



Packaging Waste Action Plan
For the Australian Packaging Covenant
Covering the Period March 2011 – December 2013

For the Northern Co-operative Meat Company Ltd

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Packaging Waste Action Plan

1.0 Background

This Packaging Waste Action Plan has been developed to meet the requirements as a signatory to the Australian Packaging Covenant (APC). The Northern Cooperative Meat Company (NCMC) became a signatory in December 2010 following on from its participation in the former National Packaging Covenant.

The APC, and therefore this Action Plan, addresses **consumer packaging** which is defined as “packaging products made of any material, or combination of materials, for the containment, protection, marketing or handling of retail consumer products.”

This also includes **distribution packaging** which is defined as “packaging that contains multiples of products, the same or mixed, intended for direct consumer purchase.” Distribution packaging includes **secondary packaging**, used to secure or unitise multiples of consumer product, and **tertiary packaging**, used to secure or unitise multiples of secondary packaging.

As the obligations under the NPC fall on ‘**Brand Owners**’ this Action Plan includes a summary of the products and brands relevant to NCMC, and what packaging relates to those brands.

As NCMC handles very little consumer packaging of products sold domestically under an NCMC Brand, NCMC has only a relatively small obligation as a signatory under the APC. However, NCMC feels that this Packaging Waste Plan presents a good opportunity to address other packaging waste issues associated with some packaging of non consumer products and products sold for export.

This Packaging Waste Plan also includes consideration of issues around packaging recycling and product stewardship in line with the requirements of the APC.

2.0 The Northern Cooperative Meat Company and its Products

2.1 The Northern Cooperative Meat Company (NCMC)

The Northern Co-operative Meat Company Ltd is a Co-operative registered under the N.S.W. Co-operatives Act 1992, and has been operating for over 75 years. It is owned by its members and operated under the direction of a fully elected board of directors.

The Cooperative’s core business is in the processing of high quality meat products and associated byproducts. This occurs in a capacity as a service processor where customers pay fees to have their livestock processed into a wide array of meat products. As such, these customers are buying a service rather buying a product. Byproducts from the processing become goods that can be marketed by the cooperative.

The cooperative holds licences to allow products to be supplied throughout the world including Australia, the Americas, Asia and the European Union.

The Cooperative consists of the following three sites:

- Head office and fully integrated livestock processing facility located at Casino, in the north east region of New South Wales
- A cattle hide tannery also located at Casino, adjacent to the above livestock processing facility
- A porcine (pig) processing facility located at Booyong, also in the north east region of New South Wales, approximately located between the major towns of Ballina and Lismore

Together, these sites provide revenue of around \$120 million per year for the cooperative. The three sites employ approximately 1000 people making the cooperative the largest New South Wales employer north of Newcastle.

The Casino livestock processing facility contains two slaughter floors, a boning room and a byproducts area where rendering, meal production and tallow production occur. There is also an extensive system of chillers, freezers and cold storage. Value adding of products continues to grow in line with customer demand for more retail-ready product, placing an ever-increasing demand on energy, water and consumer packaging.

The tannery uses a wet-blue tanning process to produce a high quality leather that has historically been seen as the benchmark for premium leathers such as those used in fine Italian shoes and handbags. The tannery also operates a 'splitter' which is used to split the cross-section of leather pieces into two thinner pieces.

On a much smaller scale the tannery also markets salted hides, facepieces and chilled (non-salted) hides. These three products are known as 'green' as they have not undergone any tanning.

The Booyong facility includes one slaughter floor, a boning room and a chiller / loadout area. Byproducts from this facility are sent to the Casino site for cooking and rendering.

2.2 NCMC's Role in the Supply Chain

NCMC's role in the supply chain is primarily as a user of packaging materials to package offals, meat and meat related products as well as leather and hide related products. The packaging can be used to package NCMC owned products or to package products owned and marketed by other commercial operations (NCMC customers) in exchange for a service fee.

For several products, NCMC markets as a wholesaler. NCMC does not market products as a retailer. However, many of the products marketed are contained in packaging that is still in place as the product is sold in a retail situation. Of these products, almost all are exported apart from two products produced in the byproducts area at Casino.

2.3 Product and Brand Ownership

2.3.1 The Cassino Brand

The Cassino brand (with a double 's') is the cooperative's brand used to market NCMC owned products from the Casino livestock processing facility. These products include meatmeal, bloodmeal, tallow, gallstones, oxgall, blood, neatsfoot oil and a variety of offals that become the property of the cooperative once the cattle are processed. Offals include hearts, livers, kidneys, tripes, and a variety of other fancy meats.

While the majority of meat products remain under the ownership of the cooperative's customers, a small proportion of the products are purchased by the cooperative and sold under the Cassino brand. This assists customers that have difficulty finding markets for certain meat cuts.

The offals from cattle processing become the property of the cooperative and are marketed domestically and internationally under the Cassino brand.



2.3.2 The Cassino RSM Brand

As a service abattoir the Booyong facility provides a service to customers, processing pigs and returning meat in carcass form, to the customers. These carcasses are then boned by the customers to produce meat cuts, many of which are retailed under the customers branding.

As the property of the cooperative, the offals from pig processing are marketed under the Cassino RSM brand.



2.3.3 The CHT Brand

The CHT brand, an acronym for Casino Hide Tanners, is used to market leathers (tanned hides) out of the cooperative's tannery.

The hides removed from cattle during livestock processing become the property of the cooperative. These 'internal' hides are tanned at the tannery. Generally, hides from other facilities (or 'external' hides) are purchased on contract to supplement the tanning of internal hides. The 'internal' and 'external' hide leathers are marketed under the CHT brand.

There is a smaller proportion of external hides that are not purchased by NCMC for tanning. These hides are tanned under a tanning fee arrangement and remain under the ownership of the customer. Of these 'service hides' the lighter weight hides are purchased by NCMC after tanning, once they are ready for loadout. These are marketed under the CHT brand.

The heavier service hides remain entirely under the ownership of the customer paying for the tanning service. These hides are marketed under the customers branding with none sold under the CHT brand.

Marketing of green (ie un-tanned) hides and face pieces also falls under the CHT brand.



2.3.4 Establishment Numbers 239 & 7170

While not brand names, establishment numbers refer to marks placed on all export meat and offal products. This signifies to export markets exactly where the meat products were produced. This is a mandatory requirement under the Export Control (Meat & Meat Products) Act regardless of whether the product is marketed by the Cooperative or by any of its customers.

As such, products owned and marketed wholly by a customer will still be marked with the 239 tag if they were processed at the Casino site or the 7170 tag if they were processed at the Booyong site.

This Packaging Waste Action Plan does not consider the 239 tag or 7170 tag as brands for the following reasons:

- a) Products marketed by the cooperative with these tags will always have a proper NCMC brand name associated with them
- b) Products marketed by the cooperative's customers will be sold under the customers brand(s)

2.4 Tannery Product Marketing and Packaging

2.4.1 Unsalted Hides

2.4.1.1 Unsalted Hide Packaging

Unsalted green hides are sold by NCMC after the hides have been chilled. The chilled hides are packed into reusable bulk bins before being transported to the customers. Some bulk bins are constructed from plastic while others are steel. There is no other packaging used for the marketing of the unsalted hides to the customers.

2.4.1.2 Unsalted Hide Marketing

While the majority of unsalted hides are marketed domestically they are only sold to commercial operations that then re-work the hides into consumer products. The bulk bins are not used for the marketing to the consumer and are reused for the transport of the hides from the NCMC tannery.

Therefore, there is no consumer packaging involved in the marketing of the unsalted hides by NCMC.

2.4.2 Salted Hides

2.4.2.1 Salted Hide Packaging

Salted green hides are stacked on wooden pallets and covered in Hessian bags. The pallets have a layer of cardboard or used salt bags placed onto them before the salted hides are stacked onto them. Typically, if used salt bags are used, 6 bags will be sufficient to cover the pallet. These used bags are the empty bags left after the salt has been removed from them.

Once covered in Hessian the pallets of salted hides are secured with two plastic straps. The loaded pallets are then trucked to domestic customers.

2.4.2.2 Salted Hide Marketing

The salted hides are exported and therefore do not involve any consumer packaging. In the past salted hides have been used by commercial operations in Australia to be re-worked into retail products. If this was to happen again none of the hides will be retailed in the same form that they left NCMC in. Therefore, there is no consumer packaging involved in the marketing of salted hides by NCMC.

2.4.3 Facepieces

2.4.3.1 Facepiece Packaging

Facepieces are transported by loading directly into bulk tipping trucks (various combinations). There is no packaging used in this process.

2.4.3.2 Facepiece Marketing

NCMC sells facepieces to commercial operations who process the facepieces into wholesale products. There is no consumer packaging involved in the marketing of salted hides by NCMC.

2.4.4 Leather

2.4.4.1 Leather Packaging

Leathers marketed by the cooperative are packaged by stacking the folded leathers onto wooden pallets and then covering each pallet with a bag fabricated from Low Density Polyethylene (LDPE). Some bags will also have Linear Low Density Polyethylene (LLDPE) blended in with the LDPE.

Generally, the bags are printed with the CHT logo. The one exception is the leather that is purchased off a customer after tanning, where blank bags (no CHT logo) are used to distinguish the product from other leathers. The technology exists to recycle all of these bags.

2.4.4.2 Leather Marketing

All leathers marketed by the cooperative, including those purchased off customers after tanning, are exported under the CHT brand to commercial operations by loading the pallets of 'bagged' product into shipping containers. None are marketed within Australia. Therefore, none of the bags used to protect the leather will end up as consumer packaging in Australia. The leather must be further processed to create articles for the retail market.

Some marketed product packaging could make its way into Australian landfill if the packaging is removed prior to leaving Australia. Reasons for such removal include the bags being damaged or bags being replaced for another reason such as an initial incorrect grading of leather or subsequent further processing of the leathers (eg splitting). While such waste packaging is not consumer packaging and is currently collected by a recycling contractor, NCMC endeavours to maximise the recovery of the waste on site for recycling or reuse, as part of the cooperatives wider aim of reducing waste to landfill.

2.5 Byproducts Marketing and Packaging

2.5.1 Meat & Bonemeal

2.5.1.1 Meal Packaging

Meat & Bone meal is bulk loaded into tipper trucks for some domestic sales. In this case there is no packaging. Other sales are made in 1 tonne bulka bags, 40 kg bags or 25 kg bags. Blood meal is sold in 25 kg bags and 1 tonne bulka bags.

The bulka bags are fabricated from woven polypropylene. The 40 kg and 25 kg bags are also woven polypropylene but with an internal LDPE liner.

Some meal is sold to customers with the bags marked with a brand name totally separate to NCMC's brands. Therefore, strictly speaking these bags represent consumer packaging that is not within the direct control of NCMC. However, this action plan will attempt, where possible, to take advantage of any synergy relating to any actions devised regarding NCMC's 25 kg bags.

All three types of bags are recyclable, including the liner in the 40kg and 25 kg bags. In terms of reuse, the bags are generally not designed for using more than once. However, the bulka bags are available in a 'multi-trip' version that is fabricated in a stronger fashion to allow several reuses of the same bag. At present NCMC only uses the 'single-trip' version.

There is no secondary or tertiary packaging used for meat & bone meal bags, or for bloodmeal bags as both are stacked on pallets in a very stable manner without any strapping or wrapping.

The only retail consumer packaging associated with this product are some 25 kg bags. The bags for bloodmeal are identical to the bags for meat & bone meal.

2.5.1.2 Meal Marketing

The large majority of meal marketed by NCMC is marketed domestically with only the occasional shipment exported.

Many of the domestic customers are directly involved in the farming and horticulture industries. In these cases the end user of the meals are purchasing direct from NCMC. However, these are not considered retail sales so the packaging is not considered consumer packaging.

Bulkabags of meals do not end up in a retail situation and therefore, do not represent consumer packaging. The 40 kg bags that do end up in a retail situation are sold under a customer's brand name and never under an NCMC brand name.

A small proportion of 25 kg bags are sold in landscaping / rural supply stores under the NCMC brand name "Cassino" and therefore, the bags constitute consumer packaging sold in Australia.

2.5.2 Tallow

2.5.2.1 Tallow Packaging

Tallow is sold by loading directly into road tankers with no packaging used at all. A relatively minor amount of tallow was sold by filling 44 gallon steel drums provided by the customers purchasing the tallow. This is unlikely to occur in the near future.

2.5.2.2 Tallow Marketing

The road tankers take tallow purchased from NCMC to other commercial operations. This tallow becomes the property of the customer who then processes the tallow into products for commercial sale under the customer's brand names. No NCMC brands are used to sell these bulk tallow amounts to consumers.

Small amounts of tallow are loaded into customers' steel drums and generally sold directly to customers in the farming industry. In these cases NCMC is the brand owner and although the packaging ends up with the consumer, it is not considered a retail sale. For this reason, and the fact that those customers often reuse the drums over and over again to receive ongoing loads of tallow, the packaging is not considered consumer packaging.

2.5.3 Oxgall

2.5.3.1 Oxgall Packaging

Oxgall is packaged for sale in steel 44 gallon drums. The drums are generally purchased as refurbished 2nd hand drums. Unlike tallow, these drums are not reused for oxgall loads at NCMC due to the drums having to be cut open at the customers' facilities to remove the solidified oxgall.

2.5.3.2 Oxgall Marketing

The oxgall is marketed domestically but the drums do not represent consumer packaging.

2.5.4 Gallstones

2.5.4.1 Gallstone Packaging

Gallstones are sold in very small quantities by NCMC without any packaging. The customers arrive on site with their own containers. The stones are placed in those containers and those containers remain the property of the customer.

2.5.4.2 Gallstone Marketing

Gallstones are marketed domestically by NCMC. The customer purchasing the stones may market these overseas.

2.5.5 Neatsfoot Oil

2.5.5.1 Neatsfoot Oil Packaging

Neatsfoot oil is packaged into 44 gallon steel drums with no other packaging used. The drums are purchased by NCMC.

2.5.5.2 Neatsfoot Oil Marketing

The oil is sold (and often onsold) to commercial operations that either reprocess the oil or use the oil for direct applications such as polishing saddles and other leather-goods. The drums end up under the ownership of those commercial operations. The drums do not end up with any customer purchasing from a retail outlet.

2.5.6 Laboratory Grade Blood

2.5.6.1 LG Blood Packaging

Laboratory grade blood is injected into specialised plastic bags using a needle and plastic tube. The bags are provided by the customer. The needles and plastic tubes are disposed of by NCMC and are not considered consumer packaging.

The product is dispatched by loading the plastic bags into chilled reusable eskies. The eskies are also provided by the customer, remain the property of the customer, and are reused over and over again.

2.5.6.2 LG Blood Marketing

LG Blood is marketed domestically by NCMC to a commercial operation that processes the material into blood products. As the blood is not purchased by consumers the plastic bags do not end up as consumer packaging. The blood products are processed through a number of steps and repackaged before being sold to the end user. None of these end user sales are conducted under an NCMC brand name.

2.5.7 Frozen Blood

2.5.7.1 Frozen Blood Packaging

This blood is frozen into blocks. Each block is placed in a plastic bag before the blocks are stacked onto pallets with a bottom cardboard slipsheet and a cardboard sheet placed above the top layer of product. The entire pallet is then wrapped with plastic stretch wrap, covered with a plastic pallet cover and strapped with 4 polypropylene straps each secured by galvanised steel buckles.

The galvanised buckles can be recycled in normal scrap steel recycling systems. The polypropylene straps are also recyclable.

2.5.7.2 Frozen Blood Marketing

This product is marketed entirely to Europe, to commercial operations that process the blood into further products. Therefore the packaging will not end up as consumer packaging and furthermore, won't even remain in Australia.

2.5.8 Pet Food

2.5.8.1 Pet Food Packaging

There are a variety of pet foods that are all packaged similarly. They are frozen into blocks before being placed onto pallets. In an identical manner to frozen blood cardboard sheets are used on the bottom and top of the product before the entire pallet is wrapped with a plastic stretch wrap. A plastic pallet cover is then placed over the loaded pallet and strapped with 4 polypropylene straps using galvanised steel buckles.

Depending on customer requirements, some products will also have plastic sheets laid between layers of product on the pallets.

2.5.8.2 Pet Food Marketing

Pet food products are marketed domestically by NCMC as raw materials to commercial operations that process the materials into commercial pet food products. The processed pet food products produced by these commercial operations are not marketed under NCMC brand names.

As NCMC's products are not marketed to end users the packaging does not end up as consumer packaging.

2.6 Offals Marketing and Packaging

2.6.1 Offals Packaging

At Casino offals are packed for freezing into cardboard boxes fitted with a plastic gusseted liner bag and then strapped with 3 pieces of polypropylene strapping tape. Depending on customer requirements each piece of product may also be individually wrapped in a separate plastic bag. Some products may also have a plastic sheet placed between each layer of product in the box.

According to customer requirements several products are vacuum packed for chilling with each individual piece of product sealed in a shrink-wrap type bag, before being placed in the lined cardboard box. This type of vacuum packaging bag is comprised of distinct layers of different plastics designed to provide the 'shrink' effect.

Some offals for freezing and some vacuum packaged offals are chilled beforehand by laying the product on metal trays lined with a plastic chilling tray sheet. The metal trays are placed on racks which are moved in and out of chillers. The trays are reused. However, the chilling tray sheets are not reused due to restrictions imposed by the Australian Quarantine Inspection Service (AQIS).

The majority of boxed offals are sent to the onsite cold store where they are frozen or chilled then stored in a palletised form until they are despatched in containers on trucks. The pallets consist of a top and bottom cardboard sheet with the entire pallet wrapped in a stretch wrap comprised of Linear Low Density Polyethylene before being covered in a plastic pallet cover.

Polypropylene strapping tape is recyclable but often this is not viable because of poor economies of scale with the straps distributed across a wide range of end users, each location having only a small amount to dispose of.

2.6.2 Offals Marketing

As the owner of the majority of offals NCMC markets these products under its own brands. However, these products are sold to commercial operations that rework or cook the products before being packaged for consumers or served in the hospitality industries. Therefore, the offal products sold by NCMC do not represent retail consumer products.

All of the offals marketed out of Booyong are split down into numerous, smaller products for retail. Therefore, none of these products are consumer retail products.

2.7 Meat Marketing and Packaging

2.7.1 Meat Packaging in General

There are dozens of different combinations of product and packaging that leave the Casino site. However, by considering the large number of meat products as one general class of product, a description of the packaging in such a complex operation is greatly simplified as follows:

Simplistically, packaged meat products are generally packaged as follows:

- Meat is wrapped in a plastic wrap or placed into a plastic bag
- Several products will have a nylon jet netting bag fitted around each piece before being placed into the bag
- Many products have a fabric soaker pad placed inside the bag or wrap
- Many products have a plastic information slip (known as an insert) placed inside the bag or wrap
- The bagged or wrapped products are then placed into a cardboard box (known as a carton) fitted with a plastic liner
- Some cartons will have cardboard dividers fitted inside to separate pieces of meat from each other
- Once packed, the cartons are strapped closed with plastic strapping tape or glued shut
- Before leaving the site the strapped or glued cartons are loaded onto pallets fitted with cardboard slip sheets

Each of the above steps is discussed in more detail with regard to the packaging, in the following sections:

2.7.2 Bags and Wraps for Individual Meat Pieces

Wraps are simply small sheets of plastic that are wrapped around meat products before they are packed into cartons.

The Bags used to package individual pieces of meat are divided into two distinct types. The first type is a simple bag comprised of polyethylene. The second type is a vacuum packaging bag that is comprised of various plastic layers chosen to shrink the bag around the meat products inside.

The polyethylene in the wraps is readily recyclable. However, any waste wraps that have more than minor contamination with blood or fat, are not readily recyclable.

Because the vacuum packaging bags consist of different component plastics in close contact with each other, these bags are not readily recyclable.

2.7.3 Jet Netting

Jet netting is a netting placed around a meat product to shape the product to enhance product presentation. Jet netting is fabricated from a nylon based material.

2.7.4 Soaker Pads

Soaker pads are used to absorb excess liquids inside the bags of meat products thus enhancing the presentation of the product.

2.7.5 Plastic Slip Inserts

These slips are placed inside the individual bags containing meat products according to customer requirements. The slips help to identify the product.

2.7.6 Carton Liners

Carton liners are fabricated from plastic and are divided into two distinct types. The first are plastic gusseted box liners that are bags with a gusset to improve the fit of the liner in the carton. The second type are simple plastic sheets. Both types are placed into cartons before individually wrapped meat products are packaged in them. Both types of liners serve to protect the cardboard carton from being damaged by product leaks and also serve to avoid leaks from the cartons during transit.

Both types also come in two colours: blue and clear. Gusseted liners also come in several different grades based on the thickness of the plastic. Typical grade thicknesses are 20, 38, 60 and 90 microns.

2.7.7 Cartons

Cartons are all comprised of cardboard and serve to contain the product while displaying product information and branding. All cartons are readily recyclable in normal cardboard recycling systems as long as they are not overly contaminated with fat or blood..

2.7.8 Carton Dividers

Where customers require so, dividers are placed into the carton to separate individually wrapped meat products from each other. NCMC customers specify the type of divider to divide the carton contents into 2 or more sections. This is done to improve the presentation of the meat products when the carton is opened by a customer down the line.

These carton dividers are readily recyclable in normal cardboard recycling systems as long as they are not overly contaminated with fat or blood..

2.7.9 Strapping Tape

Once a carton is packed strapping tape is used to secure the carton in a closed position. The strap also minimises the risk of the carton being squashed out of shape which can result in bag or liner damage which can then result in product deterioration and / or leakage.

It should be mentioned that the majority of cartons are glued shut. However, there are still several customers that desire strapping.

2.7.10 Slip Sheets

Slip sheets are comprised of cardboard panels used on pallets before stacking cartons on top. This protects the cartons from the damage that can be caused by loose nails or large wood splinters on the pallets.

Where possible the slip sheets used are those collected from pallets delivered to NCMC. These are reused over and over again until they become too damaged for further reuse. This reuse is then supplemented by cardboard slips sheets purchased by NCMC.

2.7.11 Meat Product Marketing

For the most part, the cattle processed at NCMC remain the property of the customer paying for the processing service that NCMC provides.

However, to assist customers who request it, some meat products are purchased by NCMC and marketed under the NCMC brand. However, none of these end up as retail consumer products sold in Australia.

Some of the meat processed at NCMC is loaded out in carcass form. In these cases the carcasses are hung in vehicles and no packaging is used.

2.8 Summary of NCMC Brands Retailed in Australia

The KPI's in this plan relate to NCMC brands sold or distributed with consumer packaging in Australia. Thus, the KPI's relate only to the packaging used on the following products:

<u>Retail Product</u>	<u>Brand</u>	<u>Packaging</u>	<u>Exceptions</u>
a) Meat & Bone Meal	Cassino	25 kg Bags	Direct Sales to Farms / Horticulture
b) Bloodmeal	Cassino	25 kg Bags	Direct Sales to Farms / Horticulture

3.0 Baseline Data for Covenant Key Performance Indicators

3.1 Covenant KPI 1 – Implementation of Sustainable Packaging Guidelines

Baseline data under this Covent KPI is as follows:

Number of packaging types assessed using the Guidelines = 0

Proportion of consumer packaging assessed using the guidelines = 0%

3.2 Covenant KPI 3 – On Site Recovery Systems for Recycling Used Packaging

3.2.1 Existing On Site Recovery Systems for Recycling Used Packaging

The Northern Co-operative Meat Company's Casino site has recovery systems in place to allow the following types of used packaging to be recycled:

- Waste Cardboard – bins in 4 strategic locations serving Boning Room, Carton Loadout, Canteen / Storehouse, and Maintenance, respectively. Cardboard waste is transferred to a baler used to bale the resource ready for transport by a local waste management company to a recycling centre. This is an arrangement made in conjunction with the supplier of the cardboard cartons.
- Plastic Cores (tubes) from Rolls of Plastic Bags – a system for supplier take-back whereby both suppliers of plastic bags & wraps pick up and transport the cores for recycling / reuse
- Plastic Wrap – collected at the tannery ready for transport by a local waste management company for reuse / recycling
- Aluminium Drink Cans – 1 aluminium scrap bin adjacent to Maintenance and the canteen that allows transport by a scrap metal company to a recycling operation. This is not used by the entire site and therefore only provides minimal recovery of the cans.
- Paper – shredders in Main Office, Engineering Offices, and Tanning Marketing Office respectively, that allow shredded paper to be delivered to a local commercial operation for reuse or to a local waste management company that transports the resource for recycling / reuse
- Scrap Steel – bins located near Maintenance workshops that allow collection of steel strapping used to secure equipment during delivery to NCMC
- Plastic Intermediate Bulk Containers (IBC's) – systems for take-back by some suppliers of chemical to the tannery

The Northern Co-operative Meat Company's Booyong site has recovery systems in place to allow the following types of used packaging to be recycled:

- Waste Cardboard – 1 bin serviced by a local waste management company for recycling
- Aluminium Drink Cans – an can recycling bin the main lunch room which has the cans transferred to bulk aluminium scrap bin adjacent to Maintenance that allows transport by a scrap metal company to a recycling operation
- Paper – paper from the main office is stored until collection by a document destruction company
- Scrap Steel – a bin located near Maintenance workshops that allows collection of steel strapping used to secure equipment during delivery to NCMC

This information forms the basis of a KPI for each site represented by Figures 1 & 2:

Figure 1 Number of Packaging Types Recovered for Recycling at the Casino Site

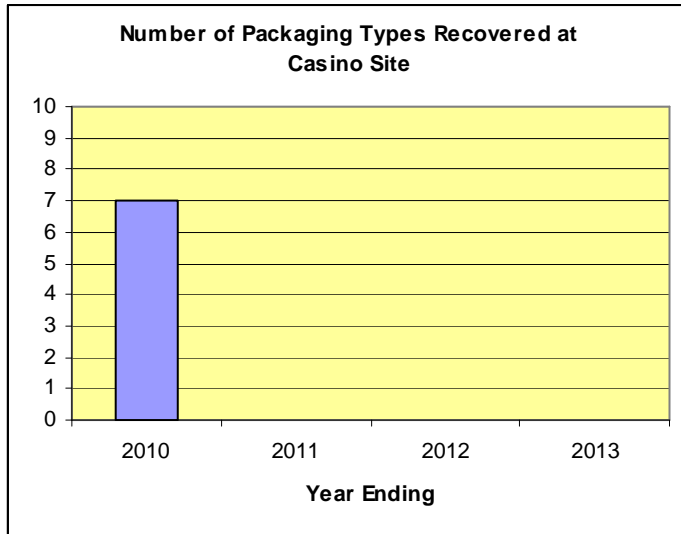
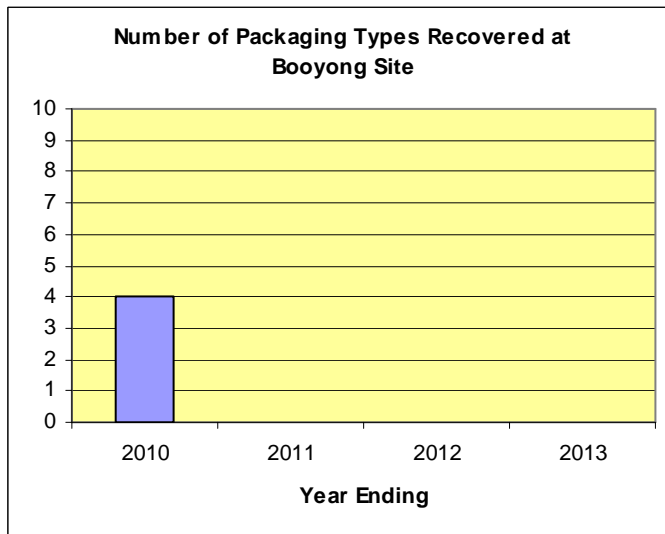


Figure 2 Number of Packaging Types Recovered for recycling at the Booyong Site

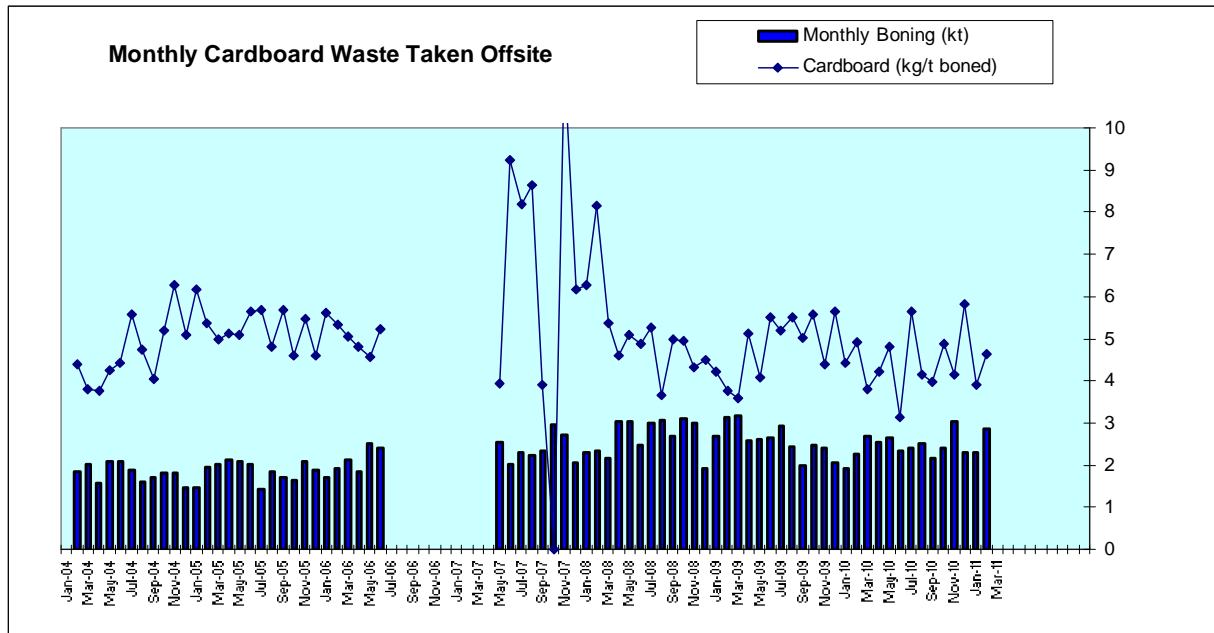


Note: In line with the covenant objectives “recycling” includes “reuse”.

3.2.2 KPIs for Individual Packaging Waste Streams

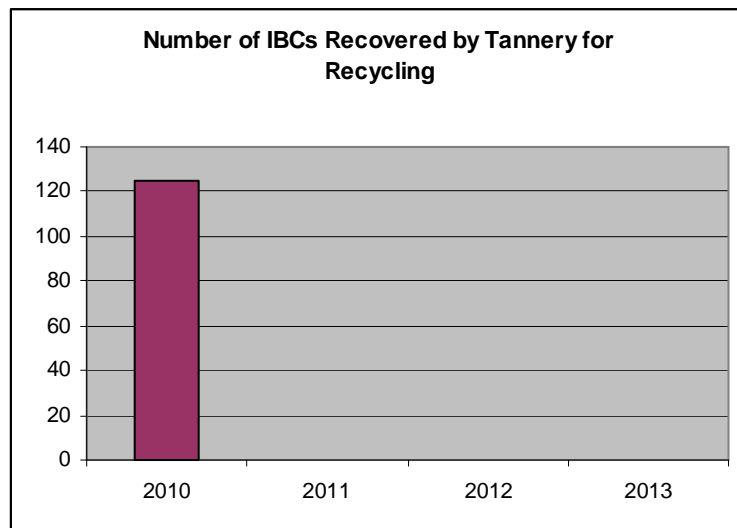
Cardboard waste sent for recycling is monitored at the Casino site. Figure 3 provides historical data.

Figure 3 Cardboard Sent for Recycling 2004 - 2011



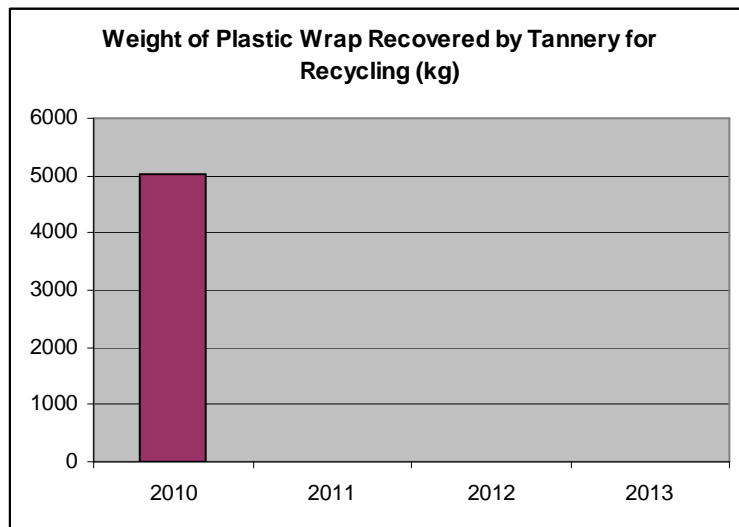
At the Casino site, the tannery records the number of IBCs returned to suppliers for reuse / recycling. Figure 4 shows historical data:

Figure 4 Number of Tannery IBCs Recovered for Recycling



The tannery also tracks the weight of plastic wrap recovered for recycling as shown in Figure 5.

Figure 5 Weight of Plastic Wrap Recovered by Tannery for Recycling



Although the weight of scrap steel is collected for recycling is recorded by NCMC, steel packaging is only a very small proportion of the total steel recovered and is not recorded separately.

3.3 Covenant KPI 4 – Policies to Buy Products Made from Recycled Packaging

3.3.1 Existing Policies for Purchasing Products Made From Recycled Packaging

The Northern Co-operative Meat Company does not currently have any formal policy or procedures relating to the recycled content of purchased made by the company. There is evidence of some isolated examples where there has been some consideration of the recycled content of some purchases. From NCMC’s perspective this KPI is simply a ‘Yes’ or ‘No’ to the question “Does the company have a policy to buy products made from recycled packaging?”

3.3.2 Application of the ‘Recycled Packaging Content’ Policy

This Action Plan includes an action to develop a policy for recycled packaging content of purchases. As the policy is applied to a product to be purchased it will be recorded as a metric. The baseline data at the time of preparing this plan is as follows:

The number of products purchases having the ‘Recycled Packaging Content’ applied = 0

3.4 Covenant KPI 7 – Working With Others to Improve Packaging Design & Recycling

3.4.1 Fate of Packaging Waste Reviewed with Receivers

One action identified later in the Action Plan is to review individual packaging waste streams with those organisations receiving them, to identify opportunities to reduce landfill and maximise reuse or recycling. The number of streams reviewed with their receivers will be tracked. The current baseline data is as follows:

The number of packaging waste streams reviewed to maximise recycling = 0

3.5 Covenant KPI 8 – Demonstrating Other product Stewardship Outcomes

3.5.1 Number of Vacuum Packaging Bag Audits With Suppliers

NCMC continues work with the suppliers of vacuum packaging bags (VPBs) to audit the use of the bags, with the target of at least 1 audit annually. As one audit was conducted in 2010 the baseline data for this KPI is established as 1 audit in 2010.

3.5.2 Extent of Double Sided Printing

CASINO SITE Baseline Data is as follows:

Number of printers (excluding specialised applications): 36
Number of Printers capable of double sided printing: 18
Number of printers with double sided printing available: 2
Percentage of printers set up for double sided printing: 5.3 %

BOOYONG SITE Baseline Data is as follows:

Number of printers (excluding specialised applications): 4
Number of Printers capable of double sided printing: 2
Number of printers with double sided printing available: 0
Percentage of printers set up for double sided printing: 0 %

3.5.3 Companies Receiving NCMC's Information Package on the Packaging Covenant

As this is a new initiative to be implemented under this Action Plan the baseline data is as follows:

Number of Companies Identified as having future dealings with NCMC = ? (to be advised)
Number of these companies receiving the APC information package = 0 %

3.6 Covenant KPI 9 – Reduction of Packaging in Litter

3.6.1 Extent of Employee Litter Awareness

Both sites will monitor this aspect by tracking the percentage of employees receiving the litter awareness training, specified as an action later in this Action Plan. The baseline data is as follows:

Percentage of Casino employees receiving the Casino Litter Awareness Training = 0%

Percentage of Booyong employees receiving the Booyong Litter Awareness Training = 0%

4.0 Current Practices and Recent Developments

4.1 Improvements to Minimise Environmental Impacts

The following are a few examples of packaging related improvements that have occurred (or that have at least been investigated) in the last decade or so. Generally, there is no data recorded to quantitatively demonstrate the improvements.

4.1.1 Changes to Meal Marketing

Throughout the last decade the marketing of NCMC branded meat & bone meal and bloodmeal has moved more toward bulk loading and away from bagged product. This has seen the percentage of bagged product reduce approximately, from 90% down to 10%, resulting in far less packaging (ie bags) requiring disposal by the end users of the meals.

4.1.2 Reuse of Meal Bulkabags (investigation only)

In prior years NCMC has investigated the multiple use of bulkabags for repeat use in the packaging of meals. However, this is not permitted under accreditation by the Australian Rendering Association (ARA) due to risk of disease transmission from one use of the bag to the next. Therefore, such reuse has not been possible at NCMC.

4.1.3 Booyong Red Offals Chilling

In recent years a change was made to chill Booyong's red offals in reusable white tubs instead of in cardboard cartons. This has avoided a significant amount of cartons being damaged in the chilling process due to the cartons going soggy. The final product is still packaged in cartons but by packing the offals after chilling, the carton usage has been reduced.

4.1.4 Frozen Line Improvements

In 2008, improvements were made to the Casino line frozen line in the boning room. This involved the replacement of strappers for securing frozen cartons with glueing and reconfiguring the path taken by the cartons on conveyors. This has resulted in a significant reduction in the use of strapping tape and has also reduced the amount of cartons damaged during conveying.

4.1.5 Dual Strapping on Chilled Line

Late in 2008, an extra carton strapper was added to the Casino boning room's chilled line. Prior to that, the front and rear straps were applied to each carton by the same strapping machine. The time that each carton spent in the strapper, having both straps applied, saw the following cartons bumping the carton in the strapper while it was being strapped. This often resulted in an unsuccessful strap and the strapping tape needing to be discarded. By adding a 2nd strapping machine to apply one of the two straps, this problem was reduced and has resulted in less strapping waste.

4.1.6 Reduced Weight of Chilled Cartons

Recently a change was made on some lines involving them being packed into a lighter weight carton base (typically used for frozen product) instead of a heavier weight chilled base. For these trim lines this has increased the product to packaging ratio.

4.1.7 Preference for Lighter Carton Liners

Over the years NCMC has also encouraged customers to use the lighter (ie thinner) carton liners, which increases the product to packaging ratio. This practice continues today and helps keep NCMC's processing costs down and allows the savings to be passed on to the customer being serviced.

4.1.8 Packaging Trim in Pallecons

NCMC has trialled the packaging of domestic meat trim in 1 tonne cardboard boxes (called pallecons) lined with a single plastic liner. Packing in pallecons overcomes the need to use 36 individual standard cartons each fitted with a plastic liner, significantly increasing the product to packaging ratio. This trial is ready to be taken to the next step (refer to Section 5.4.2 of this Action Plan)

4.1.9 Reducing Waste Bags for Hide Splitting

In 2009 the tannery began using a different type of bag to protect tanned hides while they are in storage awaiting splitting. These bags are larger and therefore, a looser fit than the current tight fitting bags that are usually damaged during removal. This is seeing a reduction in the number of damaged bags being disposed offsite.

5.0 The Action Plan

This section outlines NCMC's planned projects for the period March 2011 to December 2013, consistent with the objectives of the Australian Packaging Covenant. For each project, a timeframe and outcome are stated to ensure that performance can be adequately assessed. The actions are grouped by the three APC performance goals (Design, Recycling and Product Stewardship) and split into sub-groups within each performance goal relating to each of the APC Key Performance Indicators relevant to that performance goal.

5.1 GOAL 1 Actions to Optimise Packaging Design

5.1.1 KPI - Signatories Implementing Sustainable Packaging Guidelines

5.1.1.1 Review 25 kg Meal Bags Against Sustainable Packaging Guidelines

To maximise the sustainability of packaging used for Meat & Bone Meal, the 25 kg bags currently used for packaging Meat and Bone Meal and Blood Meal respectively, will be reviewed against the Sustainable Packaging Guidelines.

Outcome: A report on the review of 25 kg bags used for Meat & Bone Meal against the Sustainable Packaging Guidelines

Responsibility: Casino Plant Manager

Timeframe: End 2011

Outcome: A report on the review of 25 kg bags used for Bloodmeal against the Sustainable Packaging Guidelines

Responsibility: Casino Plant Manager

Timeframe: End 2011

5.1.1.2 Implement Policy to Apply Sustainable Packaging Guidelines

To maximise the sustainability of NCMC branded consumer packaging sold into the domestic market, a company policy will be developed and implemented, requiring any new packaging earmarked for use by NCMC to be reviewed and if the packaging is consumer packaging of a product retailed in Australia, the packaging will be assessed against the Sustainable Packaging Guidelines. Decisions on the use of the packaging will be based on the assessment against the Guidelines.

Outcome: A 'New Packaging' policy operating for all proposed new packaging that results in all domestic NCMC branded consumer packaging assessed against the Sustainable Packaging Guidelines before a decision on its use.

Responsibility: Chief Executive Officer

Timeframe: End 2011

5.2 GOAL 2 Actions to Enhance Packaging Collection & Recycling

5.2.1 KPI - Signatories With On Site Recovery Systems for Packaging Recycling

5.2.1.1 Enhance Current Systems for Aluminium Can Recycling at the Casino Site

To enhance the recovery of aluminium drink cans at the Casino site can recycling bins will be provided in the canteen and a system implemented for transferring the collected cans to the existing aluminium scrap bin.

Outcome: A fully functional collection system that directs aluminium cans into a recycling stream

Responsibility: Chief Engineer / Production Manager (Canteen)

Timeframe: End 2011

5.2.1.2 Review of Internal Reuse of Cardboard Received at the Casino Site

To help maximise the internal reuse of cardboard at the Casino site, a review will be undertaken to assess the reuse of cardboard used to protect cartons in transit to the site, for slip-sheets on pallets at the site.

Outcome: A report on the current status of cardboard reuse for slip-sheets and any opportunities identified for improving the amount of cardboard reused for this purpose.

Responsibility: Production Manager Boning

Timeframe: End 2013

5.2.1.3 Expand Recovery of Paper Waste at the Booyong Site

To enhance the recovery of paper waste the existing recovery system will be expanded to the other offices on the Booyong site.

Outcome: Every Booyong office with a functional system for paper recovery into a recycling stream

Responsibility: Booyong Plant Manager

Timeframe: End 2011

5.2.1.4 Implement Recovery of Plastic Drink Bottles at the Booyong Site

To enhance the recovery of empty plastic drink bottles a recovery system will be set up at the Booyong site.

Outcome: A functional system for plastic bottle recovery into a recycling stream(s)

Responsibility: Booyong Plant Manager

Timeframe: End 2012

5.2.2 KPI - Signatories With Policy to Buy With A Recycled Packaging Content

5.2.2.1 Implement A Recycled Content Policy for Significant Packaging Lines

To help facilitate markets for recycled cardboard, plastic and paper, a company policy will be developed and implemented for the company branded consumer packaging (ie bags for Meat & Bone Meal and for Blood Meal), office paper, and for the major production packaging types (ie cartons and plastics wraps). This policy will give preference to the purchase of items with higher recycled content as long as the item with higher recycled content is no more expensive and has the appropriate functionality (for instance, packaging strength and suitable surface for attaching labels).

Outcome: A 'Buy Recycled' policy operating for Meat & Bone Meal bags, Blood Meal bags, cartons, plastic wraps, & office paper that gives due consideration to cost and packaging functionality

Responsibility: Chief Executive Officer

Timeframe: End 2011

5.2.2.2 Thoroughly Review Recycled Content of Office Paper

To help facilitate markets for recycled paper and to ensure maximum benefit of the 'Buy Recycled' policy in relation to office paper, a thorough review of office paper will be conducted and a preferred supplier selected based on recycled content of the paper. The review will identify potential suppliers of office paper suitable for the company's activities, determine the recycled content of each supplier, and lead to decision on a supplier(s) for ongoing office paper supplies based on the principle of the 'Buy Recycled' policy. The Casino site uses approximately 400 reams of office paper per month.

Outcome: A decision on a supplier for ongoing office paper supplies based on a review in line with the new 'Buy Recycled' policy.

Responsibility: Office Manager (Main Office)

Timeframe: End 2012

5.3 GOAL 3 Actions to Enhance Product Stewardship

5.3.1 KPI – Signatories With Processes to Work With Others on Design & Recycling

5.3.1.1 Explore Design Improvements in 25 kg Meal Bags

To attempt to improve the packaging design of Meat & Bone Meal and Bloodmeal respectively, a review will be undertaken, in conjunction with the bag supplier, to explore implementation of design improvements in the packaging of 25 kg meal bags. This will follow on from the review against the Sustainable Packaging Guidelines scheduled for 2011.

Outcome: A report summarising investigation into improving design of 25 kg meal bags

Responsibility: Casino Plant Manager

Timeframe: End 2012

5.3.1.2 Explore How To Enhance Recycling of 25 kg Meal Bags

To reduce waste to landfill a review will be undertaken of how to enhance recycling of used 25 kg meal bags including (i) what NCMC should do with damaged / unusable bags and (ii) the placement of recycling messages or logos on the bags. This could be completed in conjunction with the review on the design of the bags (the previous action in this Plan) also scheduled for 2012.

Outcome: A report on how to enhance recycling of 25 kg meal bags

Responsibility: Casino Plant Manager

Timeframe: End 2012

5.3.1.3 Explore Improved Design of Vacuum Packaging Bags with Bag Suppliers

To attempt to address the current lack of recyclability of multi-layer vacuum packaging bags (VPB's), a review will be undertaken in consultation with the bag suppliers to explore how the bags could be modified to facilitate recycling whilst maintaining product integrity, resulting in a final report for consideration by said suppliers.

Outcome: A report on multi-layer VPB's, summarising a review on how bags could be modified to facilitate recycling.

Responsibility: Chief Engineer

Timeframe: End 2012

5.3.1.4 Explore Recycling of Plastic Strapping Tapes

To help minimise plastic waste amounts to landfill a review of current strapping tapes will be undertaken to explore opportunities for diverting this waste to recycling.

Outcome: A report on opportunities for recycling strapping tapes.

Responsibility: Environmental Coordinator

Timeframe: End 2011

5.3.1.5 Implement Monthly Reporting of Packaging Waste Recycling and Reuse

To help optimise recycling at the Casino site the amounts of packaging waste sent for recycling or reuse will be reported monthly to the Casino Production Meetings.

Outcome: Recycling data reported monthly

Responsibility: Environmental Coordinator

Timeframe: End 2011

5.3.1.6 Work With Receivers of Packaging Waste to Identify Opportunities to Reduce Landfill

To maximise the reuse or recycling of waste packaging, all organisations receiving NCMC's waste packaging will be liaised with to determine the proportions of NCMC's packaging that is recycled, reused and landfilled, respectively, and any opportunities for decreasing the amounts sent to landfill.

Outcome: A report on the fate of NCMC's waste packaging sent for recycling or reuse along with any opportunities identified for decreasing the amounts sent to landfill.

Responsibility: Environmental Coordinator

Timeframe: End 2012

5.3.2 KPI – Signatories Demonstrating Other Product Stewardship Outcomes

5.3.2.1 Distribute Disposal / Recycling Information to Purchasers of 25 kg Meal Bags

To enhance better management of used 25 kg meal bags an information package on the appropriate disposal / recycling of the bags will be developed and emailed to all known purchasers of Meat & Bone Meal and all known purchasers of Bloodmeal. This will follow the other projects relating to meal bags, contained as actions in this plan together due for completion in 2012.

Outcome: An information package on disposal of used meal bags sent to all known purchasers of NCMC meal

Responsibility: Marketing Manager

Timeframe: 30 June 2013

5.3.2.2 Work With Vacuum Packaging Bag Suppliers to Minimise Usage & Waste

To minimise waste from the use of vacuum packaging bags (VPBs) in the Casino boning, dicing, value added and offal rooms, an approximately annual audit of their use will be conducted, utilising the services of the bag supplier(s) where possible. The aim will be to identify possible improvements to minimise packaging use and packaging waste.

Outcome: Annual reports of current bag usage practices including identification of any opportunities for reducing bag usage and bag waste.

Responsibility: Casino Plant Manager

Timeframe: Annually

5.3.2.3 Review Expansion of Double Sided Printing Across the Company

To reduce propensity for litter and packaging waste associated with office paper reams, a review will be conducted across the entire company to assess the viability of expanding on the use of double sided printing, identifying areas where the idea is viable.

Outcome: A report on the viability of double sided printing across the company.

Responsibility: IT Manager

Timeframe: End 2011

5.3.2.4 Review the Placement of Recycling Logos on Strapping Tape Across The Company

To enhance the recycling of strapping tapes, a review will be undertaken to assess the viability of having recycling logo(s) on strapping tapes used across the company in future.

Outcome: A report on the viability of recycling logo(s) on strapping tapes

Responsibility: Chief Engineer

Timeframe: End 2012

5.3.2.5 Distribute an APC Information Package to Companies Dealing With NCMC

To enhance industry knowledge on packaging waste an information package will be developed and sent to all companies that NCMC deals with. This package will highlight NCMC's involvement with the APC.

Outcome: A package on NCMC's involvement with the APC sent to all companies that NCMC purchases off in 2012 & that use the services of NCMC in 2012.

Responsibility: Chief Engineer / Casino Plant Manager

Timeframe: End 2012

5.3.2.6 Continue Participation in the AMPC Project on 'Naked Trim'

To help make progress on the reduction of packaging involved with marketing frozen meat trim, participation will continue on the Australian Meat Processors Corporation (AMPC) Technical Committee group overseeing the project exploring the viability of 'Naked Block' marketing of frozen meat trim, whereby no cardboard carton is used.

Outcome: Continued contribution to the AMPC Technical Committee project on Naked Trim marketing

Responsibility: Chief Engineer

Timeframe: End 2012

5.3.2.7 Audit of Vacuum Packaging Bag Use in Booyong Boning Room

To minimise waste from the use of vacuum packaging bags (VPBs) in the Booyong boning room an audit of their use will be conducted to identify possible improvements to minimise packaging use and packaging waste.

Outcome: A report of current bag usage practices including identification of any opportunities for reducing bag usage and bag waste.

Responsibility: Booyong Plant Manager

Timeframe: End 2012

5.3.3 KPI – Reduction of Packaging Items in Litter

5.3.3.1 Internal Awareness Program at the Casino Site Around Reducing Litter

To minimise the potential for litter around the NCMC carpark at Casino and outside the driveways of the premises, an awareness program will be developed for presentation to the NCMC employees at Casino. The program will revolve around employees disposing of litter in a responsible manner, both in a general sense and in the context of the Casino site.

Outcome: A litter awareness program delivered to at least 90% of Casino employees.

Responsibility: Chief Executive Officer

Timeframe: End March 2012

5.3.3.2 Internal Awareness Program at the Booyong Site On Reducing Litter

To minimise the potential for litter in and around the Booyong plant an awareness program will be developed for presentation to the NCMC employees at Booyong. The program will revolve around employees disposing of litter in a responsible manner, both in a general sense, at home and in the context of the Booyong site.

Outcome: A litter awareness program delivered to at least 90% of Booyong employees.

Responsibility: Booyong Plant Manager

Timeframe: End May 2012

5.4 Summary Table of Actions

The actions discussed above are summarised in Table 1

Table 1 Summary Table of Actions

COVENANT GOAL / KPI	ACTION	RESPONSIBILITY	PERFORMANCE OUTCOME	TIMEFRAME
GOAL 1: Design				
KPI 1 – Signatories Implementing Sustainable Packaging Guidelines	5.1.1.1 Review 25 kg Meal Bags Against Sustainable Packaging Guidelines	Casino Plant Manager	A report on the review of 25 kg bags used for Meat & Bone Meal against the Sustainable Packaging Guidelines	End 2011
		Casino Plant Manager	A report on the review of 25 kg bags used for Bloodmeal against the Sustainable Packaging Guidelines	End 2011
	5.1.1.2 Implement Policy to Apply Sustainable Packaging Guidelines	CEO	A policy operating for proposed new packaging with domestic NCMC branded consumer packaging assessed against the Sustainable Packaging Guidelines before a decision on use.	End 2011
GOAL 2: Recycling				
KPI 3 – Signatories With Onsite Recovery Systems for Recycling Used Packaging	5.2.1.1 Enhance Current Systems for Aluminium Can Recycling at Casino Site	Chief Engineer / Production Manager Canteen	A fully functional collection system that directs aluminium cans into a recycling stream	End 2011
	5.2.1.2 Review of Internal Reuse of Cardboard Received at the Casino Site	Production Manager (Boning)	A report on the current status of cardboard reuse for slip-sheets and any opportunities identified for improving the amount of cardboard reused for this purpose.	End 2013
	5.2.1.3 Expand Recovery of Paper Waste at the Booyong Site	Booyong Plant Manager	Every Booyong office with a functional system for paper recovery into a recycling stream	End 2011
	5.2.1.4 Implement Recovery of Plastic Drink Bottles at the Booyong Site	Booyong Plant Manager	A functional system for plastic bottle recovery into a recycling stream(s)	End 2012
KPI 4 – Signatories With Policy to Buy Product of Recycled Packaging	5.2.2.1 Implement A Recycled Content Policy for Significant Packaging Lines	CEO	A 'Buy Recycled' policy operating for Meat & Bone Meal bags, Blood Meal bags, cartons, plastic wraps, & office paper that gives due consideration to cost and packaging functionality	End 2011
	5.2.2.2 Thoroughly Review Recycled Content of Office Paper	Office Manager (Main Office)	A decision on a supplier for ongoing office paper supplies based on a review in line with the new 'Buy Recycled' policy.	End 2012

GOAL 3: Product Stewardship				
KPI 7 – Signatories with Processes to Work With Others on Design & Recycling	5.3.1.1 Explore Design Improvements in 25 kg Meal Bags	Casino Plant Manager	A report summarising investigation into improving design of 25 kg meal bags	End 2012
	5.3.1.2 Explore Enhanced Recycling of 25 kg Meal Bags	Casino Plant Manager	A report on how to enhance recycling of 25 kg meal bags	End 2012
	5.3.1.3 Explore Improved Design of Vacuum Packaging Bags	Chief Engineer	A report on multi-layer VPB's, summarising a review on how bags could be modified to facilitate recycling.	End 2012
	5.3.1.4 Explore Recycling of Plastic Strapping Tapes	Environmental Coordinator	A report on opportunities for recycling strapping tapes.	End 2011
	5.3.1.5 Implement Monthly Reporting of Packaging Waste Recycling & Reuse	Environmental Coordinator	Recycling data reported monthly	End 2011
	5.3.1.6 Work With Packaging Waste Receivers to Identify Reductions in Landfill	Environmental Coordinator	A report on the fate of NCMC's waste packaging sent for recycling or reuse along with any opportunities identified for decreasing the amounts sent to landfill.	End 2012
KPI 8 – Other Product Stewardship Outcomes	5.3.2.1 Distribute Recycling /Disposal Info to Purchasers of 25 kg Meal Bags	Marketing Manager	An information package on disposal of used meal bags sent to all known purchasers of NCMC meal	30 June 2013
	5.3.2.2 Work With Vacuum Packaging Bag Suppliers to Minimise Usage & Waste	Casino Plant Manager	Annual reports of current bag usage practices & identification of any opportunities for reducing bag usage and bag waste.	Annually
	5.3.2.3 Review Expansion of Double Sided Printing Across the Company	IT Manager	A report on the viability of double sided printing across the company.	End 2011

	5.3.2.4 Review Recycling Logos on Strapping Tape Across The Company	Chief Engineer	A report on the viability of recycling logo(s) on strapping tapes	End 2012
	5.3.2.5 Distribute an APC Info Package to Companies Dealing With NCMC	Chief Engineer / Casino Plant Manager	A package on NCMC's involvement with the APC sent to companies that NCMC purchases off & that use NCMC services	End 2012
	5.3.2.6 Continue Participation in the AMPC Project on 'Naked Trim'	Chief Engineer	Continued contribution to the AMPC Technical Committee project on Naked Trim marketing	End 2012
	5.3.2.7 Audit of Vacuum Packaging Bag Use in Booyong Boning Room	Booyong Plant Manager	A report of current bag usage practices including identification of any opportunities for reducing bag usage and bag waste.	End 2012
KPI 9 – Reduction In Litter	5.3.3.1 Internal Awareness Program at the Casino Site Around Reducing Litter	CEO	A litter awareness program delivered to at least 90% of Casino employees.	31 Mar 2012
	5.3.3.2 Internal Awareness Program at the Booyong Site On Reducing Litter	Booyong Plant Manager	A litter awareness program delivered to at least 90% of Booyong employees.	31 May 2012

6.0 EXECUTIVE APPROVAL

This plan has been formally approved for implementation by _____ in the capacity

name

as _____ on this day _____.

position

date

Signed _____