



Australian Packaging Covenant

Viscount Plastics

Action Plan
July 2010 to June 2015





1.0 Executive Summary

Viscount Plastics is a leading designer, manufacturer and distributor of rigid plastic products throughout Australasia and is firmly committed to minimising the environmental impact from its product range and manufacturing sites. Viscount products are used in the Packaging, Materials Handling, Automotive and Industrial markets. The company currently employs over 500 staff and has sales in excess of \$ 120 million.

Viscount Plastics businesses operate under 5 guiding principles:

- *Safety Health and Environment*
- *People*
- *Quality*
- *Innovation*
- *Customers*

These principles ensure that Viscount continually strives to work with customers, suppliers and employees to ensure that innovative quality products and services are delivered on time. Viscount's Environmental Policy (appendix 3) clearly enunciates the Company's commitment to not only protect the environment within the boundaries of its manufacturing and distribution sites, but also a commitment to look beyond these boundaries and work with suppliers, customers, government, industry groups and the community to ensure that all Viscount's products are responsibly managed to minimise the impact on the environment.

2.0 Action Plan Overview

Viscount Plastics is pleased to provide the following Australian Packaging Covenant Action Plan setting out our commitment to the sustainable design, recovery of packaging and through product stewardship contribute to industry wide commitment for improved packaging design and recycling.

Viscount Plastics was one of the foundation members of the original National Packaging Covenant and through that process has achieved substantial improvements leading to achievement of the Bronze award from the Australian Packaging Council for our NPC action plan.

Our commitment to the Australian Packaging Covenant will continue through our APC cross-functional team that has representation from all levels of the organisation. The broad based plan below, documents our commitment from 2010 through to 2015.

It should be noted that not all of Viscount's products fall under the guidelines of consumer packaging as defined by the Packaging Covenant, however, Viscount does have a strong commitment to the environment which is reflected by the projects in the previous NPC action plan, certification to the International Environmental Management Standard ISO14001, and industry involvement through the PACIA Sustainability Leadership framework. While products such as the Milk and PET bottles produced in Western Australia, our range of Pails, and some Material handling products do directly fall under the new APC guidelines, some products do not, as such, the team in the first year has elected to conduct a self assessment to analyse the entire product range to uncover the specific APC related products and set the agenda moving forward.

With that in mind, the focus will then be on extending and documenting our environmental activities at all of the Australian Manufacturing sites with an emphasis on reducing the impact of the Products and by-products from our manufacturing processes on the environment, but importantly, seeking opportunities for conservation of energy, light weighting of products, recycling and introducing products that reduce consumer packaging. With these actions in mind, we are pleased to submit the following action plan.

A brief summary of our operational locations, typical products produced by location and materials used have been documented in appendix 1.

We would welcome any feedback on our Action Plan Report. The contact for feedback and any matters relating to our Australian Packaging Covenant Action Plan is:

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Shane Moloughney
Managing Director

- Appendix 1 Viscount products by location and materials
- Appendix 2 Action plan report matrix
- Appendix 3 Environmental policy



Appendix 1 Viscount Products by Location and Materials



**Viscount Plastics
Manufacturing Locations**



Examples of Products

Packaging	Plastic pails & lids, cartridges & accessories, blow moulded bottles
Materials Handling	Pallets and crates (milk, bottle, poultry, fish, bread, produce etc),
Industrial	Communication pits, lattice, furniture, water tanks, infrastructure etc
Materials used	HDPE, LLDPE, PVC, PP, Nylon, PET and Recycled Plastics
Manufacturing Processes	Injection Moulding, Extrusion, Blow Moulding and Rotational Moulding and Decoration

<i>State</i>	<i>Packaging</i>	<i>Materials Handling</i>	<i>Industrial</i>
<i>Queensland</i>	✓	✓	✓
<i>New South Wales</i>	✓	✓	✓
<i>Victoria</i>	✓	✓	✓
<i>Western Australia</i>	✓	✓	✓
<i>New Zealand (2 plants)</i>	✓	✓	✓



APC Performance Goals and 2015 Targets	APC Key Performance Indicator (KPI)	Viscounts Action (KPI)	Measures	Timing
<p><u>Goal 1: Design</u></p> <p>Packaging optimised to achieve resource efficiency and reduced environmental impact without compromising product quality and safety:</p>	<p>KPI 1: Proportion of signatories in the supply chain implementing the SPG for design or procurement of packaging</p>	<p>Introduce Sustainable Packaging Guidelines (SPG) into Design management system for all new APC applicable products.</p> <p>Review existing products against Sustainable Packaging Guidelines</p> <p>Develop Policy and Procedures for the Procurement Process to integrate Sustainable Packaging guidelines into all applicable APC products.</p>	<p>Development of SPG Policy and Procedures</p> <p>Introduce SPG Policy and procedures to the New Product Introduction (NPI) process</p> <p>Undertake and complete review of Viscounts product range's applicability to APC/SPG</p> <p>Document and formulate priority listing and applicable action plans</p> <p>Development of SPG Policy and Procedures</p> <p>Introduce SPG Policy and procedures to the Procurement process</p>	<p>End of 2011</p> <p>2012 Onwards</p> <p>End of 2011</p> <p>2012 - 2015</p> <p>End of 2011</p> <p>2012 Onwards</p>

APC Performance Goals and 2015 Targets	APC Key Performance Indicator (KPI)	Viscounts Action (KPI)	Measures	Timing
<p><u>Goal 2: Recycling</u></p> <p>The efficient collection and recycling of packaging</p>	<p>KPI 3: Proportion of signatories with on-site recovery systems for recycling used packaging</p> <p>KPI 4: Proportion of signatories with a policy to buy products made from recycled packaging</p>	<p>Introduction of on-site systems for recycling of used packaging</p> <p>Introduction of 'Buy Recycled Policy' to procurement and NPI process</p>	<p>Conduct recycling survey at each operational location</p> <p>Dissemination of survey information and development of efficient recovery system for used packaging</p> <p>Introduction of action plan for recycling of used packaging</p> <p>Development of 'Buy Recycled' Policy and Procedures for Everyday and NPI procurement</p> <p>Introduce 'Buy recycled' Policy and procedures to everyday procurement</p> <p>Introduce 'Buy Recycled' Policy and procedures to NPI process</p>	<p>End of 2011</p> <p>Mid 2012</p> <p>2013 Onwards</p> <p>End of 2011</p> <p>Mid 2012</p> <p>Mid 2012</p>

APC Performance Goals and 2015 Targets	APC Key Performance Indicator (KPI)	Viscounts Action (KPI)	Measures	Timing
<p><u>Goal 3: Product Stewardship</u></p> <p>Demonstrated commitment to product stewardship by the supply chain and other signatories</p>	<p>KPI 6 & 7: Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging & demonstrate other stewardship outcomes</p> <p>KPI 8: Reduction in the number of packaging items in litter</p>	<p>Identify opportunities to work with customers, suppliers and PACIA to maximise recycling.</p> <p>Identify opportunities to redesign packaging to reduce the incidence or impact in litter</p> <p>Action plan progress review</p>	<p>Undertake and complete review of Viscounts product range's applicability to APC</p> <p>Identify key opportunities, formulate priority listing and applicable action plan</p> <p>Review Viscounts applicable APC product range to uncover opportunities to reduce the incidence or impact in litter (e.g. reduction in detachable components, use off environmentally friendly materials etc)</p> <p>Identify key customer base to review identified opportunities to encourage responsible disposal or recycling of packaging to consumers</p> <p>Formal top Management review of APC action plan progress.</p>	<p>End of 2011</p> <p>Mid 2012</p> <p>Mid 2012</p> <p>End 2013</p> <p>Yearly</p>



ENVIRONMENTAL POLICY

This policy covers all activities conducted on all Viscount Plastics sites by all people on those sites. The objective of this policy is to ensure that all activities are performed in a manner that protects the environment, promotes efficiency in the use of natural resources and energy, minimises waste, and is in compliance with all applicable environmental legislation. The Environmental Management Systems shall ensure that the policy objective is achieved by:

- Anticipating environmental issues and taking appropriate action to maintain compliance with any new laws and regulations.
- Providing effective and appropriate training and instruction to all management and employees.
- Maintaining programs for environmental auditing, inspection and monitoring.
- Providing safe systems of work to prevent accidental releases and spillages, including discharges to air, water and land.
- Maintaining Viscount Plastics' standard internationally regardless of local law.
- Ensuring that Viscount is actively represented on industry / government groups concerned with the environmental impacts of our products and processes.
- Considering environmental issues when planning and implementing new processes and operations.
- Designing, manufacturing, storing and distributing products in a manner that protects the environment.
- Maintaining a consultative process that encourages employees to participate in environmental matters.
- Conserving resources by efficient use of energy and minimisation of waste.
- Working with customers and community to develop recycling strategies.
- Giving preference to suppliers and contractors that can demonstrate responsible and effective management of environmental issues.
- Monitoring of and compliance with all applicable licence conditions.
- The appropriate maintenance and application of environmental emergency procedures.

All managers and supervisors are accountable for environmental performance in their areas of control. All employees have a responsibility to follow the procedures for protecting the environment and to report incidents and hazards to their supervisors.

Shane Moloughney

Managing Director

1 January 2011