

AUSTRALIAN PACKAGING COVENANT

ACTION PLAN
July 2010 – 2018
(Revised June 2016)

FOR

**BROTHER INTERNATIONAL
(AUST) PTY LTD**

brother
at your side

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EXECUTIVE SUMMARY

Brother Industries was founded in 1908 in Japan and today is a leading global manufacturer of innovative, reliable and practical products to enhance the consumer's lifestyle for use in a variety of applications aimed at the home, business and government consumer.

Brother International (Aust) Pty Ltd (referred to as BIA throughout this action plan) is a wholly owned subsidiary of Brother Industries, Limited of Japan, and was established in 1977. The head office is located in Macquarie Park in Sydney, New South Wales with state offices located in Brisbane and Melbourne to provide sales and service to a range of consumer electronics resellers.

Brother Industries, Limited of Japan manufacture products in more than a dozen state-of-the-art global production facilities located predominately in Asia. In Australia, BIA markets the following product ranges:

- Printers – inkjet and laser
- Multi-Function Centres (MFC's) - inkjet and laser
- Fax machines
- Labelling machines
- Sewing Machines
- Scanners
- Mobile printers

BIA became a National Packaging Covenant (NPC) signatory in mid-2008 and is a current signatory to the Australian Packaging Covenant (APC) as a Brand owner for the following high profile name brands:

- Brother
- P-touch
- Innovis (Home Sewing Machines)
- Innobella (Consumables)
- Simplicity (Home Sewing Machines)
- ScanNCut

The primary packaging materials used to protect the products during transport to the consumer includes:

- Cardboard
- Plastic Wrap
- Styrofoam
- PET Blister packs
- Paper

Brother Group is committed to supporting initiatives which help to ensure the long-term sustainability of our environment and incorporates sustainability into every step of our products' lifecycle - from design, development and manufacturing, to customer usage and disposal.

BIA has achieved the following specific outcomes to date:

- Sourced environmental data on locally purchased outer packaging of consumable products packaged in Australia
- Increased the amount of recycled content in locally purchased packaging
- Implemented new labelling on local product packaging for consumables focusing on consumer and environmental information
- Expanded in-house recycling opportunities
- Improved data collection on waste practices
- Requested and received data from head office regarding recycled content in product packaging
- Adopted a Buy Recycle Purchasing Policy
- Implemented an ongoing Buy Recycled Purchasing Policy where products are price and performance competitive
- Formed a packaging review committee and assessed new and used packaging based on agreed timeframes
- Developed a Memorandum of Understanding with our third party logistics providers in relation to environmental performance
- Reviewed packaging against the Sustainable Packaging Guidelines (SPG)
- Supported of Cartridges 4 Planet Ark
- Supported of the National E-waste program by joining an approved co regulatory arrangement

This Action Plan builds on these foundations and focuses on:

- Reviewing new and existing packaging against the SPG
- Continued support of Cartridges 4 Planet Ark
- Continued support of the National E-waste program maintaining membership to an approved co-regulatory arrangement
- Continuing to provide consumer information about the recyclability of packaging
- Continuing to work with the supply chain on packaging design and recycling
- Continuing to measure, monitor, evaluate and report in-house recycling programs
- Continuing to use and give preference to recycled content in Australian packaged products

This Action plan has been endorsed by Mr Tom Frair, Director, Brother International (Aust) Pty Ltd.

1. COMPANY PROFILE

Brother Industries, Limited of Japan was founded in 1908 in Japan and today is a leading global manufacturer of innovative, reliable and practical products to enhance the consumer's lifestyle for use in a variety of applications aimed at the home, business and government consumer.

Brother Industries, Limited of Japan manufactures in more than a dozen state-of-the-art global production facilities located predominately in Asia. In Australia, Brother markets the following product ranges:

- Printers – inkjet and laser
- Multi-Function Centres s (MFC's) - inkjet and laser
- Fax machines
- Labelling machines
- Sewing Machines
- Scanners
- Mobile printers

BIA is a wholly owned subsidiary of Brother Industries, Limited of Japan and was established in 1977, with its head office located in Macquarie Park in Sydney, New South Wales. State offices are located in Brisbane and Melbourne to provide sales and service to a range of consumer electronics resellers.

1.1 Brand ownership

The primary signatory to the Australian Packaging Covenant (APC) is Brother International (Aust) Pty Ltd referred to as (BIA throughout this Action Plan). BIA is a Brand owner for the following high profile name brands:

- Brother
- P-touch
- Innovis (Home Sewing Machines)
- Innobella (Consumables)
- Simplicity (Home Sewing Machines) and;
- ScanNCut

Brother produces and sells nine key product ranges within which there are 21 types and 151 models. The current product categories and types are detailed in the table below:

Table 1 - Product Range

Product category	Type
Printers	Monochrome Laser
	Colour Laser
	Professional High Speed
Multi-Function Centres	Ink jet colour
	Colour Laser / LED
	Monochrome Laser
Faxes	Thermal
	Thermal transfer plain paper
	Laser

Product category	Type
Labellers	P-Touch
	Professional label printers
Sewing machines	Sewing machines
	Computerised Sewing Machines
	Computerised Sewing and Embroidery Machines
	Simplicity by Brother
	Embroidery Only Machines
Overlockers	
Scanners	Scanners
Mobile Printers	Mobile Printers
ScanNCut	ScanNCut
Garment Printers	Garment Printers

To support this extensive product range Brother provides a range of branded consumables and accessories including paper, toner, ink cartridges, tapes and drums. A very small amount, less than 1% and decreasing of consumables are repackaged in Australia for the local market. A full list of consumables is provided in the following table:

Table 2 - Product Categories and Associated Consumables

Product Category	Consumables
Inkjet Multi-Function Centres	Ink cartridges Paper
Laser Printers/MFCs	Toners and Drums Belt Unit Waste Toner Pack Fuser Unit & Transfer Roll
Fax Machines	Refill Roll with Cartridge Refill rolls of ink ribbon Thermal Paper Toner and Drums Ink cartridges
Labellers	Variety of tapes
Sewing Machines	n/a
Scanners	n/a
Mobile Printers	Thermal paper
ScanNCut	n/a
Garment Printers	Pigment ink cartridges

Increasingly, consumable packs are being packaged offshore and imported. In the future it is likely that only exclusive offers to retailers i.e. Officeworks; will be printed and packaged locally. It is projected that this will be an extremely small quantity and diminishing over time.

1.2 Packaging materials

The primary packaging materials used to protect these products during transport to the consumer include:

- Cardboard
- Plastic Wrap
- Styrofoam
- PET Blister packs
- Paper

BIA repackages less than 1% of all consumables sold, and none of the key products sold, so its global sphere of influence is limited. BIA is not in a position to dictate changes in packaging specifically for this low volume market.

1.3 *Business Locations*

BIA operates offices and a technical services division at the following locations:

Table 3 - *Brother Office Locations*

STATE	ADDRESS	PRIMARY FUNCTION
NSW	Macquarie Park	Head Office
NSW	Eastern Creek	Technical Services
QLD	Woolloongabba	Sales Office
VIC	Camberwell	Sales Office

All warehouse and distribution functions are outsourced to third party logistics providers.

2. PLAN MANAGEMENT

2.1 *Covenant Contact officer*

The contact officer responsible for overseeing APC activities is:

Mr Alex Rodriguez
Corporate Social Responsibility and Compliance Manager
Brother International (Aust) Pty Ltd
Level 3, Building A, 11 Talavera Road
Macquarie Park NSW 2113
Ph. (02) 9887 4344
alex.rodriquez@brother.com.au

2.2 *APC Team*

A multi-disciplinary team of skilled and appropriate staff have been briefed on the Packaging Covenant and our obligations, and consisting of representatives from the following areas:

- Senior Management
- Marketing
- Corporate Social Responsibility

The APC Packaging Review team consists of the CSR and Compliance Manager and the CSR Officer. The team seeks assistance from other staff and head office on an as needed basis.

3. BROTHER'S EXISTING ENVIRONMENTAL CREDENTIALS

Brother Industries, Limited of Japan demonstrates continuous improvement in all aspects of manufacturing and have a global commitment to Corporate Social Responsibility (CSR) in all that they do.

Basic Philosophy - Brother Group shall positively and continuously act to decrease the environmental impact of all aspects of our business operation so that society can achieve sustainable development.

Basic policy - Concern for the environment shall be the cornerstone of all operations. Safety and environmental impact shall be a prime consideration at every stage of a product's lifecycle, from design, development and manufacturing, customer usage and disposal, to reuse and recycling.

Action guidelines –

1. We will set environmental targets in all areas (manufacturing, production and service) and continuously improve their environmental aspects.
2. We will not limit our activities to observation of laws and regulations in all countries where we conduct business, but also act with a strong moral responsibility to prevent pollution and reduce environmental impact.
3. We will always consider waste reduction by the more efficient use of resources and recycling of products, and will also avoid creating contamination by hazardous substances when designing and developing both technologies and products.
4. While respecting voluntary activities by each company of the Brother Group, we will also exercise our environmental duties as a united group.
5. We will enhance the environmental understanding and awareness of all employees by activities such as environmental education and PR.
6. We will actively disclose our environmental efforts to our customers, local communities and other interested parties to further foster understanding.
7. We will endeavour to reduce impact on the ecosystem and to conserve biodiversity in all our operations.

The company's approach is demonstrated by the following activities and achievements globally.

3.1 Global Initiatives

3.1.1 Group Global Charter

The Brother Group Global Charter, originally published in 1999, refined in April 2008, provides the foundation for all Brother Group activities in the

global marketplace. Brother has a long-standing belief in respecting the environment and caring for anyone related to our company.

All Group companies and associates must base their decisions and actions on the Charter's "Basic Policies" and "Codes of Practice." The basic policies include "commitment to quality", "customer-first" and "care for the environment".

Specifically regarding the Environment "The Brother Group helps society achieve sustainable development, by positively and continuously considering the environmental impact of all aspects of our business operations."

Brother believes that Corporate Social Responsibility (CSR) should be managed just as any other business activity, and should be integrated into daily business operations. We have formed a committee to increase awareness of CSR within the company and formulate strategies and initiatives to involve everyone in the company in how we can contribute back to society and the environment in which we live, work and play.

3.1.2 *Global Environmental Achievements - 5 R Concept*

The Brother Group established the 5R concept, which lays the foundation and sets the guidelines for active participation in global efforts to reduce environmental impact:

1. **REDUCE** waste material by recycling
2. **REUSE** products and waste material
3. **REFUSE** to buy environmentally unfriendly products
4. **REFORM** materials and use again
5. **RECYCLE** rather than scrap



3.1.3 *Green Procurement Program*

Brother Industries, Limited of Japan has issued the Brother Group's Green Procurement Standard and promotes green procurement practices with an eye to working together with suppliers to ensure environmentally friendly manufacturing.

Green Procurement Policy

- 1) Buy products from suppliers who promote environmental conservation activities
- 2) Buy articles (parts, materials, sub-materials, and products) that do not contain hazardous chemical substances specified by the Brother Group.

The Green Procurement Standard applies to the Brother Group's procurement activities for all articles (parts, materials, sub-materials, and products).

3.1.4 Globally complying with regulations on chemical substances

Ensuring compliance with relevant laws (including REACH, RoHS, and TSCA) that regulate chemical substances contained in products.

Our machines' eco-friendliness is determined by the RoHS (Restriction of Hazardous Substances) Directive. There is restricted use of certain hazardous substances such as lead, mercury and cadmium in the manufacture of our products. On top of that, our machines are labelled Energy Savers, which means they consume less power, and therefore contribute to our holistic approach to being environmentally friendly. At Brother, we provide the ideal solutions that exceed expectations now and into the future. We aim to be "At Your Side" every step of the way.

3.1.5 Compliance with ISO 9001 and ISO 14001

Brother products are manufactured to exacting, environmentally friendly specifications. Brother worldwide is committed to ISO 9001 and ISO 14001, and through these controls we ensure that quality and reliability are built into every consumable and machine we manufacture. Furthermore, everything we manufacture is produced to worldwide health and safety standards.

Visit www.BrotherEarth.com for details of how Brother is contributing to environmental sustainability on a global basis.

3.1.6 Globally complying with energy-saving regulations on products

Complying with relevant energy-saving laws and regulations on products (including ErP, Russia's product regulations, South Korea's energy law, China's Energy Label, and Japan's energy saving law), with top-level energy-saving performance.

Brother printers and MFCs have also been awarded the international Energy Star conformance label.

Our Laser Printers, Multi-Function Centres (MFCs) and Faxes comply with the International Energy Star Program. As a long-time Energy Star partner, all Brother Group companies worldwide have strong social and environmental responsibilities to contribute to a cleaner planet.

3.1.7 Creating Eco-conscious Products

The Brother Group is committed to reducing environmental impact at all stages of the life cycle of its products. This is the guiding principle of the group's manufacturing activities.

Brother products are developed and designed to:

- comply with laws and regulations of the various countries and regions where sold;
- be compact and lightweight to conserve resources;
- achieve the top levels of energy conservation performance in the industry;
- manage hazardous chemical substances, as defined in the Brother Green Procurement Standards;

- be easily recycled at the end of life; and
- meet emission standards

Brother printers and MFCs have adopted a printing system that reduces consumables wastage. This printing system ensures that users no longer have to throw away a drum or inkjet print heads every time the toner or ink cartridge has been depleted. Toners and ink cartridges may now be replaced separately. Additionally, all our models have a draft print mode to reduce the amount of toner or ink required for standard prints.

4. SUMMARY OF PREVIOUS ACHIEVEMENTS

As a member of the Brother Group, BIA is guided by the same strong environmental policies and principles of our parent company and we have adopted the 5R concept as a basis for our own environmental activities. Specific Australian activities and initiatives are detailed below.

4.1 Supporting Earthwatch

BIA has a long-term partnership with Earthwatch Australia, to facilitate critical conservation efforts focused on Climate Change and Sustainable Resource Management. Through this partnership, BIA has directly supported research conducted by Earthwatch into Climate Change in the Southern Great Barrier Reef and Ningaloo Coast.

Because BIA wants to see their staff engaged with environmental issues – not just following company policy, Brother employees, stakeholders, customers and business partners, have the opportunity to be part of an environmental volunteering program where they become a 'Scientist for a Day'. This includes a one-day in-field project across Australia.

4.2 ISO 14001 Accreditation

All of BIA's offices have been accredited with the strict ISO 14001 conservation standards for the environment.

An initiative of this programs accreditation is to measure, monitor, evaluate and report monthly on waste and recycling activities. BIA has a program in place to recover for reprocessing: e-waste, cartridges, paper and commingled containers. Since data recording commenced in September 2010 the average monthly diversion from landfill has been >50%.

4.3 Cartridges 4 Planet Ark

BIA is proud to be a sponsor of the 'Cartridges 4 Planet Ark' (C4PA) recycling program. This Australia wide program collects and returns cartridges for remanufacturing and recycling - therefore keeping them out of landfill. Cartridges that are put into the specifically designed collection bins are processed and recycled with zero waste to landfill guaranteed. This program covers both laser and ink cartridges and drums.

BIA management are actively involved in the program's administration, attend quarterly meetings with C4PA members and make significant financial contributions to co-fund the program.

4.4 E-waste recycling programs

BIA was a proud partner of Byteback Australia, a program piloted by Sustainability Victoria with the aim of keeping old hardware out of landfill. This take-back program helped end users dispose of their unwanted Brother business machines responsibly. Equipment deposited at Byteback sites was broken down into components for recycling. This pilot program greatly

assisted in the development of a national program which has been rolled out when the legislative framework was agreed and became law as the *Product Stewardship Act 2011*.

BIA now partners with an approved co-regulatory arrangement as required under the Act, which calls for manufactures, importers or brand owners to take responsibility for the e-waste they produce that enters the marketplace. BIA actively participates in working groups, contributing to reviews, input into plans, considering the implications of program delivery and the financial cost to the organisation to comply with the legislative framework.

4.5 Earth Hour

BIA has been an active participant and supporter of Earth Hour conducted in March each year since 2008.

4.6 Brother Earth

Brother Earth describes our positive attitude and commitment to our communities and our planet. In Australia, we have joined forces with Earthwatch – an international organisation researching sustainable environmental solutions to help tackle climate change and sustainable resource conservation. Visitors to the www.BrotherEarth.com website can make a free click on an environmental project such as Earthwatch and Brother will donate funds on their behalf at no cost to users.



Working with you for a better environment

www.brotherearth.com

4.7 Brother Group 5R Awards

BIA was awarded the Global Brother Group 5R Award for environmental contribution in 2012 and 2013. The 5R Award is designed to encourage factories and offices to reduce environmental impacts, CO₂ reduction and promote energy conservation.

5. APC GOALS AND KPI'S

5.1 Design

The APC states - Design is to optimise packaging to achieve resource efficiency and reduce environmental impact without compromising product quality and safety

KPI 1- proportion of signatories in the supply chain implementing the SPG for design or procurement of packaging

Locally, BIA repackages less than 1% of all consumables sold and none of the key products sold so our global sphere of influence is limited. BIA is not in a position to set targets and milestones for the parent company or dictate changes for this market. However, data provided by Brother Industries, Limited of Japan demonstrates continuous improvement in all aspects of manufacturing and global commitment to Corporate Social Responsibility (CSR) in all that they do. The company globally has moved to reduce the amount of Styrofoam (EPS) as internal packaging in products where possible, and has replaced it with contoured cardboard which is fully recyclable in both domestic and commercial recycling programs, given our products are sold for home and office use. Styrofoam is still used in major heavy appliances due to its superior qualities of product protection.

5.1.1 Existing Product Packaging

The primary packaging materials used to protect these products during transport from manufacture to the consumer includes:

- Cardboard
- Plastic Wrap
- EPS – expanded polystyrene (Styrofoam)
- PET Blister packs
- Paper

Brother Industries, Limited of Japan produces a range of products and consumables, many of which are imported and sold directly into the Australian market. In essence there are nine product ranges and 151 models. To support this extensive product range Brother provides range of branded consumables and accessories including paper, toner, ink cartridges, etc. to support the principal products.

5.1.2 Timetable for Sustainable Packaging Review

5.1.2.1 Existing Products

BIA proposes to review all existing products against the Sustainable Packaging Guidelines (SPG) based on product type, given the commonality of packaging used and source. The assessment priority will be based on sales activity and volume with the most popular products category sold by BIA in the Australian market assessed first.

The review will be undertaken in accordance with the following timeline detailed below.

Review against SPG Timeline for Existing Products

Product category	Proposed Timeline
Laser Printers	September 2011
Multi-Function Centres	September 2012
Sewing machines and Ink Jet Printers	September 2013
Labellers	September 2014
Faxes	September 2015
Scanners	September 2016
Mobile Printers	September 2017

5.1.2.2 Existing Consumables

For consumables it is proposed to review in conjunction with the product type. In respect to value packs these will be assessed by a sub category of domestic and imported.

Review against SPG Timeline for Existing Consumables

Product Category	Consumables	Proposed Timeline
Mono toners	Mono Toners and Drums	September 2011
Colour toners	Colour Toners and Drums	September 2012
Inkjet	Ink cartridges	September 2013
Labellers	Variety of tapes	September 2014
Fax Machines	Refill Roll with Cartridge Refill rolls of ink ribbon	September 2015

5.1.3 Review of new product packaging

BIA is aware that all new products or consumables entering the Australian market must be assessed against the SPG. BIA has established an APC Packaging Review team comprising representatives as specified in section 2.2 to undertake this activity on an as needs basis.

Due to the constant and evolving technology being researched and developed by Brother globally it is expected that based on historical information and forwarded forecasts up to 200 new models may need to be assessed over the next 5 years. BIA assesses the top selling models in each product range as the only variation in models being additional functionality over the base model while typically the packaging for the entire product category remains the same with only minor changes occurring based on equipment size and weight.

5.1.4 Summary of Timetable for Review of Existing Products and Consumables

Activity	Years						
	2011	2012	2013	2014	2015	2016	2017
Laser Printers and consumables • MonoToners and Drums							
Multi-Function Centres • Colour Toners and Drums							
Sewing machines and Ink Jet Printers • Ink cartridges							
Labellers and tapes							
Fax machines and consumables							
Scanners							
Mobile Printers							

5.2 Recycling

Recycling – the efficient collection and recycling of packaging

KPI 2 N/A – Not relevant to individual signatories

KPI 3 Proportion of signatories with on-site recovery systems for recycling used packaging

5.2.1 On site Recovery systems

BIA has ensured in-house waste management and recycling programs and practices are provided for all staff at all work sites nationally. Reuse and recycling programs are established for paper/cardboard, comingled containers, e-waste and printer cartridges. Head office and technical services sites also provide facilities for battery and polystyrene.

BIA monitors waste at head office, with monthly reporting in place both internally to staff, and externally to stakeholders including the APC. This monitoring began in September 2010 with an obligation on all contractors to provide data for reporting. Since monitoring began diversion has averaged >50%.

BIA with the support of staff and management will continue to strive to maintain the commitment of diverting recyclable waste from landfill.

5.2.2 Buy Recycled

KPI 4 Proportion of signatories with a policy to buy products made from recycled packaging. All Covenant signatories will have a formal documented policy of buying recycled products or materials.

Brother Group has a Green Procurement Policy and Procedure in place which actively requires suppliers to provide detailed information as part of an environmental assessment for each product, in the quest to improve the energy saving / resource saving / recyclability of the parts / products they supply. Brother Industries, Limited of Japan advice in respect to recycled content for paper and cardboard packaging used for export globally, that a minimum of 40% and up to 80% recycled content is included. The proportion of recycled material used in packaging production varies depending on design, material type and characteristics desired.

BIA has adopted a Buy Recycled Purchasing Policy and has in place preferential purchasing requirements based on the policy. A very small amount of consumables are repackaged in Australia for the local market. Environmental data has been obtained in relation to the amount of recycled content of external packaging of “value packs”. Our advice is that the outer package contains 88% recycled content. Increasingly these packs are being packaged offshore and imported and local content will diminish over time.

5.3 Product Stewardship

Product Stewardship – a demonstrated commitment to product stewardship by the supply chain and other signatories

KPI 5 N/A – Not relevant to individual signatories

KPI 6 Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging

5.3.1 Third party logistics

BIA's third party logistics (3PL) suppliers are involved in transport packaging and product packaging disposal. BIA technical services team utilise the facilities of the 3PL supplier for packaging recycling. BIA has a signed Memorandum of Understanding (MOU) with our 3PL suppliers in regards to facilities for recycling and transport packaging.

5.3.2 Labelling of Consumables Packaging

BIA is working alongside their design company to review and redesign consumables packaging for the Australian market. These reviews occur on an as needed basis. Part of the criteria for consideration at the material selection stage is the recyclability and / or recycled content. Where BIA can influence the small amount of locally packaged product we have ensured all packaging labeling has been modified and are working towards increasing the amount of recycled content used in packaging. All Australian packaging products are labeled with new user friendly consumer information added to the external package including:

- cartridge recycling
- please recycle, mobius loop symbol
- package contains recycled content

KPI 7 Proportion of signatories demonstrating other product stewardship outcomes

5.3.3 ISO 14001 Accreditation

BIA's Environmental Management System (EMS) is accredited with the strict ISO 14001 conservation standards for the environment. As part of the program accreditation an annual review of the EMS must also be completed and the current Environmental Policy is available on the company web site.

5.3.4 National Television and Computer Recycling Scheme

BIA will continue to partner with an approved co-regulatory arrangement as required under the *Product Stewardship Act 2011*, and actively participate in working groups, reviews and planning.

5.3.5 Cartridges 4 Planet Ark

BIA will continue to be a sponsor of the 'Cartridges 4 Planet Ark' (C4PA) recycling program.

5.3.6 Supporting Earthwatch

BIA has a long-term partnership with Earthwatch Australia, to facilitate critical conservation efforts focused on Climate Change and Sustainable Resource Management. Through this partnership, BIA will directly support research

being conducted by Earthwatch into Climate Change in the Southern Great Barrier Reef and Ningaloo Coast.

Because BIA wants to see their staff engaged with environmental issues – not just following company policy. BIA employees, stakeholders, customers and business partners, have the opportunity to be part of an environmental volunteering program where they become a 'Scientist for a Day'

5.3.7 Earth Hour

BIA has been an active participant and corporate supporter of Earth Hour conducted during March each year since 2008. BIA will continue this association.

5.3.8 Eco Points Program

BIA has run an internal Eco Points program since 2010 to educate staff on environmental and sustainability topics. Participation rates are reported monthly.

KPI 8 Continuous reduction in the number of packaging items in litter

5.3.9 Litter

Brother products are sold in retail outlets and online, and consumed in the home and office environment. The propensity of our packaging to become litter is remote and there is no evidence of our products nor packaging evident in the litter stream. In an effort to encourage the correct disposal of packaging BIA has ensured that, on locally packaged products, the external packaging displays the please recycle mobius loop.

6. ACTION PLAN SUMMARY TABLE

Covenant Performance goals and KPIs	Actions	Responsibility	Baseline data	Target or Performance goal	Timeline Or Milestones (MMYY)	Evidence
1. Design-optimize packaging to achieve resource efficiency and reduce environmental impact without compromising product quality and safety						
KPI 1 Proportion of signatories in the supply chain implementing the SPG for design or procurement of packaging	Establish and maintain an APC Packaging Committee to review both imported and locally packaged consumables with SPG.	Packaging Review Committee	No data available	Committee formed and maintained, and SPG reviewed	Formed: June 30 th 2011 Annual reviews	<ul style="list-style-type: none"> • Meeting minutes • Advise BIA stakeholders of SPG and obligations • SPG template developed
	APC Packaging Committee review existing imported and local packaging with SPG including: <ul style="list-style-type: none"> • Laser Printers/ mono toners • Multi-Function Centres / colour toners • Sewing machines/ inkjets and cartridges • Labellers • Fax machine • Scanners • Mobile printers 			Reviews completed in accordance with timelines provided	Annual reviews according to plan above	<ul style="list-style-type: none"> • Develop checklist as appropriate to each product type • Request information from OS as required • Minutes and correspondence • Template completed

Covenant Performance goals and KPIs	Actions	Responsibility	Baseline data	Target or Performance goal	Timeline Or Milestones (MMYY)	Evidence
	APC Packaging Committee review new packaging as and when needed	Packaging Review Committee	No data available	100% of all new packaging reviewed	As needed	<ul style="list-style-type: none"> Develop checklist as appropriate to each product type Request information from OS as required Minutes and correspondence Template completed
2. Recycling – the efficient collection and recycling of packaging						
KPI 3 Proportion of signatories with on-site recovery systems for recycling used packaging	Monitor, measure and evaluate in- house recycling at corporate head office	Corporate Social Responsibility and Compliance Manager	50% average diversion rate	>50% diversion from landfill	Monthly reports Annual average	<ul style="list-style-type: none"> Monthly reporting internally Annual reporting to external stakeholders – APC Used packaging only to be included and not e-waste returns
	Educate staff and improve waste management onsite by rolling out new training program		Current training is conducted during induction and through the Eco Points Program	Training revised for all sites. >90% of staff trained	March 2016	Training material and training records

Covenant Performance goals and KPIs	Actions	Responsibility	Baseline data	Target or Performance goal	Timeline Or Milestones (MMYY)	Evidence
KPI 4 Buy Recycled - Signatories with a policy to buy products made from recycled packaging.	Adopt and maintain a Buy Recycled Purchasing Policy	Corporate Social Responsibility and Compliance Manager	Policy in place	Maintain >70% recycled content in local packaging material Registers updated	Annual review	<ul style="list-style-type: none"> Signed policy Register of local packaging materials Information from supplier/s Register of other materials containing recycled content
	Identify opportunities for an increase in Buy Recycled quantities, and implement where practicable		No data available	Identify opportunities and implement as practicable	Annual	Documentation, meeting minutes
3. Product Stewardship - Demonstrated commitment product stewardship by the supply chain and other signatories						
KPI 6 Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging	Review transport packaging used by third parties at warehousing facilities and maintain a Memorandum of Understanding (MOU) in regard to transport packaging and recycling facilities	Corporate Social Responsibility and Compliance Manager	MOU renewed annually	Only reusable or recyclable packaging used, recycling facilities available	Ongoing – updated and signed as required	MOU signed with 3PL
KPI 7 Proportion of signatories demonstrating other product stewardship outcomes	Continue to be actively involved and financially support “Cartridges for Planet Ark”		Full Campaign Partner. Zero waste to landfill	Maintain partnership	Monthly reports from contractor	C4PA reporting. Certificate for zero waste to landfill.

Covenant Performance goals and KPIs	Actions	Responsibility	Baseline data	Target or Performance goal	Timeline Or Milestones (MMYY)	Evidence
	Maintain partnership with approved co-regulatory arrangement and monitor its operation and performance		Currently partnered with approved co-regulatory arrangement	Maintain partnership. Monitor compliance with targets.	Annual	Reporting to Federal govt. annually
	Maintain ISO 14001 certification & environmental management system across all sites		Certified	System and certification maintained	Annual reporting	External audit reports and certification Annual report
	Support Earthwatch		BIA is a current supporter.	Maintain support. Citizen scientist participation.	Annual reporting	Annual scientific reporting
	Support Earth Hour		BIA is a current supporter.	Maintain support	Annual reporting	Active support of initiative to all staff and community
	Eco Points Program		No data available	>90% staff participation	Annual	Annual reporting
KPI 8 Continuous reduction in the number of packaging items in litter	Continue to replace EPS with cardboard packaging which is less harmful in the marine environment where it is possible and practicable.	Corporate Social Responsibility and Compliance Manager	No data available	replace EPS with cardboard where practicable	Annual review	Documentation of review of products with EPS in packaging for protection during transport
	Inclusion of disposal instruction labelling on locally packaged products		All locally packaged product is labelled with disposal instructions	All new and existing locally packaged product to be labelled with disposal instructions	100% of locally packaged products Annual review	Documentation of review
	Litter patrol at appropriate sites		Initial patrol conducted July 2015	Patrol carried out in conjunction with EMS Checklist	Quarterly	Quarterly EMS checklist