

Australian Packaging Covenant Action Plan

2019 and ongoing

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Product brand and sku list- refer Vic HO Drive and "Approved Supplier" file with reference to the current year.

Data collection and statistical analyses- refer Vic HO Drive and "TNPC" file with reference to the prior year.

1. Overview:

The Australian Packaging Covenant (APC), has the objective to minimize the environmental impacts arising from the disposal of used packaging, conserve resources through better packaging design and production processes and facilitate the re use and recycling of used packaging materials where possible.

Businesses (referred to as "the business") covered by this Covenant include:

- Manassen Foods Australia Pty Limited, MFA
- Hutchinson's Limited Hutchinson's (a registered New Zealand company)
- Margaret River Dairy Company Pty Limited MRDC (located in Metricup, WA) a Manufacturer to Manassen
- Mundella Dairy (located in Mundijong, WA) a manufacturer to Manassen
- A View to Foods (located in Perth, WA) a manufacturer to Manassen

The Company is classified as a PACKAGING USER at 100% of its Turnover

2. Executive Summary:

The business is strongly committed to the principals of the Covenant and through this action plan, outlines the steps that it will seek to undertake to minimise the environmental impact of packaging of the products it handles on behalf of proprietary brand owners (Principal brands) and for products under its own brands (Corporate brands).

As a major importer and distributor of foods into Australia and New Zealand, and working with major manufacturers and packers both locally and around the world, the business will encourage all manufacturers to be aware of the existence of the APC for products it imports, buys locally, manufactures and handles, and to consider our environment at every opportunity.

The business acknowledges the term "Brand Owner" as determined in the Glossary of Terms, meaning:

"A person who is the owner or licensee in Australia and New Zealand of a trade mark under which a product is procured locally or imported, sold and distributed, and in the case of an imported product, is the first person to sell that product in Australia or New Zealand."

Accordingly, the business will

- ensure that all key participants are aware of the function and purpose of the APC and the role the business has in this chain
- work with and explain the principals of the APC and provide relevant information to all suppliers and packers
- ensure waste management is always part of the culture of the business
- strive to reduce any superfluous packaging wherever this is practical
- encourage manufacturers to use recyclable materials where possible
- continue to systematically review the product range and associated packaging materials
- maintain a detailed record of every product and over time, the change, based on above

3. Policy Objectives:

The primary purpose of this policy is to drive a reduction in unnecessary packaging on existing product lines carried, and on new product lines at development stage, so doing, reduce the amount of packaging actually sold as a % of mass of actual food sold.

Secondly, to effectively manage the *separation and disposal of waste in the business* (logistics and common paper disposal from administration) and the transfer of the recyclable component away from landfill.

And thirdly, via the Business Sustainability and Environment Policy, to maintain an ongoing awareness of such matters

- 4. Product Stewardship:
- 4.1 Design components essential to achieve desired shelf life and product protection as well as the minimum required to effectively market the product.
- 4.2 Production to communicate the business's commitment to the APC and its objectives with Principal partners and Corporate brand suppliers and to work actively on these matters

- 4.3 Distribution Logistics has an objective to reduce all added materials used in shipping product that may already be included in outer packs/shippers.
- 4.4 Disposal- where practical (space constraints) disposal instructions and recycle information to be incorporated on pack. All business sites have recycle bins available for disposal of recyclable waste and processes all such materials accordingly.
 - 5. Sustainable Packaging and Source Reduction: (refer addendum 2)

Sustainable packaging is packaging that is Fit for Purpose, resource efficient, made from low impact materials and is re-usable or is recyclable at end of its life.

Source reduction is packaging which is the minimum that is required to guarantee product integrity, optimum eating quality and provide maximum safety under designated storage conditions to the end of its recommended shelf life. Where additional packaging is required to create a marketing appeal, such should be the minimum possible, but all that is required to execute the task.

Ask The Question- "Is the packaging being proposed, necessary or can it be avoided".

Separation and disposal of in-house waste is practiced. Refer Warehouse paper/recycling procedure.

Propensity to become litter- Where applicable and possible, disposal instructions will be included in artwork of Corporate brands items. For proprietary brands, such inclusion will be encouraged, but will depend on each producer and marketer.

Wherever possible and practical, the business will strive for single component packaging as a benchmark.

Incorporation of Recycle content - Wherever possible, the use of recycled material is to be encouraged. For products where part or all of the packaging is not recyclable this is to be dealt with when discussions take place with suppliers. For proprietary brands this decision is that of the brand owner, but the brand manager will raise the requirements accordingly.

Consumer Information - This relates to on pack information that will assist in correct disposal in event of recycling as well as direct disposal into waste. Products sourced from the EU largely already provide such information. For Corporate brands, this is considered when new art is designed or art reviews take place. This will include "Disposal instruction" logo on any packaging material that is NOT recyclable and already carries the Recycle logo.

6. Objective of Packaging:

Packaging is primarily required to protect the shelf life and integrity of any product and to ensure that the consumer receives the product in its freshest possible state and in a safe manner to consume. Further, the packaging must be attractive to consumers, provide a good selling message and provide sufficient information about the product, its life cycle, its usage and satisfy all labelling legislative data. Serving suggestions and recipes are also valid.

7. APCO guidelines post 2018:

A: Leadership-

1. Sustainability:

Strategy: Every item we sell is first considered as to its possible negative effects on the environment.

- Does it have more packaging components than are essentially required to keep the food safe (food safe materials, tamper proof and minimalistic)
- Is the direct food covering packaging recyclable
- Is the outer carton recyclable
- Is the outer carton made form a % recycled material and if yes, what % applies
- Does the sku label have recycle information displayed
- Does the sku label have disposal instruction displayed
- Does the outer carton have recycle information displayed
- 1.1 What are the targets
 - Every NPD sku must be evaluated against all of the above
 - Every existing sku must be reviewed bi annually to these criteria
 - Measure any improvement at review period
- 1.2 How are the above included in the business plan
 - Supplier Self Assessment (F9)
 - Product specification (F22)
 - Review process
 - Approved Supplier Program (ASP)
 - ASP file updated to gather stats
- 1.3 How are the targets measured and time based
 - Capture into APCO file and calculate findings at end of each calendar year (December)
 - Compare overall result to year on year outcomes
 - NOTE that due to ever changing portfolio of products and suppliers, the Y/Y indicator is a guide only

2. Closed Loop Collaboration:

- Share the plan with suppliers and 3PL producers/providers
- Raise any "failure to contribute" and log outcomes
- What alternate concepts apply and how hard are these to include
- Document outcomes and measure results

3. Consumer Engagement:

- By placing logos and information on sku packs, we trust consumers will use this information to achieve the end objective of reducing waste to landfill.
- All outers carry a consumer or user message (recycle or dispose of thoughtfully)

4. Leadership:

• What we do Non-Commercially such as ..

Use recycled paper for stationery

Use IT tablets to take orders in the trade space (vs paper based system)

Warehouse operations are Infrared paperless to picking stage

Use of IT systems for selected meetings, thus saving on travel and carbon generating outcomes (airlines/cars)

Training and exposure across BDD teams so that good lessons are learned and bad habits are stopped

B.OUTCOMES-

- 1. Design and Procurement:
 - Statistics to quantify and show progress to leadership goals and ambitions
 - 1. Current year sku numbers
 - 2. Percentage of current portfolio evaluated in current review year
 - 3. Year on year comparisons
 - 4. Specific success stories
 - Packaging Material Efficiency
 - 1. Ratio of packaging material that is recyclable
 - 2. Ratio of packaging that is made from recycled materials
 - Post Consumer Recovery
 - 1. Consumer labelling
 - 2. Product packaging innovation

C. OPERATIONS:

- 1. On Site Waste Diversion
 - Waste diversion policy on outer packaging
 - Contract with recycling organisation to collect above waste
 - Recoding this volume and compare year on year
 - What is this as an index to all food and packaging sold

2. Supply Chain influence

- Communication with supplier, based on relevant matters
- Encourage suppliers to engage with their principal packing providers as to what is available and to assist the above process

8. Covenant Committee:

The committee is constituted by members of the company that have a direct impact on product development, packaging and marketing as well as persons involved in processing of product and disposal of waste materials.

Coordinator : Neil Brand Secretary : Daniel Kim

Members : To be updated end March 2019 (following recent restructure)

The signatory to the covenant is the Group General Manager Technical and Compliance: Neil Brand.

This role is fully supported by the Board of Directors and the actions and outcomes are delegated accordingly.

The committee, chaired by the Co-ordinator, will meet once per annum to review progress and determine if new actions are required.

The Co-ordinator is empowered to make changes to the plan and to direct policies and procedures related hereto, as required.

Regular reviews and assessments will be carried out by the Co ordinator and the Secretary and where required, individual responsible persons will be involved in addressing any issues that arise from time to time.

9. Modis Operandi:

The business has a formal Approved Supplier Program (ASP) that directs and manages the process and procedure for all existing items as well as for all New Product Development (NPD) that is undertaken.

Locally, where the business (MFA) manufactures and packs its own brands and items, the business will work in partnership with professional packaging manufacturers to promote the use of recyclable materials wherever possible (outers, shelf ready trays, wraps and primary packaging such as cheese bags and yoghurt tubs and where else the business has direct input into initial product conception and

design). With local suppliers from NON MFA businesses, the business relies on the integrity of such approved suppliers to be aware of and to manage itself within the framework of the APCO and their own plans.

With International suppliers, the business will ensure that its principals are aware of the APC and that they are aware that it supports this initiative. Every effort will be made by the business to encourage its principals to follow the guidelines of the Covenant. Many Europe based producers are signatories to the GRUNEPUNKT and similar covenants in their home countries.

Data collected, related to above, is now an intrinsic component of the overall Technical and Compliance process followed for every product in the catalogue. Review of this data is ongoing with a formal report to be prepared at least once per annum. Management will report on data analysis and such data will be reviewed ongoing.

As the business has little or no control on the final disposal of packaging for its consumer items (food), it endeavours to encourage sensible and thoughtful disposal by applying logos and also where applicable, applying Recycle notices on its packaging.

Statistical analyses is captured from direct and actual sales history (QLICKVIEW) and reviewed annually. Year on year trends are monitored and reported on, to the various stakeholders.

10. Data Collection:

The following data is collected and processed and reported on, ongoing. This is a live process and coincides with other regular controlled processes. (F9, F22 and Launch/BID) within the business. All data is collected by individual sku and related outer packaging.

- mass of the item of sale (nett mass for sale per consumer unit)
- tare weight of the consumer unit
- Identification of the packaging material type of the consumer unit and if recyclable or not
- mass of all outer packaging
- nature of the packaging material used for outer and if recyclable or not.
- total packaging mass as a percentage of the actual mass of food per unit
- total mass of packaging that is recyclable

11. Action Plan and timing:

•	New Lines and line extensions: Refer completion of data on Product specification forms (F22) and sign off via BID	Ongoing
•	Data Base set up and updated as sku lines are deleted or added	Ongoing
•	Capture sales for period of preceding annual financial year	End of December
•	Identify packaging as a % of product sold	Ongoing
•	Identify % of packaging that is recyclable	Ongoing
•	Committee Meetings	Once per
•	Logistics Waste Disposal policy	Issued 31/5/07
•	Record volume of Disposal of on-site recyclable waste	Quarterly
•	Identify progress made in reduction of packaging material by measurement of Sales year on year vs % packaging used, year on year.	Ongoing
•	Record all major innovations and retain on file	Ongoing
•	Identify which brands/suppliers are good and which are not good contributors to endeavours in the business objective to the APCO and consider implications	Ongoing

12. Key Performance Indicators

The results of the annual review of the KPI's will provide an indication of how successful the company is in achieving its Packaging Covenant goals and objectives.

In the business the catalogue of products and the related supplier base changes, ongoing. Items are deleted and new items introduced. The situation is fluid and all results measured must be considered accordingly. It cannot simply be a one on one comparison.

Goals and objectives will be amended subject to the number of product variants, new lines, deleted lines and imposts made by local retailers in terms of their own packaging demands and needs. The Business electronic records will be updated on a regular basis and this will reflect changes in each reporting period. This data is used to complete the annual APCO report, due in March each year for the preceding Financial year (Jan-Dec).

For Action Plan KPI Summary table, see addendum 1

13. SPG Guidelines

For SPG Guidelines, see addendum 2

14. List of Brands and statistical data

The actual number of BRANDS and stock keeping items changes from time to time, as result of new listings and deletions following portfolio review.

Due to the ever changing portfolio mix, an updated list is published at end of each calendar year.

For List of Current brands and sku's, see VIC Head Office Drive, and File "Approved Supplier Program"

For Data collection and statistical analyses see VIC Head Office Drive and File "TNPC year"

15. Policy and Procedure

For Policy and Procedure, see Group VQM in Group Intranet (Technical)

- Approved Supplier Program (VQM chapter 14)
- Recycling Policy
- Culture, Ethics, The Environment (includes Waste management), Human Resources and Occupational Health and Safety. (VQM Ch 6)

16. Contact Details

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