

Australian Packaging Covenant



Bundaberg Sugar Ltd

5-Year Action Plan
1 July 2010 to 1 July 2015

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Executive Summary

This Action Plan has been prepared in accordance with the Australian Packaging Covenant which replaced the National Packaging Covenant in 2010. Bundaberg Sugar has been a signatory to the Covenant since 2001 to reduce the environmental impact of consumer packaging throughout its lifecycle. We recognise the vital role packaging plays in ensuring that the products are protected and preserved, waste minimised, and quality and health and safety assured. Packaging also has other economic benefits which include the marketing, logistical distribution and branding of products. This 5-year Action Plan builds on the previous achievements of Bundaberg Sugar and reflects the three goals set out in the strategic plan prepared by the Covenant Council. These goals are:

1. Packaging Design consistent with the Sustainable Packaging Guidelines
2. Recycling
3. Product Stewardship

Bundaberg Sugar is committed to working together with the Australian Packaging Covenant to achieve these goals.



COLIN ANTHONY STITT

Executive Chairman
Bundaberg Sugar Ltd

1. Company Profile

Bundaberg Sugar is a grower, miller, refiner and marketer of sugar and related products to a wide range of retail, industrial, food service and export customers. The company is Queensland's largest cane grower and owns and operates sugar mills, a refinery and packaging facility in Queensland. It continues to build market share in the world competitive refined sugar market.

Bundaberg Sugar is a significant employer in most of the regions in which it operates and employs up to 1,200 people. In 2000 Bundaberg Sugar was acquired by Finasucre a Belgian company. The company recognises its responsibility to the community and actively supports the environment, education, health, welfare, emergency services, youth, sport, culture and arts.

2. Sustainability

2.1 Energy Efficiency Opportunities Program

Bundaberg Sugar sources over 95% of its energy usage from renewable fuel in the form of bagasse. Bagasse is the fibrous part of the sugar cane plant left after the sugary juice is extracted. Bagasse is burnt as fuel in boilers at Bundaberg Sugar factories to produce steam to power the factories mechanical equipment, to generate electricity and for process heating. Bundaberg Sugar operates its factories in the most energy efficient way possible and is committed to identifying cost effective projects to further maximise energy efficiency into the future.

Bundaberg Sugar registered for the Government's Energy Efficiency Opportunities program in 2007. We then developed an Assessment and Reporting Schedule for Government approval. The focus is on cost effective energy savings opportunities identified in the assessment. Bundaberg Sugar's report is available on the company website.

2.2 Australian Packaging Covenant

Since 2001 Bundaberg Sugar has developed action plans and annually reports for the National Packaging Covenant, a government initiative formed to establish a framework based on the principle of shared responsibility for the effective lifecycle management of packaging materials including their recovery and recycling and to ensure it produces sustainable environmental benefits in a cost effective manner without compromising quality and safety of the product. We developed a five-year Action Plan based on product stewardship covering design, production, distribution, disposal, research, market development, education, labelling and manufacturing and retailing. Our achievements were reported in the annual reports submitted to the Covenant Council.

In 2005 the National Packaging Covenant set measurable objectives built on earlier strategies and signatories had to report on specific KPIs based on the Environmental Code of Practice for Packaging covering source reduction, potential for packaging reuse, recovery and recycling, ability to incorporate recycled content, minimising impacts of packaging, propensity to become litter and consumer information.

Bundaberg Sugar's achievements are:

- Downgauged the stretchwrap film by 12%.
- Downgauged the multi-wall paper bags from 3-ply to 2-ply, a reduction of 33% in waste.
- Reduced the thickness of the plastic sheets by 60%.

- Stopped using cardboard base for 2kg lines, a reduction of about 6 Tonnes per annum of paper material going to waste recycling.
- Stopped the use of composite cans that posed difficult to separate in the recycle stream.
- Using reusable tubs for the 500g Tub line that can be reused for multi-purpose food storage and microwave safe.

In 2010 the National Packaging Covenant was replaced by the Australian Packaging Covenant. The new Covenant focuses on consumer packaging with the following three goals:

Goal 1: Packaging Design - to optimise packaging to use resources efficiently and reduce environmental impact without compromising product quality and safety. Implement design and procurement processes consistent with the Sustainable Packaging Guidelines

Goal 2: Recycling – the efficient collection and recycling of packaging.

Goal 3: Product Stewardship – Reduction in packaging items in the litter stream.

3. Consumer Products

Bundaberg Sugar is a brand owner of a range of sugar and syrup products. The name Bundaberg enjoys a reputation for quality, innovation and customer value. The consumer range of products that is covered in the 5-year Action Plan is as follows:

Product	Packaging Type (Primary)	Secondary (outers)	Tertiary (pallet stretchwrap)
1kg Bundaberg White Sugar	Paper	Yes	Yes
2kg Bundaberg White Sugar	Paper	Yes	Yes
500g Caster Sugar	Plastic	Yes	Yes
3kg Bundaberg White Sugar	Plastic	Yes	Yes
500g Bundaberg Icing Mixture	Plastic	Yes	Yes
1kg Bundaberg Icing Mixture	Plastic	Yes	Yes
1kg Bundaberg Pure Icing	Plastic	Yes	Yes
500g Bundaberg Pure Icing	Plastic	Yes	Yes
500g Bundaberg Brown Sugar	Plastic	Yes	Yes
1kg Bundaberg Brown Sugar	Plastic	Yes	Yes
50 serves Sachet Sticks	Paper	Yes	Yes
500g tub Bundaberg White Sugar	Plastic	Yes	Yes
1kg Golden Syrup	Plastic	Yes	Yes
1kg Raw Sugar	Plastic	Yes	Yes

ENVIRONMENTAL POLICY

It is the policy of Bundaberg Sugar Ltd to conduct its business with proper regard for the protection and enhancement of the environment.

In pursuing this objective, the Company will operate an environmental management system to ensure compliance with statutory and regulatory requirements. In addition, it is committed to continual review and improvement in all activities.

Environmental awareness will be promoted amongst all employees and contractors to increase understanding of environmental matters.

C A Stitt

Chairman
Bundaberg Sugar Ltd

ACTION PLAN 2010 - 2015

1. DESIGN (Incorporating the Sustainable Packaging Guidelines)					
Design Strategy	Year 1 Action Plan 01/07/2010 - 30/06/2011	Year 2 Action Plan 01/07/2011 - 30/06/2012	Year 3 Action Plan 01/07/2012 - 30/06/2013	Year 4 Action Plan 01/07/2013 - 30/06/2014	Year 5 Action Plan 01/07/2014 - 30/06/2015
Minimise materials (source reduction)	<p>1. Form a team to review the design of existing packaging.</p> <p>Due to the huge tasks involved in reviewing all packaging types, it has been necessary to organise the review into 3 groups of packaging formats over the course of 3 years:</p> <p>Group 1: Paper packaging including secondary and tertiary. Review in Year 2.</p> <p>Group 2: Plastic packaging including secondary and tertiary packaging. Review in Year 3.</p> <p>Group 3: Contract packing including tubs and plastic jars. Review in Year 4.</p> <p>2. Develop a Matrix for each consumer product</p>	<p>Group 1 – Consumer paper packaging for 1kg, 2kg and Sachets Sticks (Primary, Secondary and Tertiary)</p> <p>Review, if the answer is no provide reason:</p> <p>Is the packaging necessary?</p> <p>Has the package been designed to use minimum amount of thickness and weight to suit the required level of functionality?</p> <p>Has the package been designed to minimise the number of separate layers of materials or the number of components?</p> <p>Could the amount of material used in the package be reduced further?</p> <p>What is the likely impact</p>	<p>Group 2 – Consumer plastic 'pillow' packaging for 500g, 1kg and 3kg (Primary, Secondary and Tertiary)</p> <p>Review, if the answer is no provide reason:</p> <p>Is the packaging necessary?</p> <p>Has the package been designed to use minimum amount of thickness and weight to suit the required level of functionality?</p> <p>Has the package been designed to minimise the number of separate layers of materials or the number of components?</p> <p>Could the amount of material used in the package be reduced further?</p> <p>What is the likely impact</p>	<p>Group 3 – Contract packing for tubs and plastic jars.</p> <p>Review, if the answer is no provide reason:</p> <p>Is the packaging necessary?</p> <p>Has the package been designed to use minimum amount of thickness and weight to suit the required level of functionality?</p> <p>Has the package been designed to minimise the number of separate layers of materials or the number of components?</p> <p>Could the amount of material used in the package be reduced further?</p> <p>What is the likely impact of these options on functionality, product</p>	<p>Action any identified opportunities of improvement from all packaging groups.</p> <p>Review improvements.</p>

	to record the outcome of the review and opportunities of improvement.	<p>of these options on functionality, product protection and consumer safety?</p> <p>Does the design of the package allow the product to be completely dispensed to avoid product wastage?</p> <p>Are there any plans to further reduce materials?</p>	<p>of these options on functionality, product protection and consumer safety?</p> <p>Does the design of the package allow the product to be completely dispensed to avoid product wastage?</p> <p>Are there any plans to further reduce materials?</p>	<p>protection and consumer safety?</p> <p>Does the design of the package allow the product to be completely dispensed to avoid product wastage?</p> <p>Are there any plans to further reduce materials?</p>	
Maximise water and energy efficiency		<p>Have the company and the packaging suppliers taken steps to optimise the energy efficiency of production processes?</p> <p>Have the company and the packaging suppliers taken steps to optimise the water efficiency of production processes?</p> <p>Has the company considered using renewable energy for manufacturing?</p>	<p>Have the company and the packaging suppliers taken steps to optimise the energy efficiency of production processes?</p> <p>Have the company and the packaging suppliers taken steps to optimise the water efficiency of production processes?</p> <p>Has the company considered using renewable energy for manufacturing?</p>	<p>Have the company and the packaging suppliers taken steps to optimise the energy efficiency of production processes?</p> <p>Have the company and the packaging suppliers taken steps to optimise the water efficiency of production processes?</p> <p>Has the company considered using renewable energy for manufacturing?</p>	
Use recycled materials		<p>What is the amount and percentage of recycled material in the following?</p> <ul style="list-style-type: none"> - Primary - Secondary - Tertiary unit 	<p>What is the amount and percentage of recycled material in the following?</p> <ul style="list-style-type: none"> - Primary - Secondary - Tertiary unit 	<p>What is the amount and percentage of recycled material in the following?</p> <ul style="list-style-type: none"> - Primary - Secondary - Tertiary unit 	

		<p>Could alternative formats or materials incorporate recycled material or offer a better environmental impact solution?</p> <p>Is it possible to use more post-consumer recycled material?</p> <p>Have you discussed the use of recycled materials with your marketing department and identified market concerns?</p>	<p>Could alternative formats or materials incorporate recycled material or offer a better environmental impact solution?</p> <p>Is it possible to use more post-consumer recycled material?</p> <p>Have you discussed the use of recycled materials with your marketing department and identified market concerns?</p>	<p>Could alternative formats or materials incorporate recycled material or offer a better environmental impact solution?</p> <p>Is it possible to use more post-consumer recycled material?</p> <p>Have you discussed the use of recycled materials with your marketing department and identified market concerns?</p>	
Use renewable and/or recyclable materials		<p>What is potential for and availability of materials derived from a renewable source?</p> <p>Are the renewable raw materials grown and harvested using sustainable farming or forestry practices?</p> <p>What is the potential for incorporating recyclable materials?</p> <p>Describe your understanding on the extent to which the consumer packaging used is collected for recycling in the</p>	<p>What is potential for and availability of materials derived from a renewable source?</p> <p>Are the renewable raw materials grown and harvested using sustainable farming or forestry practices?</p> <p>What is the potential for incorporating recyclable materials?</p> <p>Describe your understanding on the extent to which the consumer packaging used is collected for recycling in the</p>	<p>What is potential for and availability of materials derived from a renewable source?</p> <p>Are the renewable raw materials grown and harvested using sustainable farming or forestry practices?</p> <p>What is the potential for incorporating recyclable materials?</p> <p>Describe your understanding on the extent to which the consumer packaging used is collected for recycling in the</p>	

		geographic area where the product will be sold?	geographic area where the product will be sold	geographic area where the product will be sold	
Minimise hazards associated with potentially toxic and hazardous materials.		<p>Have you applied conventional and conservative risk management principles in the selection of substance for packaging applications to eliminate toxic and hazardous substances?</p> <p>Does the packaging meet Australian and / or International standards in relation to the levels of potentially toxic and harmful substances?</p>	<p>Have you applied conventional and conservative risk management principles in the selection of substance for packaging applications to eliminate toxic and hazardous substances?</p> <p>Does the packaging meet Australian and / or International standards in relation to the levels of potentially toxic and harmful substances?</p>	<p>Have you applied conventional and conservative risk management principles in the selection of substance for packaging applications to eliminate toxic and hazardous substances?</p> <p>Does the packaging meet Australian and / or International standards in relation to the levels of potentially toxic and harmful substances?</p>	
Use materials from responsible suppliers		<p>Are raw materials sourced from suppliers who have documented environmental management systems?</p> <p>Do you give preference to suppliers that are signatories (if applicable) to the Covenant?</p> <p>Are you or your suppliers engaged in a sustainability program such as the PACIA / EPA Victoria Sustainability Leadership Framework.</p>	<p>Are raw materials sourced from suppliers who have documented environmental management systems?</p> <p>Do you give preference to suppliers that are signatories (if applicable) to the Covenant?</p> <p>Are you or your suppliers engaged in a sustainability program such as the PACIA / EPA Victoria Sustainability Leadership Framework</p>	<p>Are raw materials sourced from suppliers who have documented environmental management systems?</p> <p>Do you give preference to suppliers that are signatories (if applicable) to the Covenant?</p> <p>Are you or your suppliers engaged in a sustainability program such as the PACIA / EPA Victoria Sustainability Leadership Framework</p>	

Design for transport					
		Can the distribution packaging be reduced or eliminated through redesign of the primary or secondary package, or vice versa?	Can the distribution packaging be reduced or eliminated through redesign of the primary or secondary package, or vice versa?	Can the distribution packaging be reduced or eliminated through redesign of the primary or secondary package, or vice versa?	
		Are you currently using shelf ready/retail ready packaging? Is it being used effectively? If it is not being used effectively has this been communicated to others in the supply chain?	Are you currently using shelf ready/retail ready packaging? Is it being used effectively? If it is not being used effectively has this been communicated to others in the supply chain?	Are you currently using shelf ready/retail ready packaging? Is it being used effectively? If it is not being used effectively has this been communicated to others in the supply chain?	
		Have you used light weighting (source reduction) strategies in your package design? Have you considered the overall environmental impact of light weighting e.g. does your design for transport have a negative impact on the recyclability of the used packaging?	Have you used light weighting (source reduction) strategies in your package design? Have you considered the overall environmental impact of light weighting e.g. does your design for transport have a negative impact on the recyclability of the used packaging?	Have you used light weighting (source reduction) strategies in your package design? Have you considered the overall environmental impact of light weighting e.g. does your design for transport have a negative impact on the recyclability of the used packaging?	
		Have you designed your consumer packaging to maximise the efficiency of secondary or tertiary packaging e.g. in pallet configuration.	Have you designed your consumer packaging to maximise the efficiency of secondary or tertiary packaging e.g. in pallet configuration.	Have you designed your consumer packaging to maximise the efficiency of secondary or tertiary packaging e.g. in pallet configuration.	

		<p>Are you fully utilising the transport options such as pallet efficiency and truck height? Are there any efficiencies that can be achieved?</p> <p>Is there an opportunity to switch to more efficient vehicles, hybrid vehicles or renewable energy sources for your distribution fleet?</p> <p>Do you consider back-loading of used packaging or waste products once deliveries have been made? Can your distribution network aid the recovery of used packaging?</p>	<p>Are you fully utilising the transport options such as pallet efficiency and truck height? Are there any efficiencies that can be achieved?</p> <p>Is there an opportunity to switch to more efficient vehicles, hybrid vehicles or renewable energy sources for your distribution fleet?</p> <p>Do you consider back-loading of used packaging or waste products once deliveries have been made? Can your distribution network aid the recovery of used packaging?</p>	<p>Are you fully utilising the transport options such as pallet efficiency and truck height? Are there any efficiencies that can be achieved?</p> <p>Is there an opportunity to switch to more efficient vehicles, hybrid vehicles or renewable energy sources for your distribution fleet?</p> <p>Do you consider back-loading of used packaging or waste products once deliveries have been made? Can your distribution network aid the recovery of used packaging?</p>	
Design for reuse		<p>Have you considered and compared the environmental benefits of reusable packaging with single-use packaging?</p> <p>Do you have packaging supply chain confirmation that the package is capable of reuse for the intended application under normal conditions,</p>	<p>Have you considered and compared the environmental benefits of reusable packaging with single-use packaging?</p> <p>Do you have packaging supply chain confirmation that the package is capable of reuse for the intended application under normal conditions,</p>	<p>Have you considered and compared the environmental benefits of reusable packaging with single-use packaging?</p> <p>Do you have packaging supply chain confirmation that the package is capable of reuse for the intended application under normal conditions,</p>	

		<p>without risk to the product or to the health and safety of packaging supply chain workers and consumers?</p> <p>Has the product been designed to maximise the number of return trips / reuse?</p> <p>Is the packaging format applicable for reconditioning once the packaging has fulfilled its designated purpose? If not can the reusable packaging be recycled?</p>	<p>without risk to the product or to the health and safety of packaging supply chain workers and consumers?</p> <p>Has the product been designed to maximise the number of return trips / reuse?</p> <p>Is the packaging format applicable for reconditioning once the packaging has fulfilled its designated purpose? If not can the reusable packaging be recycled?</p>	<p>without risk to the product or to the health and safety of packaging supply chain workers and consumers?</p> <p>Has the product been designed to maximise the number of return trips / reuse?</p> <p>Is the packaging format applicable for reconditioning once the packaging has fulfilled its designated purpose? If not can the reusable packaging be recycled?</p>	
Design for recovery		<p>To what extent are the packaging materials collected for recycling in the geographic area in which the product will be sold?</p> <p>How much of the packaging is recyclable?</p> <p>How many materials are being used in this package? If more than one material is used, are the different materials compatible in the recycling process?</p> <p>Are any materials bonded together and</p>	<p>To what extent are the packaging materials collected for recycling in the geographic area in which the product will be sold?</p> <p>How much of the packaging is recyclable?</p> <p>How many materials are being used in this package? If more than one material is used, are the different materials compatible in the recycling process?</p> <p>Are any materials bonded together and</p>	<p>To what extent are the packaging materials collected for recycling in the geographic area in which the product will be sold?</p> <p>How much of the packaging is recyclable?</p> <p>How many materials are being used in this package? If more than one material is used, are the different materials compatible in the recycling process?</p> <p>Are any materials bonded together and</p>	

		<p>therefore difficult to recycle? If yes, has an alternative format/system been considered?</p> <p>Has the packaging been designed to minimise the impacts that any components such as closures, labels, sleeves, carry handles, etc. may have on the recycling process?</p> <p>Have you consulted with recyclers or composters (depending on the intended recovery process) to find out whether any components will be problematic in the recovery process or in the end-product?</p> <p>If compostable materials are being considered, has reference been made to industry standards such as the PACIA's document, <i>Using Degradable Plastics in Australia – A product stewardship guide and commitment?</i></p> <p>Is packaging of this type and purpose included in</p>	<p>therefore difficult to recycle? If yes, has an alternative format/system been considered?</p> <p>Has the packaging been designed to minimise the impacts that any components such as closures, labels, sleeves, carry handles, etc. may have on the recycling process?</p> <p>Have you consulted with recyclers or composters (depending on the intended recovery process) to find out whether any components will be problematic in the recovery process or in the end-product?</p> <p>If compostable materials are being considered, has reference been made to industry standards such as the PACIA's document, <i>Using Degradable Plastics in Australia – A product stewardship guide and commitment?</i></p> <p>Is packaging of this type and purpose included in</p>	<p>therefore difficult to recycle? If yes, has an alternative format/system been considered?</p> <p>Has the packaging been designed to minimise the impacts that any components such as closures, labels, sleeves, carry handles, etc. may have on the recycling process?</p> <p>Have you consulted with recyclers or composters (depending on the intended recovery process) to find out whether any components will be problematic in the recovery process or in the end-product?</p> <p>If compostable materials are being considered, has reference been made to industry standards such as the PACIA's document, <i>Using Degradable Plastics in Australia – A product stewardship guide and commitment?</i></p> <p>Is packaging of this type and purpose included in</p>	
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		<p>the Australian Council of Recyclers (ACOR) <i>Kerbside recycling specifications</i>? Have these specifications been considered in the packaging design?</p> <p>Have you developed and implemented appropriate labelling on packaging to encourage consumers to recycle or compost?</p> <p>Is rigid plastic packaging labelled with PACIA's plastics identification code?</p>	<p>the Australian Council of Recyclers (ACOR) <i>Kerbside recycling specifications</i>? Have these specifications been considered in the packaging design?</p> <p>Have you developed and implemented appropriate labelling on packaging to encourage consumers to recycle or compost?</p> <p>Is rigid plastic packaging labelled with PACIA's plastics identification code?</p>	<p>the Australian Council of Recyclers (ACOR) <i>Kerbside recycling specifications</i>? Have these specifications been considered in the packaging design?</p> <p>Have you developed and implemented appropriate labelling on packaging to encourage consumers to recycle or compost?</p> <p>Is rigid plastic packaging labelled with PACIA's plastics identification code?</p>	
Design for litter reduction		<p>Do you understand where, when and how the product will be used and by whom?</p> <p>Is the package likely to be consumed away from home and therefore have the propensity to become litter?</p> <p>To what extent is this packaging type represented in the litter stream?</p> <p>How many separate or easily separable components that could</p>	<p>Do you understand where, when and how the product will be used and by whom?</p> <p>Is the package likely to be consumed away from home and therefore have the propensity to become litter?</p> <p>To what extent is this packaging type represented in the litter stream?</p> <p>How many separate or easily separable components that could</p>	<p>Do you understand where, when and how the product will be used and by whom?</p> <p>Is the package likely to be consumed away from home and therefore have the propensity to become litter?</p> <p>To what extent is this packaging type represented in the litter stream?</p> <p>How many separate or easily separable components that could</p>	

		<p>end up as litter does the packaging item have (e.g., screw cap lids, peel off seals), and can they be reduced?</p> <p>Has the package been designed to minimise the number of separate or separable components?</p> <p>Do you provide advice for consumers on the label to encourage appropriate disposal or recovery?</p> <p>What steps have you undertaken to reduce the occurrence of your packaging in the litter stream?</p> <p>Have options been considered for away-from-home recycling as part of an overall littering abatement program?</p>	<p>end up as litter does the packaging item have (e.g., screw cap lids, peel off seals), and can they be reduced?</p> <p>Has the package been designed to minimise the number of separate or separable components?</p> <p>Do you provide advice for consumers on the label to encourage appropriate disposal or recovery?</p> <p>What steps have you undertaken to reduce the occurrence of your packaging in the litter stream?</p> <p>Have options been considered for away-from-home recycling as part of an overall littering abatement program?</p>	<p>end up as litter does the packaging item have (e.g., screw cap lids, peel off seals), and can they be reduced?</p> <p>Has the package been designed to minimise the number of separate or separable components?</p> <p>Do you provide advice for consumers on the label to encourage appropriate disposal or recovery?</p> <p>What steps have you undertaken to reduce the occurrence of your packaging in the litter stream?</p> <p>Have options been considered for away-from-home recycling as part of an overall littering abatement program?</p>	
Design for consumer accessibility		<p>Has the consumer's ability to access the product within the packaging been adequately considered in the design process? For example, has a consumer specialist analysed the actions</p>	<p>Has the consumer's ability to access the product within the packaging been adequately considered in the design process? For example, has a consumer specialist analysed the actions</p>	<p>Has the consumer's ability to access the product within the packaging been adequately considered in the design process? For example, has a consumer specialist analysed the actions</p>	

		<p>required to interact with the product?</p> <p>Have you considered whether the level of information on the packaging ensures the consumer is aware of its contents and how to open the package?</p> <p>Have you considered the demographic of the consumer who will use the product? Are there any limiting factors typically associated with these consumers?</p> <p>Can changes be made to improve the ability of the consumer to use the product without compromising the safety, security or quality?</p> <p>To what extent has your company ever received any complaints in relation to accessibility of packaging?</p> <p>Could an alternative design be used efficiently to minimise the requirement for tools such as a knife or scissors?</p>	<p>required to interact with the product?</p> <p>Have you considered whether the level of information on the packaging ensures the consumer is aware of its contents and how to open the package?</p> <p>Have you considered the demographic of the consumer who will use the product? Are there any limiting factors typically associated with these consumers?</p> <p>Can changes be made to improve the ability of the consumer to use the product without compromising the safety, security or quality?</p> <p>To what extent has your company ever received any complaints in relation to accessibility of packaging?</p> <p>Could an alternative design be used efficiently to minimise the requirement for tools such as a knife or scissors?</p>	<p>required to interact with the product?</p> <p>Have you considered whether the level of information on the packaging ensures the consumer is aware of its contents and how to open the package?</p> <p>Have you considered the demographic of the consumer who will use the product? Are there any limiting factors typically associated with these consumers?</p> <p>Can changes be made to improve the ability of the consumer to use the product without compromising the safety, security or quality?</p> <p>To what extent has your company ever received any complaints in relation to accessibility of packaging?</p> <p>Could an alternative design be used efficiently to minimise the requirement for tools such as a knife or scissors?</p>	

Provide consumer information		<p>What environmental issues have been considered during development of the product's marketing strategy, for example use of environmental claims, logos and consumer education?</p> <p>Will any environmental claims be made about the packaging item?</p> <p>Has information been used on packaging to encourage recycling, for example the Mobius loop (refer to AS/NZS 14021).</p> <p>Has plastic packaging been identified with the voluntary Plastics Identification Code which marks plastic containers to identify the plastic resin from which they are made?</p> <p>Has appropriate information in relation to litter prevention been included on all packaging of products likely to be consumed away from home?</p> <p>If recycling logos are to be used on the packaging, have you</p>	<p>What environmental issues have been considered during development of the product's marketing strategy, for example use of environmental claims, logos and consumer education?</p> <p>Will any environmental claims be made about the packaging item?</p> <p>Has information been used on packaging to encourage recycling, for example the Mobius loop (refer to AS/NZS 14021).</p> <p>Has plastic packaging been identified with the voluntary Plastics Identification Code which marks plastic containers to identify the plastic resin from which they are made?</p> <p>Has appropriate information in relation to litter prevention been included on all packaging of products likely to be consumed away from home?</p> <p>If recycling logos are to be used on the packaging, have you</p>	<p>What environmental issues have been considered during development of the product's marketing strategy, for example use of environmental claims, logos and consumer education?</p> <p>Will any environmental claims be made about the packaging item?</p> <p>Has information been used on packaging to encourage recycling, for example the Mobius loop (refer to AS/NZS 14021).</p> <p>Has plastic packaging been identified with the voluntary Plastics Identification Code which marks plastic containers to identify the plastic resin from which they are made?</p> <p>Has appropriate information in relation to litter prevention been included on all packaging of products likely to be consumed away from home?</p> <p>If recycling logos are to be used on the packaging, have you</p>	
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		identified existing systems that will be able to recycle the packaging?	identified existing systems that will be able to recycle the packaging?	identified existing systems that will be able to recycle the packaging?	
Responsibility	Packaging Review Team (comprising of representative from Production, Technical, Quality & Food Safety, Sales & Marketing, Procurement).				
2. RECYCLING					
	Year 1 Action Plan 01/07/2010 - 30/06/2011	Year 2 Action Plan 01/07/2011 - 30/06/2012	Year 3 Action Plan 01/07/2012 - 30/06/2013	Year 4 Action Plan 01/07/2013 - 30/06/2014	Year 5 Action Plan 01/07/2014 - 30/06/2015
A Policy to buy products made from recycled packaging.	1. Compile a list of stationary suppliers and secondary and tertiary suppliers. There is limitation to using recycled material for primary packaging in contact with product. Recycled packaging is not permitted for food contact status.	1. Determine source of materials and the recycled content for each material supplied.	1. Contact suppliers for alternative materials to products that are from virgin materials. 2. Obtain alternative material and evaluate for performance.	1. If the materials are from recycled packaging and it has been evaluated to perform as desired continue to purchase it. 2. Approach department heads in the company to adopt a Buy Recycled policy.	1. Draft a Buy Recycled policy for review and approval.
Onsite recovery system for collection and recycling of used packaging.	The site has maintained a proper disposal system for the recovery of used packaging materials and general waste. Onsite, there are designated disposal bins for paper, cardboard and LDPE plastic and general waste. A recycler collects these at least three times a week for proper recycling.				
Responsibility	General Manager Sales & Marketing Quality Officer				

3. PRODUCT STEWARDSHIP					
	Year 1 Action Plan 01/07/2010 - 30/06/2011	Year 2 Action Plan 01/07/2011 - 30/06/2012	Year 3 Action Plan 01/07/2012 - 30/06/2013	Year 4 Action Plan 01/07/2013 - 30/06/2014	Year 5 Action Plan 01/07/2014 - 30/06/2015
A documented procedure to review all existing packaging against the Sustainable Packaging Guidelines	<ol style="list-style-type: none"> 1. Draft a procedure for reviewing existing packaging against the Sustainable Packaging Guidelines. 2. Compile a list of different types and formats of existing packaging. 	<ol style="list-style-type: none"> 1. Commence review of existing packaging using the Sustainable Packaging Guidelines and identify the materials that have reached optimum design. 2. Identify areas that need improvement. 	<ol style="list-style-type: none"> 1. If further improvement is needed, investigate alternative and ways to change the design to reduce the environmental impact without compromising product quality and safety. 	<ol style="list-style-type: none"> 1. Obtain samples of materials and conduct trials to evaluate alternatives. 	<ol style="list-style-type: none"> 1. Implement changes to materials and / or design of existing packaging, if necessary. 2. Review any improvement and changes made to ensure it is in line with the Sustainable Packaging Guidelines.
Work with packaging suppliers to improve packaging design and increase recycling of used packaging	<ol style="list-style-type: none"> 1. Review all existing packaging suppliers. 	<ol style="list-style-type: none"> 2. Develop and send a questionnaire to suppliers asking for specification of the raw materials, recycled content and any plans to improve the design and if they are a signatory to the APC. 	<ol style="list-style-type: none"> 1. Review questionnaire answers from suppliers. 2. Develop a procedure to send to suppliers the questionnaire every year as part of annual review to ensure any change to packaging design does not compromise product quality and safety but increases recycling rate. 	<ol style="list-style-type: none"> 1. Calculate the % recycled content of existing packaging materials. Work with suppliers to look at possibility of increasing recycled content of materials. 2. Calculate % recyclable materials of total materials used. 	<ol style="list-style-type: none"> 1. Determine improvements made by suppliers in the design and recycled content of packaging. 2. Monitor performance of recycled materials used for packaging to ensure it does not compromise quality and safety.
A formal procedure to include the Sustainable Packaging Guidelines as part of design and procurement process	<ol style="list-style-type: none"> 1. Review the procurement procedure. 2. Educate staff on the Sustainable 	<ol style="list-style-type: none"> 1. Commence to draft a procedure to integrate the Sustainable Packaging Guidelines with the supplier approval and 	<ol style="list-style-type: none"> 1. New procedure to be included in the Quality Management System. 2. Organise a meeting to introduce the new 	<ol style="list-style-type: none"> 1. Implement the Sustainable Packaging Guidelines in the procurement of packaging raw materials. 	<ol style="list-style-type: none"> 1. Review the implementation of Sustainable Packaging Guidelines.

	Packaging Guidelines.	procurement process.	procedure to relevant staff.		
Reduce litter	1. Include litter reduction as part of Design Strategy review in section 1.	1. Obtain data from recycling organisation on types of packaging found in litter stream.	1. Determine extent to which our brand label has entered the litter stream.	1. Investigate ways to provide advice to consumers on the packaging label.	1. Consider sponsorship of anti-litter education program.
Waste management contract for collecting and recycling packaging.	1. Obtain the procedure from contractor for collecting and recycling packaging.	1. Review the procedure to ensure proper disposal and recycling is maintained.	1. Audit the current contractor who collects our used packaging for recycling to ensure proper procedure is followed.	1. Determine opportunities for improvement raised in the audit of contractor.	1. Action opportunities for improvement.
Responsibility	General Manager Sales & Marketing Quality Officer National Retail Manager				
REPORT DUE	31 October 2011	31 October 2012	31 October 2013	31 October 2014	31 October 2015

Contact Details

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