eliminated	YES	<u>NO</u>
A component of the package can be eliminated	YES	<u>NO</u>
What are the approximate dimensions of the package?	<b>Can: Diameter 156mm, Height 180mm Label: Height 173mm, Length 490mm Case: Height 184mm, Width 160mm, Length 472mm</b>	
What is the approximate weight of the package in grams?	Can: 306g Label: 2g Case: 180g	
If the package is to contain a liquid or other material sold by volume, state the container capacity in mL.	Can 3000mL Case 3 x 3000mL	
If the container is designed for material sold by mass, state the container capacity in grams.	<b>N/A</b>	
Can the overall packaging volume be reduced by using a different package or container?	YES	<u>NO</u>
Is it possible to increase secondary or tertiary packaging to reduce primary packaging and achieve a net overall reduction?	YES	<u>NO</u>
Through product design changes (e.g. liquid concentrates, improved product ruggedness); can the package be redesigned to use less material without compromising the product?	YES	<u>NO</u>
Is it feasible to replace a number of smaller packages with a single larger, more efficient package size (e.g. family size or bulk containers rather than individual portion packages)?	YES	<u>NO</u>
Does a product or package change which results in source reduction cause increased solid waste in other areas (e.g. and increased amount of food spoilage and thrown away as a result of changing from a smaller to larger packaged servings)?	YES	<u>NO</u>
Is it possible to reduce or eliminate secondary or tertiary packaging or wrapping?	YES	<u>NO</u>
Are customer suggestions on source reduction possibilities for secondary and tertiary packaging throughout the distribution system solicited and encouraged?	YES	<u>NO</u>



### 2.2 Re-use

Can the package or any of its components be designed to be safely refilled or re-used by consumers?	YES	<u>NO</u>
Can it be re-used by the manufacturer for the same or similar purpose?	YES	<u>NO</u>
If so, is there an established system for collection?	<u>N/A</u>	
Would re-use of the package contravene any State or Federal health regulation, or National Health and Medical Research Council recommendation?	YES	<u>NO</u>

### 2.3 Recycling

Does the technology exist to collect packaging from consumers and recycle it commercially?	<u>YES</u>	NO
If so, is there an established system for collection?	<u>YES</u> - refer to BCC website – kerbside recycling	NO
If not, is the necessary research being conducted to develop this technology – either alone or in conjunction with industry, government officials or academia?	<u>N/A</u>	NO
Is there an established system for separation at source <ul style="list-style-type: none"> <li>o In commercial premises</li> <li>o In the home or other consumer outlets.</li> </ul>	<u>YES</u> <u>YES</u>	NO NO
Does the packaging include a recommendation to consumers to clean the package prior to disposal if it is to be recycled?	YES	<u>NO</u>
Is it possible to use a single material type for the entire package, e.g. the bottle, closure, and label.	YES	<u>NO</u>
If so is this being done	<u>N/A</u>	
Does the package incorporate a recycling logo?	<u>YES</u>	NO
If a plastic package, does it incorporate the PACIA's Plastic Coding System for easy identification of plastic type?	<u>N/A</u>	
Is there advice on containers which contain toxic chemicals, or where the manufacturer has no control over the end use of the container? <ul style="list-style-type: none"> <li>o That it should not enter the recycling system</li> </ul>	<u>N/A</u>	
o Describing the most appropriate means of disposal		



Has an in-house or in-plant resource recovery or recycling system to use waste products generated from the manufacture of your product or package been established?	<u>YES</u>	NO
<ul style="list-style-type: none"> <li>o Into the same product</li> <li>o Recycled into a secondary product</li> <li>o The material is sold or given to an outside vendor to be recycled.</li> </ul>	YES YES <u>YES</u>	<u>NO</u> <u>NO</u>
Are the outer and inner packaging used for shipment and distribution of goods recyclable?	<u>YES</u>	NO
Has a resource of recovery and recycling system been established in co-operation with customers to collect and re-use distribution packaging waste that does not reach the ultimate consumer?	<u>YES</u>	NO
If not, is there an active development of such a system?	<u>N/A</u>	
If the product is being distributed in States or Territories with CDL, has the product been registered with the relevant EPA?	<u>YES</u>	NO
If not, is the container size exempt from CDL?	<u>N/A</u>	

#### 2.4 Degradability

Is the package technically biodegradable or photodegradable?	YES	<u>NO</u>
If yes, will the intended disposal system (e.g. landfill, sewerage) provide the right environmental conditions for degradation?	<u>N/A</u>	
Will degradability produce any by-products which are harmful to the environment?	<u>N/A</u>	
Has research been undertaken to evaluate the positive and negative aspects of using degradable materials?	YES	<u>NO</u>
Has the relevant State or Territory environment protection body been consulted?	<u>YES</u>	NO

#### 2.6 Disposal

If the package cannot be recycled, can it be treated prior to disposal to minimize its environmental impact in landfill?	YES	<u>NO</u> – Package is recyclable
Can the energy content of the package be recovered by incineration?	<u>N/A</u>	
Has the package been designed to be easily compressed prior to disposal to minimize its volume in landfill?	<u>N/A</u>	
Does the product incorporate the 'Do the Right Thing' message to the consumers encouraging them to dispose of the product in the appropriate manner?	<u>N/A</u>	



Does the package include any toxic materials which might leak into the environment in landfill?	YES	<u>NO</u>
If so, are these essential to the product?	<u>N/A</u>	
If not, are steps being taken to eliminate them from the product?	<u>N/A</u>	
Does the package contain any degradable materials?	YES	<u>NO</u>