



National Packaging Covenant
ACTION PLAN
2008 - 2011

08 / **2011 action plan**

national packaging covenant

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ENVIRONMENT STATEMENT

Confoil Pty. Ltd. is committed to take necessary action, to keep to a minimum the impact from its daily operation on the environment, and gives a high priority to environmental considerations when making short and long term decisions.

The company reviews and revises policies and operating procedures periodically in line with the latest developments and findings on environmental issues, waste minimisation and recycling, to ensure that only the most up to date technologies and methods are used at any one time.

This policy provides for ongoing training, encouragement and reward through the recognition of all company employees, in an endeavour to achieve a consistent reduction of waste levels and to continually seek awareness and techniques to further reduce waste in all areas of the organisation.

It is the policy of this company to recycle or to arrange for recycling of all primary and secondary scrap materials that cannot be used in the normal manufacturing processes. All viable avenues are pursued to develop methods and technologies to make re-use of these waste materials and to efficiently manufacture alternative products for sale from such materials. Confoil Pty. Ltd. supports and encourages recyclers of paperboard products, aluminium products and materials.

All suppliers to the company are encouraged to furnish their respective policies on environmental, recycling and waste minimisation issues, incorporating their clearly stated objectives, as assessment of such policies may influence future purchasing decisions.

Confoil Pty. Ltd. endeavours to display on all its packaging materials, and where practicable on its finished product, recognised recycling logos and codes, to encourage end users to seek and select an appropriate recycling stream for recommended environmentally safe disposal. The company, through industry associations, endeavours to make consumers aware of alternative uses and applications of its products after they have performed this primary function.

Introduction

Confoil's fourth National Packaging Covenant Action Plan provides a framework for Confoil as it moves towards achieving sustainability.

The action plan covers a three year time frame and provides a range of broad goals covering key business indicators. The goals are achievable and measurable, so that Confoil can regularly evaluate and determine the progress to achieving the goal. This action plan also serves to align ourselves with the proposed legislation covering emissions trading which forms part of the current Governments overall climate change strategy.

This plan builds on earlier initiatives established in prior action plans developed since becoming a National Packaging Covenant signatory in 2002. Some key achievements to date include;

- ✓ Rationalisation of product range
- ✓ Down gauging several high volume foil and paperboard trays resulting in significant raw material savings
- ✓ Increased product output while achieving a significant reduction in energy consumption.
- ✓ Provide effective recycling systems
- ✓ Introduced a number of scrapless tools and multi cavity tools which reduced waste levels, improved yield and conserved energy.
- ✓ Increased recycling rates
- ✓ Implemented a buy-recycle purchasing policy
- ✓ Consolidate delivery to reduce costs, transit times, reduce damage through handling of stock and provide excellent service to customers

Confoil continue to be strong advocates of the National Packaging Covenant and are committed to building a sustainable business.

Company Profile

Company Name: Confoil Pty Ltd (trading as Confoil Containers).

Company Size: Turnover - Approximately AU\$50 million per annum
Employees - Approximately 200
Market Share - Market Leader
Ownership - Privately owned Australian company.

Location: Head Office and Manufacturing is located in Bayswater, Victoria
66 Canterbury Road, Bayswater North, Victoria, 3153

Manufacturing & sales – Seven Hills, NSW

Printing Facility – Scoresby, VIC

Sales Office –Toowong, Queensland

Commercial Activities:

- Manufacturing of food packaging including;
- ✓ Rigid & smoothwall aluminium foil containers
 - ✓ Dualpak – Dual ovenable pressed paperboard containers
 - ✓ Aluminium foil rolls and pop up foil sheets
 - ✓ Cellulose and parchment baking moulds

Corporate Accreditations:

ISO Accreditation
H.A.C.C.P
Occupational Health and Safety

Place in Packaging Chain:

Packaging Manufacturer

Contact Officer

The officer charged with the responsibility of implementing and reporting on the Packaging Covenant Action Plan and annual reports is Lynda Rogers. Her details are as follows;

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Action Plan 2008 - 2011

This plan continues to build on initiatives established in earlier action plans developed over the years since becoming a signatory to the National Packaging Covenant. It is not a static document and will evolve as the company grows and undergoes structural change. For ease of navigation, this action plan has been divided into two sections.

Section 1 - 'Confoil Key Performance Indicators' outlines the goals Confoil has established for the duration of this action plan. It sets out the strategies Confoil will follow and monitor in order to evaluate our progress towards meeting the stated goals.

<i>Confoil Key Business Indicators</i>	<i>Goal</i>
Disposal - Waste Minimisation	To reduce waste produced, investigate product lifecycle opportunities and reduce waste disposed to landfill.
Production - Conserve Energy & Reduce Gas Emissions	Efficient utilisation of energy and reduce greenhouse emissions.
Communication & Education	Provide informative & educational communication to Confoil staff and the wider community.
Distribution - Logistics Review	Provide an efficient, effective logistic service, consolidate transport & provide efficient distribution.
Design / Production - Continuous Improvement	Remain abreast of latest technology & advanced production techniques. Incorporate ECCoPP.
Emissions Trading	Understand our carbon footprint, reduce greenhouse emissions and prepare for Emissions Trading.

Section 2 - 'Covenant Council KPI's' includes all the environmental performance goals and key actions required by the NPC in its efforts to deliver the outcomes undertaken by the Covenant.

SECTION 1- Confoil Key Performance Indicators

Disposal - Waste Minimisation

Goal: To reduce waste produced, investigate product lifecycle opportunities and reduce waste disposed to landfill.

Waste minimisation will be a multi-faceted approach, as Confoil continue to maintain and build on our established record of waste management. Confoil's objective is to reduce the amount of waste produced, investigate opportunities to reduce, re-use, recycle and recover primary and secondary packaging materials and significantly reduce the amount of waste disposed to landfill. Confoil's objectives are;

- ✓ Manage and reduce waste directed to landfill.
Measure: m³ sent to landfill
- ✓ Maintain current levels of manufacturing scrap in all divisions whilst continuing to explore methods of reducing scrap levels further.
Measure: % scrap produced per tonne of raw material by material type.
- ✓ Provide cost efficient and effective recycling systems.
Measure: Audit report on Collection Contractors
- ✓ Communicate and explore opportunities of minimising waste within our supply chain.
Measure: Record of communications.
- ✓ Harness the support & encourage the exchange of ideas for good waste management from all Confoil staff.
Measure: Report / Implementation of process
- ✓ Make informed purchasing decisions by considering the environmental impact as well as the economic implications of products purchased.
Measure: Annual purchasing report
- ✓ Reduce office / administration waste levels.
Measure: Annual report monitoring; quantity of photocopying paper used, number of bins picked up, implementation of electronic filing, conversion of hard copy manuals to electronic files and incorporation of other computer based systems.

Production - Conserve Energy & Reduce Greenhouse Emissions

Goal: Efficient utilisation of energy and reduce gas emissions.

Confoil's manufacturing practice continues to focus on energy reduction while increasing output. Recent reduction in energy consumption can be contributed to Confoil's continued 'targeted maintenance' of plant & equipment, improved processes and continual review of the manufacturing systems. Confoil's goal is to maintain current energy levels while further investigating opportunities for conserving energy and improve energy utilisation. Confoil will;

- ✓ Conduct energy audits across all facilities.
Measure: Written report
- ✓ Aim to achieve lower running costs in terms of energy utilisation and by assessing opportunities for energy reductions.
Measure: Report - Energy consumption compared to output.
- ✓ Establish systems to manage issues arising.
Measure: Written report
- ✓ Involve all staff and raise awareness of good energy management.
Measure: Report / Implementation of communication.
- ✓ Establish accurate and reportable bench-marking data
Measure: Submission of the NPC annual report by October each year.
- ✓ Consider programs from both an environmental and economic stance which offset greenhouse gas emissions.
Measure: Written report.

Communication & Education

Goal: Provide informative & educational communication to Confoil staff and the wider community.

Every year Confoil formally reviews its environmental performance by collecting bench-mark data and submitting an annual NPC report detailing progress against the Covenants KPI's and internal goals established by Confoil. Communicating our achievements is a vital part in promoting the company's environmental credentials to our staff, customers, suppliers and the wider community. This communication also plays an important role in promoting the National Packaging Covenant and the Packaging Industry. Confoil will;

- ✓ Promote the NPC, internally & externally via newsletters and corporate publications.
- ✓ Investigate sponsorship of programs which promote, recognise and reward good environmental management / outcomes.
- ✓ Produce external correspondence to customer base and suppliers, communicating Confoil's environmental initiatives and canvassing support.
- ✓ Promote environmental initiatives and newsworthy articles on the Confoil website.
- ✓ Actively seek guests to speak to the management group.
- ✓ Open dialogue with the council in our new municipality.

Measure: The above actions points will be reported on in an annual 'Communication & Education' Report. It will supported by relevant documentation.

Distribution - Logistics Review

Goal: Consolidate transport, provide efficient distribution & other logistic services with consideration of environmental implications.

Confoil prides itself on its high level of service, short lead times and flexibility in meeting the needs of our customers. It is with these drivers in mind that Confoil continually review the logistic systems that offer internal and external customers a range of integrated services ranging from; warehousing, material handling, distribution, order processing and inventory management. Confoil aims to maintain efficient & effective logistic services while minimising the environmental impact. Confoil will;

- ✓ Maximise loads on trucks.
- ✓ Reduce transport emissions.
- ✓ Regularly service trucks to gain optimum fuel efficiency.
- ✓ Annually review metropolitan truck routes.
- ✓ Investigate ways of reducing paperwork through use of computer based systems.
- ✓ Develop markets for secondary packaging where possible.
- ✓ Enquire as to supplier 'buy back' options on secondary packaging options.
- ✓ Continue to develop bar coding systems.
- ✓ Continue to audit customer requirements.
- ✓ Monitor product handling practices with the aim of reducing damaged stock.
- ✓ Monitor use of secondary packaging products ie: pallet wrapping
- ✓ Make informed purchasing decisions by considering the environmental impact as well as the economic implications of products purchased.
- ✓ Monitor and review collection agency contracts ie: 'standing pick up' or 'on demand'.
- ✓ Optimise waste bin pick ups. (ie: full bins v's half full)

Measure: An annual 'Logistics' report with supporting documentation will cover the points above.

Design / Production - Continuous Improvement

Goal: Remain abreast of latest technology & advanced production techniques. Incorporate ECoPP.

Confoil's operating methods focus on lean manufacturing and superior product design within tight quality parameters. Waste minimisation, conservation of energy and continual improvement underpin the operational culture. Confoil will;

- ✓ Audit current packaging and re-design where possible to minimise packaging with the use of the ECoPP.
- ✓ Decrease the amount of material used whilst retaining product integrity.
- ✓ Design new tooling and modify old tooling to multi cavity dies where possible.
- ✓ Minimise reject product in production process.
- ✓ Continue 'targeted maintenance' to optimise energy consumption.
- ✓ Continue to report and monitor processes against baseline data.
- ✓ Bench mark against 'best practices' and consider latest technology.
- ✓ Annually audit current practices.

Measure: An annual 'Production' report with supporting documentation will cover the points above.

Emissions Trading

Goal: Understand and document our carbon footprint, reduce greenhouse emissions and prepare for Emissions Trading.

Confoil recognises the need to be well prepared for changes in legislation governing climate change. The need to understand and document the company's carbon footprint is a key element in providing a strategic plan for reducing greenhouse gas emissions and adapting to the impacts of future 'emissions trading' legislation. Confoil will;

- ✓ Understand & document baseline data on the company's current carbon footprint position.
- ✓ Aim to reduce greenhouse gas emissions.
- ✓ Look at opportunities to offset greenhouse gas emissions.
- ✓ Continue to support & work with the NPC to achieve the KPI's set by the covenant.
- ✓ Keep abreast of the proposed 'Emissions Trading Scheme' and develop a strategic plan to deal with the impact of such legislation.

Measure: Documentation of Carbon Footprint & 'Emissions Trading' strategy.

SECTION 2- Covenant Council Key Performance Indicators

Key Action: Packaging designed, manufactured, distributed and marketed to minimise the amount of material and other resources essential to guarantee the protection, safety, hygiene and shelf-life of the product.

#2: KPI Resources used to produce packaging, by material type; energy (megajoules & Kwh), water (kilolitres).

Qualifier 1.This KPI will be reported across Confoil's entire manufacturing processes as we do not have the capacity to break down the consumption of energy over different areas of manufacture.
2. Water is not a key component of our manufacturing process therefore has not previously been included. Confoil, as part of this new action plan, will report annual usage.

Report Annually

Measure Report title: "Earned Hours"

Energy Usage (Gas & Electricity) compared with number of production hours. This report will provide the number of megajoules or Kwh per hour of production. This benchmark figure will then be used to maintain our energy consumption and where possible improve upon it.

Baseline Data Reference data is available in the current NPC report. See October 2008 report.

This initiative has been highlighted for further action in section 1.

#3: KPI Improvements in design, manufacture, marketing & distribution to minimise the environmental impacts of packaging.

Baseline Data Reference data is available in current NPC report. See October 2008 report. This initiative has been highlighted for further action in section 1 and will be reported on in the next NPC report.

Key Action: Packaging designed and manufactured to optimise the amount of post-consumer recycled content.

5: KPI Average % per annum, of post-consumer recycled content in packaging manufactured.

Qualifier 1. Confoil is a converter of raw material hence does not receive any post consumer recycled product back. All post consumer waste is trade waste associated with the receipt of raw materials and supplies for manufacturing purposes.

Baseline Data Confoil's Dualpak division (Pressed Paperboard Trays) uses 100% virgin Board.

Confoil's foil division uses aluminium foil which has zero recycled content.

6: KPI Total weight, by type, of 'non-recyclable' consumer packaging sold per annum into the Australian market.

Measure Tonnes by type. % of total packaging sold.

Baseline Data All key products manufactured by Confoil are 100% recyclable. The only 'non-recyclable' products sold by Confoil are traded products which include; Foam cups, plastic wrap, film lids, clip on plastic lids
Reference data is available in current NPC report. See October 2008 report.
This initiative has been highlighted for monitoring in section 1.

Key Action: Provision of Collection Services for post consumer packaging and paper.

16: KPI Percentage of signatories providing recycling collection facilities for post consumer packaging generated on site.

Baseline Data Confoil provide a number of on site recycling facilities for the collection of post consumer packaging generated through normal day to day operations. These services are continually reviewed and Confoil may change providers. A list of agencies is available in the current NPC report. See October 2008 report.
This initiative has been highlighted in section 1 and will continue to be monitored.

Key Action: Increased recycling of used packaging

21: KPI Estimated tonnage of consumer packaging sent (a) for recycling and (b) to landfill from on-site collection facilities.

Report Monthly

Measure Cubic metres recycled and cubic metres to landfill

Baseline data Reference data is available in current NPC report. See October 2008 report.

Key Action: Secondary market creation supported for recovered packaging material.

26: KPI Implementation of Buy Recycled purchasing policy or practices.

Baseline data Confoil now has a formal policy covering this KPI. Refer to the current NPC report for data covering this action point. See NPC October 2008.
This is an initiative that has been highlighted for further action in section 1.