



UTS: INSTITUTE FOR SUSTAINABLE FUTURES



# Packaging Sustainability Framework for APC Signatories

Final Report to the Australian  
Packaging Covenant Organisation

# 2017

## ABOUT THE AUTHORS

**The Institute for Sustainable Futures (ISF)** was established by the University of Technology, Sydney in 1996 to work with industry, government and the community to develop sustainable futures through research and consultancy. Our mission is to create change toward sustainable futures that protect and enhance the environment, human wellbeing and social equity. For further information visit: [www.isf.uts.edu.au](http://www.isf.uts.edu.au)

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# EXECUTIVE SUMMARY

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## Background

The purpose of this research was to develop a packaging sustainability framework and self-assessment tool to allow Australian Packaging Covenant (APC) members to report on their progress towards meeting packaging sustainability targets. The framework was developed in consultation with the APC team and APC members, taking account of:

- previous APC reporting requirements and feedback from members on the limitations of those requirements;
- relevant international reporting standards, frameworks and metrics; and
- feedback from APC members obtained via a pilot of a first draft of the framework and self-assessment tool.

## Phase 1 of the project - methodology

Following background research, a preliminary framework was developed and pilot-tested with a representative sample of APCO members. During the first phase, 37 APC members were invited to participate in the pilot study and complete the self-assessment tool and feedback survey. Of the 37 who were invited to participate, 30 members returned the completed tool and survey. Following the return of the self-assessment tool, pilot participants were invited to attend a facilitated workshop and provide further feedback. In total, 18 participants attended the workshop representing 15 organisations. Based on this feedback a number of recommendations were adopted and the APCO packaging sustainability framework was updated to reflect these suggestions.

The overwhelming response from a second round of feedback provided by 6 companies, was that the framework is a comprehensive and fair mechanism to assess an organisation's progress towards packaging sustainability and that the framework and online self-assessment tool would be beneficial for helping companies improve their packaging sustainability. Some additional changes were made to the framework in response to suggestions from these companies on specific criteria.

## Packaging sustainability framework

The Australian Packaging Covenant Organisation (APCO) packaging sustainability framework is a matrix of packaging sustainability criteria, against which companies are able to measure their performance. The framework consists of thirteen independent criteria in

three categories: (1) Leadership; (2) Packaging Processes and Outcomes; and, (3) Operations. Each criterion has five levels of performance ranging from ‘Getting started’ to ‘Beyond best practice.’ Companies are able to progress to higher performance levels when they can demonstrate that they have met the requirements for those levels.

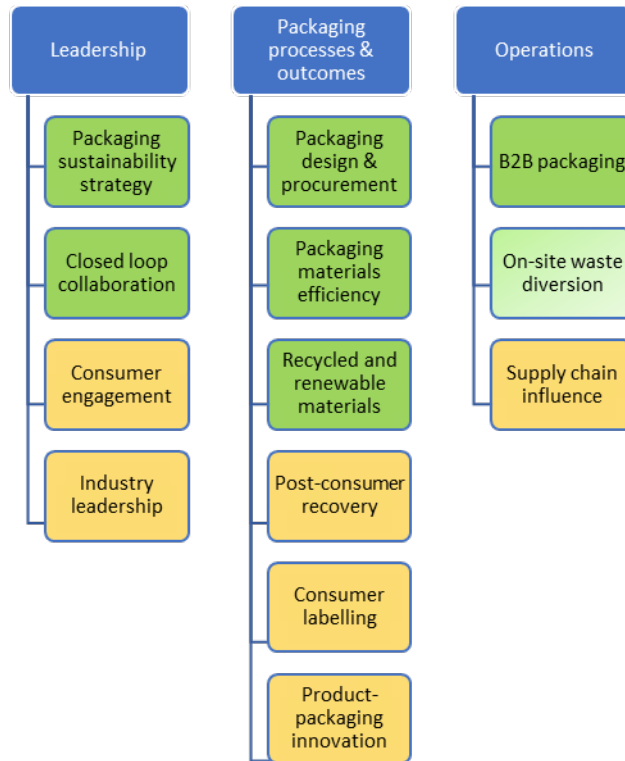


Figure 1 Summary of the criteria

### Self-assessment tool

The self-assessment tool is a database and self-assessment questionnaire that asks organisations specific questions relating to the packaging sustainability criteria. The tool uses responses to these questions to automatically calculate the packaging sustainability performance of the company within the framework. The final online self-assessment tool (yet to be developed) will be a secure, central repository for companies to enter and monitor performance against packaging sustainability. The self-assessment tool collects information about the quantity of packaging produced and how packaging sustainability will be addressed in the future. It will also allow the submission and creation of company Action Plans. The self-assessment tool will therefore incorporate the packaging sustainability framework and allow for the storage of data, monitoring of performance, benchmarking analysis and the creation of custom reports.

## Key considerations

The APCO packaging sustainability framework aims to capture the major elements that are required for improving packaging sustainability. The final versions of the framework and self-assessment tool incorporate the following key considerations:

- Developing a framework that can be used by a diverse number of organisations irrespective of the products they sell, relative position in the supply chain, company size or sector they belong to;
- Providing modularity and flexibility by providing sector specific descriptions on how to answer each criteria and the ability to skip criteria that are not relevant to the organisation.
- Rewarding organisations for setting specific targets, monitoring those targets and then publicly reporting against those targets;
- Providing recognition for organisations who are improving overall product-packaging sustainability outcomes but that may conflict with some specific packaging outcomes (e.g. increase in packaging volume owing to more recycled content being used etc.)
- Recognising organisations who are going beyond incremental improvements in packaging efficiency by implementing innovative whole life product-packaging solutions and trialing new business models that disrupt existing practice;
- Rewarding companies who are providing industry leadership and working closely with suppliers and customers both up and down their supply chain to improve packaging sustainability;
- Encouraging companies to review and improve **all** packaging under their control or that they have influence over (e.g. both existing and new packaging) rather than only considering the design of new packaging that is being put onto the market;
- Providing key recommendations against each criterion for progress to the next level in the framework.

## Benefits for member organisations

We envisage the online assessment tool will primarily be used by organisations to assist them in identifying opportunities to improve their packaging sustainability performance. The scoring system will provide a robust assessment of a company's strengths and weaknesses in relation to the framework. The recommendations provided by the self-assessment tool will be immediate and provide advice on how the organisation can progress to the next level within each criterion in the framework. The self-assessment tool (to be developed in the second phase of this research) will provide the opportunity for organisations to benchmark

themselves against similar or best performing organisations belonging to the same industry sector, company size or another relevant grouping. The tool will allow organisations to monitor their performance over time and download individual company reports that can be used for internal or external reporting purposes. The online tool will assist companies to prepare their annual 5 year Action Plans for submission to APCO, based on the criteria in the framework as well as any ongoing strategies from previous plans that they wish to include.

## Benefits for APCO

The online tool will become a central repository of company packaging data for Australia. It will therefore allow each organisation to update, edit and take responsibility for their packaging sustainability data. APCO will be able to monitor organisational progress over time, conduct ex-ante assessments and directly assist companies to reach packaging sustainability targets. APCO will have access to all company reports and data and will be able to download the data in Excel format for deeper analysis and post-processing. The tool will enable the collection of empirical data on the weight and type of packaging that is being produced. This will also allow APCO to collect and aggregate packaging information for their own external reporting purposes.

## Phase II and next steps

Phase I of this research produced the packaging sustainability framework and an Excel-based draft of the self-assessment tool to provide a score and a set of recommendations. This research also provided a description of how the self-assessment tool and database will work in practice. The next phase of this research will construct the online database and implement the questionnaire for assessing company performance. It will also design the final company reports that will be downloadable as PDF documents. In total three reports are envisaged,

- (1) Individual company assessment against framework and recommendations
- (2) Benchmarking report that shows performance of company with respect to similar companies
- (3) Final Action Plan that that can be submitted directly to APCO



# DEFINITIONS AND ABBREVIATIONS

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APCO	Australian Packaging Covenant Organisation
APC	Australian Packaging Covenant (document)
KPI	Key Performance Indicator
SPG	Sustainable Packaging Guidelines
UTS	University of Technology Sydney
ISF	Institute for Sustainable Futures
PACNZ	Packaging Council of New Zealand

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# 1 INTRODUCTION

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The Institute for Sustainable Futures (ISF) and Helen Lewis Research were commissioned by the Australian Packaging Covenant Organisation (APCO) to develop a packaging sustainability framework for members. This would primarily be used as the basis for annual reports and future action plans.

## BACKGROUND

The key performance indicators (KPIs) in the previous Covenant (2010 – 2016) were very broad, and at least one of them (KPI 3, 'product stewardship') was ambiguous. This meant that members did not always focus their action plans appropriately or plan for continuous improvement. It also made it difficult for the APC and its stakeholders to monitor performance over time. The scoring system used for the annual evaluation of reports was not always consistently applied.

KPIs in the earlier Covenant (2005-2010) included quantitative measures (e.g. product-packaging ratio) that were more challenging for members to collect, and could not be aggregated to measure overall performance.

As a result, APCO was interested in developing a new packaging sustainability framework that will achieve a number of primary objectives:

- provide a more consistent and transparent way for APCO to evaluate and report on member performance
- add value to individual members by providing feedback on their performance and suggested opportunities for further improvement
- reduce the administrative burden of reporting for both members and APCO
- generate credible data to track performance of members over time and to support better targeting of resources
- a strong platform for engagement with companies on improving packaging sustainability.

The framework may have other applications and benefits, such as helping to uncover barriers to packaging sustainability and linking packaging sustainability to business value.

The framework will support implementation of the updated Covenant and APCO's Strategic Plan (2017 – 2022), which has three 'pillars': resource efficiency, less waste to landfill, and leadership.

The framework also needs to be consistent with relevant international frameworks (including language and metrics) to avoid 'reinventing the wheel'. It will have to evolve over time to reflect changing industry practices, environmental issues, technologies, infrastructures etc.

## Benefits for members

The new framework has a number of benefits for members, including:

- the ability to benchmark their performance against peers using a transparent and consistent framework
- a more tailored approach to packaging sustainability, responding to criticism that the previous KPIs were too generic
- a more rigorous and structured process for action planning and a clear pathway to improved performance
- more support for companies starting their sustainability journey
- more guidance for companies that believe they have 'done everything' through a focus on continuous improvement
- assistance to meet the expectations of their stakeholders for more sustainable packaging
- closer alignment with global standards/metrics and industry best practice.

## 2 METHODOLOGY

The development of the packaging sustainability framework was evidence-based, drawing on previous evaluations of the Covenant as well as international standards and best practices in packaging sustainability. It was developed in close collaboration with APCO to build on existing knowledge and ensure alignment with other APCO initiatives, and taking account of feedback from APC signatories.

### PROJECT PHASES

The project was undertaken in five stages, as shown below.

Stage 1: Background research	<ul style="list-style-type: none"> <li>• Understanding of previous APC work</li> <li>• Identification of international benchmarks</li> </ul>
Stage 2: Draft framework	<ul style="list-style-type: none"> <li>• Internal workshop with ISF/APCO</li> <li>• Draft #1 developed</li> </ul>
Stage 3: Pilot testing #1	<ul style="list-style-type: none"> <li>• Cross-section of APC signatories recruited</li> <li>• Tool developed and sent to participants</li> </ul>
Stage 4: Workshop	<ul style="list-style-type: none"> <li>• One day workshop held at UTS</li> <li>• User feedback and responses recorded</li> </ul>
Stage 5: Pilot testing #2	<ul style="list-style-type: none"> <li>• Outcomes of pilot reviewed by ISF/APCO</li> <li>• Draft #2 developed</li> <li>• Further feedback from APC signatories</li> </ul>
Stage 6: Reporting	<ul style="list-style-type: none"> <li>• Draft report submitted for review</li> <li>• Final report</li> </ul>

#### Stage 1: Background research and literature review

At the outset of the project, we undertook background research to address the following three research questions:

- (1) What is the capacity of APC signatories to measure and report against packaging sustainability indicators?
- (2) How can existing standards and guidelines inform the selection of performance indicators for the framework?
- (3) What principles and practical considerations should guide the structure and content of the framework and its use by signatories?

We reviewed existing Covenant documents, including:

- Evaluations of the previous National Packaging Covenant (2005-2010) and Australian Packaging Covenant (2010 – 2016) to understand strengths and weaknesses of previous KPIs and reporting
- More recent APC member surveys and evaluations
- A sample of member action plans and reports
- The new Covenant agreement and strategic plan (2016).

We also reviewed existing national and international standards, terminology and metrics to identify key performance indicators (KPIs) and targets that relate to APCO's goals, including:

- The Packaging Council of New Zealand (PACNZ) draft reporting framework.
- ISO standard *Sustainable procurement – guidance*
- Other relevant ISO standards for environmental management, quality systems, labelling, packaging sustainability and design for environment
- Consumer Goods Forum *Global packaging protocol*
- EUROPEN *Packaging in the sustainability agenda*
- Sustainable Packaging Coalition *Design guidelines for sustainable packaging*
- Global Reporting Initiative *Sustainability reporting standards*
- UN Sustainable Development goals.

See Section 3 of this report for a summary of the outcomes of the Background Research and Literature Review.

## Stage 2: Draft framework and self-assessment tool

The framework was developed through a collaborative process with APCO team members. We developed a first draft of the framework, drawing on a similar framework developed for a previous project and incorporating the key findings from the background research. We then held a workshop with APCO team members to present and get feedback on the draft framework, rationale and recommendations for pilot testing.

Following the workshop, the draft framework was refined and we developed the self-assessment tool in excel based on the framework.



### Stage 3: Pilot testing of self-assessment and survey

In consultation with ISF, APCO recruited 37 companies to take part in the pilot of the self-assessment tool, ensuring that they represented a spread of industry sectors. ISF provided the pilot participants with the self-assessment tool and instructions and asked them to complete it without assistance. In addition, a brief feedback survey was included in the tool, and within each criterion participants had the option to provide comments on the criteria and questions. A total of 30 from the 37 companies who were asked to participate returned sufficiently completed self-assessment tools and survey within the timeframe of the pilot.

### Stage 4: Workshop

All pilot participants were invited to take part in a feedback workshop in Sydney on Wednesday 5 April to share their experiences of completing the tool, and to discuss potential improvements. The workshop was attended by a total of 18 participants representing 15 organisations, 5 members from the APCO team and 4 research staff from ISF, plus an independent facilitator (please see Appendix C for list of participants).

At the workshop, participants had the opportunity to ask questions of clarification and raise concerns with both the ISF and APCO teams. Feedback was provided at four separately themed tables covering:

**Table 1:** Framework Criteria and Structure

**Table 2:** Tool Modularisation

**Table 3:** Scoring and Recommendations

**Table 4:** Evidence and Quantitative Data

One of the organisations that was unable to participate in the workshop was instead interviewed. A summary of the feedback obtained through these processes and the response to the feedback in the final version of the framework is provided in Appendix D.

### Stage 5: Refining the framework

The framework and the questions in the self-assessment tool were refined based on feedback from the trial and a detailed discussion of the key learnings from the trial between APCO and the research team. We obtained feedback on the refined framework from 5 organisations representing a cross section of sectors, via surveys and interviews. The feedback from this process was incorporated into the final version of the framework and

self-assessment tool questions which are provided in this report. Feedback to the second round and our response to this feedback can be found in Appendix E.

## Stage 6: Report

Final design of the framework as an on-line self-assessment tool was outside the scope of this project, but this report provides recommendations on usability and implementation, including design of the self-assessment (on-line) tool, capacity building activities for members (using the framework for action plans, reporting and continuous improvement), aggregated reporting by APCO, and future evaluation and updating of the framework. See Section 7.

## 3 BACKGROUND RESEARCH

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The Background research addressed the following three research questions:

1. What is the capacity of APC members to measure and report against packaging sustainability indicators?
2. How can existing standards and guidelines inform the selection of performance indicators for the framework?
3. What principles and practical considerations should guide the structure and content of the framework and its use by members?

### CONSTRAINTS ON MEMBER PERFORMANCE

A number of research reports for the APC have identified barriers, constraints and opportunities that should inform the development of the new packaging framework. The findings of two of the most recent reports—analysis of annual reports submitted by members in 2016<sup>1</sup> and a subsequent member survey<sup>2</sup>—are summarised in Table 1.

The previous annual reporting template asked members to report any areas of difficulty in making progress against the action plan, Covenant goals or KPIs. Responses included sustainability not integrated in their business, limited influence over packaging design, or lack of time and financial resources to commit to improving packaging sustainability. Member annual reports were analysed by an independent consulting group, who found that smaller companies consistently achieve lower scores on average than larger companies. This feedback is supported by a survey of small to medium sized businesses for Australia Post, which found that 35% of small businesses in Australia do not have a formalized approach to sustainability and do not include any sustainability considerations in their work<sup>3</sup>.

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<sup>1</sup> ARTD Consultants (2016). Analysis of the Australian Packaging Covenant signatory reports 2016. Sydney, Report to Australian Packaging Covenant.

<sup>2</sup> Parker, G. and P. Souvlis (2016). Project star 2: Australian Packaging Covenant, Report by Pollinate for Australian Packaging Covenant Organisation (APCO). There were 149 survey respondents from over 900 members.

<sup>3</sup> Banksia Foundation (2016). Small business making sustainability part of every day. Melbourne, Australia Post.

This information has a number of implications for the proposed APCO framework. It suggests that the framework should:

- be as simple as possible for members to use
- align, wherever possible, with existing standards and accreditation schemes
- be supported by simple tools, guidelines and/or training from APCO
- recognise that different groups of members have different levels of capacity and influence.

**Table 1: Feedback from APC members (summarised findings of two recent APC research reports)**

<b>Understanding of sustainability</b>	Only 41% of survey respondents believe that sustainability is integrated in their organisation
<b>Ability to influence packaging design</b>	<p>61% of survey respondents say they design packaging in Australia but only 38% believe can influence their packaging design in Australia.</p> <p>In their 2016 annual reports 13% of members<sup>4</sup> stated that they had limited ability to influence packaging decisions made by overseas parent organisations and partners. Others mentioned regulatory constraints, e.g. preventing recycled materials for food, pharmaceuticals or Dangerous Goods.</p>
<b>Ability to influence suppliers</b>	<p>In their 2016 annual reports 6% of members stated that limited supply or cost of recycled/recyclable materials was a constraint.</p> <p>This was reinforced by the member survey, with 30% saying the cost of recyclable material is higher than virgin materials<sup>5</sup>. 40% of survey respondents nominated ‘no viable sustainable alternative materials/products’ as one of their top 3 barriers</p>
<b>Ability to influence</b>	38% of survey respondents said that retailer demand is one of their top 3

<sup>4</sup> In 2016, 512 members of the 682 who provided an on-line annual report (75%) provided comments on difficulties, with several reporting multiple difficulties.

<sup>5</sup> The language here is ambiguous – it presumably compares ‘recycled’ rather than ‘recyclable’ material with virgin material

<b>customers</b>	barriers to packaging sustainability.
<b>Capacity to measure and report waste &amp; packaging data</b>	<p>In their 2016 annual reports 5% of members mentioned that their capacity to measure and report waste and packaging was a constraint.</p> <p>Only 14% of survey respondents said they could not easily measure their own impact on the environment. More than half of all members said that they currently measure, or could measure, a wide range of indicators (see <b>Table 2</b>).</p>
<b>Capacity to prepare, implement and report on action plans</b>	<p>Larger companies perform better on APC KPIs than smaller ones. Average scores increased progressively from 3 out of a total score of 5 for very small companies (&lt;\$5m) through to 3.9 for very large companies (&gt;\$1b)</p> <p>Members with more experience of the APC (i.e. have been a member for longer) perform better than recent members. Average scores increased progressively from 2.9 out of a total of 5 for those who have only reported twice since 2012, to 3.4 for those who have reported five times.</p> <p>In their annual reports members mentioned a number of constraints. The most frequent was financial costs and limited staff time (20%), particularly for small firms, followed by restructuring or staff changes (14%). Some (2.5%) felt they had reached the limits of what could be achieved without compromising their products.</p>
<b>Implementation of KPI 1 (design)</b>	<p>Based on members' 2016 annual reports:</p> <ul style="list-style-type: none"> <li>• 81% of members reported they had a documented policy or procedure for evaluating and procuring packaging using the Sustainable Packaging Guidelines (SPGs) or similar</li> <li>• 71% had reviewed half of their packaging material against the SPG</li> <li>• 75% had reviewed all new packaging during the previous year against the SPG</li> </ul>
<b>Implementation of KPI 2 (recycling)</b>	<p>Based on members' 2016 annual reports:</p> <ul style="list-style-type: none"> <li>• 84% had on-site recycling systems for used packaging at all facilities/sites managed by the company.</li> </ul>

- 99% had recycling systems at all or some facilities/sites
- 74% had a policy of buying products made from recycled packaging and in most cases the policy had been implemented

In the 2016 member survey, 30% nominated the lack of recycling infrastructure, as one of their top 3 barriers to packaging sustainability.

**Implementation of KPI 3 (product stewardship)**

Based on members' 2016 annual reports:

- 68% had formal processes for working with others to improve design or recycling
- 74% showed product stewardship outcomes through a range of different approaches

*Source: Information is taken from analysis of 682 member 2016 reports<sup>6</sup> and a survey of 149 members in 2016<sup>7</sup>*

## PERFORMANCE INDICATORS

### Evolution of Covenant KPIs

The latest Covenant (2017) is the fourth iteration of the voluntary agreement between the packaging supply chain and the Federal/state and territory governments. KPIs have changed significantly since the first Covenant was introduced in 1999, in response to feedback from members and changing industry/stakeholder priorities.

One of the most significant changes over time is the level of quantitative data that members were required to collect and report annually. The second Covenant (2005-2010), for example, required brand owners to report the quantity of packaging used and products sold (tonnes) and the product-packaging ratio. Research undertaken as part of the Covenant evaluation in 2008 found that only 67% of annual reports provided a packaging-product ratio, and of this group only 61% reported the ratio in the correct units<sup>8</sup>.

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<sup>7</sup> Parker, G. and P. Souvlis (2016). Project star 2: Australian Packaging Covenant, Report by Pollinate for Australian Packaging Covenant Organisation (APCO).

<sup>8</sup> RMIT (2008). Review of signatory action plans and annual reports - supplementary work. Melbourne, Centre for Design at RMIT University for the National Packaging Covenant Council.

A survey of members for the evaluation<sup>9</sup> revealed that collecting data for KPI's was 'onerous' (67% of members), but almost half of those surveyed (45%) agreed that collecting KPI data had benefited their company. Members provided a number of suggestions for improvement, for example KPIs tailored to different member groups and a broader suite of KPIs addressing sustainability and environmental harm<sup>10</sup>.

In response to the results of the 2008 evaluation, the third Covenant (2010-2016) simplified KPIs and removed the requirement for most quantitative data, e.g. weights of packaging used and product sales, recycled content and the amount of 'non-recyclable' packaging used.

More recent feedback from members in 2016<sup>11</sup> was that:

- the majority of members currently measure, or could measure, a number of relevant KPIs (Table 2)
- the majority of members would like APCO to provide benchmark targets specific to each sector
- reporting would be easier for members if it incorporated GRI, ISO 14001, ISO 9000 and FSC standards (e.g. tick box options).

**Table 2: APC members' ability to measure packaging KPIs<sup>12</sup>**

KPI	Currently measure	Could measure	Could not measure or don't know
Waste to landfill (operations)	53%	18%	28%
Recycling rates (operations)	48%	21%	31%
Packaging material	50%	32%	18%

<sup>9</sup> Hyder Consulting (2008). National Packaging Covenant mid term review: stakeholder views evaluation. Melbourne, Report to the National Packaging Covenant Council.

<sup>10</sup> Ibid.

<sup>11</sup> Parker, G. and P. Souvlis (2016). Project star 2: Australian Packaging Covenant, Report by Pollinate for Australian Packaging Covenant Organisation (APCO).

<sup>12</sup> Ibid.

KPI	Currently measure	Could measure	Could not measure or don't know
types			
Recyclability of materials	44%	36%	19%
Material waste	38%	30%	32%
Recycled content	38%	32%	30%
Reduction in materials	31%	39%	30%
Product defect rates due to failed packaging	25%	31%	44%
Transport impacts	22%	28%	50%
Quantity virgin materials	21%	30%	51%
Packaging-product ratio	19%	44%	63%
Renewable materials	19%	37%	44%
Relevant takeback schemes	14%	20%	66%
Life cycle analysis	9%	30%	61%

### International standards

A range of international standards were reviewed to identify key performance indicators (KPIs) and targets that relate to APCO’s goals.

The key findings from this review include:



- Many of the standards, including the Global Protocol on Packaging Sustainability ('Global Protocol')<sup>13</sup> and the Corporate Responsibility Index<sup>14</sup> differentiate between corporate level KPIs that integrate sustainability within business processes, and more specific environmental or sustainability indicators. These standards and protocols therefore provide a useful structure for the APCO framework.
- There are two international sustainability frameworks include criteria and metrics for public reporting that should be adopted where relevant: the global Reporting Initiative (GRI)<sup>15</sup> and the Global Packaging Protocol. GRI, for example, provides guidelines on:
  - total weight or volume of materials that are used to produce *and package* the organisation's primary products and services, by non-renewable and renewable materials
  - percentage of recycled input materials used to manufacture the organisation's primary products and services (based on total weight or volume reported at 301-1) (*301-2 Recycled input materials used*)
  - percentage of reclaimed products and their packaging materials for each product category (*301-3 Reclaimed products and their packaging materials*)
  - total weight of non-hazardous waste, with a breakdown by disposal methods where applicable (*306-2 Waste by type and disposal method*).
- Several key documents on packaging sustainability, including the Global Protocol and EUROPEAN's *Packaging in the sustainability agenda*<sup>16</sup>, stress the need for packaging to be integrated within broader sustainability programs and metrics, e.g. impact on product protection and waste

<sup>13</sup> The Consumer Goods Forum (2011), Global protocol on packaging sustainability 2.0, [http://www.theconsumergoodsforum.com/files/Publications/GPPS\\_2.pdf](http://www.theconsumergoodsforum.com/files/Publications/GPPS_2.pdf)

<sup>14</sup> Business in the Community (2016), 'About the CR Index, <http://www.bitc.org.uk/services/benchmarking/cr-index/about-cr-index>

<sup>15</sup> GRI, GRI standards (undated), <https://www.globalreporting.org/standards>

<sup>16</sup> ECR Europe and EUROPEAN (2009), Packaging in the sustainability agenda: a guide for decision makers, EUROPEAN, Brussels, <http://www.packagingfedn.co.uk/images/reports/Packaging%20in%20the%20Sustainability%20Agenda-A%20Guide%20for%20Corporate%20Decision%20Makers.pdf>

- The ISO 9000<sup>17</sup> and 14000<sup>18</sup> series provide systematic approaches to the effective management of organisations, products and processes based on the Deming cycle (Plan-Do-Check-Act). A focus on quality management and continuous improvement could be integrated in action plans and reporting.

## RATING SYSTEMS

The proposed APC framework includes a rating system to measure performance against a numerical scale. Rating scales to evaluate corporate performance are used for other sustainability initiatives, e.g.:

- The Corporate Responsibility Index gives companies a score for each area of action (company strategy, integration, management, performance & impact, assurance & disclosure). These scores are then converted into a star rating between half a star and 5 stars, and illustrated using a spider diagram. Companies complete an on-line questionnaire and receive an immediate report. The aim is to challenge companies to reach higher levels of performance, and there is expectation that progressing up the ranging will take 3-5 years.
- The Dow Jones Sustainability Index<sup>19</sup> provides companies with a score for each criterion and a weighted total score out of 100. This includes scores for disclosure (transparency) as well as performance. Companies receive a 'benchmarking scorecard' that compares their performance to industry peers.

The proposed New Zealand packaging stewardship scheme<sup>20</sup> contains five levels of performance, but these represent different KPIs rather than different levels of performance for each KPI (Table 3).

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<sup>17</sup> International Standards Organization (Undated), ISO 9000 – quality management, <https://www.iso.org/iso-9001-quality-management.html>

<sup>18</sup> International Standards Organization (Undated), ISO 14000 family – environmental management, <https://www.iso.org/iso-14001-environmental-management.html>

<sup>19</sup> RobecoSAM (undated), Dow Jones Sustainability Diversified Indices, <http://www.sustainability-indices.com/index-family-overview/djsi-diversified-family-overview/index.jsp>

<sup>20</sup> Packaging Council New Zealand, New Scheme 2014, unpublished

Table 3: Proposed New Zealand stewardship scheme

	Performance level	Reporting requirement	Applies to
Mandatory for Packaging Council members	Level 1	Total weight of waste and recycling generated	All Packaging Council members
	Level 2	Recycling systems in place	All Packaging Council members
	Level 3	Formal waste reduction policy and programme in place	All Packaging Council members
	Level 4	Adopt and implement relevant industry Code of Conduct	Packaging Manufacturers
		Packaging Design Compliance System based on Packaging Council’s Code of Practice	Brand owners
		Adopt and implement relevant Industry Code of Practice	Retailers, waste service providers
Optional	Level 5	Report production tonnage	Packaging manufacturers
		Contribute to community education on packaging	Brand owners
		Report on tertiary packaging tonnage to recycling	Retailers
		Report on post-consumer waste to MRF and landfill	Waste service providers

The ratings system used for the previous Covenant had a different purpose, i.e. to evaluate each signatory’s progress in achieving their own milestones and targets, but are included here as a reference. An evaluation of signatory performance in 2016 by ARTD Consultants

concluded that average scores had generally improved. Seventy-four percent of members received a rating of 3 or more in 2016 compared to only 57% in 2015<sup>21</sup>.

In their evaluation of performance in the previous year, ARTD Consultants provided several recommendations to 'fine-tune the rating system, including<sup>22</sup>:

- excluding certain KPIs for some members where they are not applicable to that type of organisation
- effort towards meeting KPIs must be shown by all companies but the impact of their effort varies (e.g. a food company's packaging has more impact on litter than a non-food company, and large companies account for more packaging). This must therefore be accounted for during aggregation and analysis
- results should be weighted according to company size.

## MODULARISING THE FRAMEWORK

Feedback from members suggests that the 'one size fits all' approach to Covenant KPIs is causing frustration. Two-thirds of members believe that APC benchmark targets would be more useful to their organisation if they were designed to be specifically relevant for the sector they belong to<sup>23</sup>. Problems identified with the previous reporting and performance rating system include<sup>24</sup>:

- some KPIs are less relevant to some sectors than others, and some members have simply responded to particular KPIs with 'NA'.
- action by larger companies will have a far greater impact on Covenant KPIs than small companies that use a lot less packaging.

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<sup>21</sup> ARTD Consultants (2016). Analysis of the Australian Packaging Covenant signatory reports 2016. Sydney, Report to Australian Packaging Covenant.

<sup>22</sup> ARTD Consultants (2015). Analysis of Australian Packaging Covenant signatory reports, 2015. Sydney, Report to Australian Packaging Covenant.

<sup>23</sup> Parker, G. and P. Souvlis (2016). Project star 2: Australian Packaging Covenant, Report by Pollinate for Australian Packaging Covenant Organisation (APCO).

<sup>24</sup> ARTD Consultants (2015). Analysis of Australian Packaging Covenant signatory reports, 2015. Sydney, Report to Australian Packaging Covenant.

Analysis of APC member constraints in 2016 recommended that:

*Reporting and assessment criteria should be different for big corporations and small businesses to acknowledge the grassroots conditions and experiences of vastly different business models<sup>25</sup>.*

## INTEGRATION IN BUSINESS PROCESSES

One of the KPIs in APCO's Strategic Plan is the percentage of members with a long-term sustainability strategy in place that incorporates the Sustainable Packaging Guidelines (SPG), is integrated into business processes and has clear and measurable targets.

A number of relevant ISO standards were reviewed to identify any strategies for integrating sustainability strategies into business processes. These included:

- referencing design for sustainability objectives, targets and procedures in a company's Environmental Management System (ISO 14001)
- integrating the SPG in product-packaging development policies and processes (ISO/TC 14062)<sup>26</sup>
- integrating the SPG in procurement policies and processes, supported by active engagement with suppliers (ISO 20400)<sup>27</sup>.

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<sup>25</sup> Atkins, K. (2016). Analysis of the Australian Packaging Covenant signatory constraints. Sydney, Australian Packaging Covenant.

<sup>26</sup> International Standards Organization, ISO/TC 14062: 2002, Environmental management – integrating environmental aspects into product design, <https://www.iso.org/standard/33020.html>

<sup>27</sup> <sup>27</sup> International Standards Organization, ISO 20400: 2017, Sustainable procurement - guidance, <https://www.iso.org/standard/63026.html>

# 4 FEEDBACK AND SURVEY RESULTS

## SUMMARY

The following section outlines the feedback that was received from APCO members during the pilot testing phase of the APCO packaging framework and self-assessment tool. Feedback was obtained via multiple modes including: written qualitative feedback; structured survey; one-to-one interviews and a facilitated workshop. The different feedback mechanisms enabled a rich and inclusive process, maximising the opportunity for improvement recommendations to be considered and incorporated as appropriate.

Following the pilot and signatory workshop, the framework and tool were updated and modified in consultation with APCO staff. The second version of the framework was then reviewed by a smaller group of representative companies from different sectors. Further amendments were then incorporated into the final version of the framework.

## RESULTS FROM SURVEY

From the 37 organisations who were asked to participate in the pilot study, 33 organisations completed the self-assessment tool and 29 provided feedback to the survey questions. A copy of the full survey can be found in Appendix F. The following section presents the key results from the feedback survey on the self-assessment tool.

### Ease of completing the online tool

**Question:** Overall, how easy or difficult was it to complete the self-assessment questions?

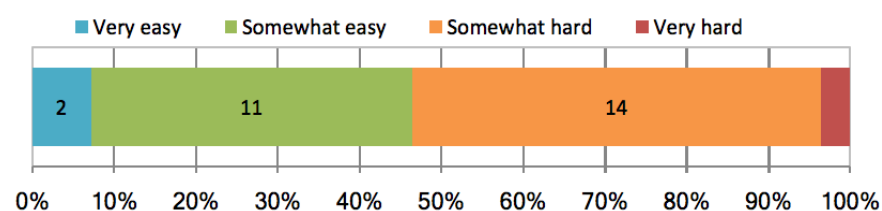


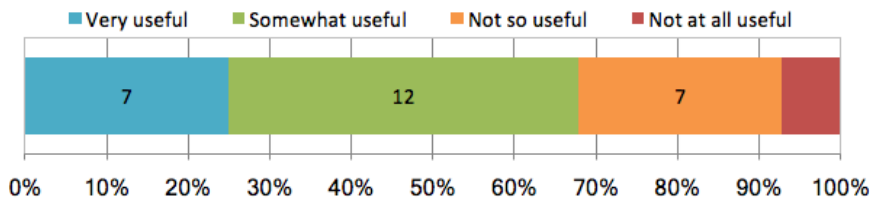
Figure 2: Difficulty of completing the online tool

Figure 2 shows that 48% of respondents found the completion of the self-assessment tool either “Very Easy” or “Somewhat Easy” and only one respondent found the self-assessment “Very Hard”. The questions that organisations had the most difficulty responding to were questions relating to criteria that were not directly relevant to the sector being studied (e.g.

packaging manufacturers being asked questions about product design). Questions relating to supply chain and operations were also reported as difficult owing to the fact that data was not readily available.

**Usefulness of the framework and online tool**

**Question:** How useful did you find the score information?



**Figure 3: Usefulness of the framework and online tool**

The scoring information and feedback provided by the self-assessment tool was found to provide very useful information to respondents. Over two-thirds or 68% of the respondents found the scoring information either “very useful” or “somewhat useful” only 10 organisations found the score information “not so useful” or “not at all useful”.

Organisations found the tool was most useful for providing goals and objectives to aim for and identifying opportunities for improvement. Other feedback on the usefulness of the tool included:

*“It confirms many of the concepts and recommendations we have posited and thereby help us confirm our vision and strengthen our internal case”*

*“[helps us to understand the] perception of what others see as important”*

*The visualization of results was also seen as being important.*

*“The online tool shows how we answered questions graphically which we can see straight away”*

**Usefulness of recommendations**

**Question:** How useful did you find the recommendations?

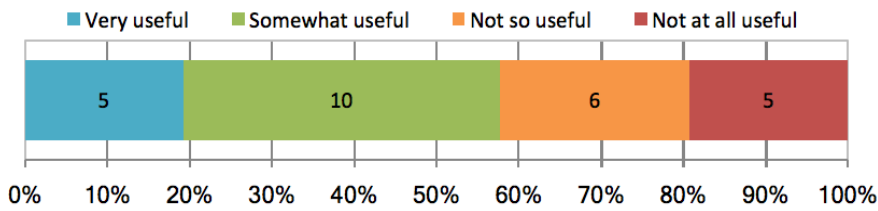


Figure 4: Usefulness of recommendations

Over 58% of respondents to this question found the recommendations either “Very useful” or “Somewhat Useful” suggesting that providing recommendations to organisations are an important feature of the self-assessment tool. Some respondents found the recommendations too generic and not directly aligned to the goals of the organisation.

### Accuracy of scores

**Question:** Do the scores accurately represent where your company is presently at in the process of improving packaging sustainability?

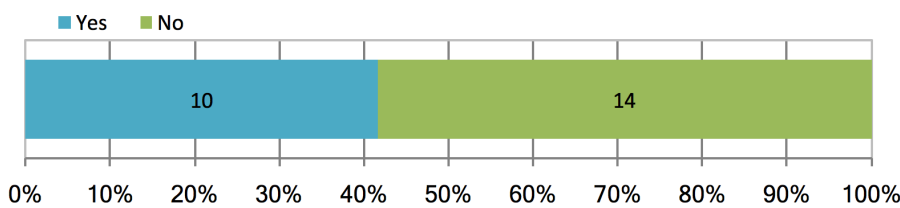


Figure 5: Perceived accuracy of scores

Over 40% of respondents thought the scores accurately represented where their organisation was at in the process of improving packaging sustainability. The remaining companies had a range of reasons why the scores didn’t accurately reflect their progress. In light of this feedback the packaging tool underwent some fairly significant changes to allow for the diversity of companies that will be analysed and to prevent companies being unfairly penalised in areas where they have little control. Many of these concerns will be alleviated once the tool has been adequately modularised.

*“Yes [it does reflect where we are] but does not reflect future work, since we are not able to share our plans externally”*

*“Due to the large and complex nature of our business we are penalized for not providing information”*

*“We have restrictions on what can be done practicably to ensure we have sufficient*

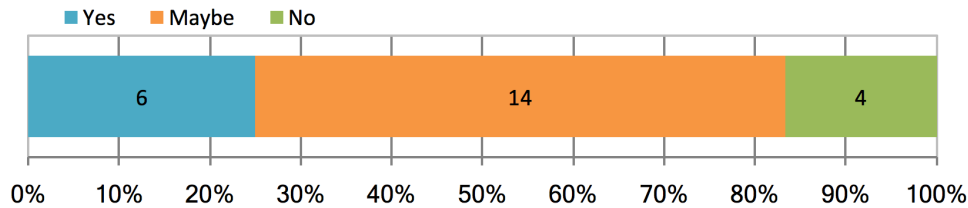


*protection for our product”*

*”No the assessment framework is very rigid and needs to be more accommodating”*

### Supporting evidence

**Question:** In future reporting, do you think members should be required to upload supporting evidence with their responses?



**Figure 6: Should supporting evidence be required as part of online tool?**

There were mixed views on whether it should be mandatory for members to provide evidence as part of the online self-assessment process. There are many options available for organisations to provide evidence. These include: (1) uploading evidence directly to the online tool (e.g. sustainability strategy); (2) providing a link to supporting evidence; (3) describing what they have done; and (4) formal auditing processes established. Several pilot participants understood the need for higher levels of performance to require higher levels of scrutiny. A safe middle ground that would satisfy the concerns for most pilot participants would require evidence to be uploaded for some but not all questions and allow the option for an organisation to select whether that information should be made public. Some of the feedback received on the provision of evidence includes:

*“Yes, but users should select whether this is made public”*

*“I suggest that some should be mandatory and the rest should be discretionary”*

*“This is too time consuming for all questions”*

*“Yes.. I believe in adopting higher levels of ambition but also scrutiny go hand in hand”*

*“We have evidence and would prefer to share during the audit process”*

*“No. I think it’s satisfactory that members are trusted to answer truthfully but [evidence] should be available when requested.”*

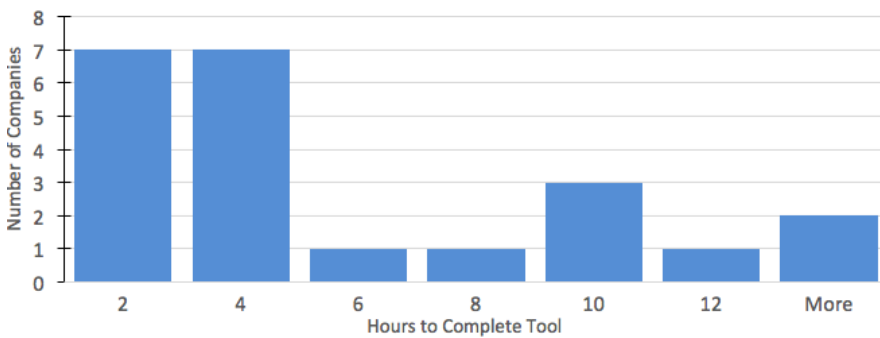
*“We would be comfortable describing the evidence, but not uploading due to privacy*

concerns.”

**Length of time to complete the survey**

**Question:** Approximately how long did it take you to complete the self-assessment questions (including time spent collecting answers, data and evidence?)

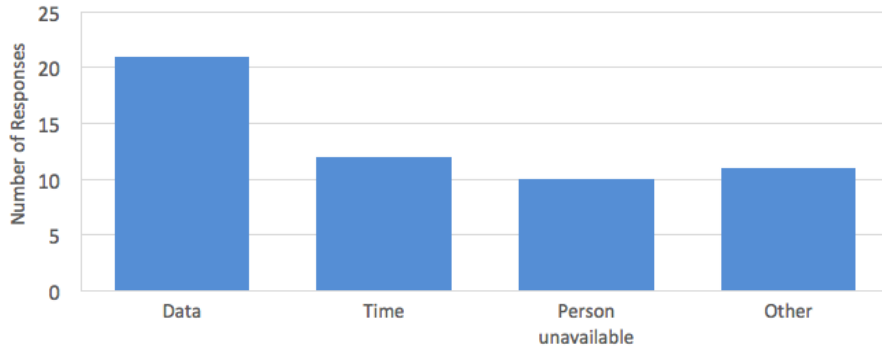
Over half of respondents took six hours or less to complete the online assessment. Given that this was the first time that companies were required to undertake this type of assessment, we expect the total time for completing self-assessments will decrease over time. Companies who did not have information readily available experienced the highest durations in completing the online tool.



**Figure 7: Hours to complete self-assessment tool**

**Reasons that made answering the questions difficult**

**Question:** What were the main impediments to answering the questions? (You may select more than one).



**Figure 8: What were main impediments to answering questions?**

Getting access to available data and the time to complete the online assessment were found to be the largest impediments to completing the online assessment. Those organisations who didn't find the tool useful gave the following reasons:

*“Questions are not relevant to our business”*

*“As a large global company, we found it difficult to get the information required”*

*“We were penalized where we were not able to provide numerical data”*

*“A key concern is confidentiality of data”*

*“There are certain aspects that would require significant changes to the current business practices”*

**Summary of total scores from pilot participants**

Figure 9 shows the distribution of weighted total scores for each company who completed the self-assessment tool. The figure below shows a satisfactory distribution of performance ranging from excellent to poor. The mean overall score from the submissions was 38% with 12 out of 27 companies scoring above the mean and two companies scoring above 75%.

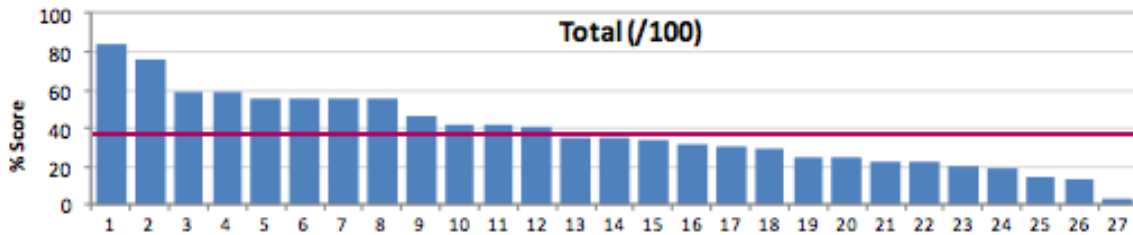


Figure 9: Normalised score from companies

## FEEDBACK FROM PILOT STUDY AND WORKSHOP

The workshop provided a structured format for ISF and APCO staff to receive direct feedback on the strengths and weaknesses of the proposed framework and online tool developed by ISF. The workshop also provided an opportunity for APCO staff to explain why APCO is updating the reporting process and the process for rolling out and updating the new packaging framework and online tool over the next 12 months.

The comments below are a combination of feedback from participants in the workshop and the reflections of the ISF team on what they heard during the workshop, and further ideas that were considered. These build on responses that were received through the written survey in the self-assessment tool. The main feedback from the workshop was grouped into five categories. For detailed feedback and how we have responded to this feedback please see Appendix D.

Feedback received during the two rounds of pilot testing led to the following modifications being made to the packaging framework and online-assessment tool:

- The original framework was simplified into thirteen criteria by combining several of the original criteria;
- Criteria representing ‘process’ rather than ‘outcomes’ were shifted under the ‘packaging sustainability’ criteria;
- Some criteria were changed to be additive rather than conditional allowing companies to select any of the clauses within a criteria;
- Companies are now given greater flexibility to not respond to ‘recommended criteria’ if that criteria is not relevant to their sector or business;
- Specific guidance will be provided for organisations within different sectors on how they should interpret and respond to different criteria.

- Quantitative data on the amount of packaging that is being produced will be collected outside of the packaging framework so companies are not penalized within the framework for achieving packaging sustainability in different ways that may not lead to a reduction in the weight of packaging. This will still allow APCO to collect the aggregate data they need for reporting purposes.
- A free form section will be included within each criterion so organizations can justify their score or add further information on how they are progressing within that criterion etc.
- A free form section will be added at the end of the framework that will allow for organisations to describe successful initiatives

# 5 PACKAGING SUSTAINABILITY FRAMEWORK

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## SUMMARY

This generic version of the framework represents the base case and is primarily targeted at product brand owners, i.e. suppliers of packaged products that sell under their own brand. This group makes up ~95% of all APC members. The other 5% of members will be able to answer a bespoke modularised version of the tool. We propose that this will be achieved first through guidance information that is provided to each sector, and secondly through self-selection (e.g. a company can choose not to respond to 'best practice' criteria because it is not relevant to them). However, when companies are benchmarked against other companies from the same sector they will be benchmarked against the criteria for that sector. For example, if a company does not answer a question they will not be assessed against that criteria for their own report, but they may be benchmarked against a particular sector or some other dimension for comparison purposes. The packaging sustainability framework is presented in Appendix A.

This chapter outlines:

- the principles that guided development of the framework
- the structure of the framework
- the framework criteria
- the performance rating system
- modularization for different sectors and groups

## PRINCIPLES OF THE FRAMEWORK

The background research was used to build an evidence base for constructing a framework that was compatible with the following principles.

The framework should:

1. Support the implementation of the Covenant by linking signatory action plans and reports to the goals and KPIs in APCO's Strategic Plan and take account of international standards and protocols.

2. Add value to members by providing them with a structured process for improving packaging sustainability.
3. Encourage members to consider packaging within a broader sustainability strategy for their organisation and its products, which is based on well recognised standards.
4. Encourage members to implement a management system for packaging sustainability based on the PDCA (plan-do-check-act) quality model.
5. Provide a structured and transparent framework for signatory reporting and evaluation.
6. Minimise the administrative load on members by ensuring that KPIs and reporting requirements are as simple as possible and linked to other business processes, standards and certifications.
7. Allow members to use existing policies/procedures/certifications etc. as evidence of performance.
8. Be as consistent as possible with the previous APC while continuing to evolve and improve, in order to minimise disruption to existing members.
9. Provide members with a pathway for continuous improvement in packaging sustainability that goes beyond a framework of minimum compliance and encourages members to aim for internationally recognised best practice
10. Include a set of minimum (compulsory) performance requirements for all members, with additional (optional) reporting options for members already at a higher level or interested in positioning themselves as a leader.
11. Be modified, where appropriate, for different sectors or groups to improve the frameworks relevance and usability

## STRUCTURE OF THE FRAMEWORK

The framework consists of three categories (blue): Leadership; packaging processes and outcomes; and operations. There are 13 criteria and each criterion belongs to a category: leadership (4); packaging processes and outcomes (6); operations (3). Across the framework there are six mandatory criteria (green) and seven recommended best practice criteria (yellow). While it is not mandatory, packaging companies are strongly encouraged to report on their on-site waste diversion (Criterion 12). Within each criterion there are 5 clauses (or levels) making up that criteria. Each criterion will either be additive or conditional. Additive criteria are criteria where a company can get a score for meeting any clause in any order within that criteria. For example, a company can meet clause 1, and 4 to get 2 out of 5 points for that criteria. A conditional criterion is one where a company can only progress to the next level once they have met the previous clause. For example, to get

3 points a company must have first met clauses 1 and 2. Figure 10 provides a summary for the proposed structure of the packaging framework against each of the three categories.

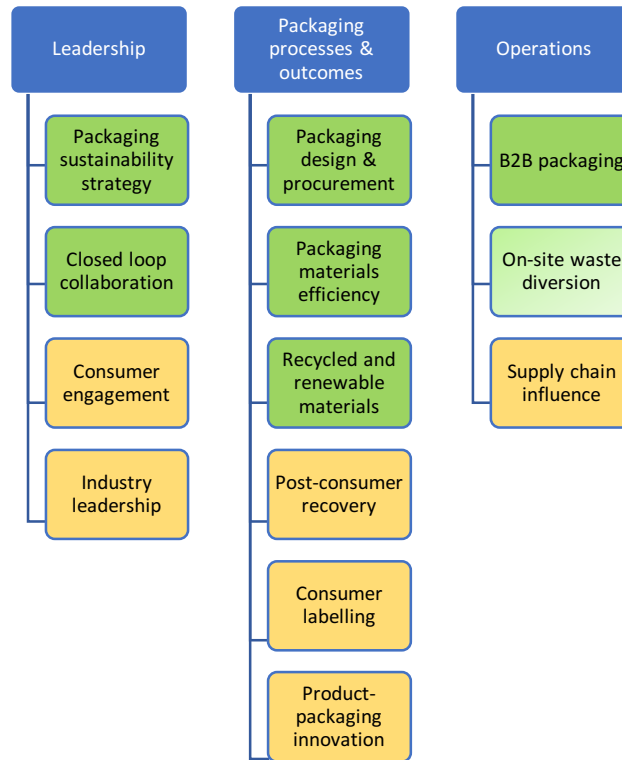


Figure 10: Summary of criteria

## PERFORMANCE CRITERIA

The performance criteria aim to achieve several objectives:

- enable APCO to measure and report on the goals and KPIs within its strategic plan;
- provide members with a structured approach to packaging sustainability that incorporates their APC obligations;
- allows members to identify areas of improvement with a list of further recommendations on how to progress under each criterion.

Table 1 below provides a summary for each criteria. The table includes a brief description of the criteria, whether the criteria is additive or conditional, the main objective of the criteria, and how the criteria will vary or be by different sectors.



Table 4 Summary of Criteria

Criteria		Description	Objective	Variations by sector
<b>Leadership</b>				
1	<b>Packaging sustainability strategy</b>	<p>Packaging sustainability plan with packaging targets, monitoring and reporting</p> <ul style="list-style-type: none"> <li>• Additive criteria</li> <li>• Core criteria</li> </ul>	<p>Integrate packaging sustainability goals and targets in corporate strategy, including use of the Sustainable Packaging Guidelines (SPG) or equivalent.</p>	<ul style="list-style-type: none"> <li>• Packaging suppliers: ‘Packaging Sustainability Strategy’ should be amended to ‘Sustainability Strategy’.</li> <li>• Retailers: Strategy should address all areas within the company’s sphere of influence.</li> <li>• Global companies: if no Australian specific strategy is available, commitment to use the SPG can be documented in another formal document adopted by management in Australia.</li> </ul>
2	<b>Closed loop collaboration</b>	<p>Company is collaborating with stakeholders to close the loop (improve recovery) for specific materials</p> <ul style="list-style-type: none"> <li>• Conditional criteria</li> <li>• Core criteria</li> </ul>	<p>Encourage supply chain solutions to recover packaging and create sustainable closed loop economies<sup>1</sup>.</p>	<ul style="list-style-type: none"> <li>• Packaging suppliers: criterion refers to initiatives to improve recoverability of their products, i.e. the packaging materials and components they supply to customers.</li> </ul>
3	<b>Consumer engagement</b>  (Additive criterion)	<p>Company is informing and educating consumers about packaging sustainability, including through on-pack labels</p> <ul style="list-style-type: none"> <li>• Additive criteria</li> </ul>	<p>To inform and educate consumers about sustainability through packaging.</p>	<ul style="list-style-type: none"> <li>• Packaging suppliers: The criterion refers to business customers rather than end consumers</li> </ul>

		<ul style="list-style-type: none"> <li>Recommended criteria</li> </ul>		
4	<b>Industry leadership</b>  (Additive criterion)	Company is involved in other packaging-related sustainability initiatives (e.g. litter reduction, marine plastics initiative, sharing knowledge with peers, education etc) <ul style="list-style-type: none"> <li>Additive criteria</li> <li>Recommended criteria</li> </ul>	To promote other initiatives within Australia that improve packaging sustainability through collaborations and industry leadership.	None
<b>Packaging processes &amp; outcomes</b>				
5	<b>Packaging design &amp; procurement</b>	Procedures that integrate the SPG or equivalent into packaging design or procurement <ul style="list-style-type: none"> <li>Conditional criteria</li> <li>Core criteria</li> </ul>	Ensure that the Sustainable Packaging Guidelines (SPG) or equivalent is being used to evaluate all packaging.	<ul style="list-style-type: none"> <li>Packaging suppliers: The criterion refers to design procedures for packaging around their products</li> <li>Retailers: The criterion applies to the design of own-brand product packaging and retail packaging only.</li> </ul>
6	<b>Packaging materials efficiency</b>	Optimising packaging material efficiency by optimising weight and volume <ul style="list-style-type: none"> <li>Conditional criteria</li> <li>Core criteria</li> </ul>	To reduce material consumption and associated environmental impacts in the packaging life cycle by optimising the volume and weight of packaging.	<ul style="list-style-type: none"> <li>Packaging suppliers: The criterion refers to efficiency of packaging around their products</li> <li>Retailers: The criterion applies to the design of own-brand product packaging and retail packaging</li> <li>Importers, distributors and brand owners that do not design their own packaging, i.e. they rely on suppliers to provide 'off the shelf' packaging</li> </ul>

				or to develop the packaging: this criterion is not applicable.
7	<b>Recycled &amp; renewable materials</b>	<p>Optimising use of recycled and renewable materials</p> <ul style="list-style-type: none"> <li>• Conditional criteria</li> <li>• Core criteria</li> </ul>	To support a circular economy for packaging by optimising the quantity of materials that are renewable and/or contain at least some recycled content.	<ul style="list-style-type: none"> <li>• Packaging suppliers: The criterion refers to materials used to make packaging for their products</li> <li>• Retailers: The criterion applies to the design of own-brand product packaging and retail packaging.</li> <li>• All non-brand owners: can estimate rather than calculate percentages.</li> <li>• Importers, distributors and brand owners that do not design their own packaging, i.e. they rely on suppliers to provide 'off the shelf' packaging or to develop the packaging: this criterion is not applicable.</li> </ul>
8	<b>Post-consumer recovery of packaging</b>	<p>Optimising the proportion of consumer packaging that can be recovered through reuse, recycling, composting or energy recovery</p> <ul style="list-style-type: none"> <li>• Conditional criteria</li> <li>• Recommended criteria</li> </ul>	To increase the proportion of packaging that can be recovered for reuse, recycling, composting or energy recovery in Australia and show that outcomes are being met.	<ul style="list-style-type: none"> <li>• Packaging suppliers: The criterion refers to recoverability of packaging around their products.</li> <li>• Retailers: The criterion applies to the design of own-brand product packaging and retail packaging.</li> <li>• All non-brand owners: can estimate rather than calculate percentages.</li> </ul>
9	<b>Consumer labelling</b>	Proportion of consumer packaging with an on-pack label for disposal or recovery	Encourage the use of on-pack labels that equip consumers to easily determine the correct disposal method for post-consumption	<ul style="list-style-type: none"> <li>• Packaging suppliers: The 'consumer' is their customer, e.g. a brand owner. Labelling only applies to B2B packaging.</li> </ul>

		<ul style="list-style-type: none"> <li>• Conditional criteria</li> <li>• Recommended criteria</li> </ul>	packaging <sup>ii</sup>	<ul style="list-style-type: none"> <li>• Retailers: The criterion applies to the design of own-brand product packaging and retail packaging.</li> <li>• All non-brand owners: can estimate rather than calculate percentages.</li> <li>• Importers, distributors: this criterion is not applicable Brand owners that do not design their own packaging, i.e. they rely on suppliers to provide 'off the shelf' packaging or to develop the packaging: this criterion is not applicable</li> </ul>
10	<b>Product-packaging innovation</b>	<p>Company is rethinking product-packaging systems (design, delivery systems, business models) to achieve sustainability outcomes</p> <ul style="list-style-type: none"> <li>• Conditional criteria</li> <li>• Recommended criteria</li> </ul>	To reduce the life cycle environmental impact of packaging through innovation in the design of the product-packaging system	<ul style="list-style-type: none"> <li>• Packaging suppliers: The criterion applies to materials used to make packaging for their products.</li> <li>• Retailers: The criterion applies to the design of own-brand product packaging and retail packaging.</li> <li>• Importers, distributors and brand owners with no control of product/package development: this criterion is not applicable.</li> </ul>
<b>Operations</b>				
11	<b>Business-to-business packaging</b>	<p>Reduction in single use B2B packaging to customers over the past 3 years</p> <ul style="list-style-type: none"> <li>• Conditional criteria</li> <li>• Core criteria</li> </ul>	Reduce the amount of single-use B2B packaging <sup>iii</sup>	<ul style="list-style-type: none"> <li>• Packaging suppliers: The criterion refers to B2B packaging they use to transport products to customers</li> <li>• Retailers: The criterion applies to B2B packaging from suppliers, with a focus on packaging under their control, i.e. own-brand</li> </ul>

				<p>products and fresh produce.</p> <ul style="list-style-type: none"> <li>All non-brand owners: can estimate rather than calculate percentages</li> </ul>
12	<b>On-site waste diversion</b>	<p>Diversion of on-site waste from landfill i.e. to reuse, recycling, composting, energy recovery (excl. incineration)</p> <ul style="list-style-type: none"> <li>Conditional criteria</li> <li>Core criteria (packaging companies)</li> <li>Recommended criteria</li> </ul>	<p>Increase the recovery of packaging waste generated on-site. A proxy measure is used, i.e. total waste diversion from landfill, as most companies do not measure packaging waste separately from other waste.</p>	<ul style="list-style-type: none"> <li>Packaging suppliers: On-site was to be defined as all solid waste generated in manufacturing facilities, distribution centres (DCs) and offices.</li> <li>Retailers: On-site waste to be defined as all waste generated in distribution centres (DCs) retail stores and offices.</li> </ul>
13	<b>Supply chain influence</b>	<p>Influence on supply chain to achieve sustainability goals</p> <ul style="list-style-type: none"> <li>Conditional criteria</li> <li>Recommended criteria</li> </ul>	<p>Engage with suppliers to build support for and capacity to achieve packaging sustainability goals.</p>	<ul style="list-style-type: none"> <li>Packaging suppliers: The criterion refers to procurement of packaging for their products.</li> <li>Retailers: The criterion applies to the design of own-brand product packaging, retail packaging and retail-ready packaging. Questions to focus on all 3 categories – RRP, own brands, carry bags.</li> </ul>

## PERFORMANCE RATING SYSTEM

Under the previous Covenant, signatory action plans were evaluated by an independent assessor, who gave them a rating between 0 and 5. The focus was on achievement of milestones and targets as set out in each signatory’s action plan. The individual ratings were not published. They were provided to each signatory, along with some simple suggestions on how the company could improve their performance.

This framework is different because it aims to rate performance against an external, standard set of criteria and KPIs (determined by APCO), rather than simply achievement of the company’s own milestones and targets. The proposed framework provides a system for evaluating performance against each criterion. Within each criterion there are 5 clauses (or levels) making up that criterion. Each criterion will either be additive or conditional. Additive criteria are criteria where a company can get a score for meeting any clause in any order within that criterion. For example, a company can meet clauses 1 and 4 to get 2 out of 5 points for that criterion. A conditional criterion is one where a company can only progress to the next level once they have met the previous clause. For example, to get 3 points a company must have first met clauses 1 and 2.

The five levels of performance are described in Figure 11 and the requirements for each level are dependent on the specific criteria as described in Appendix A and Appendix B.



Figure 11: Levels of performance

## MODULARISATION FOR DIFFERENT SECTORS

Feedback from members and the literature review both suggested that a modular approach that differentiates between user groups would be most useful for members. The generic version of the framework outlined in Table 4 above and Appendix A represents the base case, and is primarily targeted at product brand owners<sup>28</sup>, i.e. suppliers of packaged products that sell under their own brand. This group makes up ~95% of all APC members. The other 5% of members will be able to answer a bespoke modularised version of the tool as indicated in the Appendix B.

We propose that modularisation will be achieved first through guidance information that is provided to each sector, and second through self-selection (e.g. a company can choose not to respond to 'recommended' criteria because it is not relevant to them). As far as possible, the criteria will remain the same with minor variations in scope or more specific examples and guidelines for how the criteria should be interpreted for a particular sector. Companies will also be given the opportunity to explain why they did not respond to a particular criteria to assist with any follow-up auditing process that may occur (e.g. cigarette companies can explain they will not answer the criterion for packaging labels as that is regulated and have no opportunity to make any changes). If a company chooses not to respond to a criterion, this criterion will not be represented in the final individual company report and a recommendation will only be provided if a company selects the question as being relevant to their organisation.

The key factor that has been taken into account in modularisation is **influence**, i.e. whether the company can influence packaging design for their own products or the products they sell. We also considered modularisation based on **capacity**, i.e. whether staff have the time and expertise to complete the self-assessment (e.g. small companies generally have less capacity). This has been addressed by making recommended criteria optional. Companies can choose which recommended criteria they respond to and they will be benchmarked against similar companies as described above.

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<sup>28</sup> The NEPM (Used Packaging Materials) defines brand owners as 'a person who is the owner or licensee in Australia of a trade mark under which a product is sold or otherwise distributed....; or a person who is the franchisee ....; or in the case of a product that has been imported, the first person to sell that product in Australia; or in respect of in-store packaging, the supplier of the packaging to the retailer (pp 4-5)

The APCO packaging framework is modified for four key sectors or groups in the supply chain that have significant differences to brand owners. This is achieved by providing an additional description for how the criteria should be interpreted. For example, for packaging suppliers, on-site waste is defined as all solid waste generated in manufacturing facilities, distribution centres (DCs) and offices. For other sectors this just refers to the recovery of packaging waste (See Table 4). Table 5 below describes the four different sectors and the rationale for treating them separately within the APCO packaging framework.



**Table 5: Categories of members for modularisation**

Category	Number of APC members	Rationale for a distinct category
1. Packaging suppliers / manufacturers	68	Have some influence over packaging design and materials by working with customers but not complete control. Don't interact directly with the end consumer
2. Retailers who are brand owners (sell products under their own brand)	Unknown	Retailers have control over packaging design for their own brand products, retail ready packaging specifications and retail shopping bags
3. Retailers who are non-brand owners,	Unknown	Limited or no influence over packaging design for products but can influence retail-ready packaging specifications and retail shopping bags.
4. Brand owners who do not design their own packaging and Importers / distributors	Unknown	Limited or no influence over packaging design.

The difficulty of assigning organisations to different sectors is complicated by the fact that many organisations don't neatly fit within any one sector. For example, some retailers are also brand owners some product manufacturers are not brand owners and some brand owners may also manufacturer their own packaging or purchase packaging from a separate entity. The control that any single organisation has over its packaging is determined from a range of factors that are unique to each organisation. Providing guidance within the framework as well as a level of self-autonomy will provide organisations the freedom to complete the assessment in a way that works for them.

Providing organisations with the opportunity to download a benchmarking report against a classification grouping of their own choosing will allow companies to compare their own progress with respect to the progress of their peers. The classification of different

benchmarking groups has not yet been decided but may be done by: sector, questions answered, core or recommended, company size, region, national / multinational etc.

We propose that sector level benchmarking and analysis of company performance criteria (e.g. to determine high performing companies) is done as a separate exercise and custom bespoke reports can be generated for APCO as a separate process across different sectors and groups.

## SCORING SYSTEM

The APCO packaging framework was developed as a scoring and benchmarking framework so that organisations can get a clear picture of how they are performing against a set of objective criteria. Reporting, implementing and monitoring against a sustainability plan is one of the most critical elements for achieving long term progress towards sustainability outcomes and continuous improvement. This is the first criteria in the framework and it is also worth the most points (i.e. 15 points). The first component of this criteria is having a packaging sustainability plan that commits to using the APC Sustainable packaging guidelines (SPG) or equivalent and then implementing that plan using SMART targets, integrating the plan into business processes and then publicly reporting on progress against packaging sustainability targets. These components are worth a total of five points. The second part of this criteria requires organisations to commit (e.g. setting targets) and report against these commitments. There are ten specific targets identified where companies will be expected to publicly report their progress. Each of the other twelve criteria are valued at 5 points each.

The scoring system is primarily a process for companies to assess how they are performing against the framework, and over time, to monitor how they are progressing against the framework. The second benefit of the scoring system is that it can be used to assess company performance against industry benchmarks (e.g. comparison of performance with other companies belonging to the same sector).

When companies are benchmarked against companies from the same sector, they will also be benchmarked against the criteria that other companies from that sector reported. For example, if a company has selected that they are “brand-owners” then they will be benchmarked against the criteria that other companies who also self-selected as “brand owners”. Therefore, all criteria that were answered by “brand-owners” will be included in the benchmark report. For example, Company A may choose not to report against ‘Industry

Leadership' as a 'recommended' criterion, but when that company is benchmarked against other companies it may be benchmarked against 'industry leadership' as a criterion because other brand-owners have also answered that question.

This approach has several benefits. Firstly, it provides companies with sufficient autonomy to choose how they wish to be benchmarked (e.g. companies in the same sector, companies who have answered the same questions, companies that are of the same size, companies with the same industrial classification (SIC)). Secondly it will encourage companies to answer the criteria being answered by their peers, as they will be benchmarked against the same criteria as their peers whether they answer the question or not. Thirdly, by providing each company with two separate reports (e.g. an individual company assessment and a benchmarking report) an organisation is first able to reflect on their own progress against packaging sustainability criteria, before comparing their own progress against reports submitted by other organisations.

## 6 SELF-ASSESSMENT TOOL

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### SUMMARY

The APCO packaging sustainability framework outlined above describes the various criteria that should be considered within a packaging sustainability strategy and identifies a performance pathway that members can follow to move towards best practice and beyond. This section outlines the self-assessment tool that will be used for reporting against the framework and performance evaluation.

As noted in Section **Error! Reference source not found.**, we developed a draft self-assessment tool in Microsoft Excel. The tool was developed based on the original APCO packaging framework and was tested by 30 independent companies as part of a pilot. A series of questions was assigned to each criterion to determine if a company had met the conditions for a particular level within a criterion. Against each question, organisations were asked whether they could provide evidence and what that evidence would be. Companies were also given the option to fill-out a 'comment' box to provide any additional text that may be used to improve the self-assessment tool.

Feedback received from the two pilot studies was used to update the framework and the questions within the self-assessment tool. The questions within the tool and the structure of the online tool have also been updated and are submitted as an attached excel file and are provided in Appendix G.

### SELF-ASSESSMENT TOOL STRUCTURE

The revised self-assessment tool consists of seven sections, summarised below in Figure 12. The online-tool will have a different structure than that outlined below.

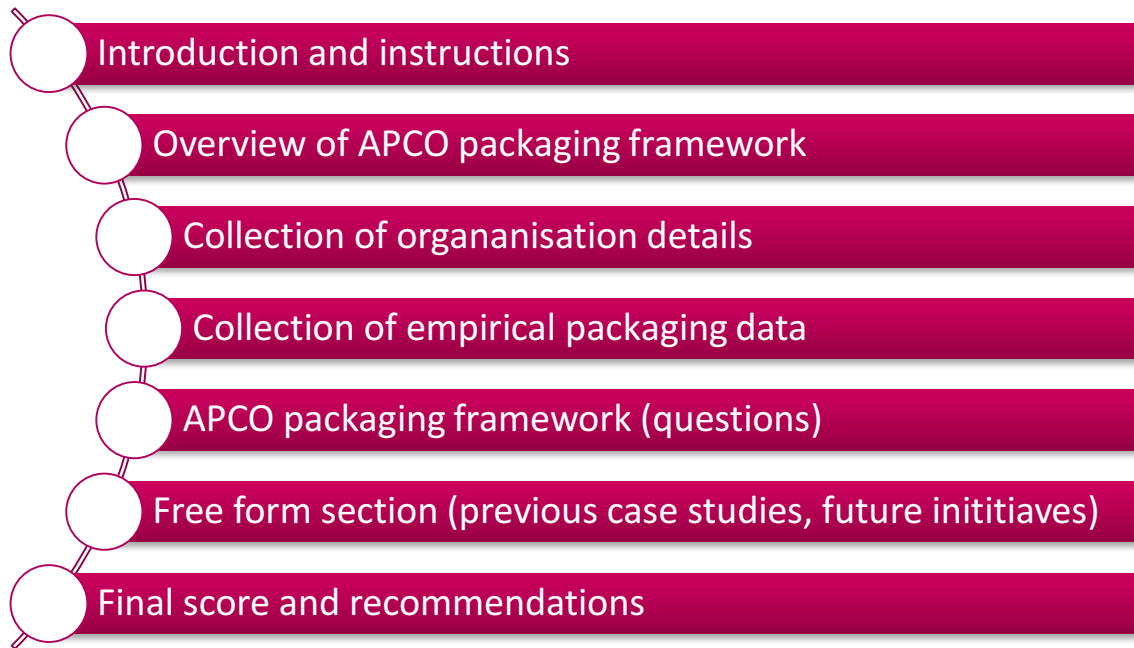


Figure 12: Main sections of self-assessment tool

### First Section

The first section introduces the objective of the framework and provides information relevant for completing the online tool and framework.

### Second Section

The second section gives an overview of the APCO packaging sustainability framework, how the scoring system works what the different criteria are and the requirements for making progress within each criteria.

### Third Section

This section will collect details about the company which will be used for individual company benchmarking and for APCO benchmarking.

### Fourth Section

One requirement for the online tool is to collect information about the amount of packaging being put onto the market. This information will not be used to 'score' company performance but will be used to aggregate the total amount of packaging that is being produced across different sectors and to identify progress in minimising the quantity of single-use packaging and optimising product-packaging sustainability. The data collected will be mandatory for brand owners and optional for other companies (but highly

encouraged). Data on the weight (tonnes) of the following material types used in packaging will be requested:

- Glass
- Steel
- Aluminium
- Paper/cardboard
- Polyethylene terephthalate (PET)
- High density polyethylene (HDPE)
- Low density polyethylene (LDPE)
- Polyvinyl chloride (PVC)
- Polypropylene (PP)
- Polystyrene (PS)
- Expanded polystyrene (EPS)
- Other plastic
- Composite material
- Timber
- Other (specify)

### **Fifth Section**

The fifth section assesses companies against the APCO packaging framework. This section is broken into three major categories: leadership; packaging processes and outcomes; and, operations. A series of questions is asked under each criterion to ascertain the level of performance that is being achieved and provide a score. All companies will be required to answer mandatory APCO criteria (mandatory criteria), while questions for the other criteria will be optional (recommended criteria). At the end of the survey, organisations will be given recommendations for how they are able to improve and progress to the next level within a criterion based on their responses. Under each criterion, organisations will have the option to provide more information or explain their response to a particular criterion. Explanations provided will not impact on scores but may be used for final reporting and auditing purposes.

### **Sixth Section**

Once the framework has been completed, organisations will be given the opportunity to describe various initiatives or achievements for improving packaging sustainability across the organisation over the previous 12 months. This section will be split into two parts: the first will record initiatives that the company has undertaken over the previous 12 months.

This section allows companies to provide more detail on their packaging sustainability achievements. The second component of this section will ask members to record their future plans and targets. It could be broken down into two sections i) short term plans (e.g. next 12 months) and ii) long term plans (e.g. next 5 years).

### Seventh Section:

The seventh section will include a summary of organisational performance against each criterion, and a series of recommendations for how they can progress to the next level within each criterion. The online version of the tool will provide the option for companies to download their performance and recommendations as a PDF document.

## SCORING, REPORTING AND BENCHMARKING

The self-assessment tool will automatically calculate scores, based on responses to questions. Companies will be given a score for each criterion they have chosen to answer, with the recommendations being based only on the criteria they have responded to. As noted previously, when companies are benchmarked against other companies from the same sector they will be benchmarked against the criteria for that sector regardless of whether they answered those questions or not. For example, if a company does not answer a question they will not be assessed against that criteria for their own report, but they may be compared to other companies within a particular sector or some other dimension for benchmarking purposes.

## COMPANY RECOMMENDATIONS

The self-assessment tool will provide recommendations on how an organisation can improve their performance and progress to the next level within a criterion. The recommendations will provide clear actions the company can take to achieve the next level of performance including sector specific examples or case-studies that have been achieved at the next level in the framework.

## 7 PHASE II: DEVELOPMENT OF THE ONLINE TOOL

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Phase II of this project will implement the APCO packaging framework and self-assessment tool so that it can be completed in an online environment. Phase II of this project will deliver the following:

- Development of a relational database that is stored on the cloud that allows the collection of responses from APCO members in a secure, accessible and flexible format through a series of online forms accessed through a web-browser.
- Provide an online authentication system and web portal for members and administrators to securely login to the online APCO packaging database.
- Provide secure access to APCO staff to monitor and edit the live database and download data in excel format for internal review, analysis and reporting.
- Provide an online questionnaire based on the APCO packaging framework that allows organisations to be assessed on their packaging sustainability and receive progress reports on their performance accompanied by a series of recommendations for further improvement.
- The ability for data to be aggregated by APCO staff.
- The ability for organisations to review and download a report on their performance against the packaging framework criteria along with recommendations for how to improve.
- The ability to benchmark companies against their peers and the ability to download this report for internal and external reporting.
- The ability for companies to complete their action plans through the APCO packaging tool and for these reports to be directly submitted to APCO.
- The ability for APCO staff to generate queries on the data and review summary information that may include tables and charts by sector, region, company size etc.
- A flexible tool and database that will allow for the expansion and customisation of the tool as user requirements change and evolve over time.
- The ability for APCO to run queries on the data and export the data in excel format for analysis and review.
- The capability for running summary reports, queries and pivot tables for different sectors and groups as required;
- The capability for undertaking multi-year analysis and to capture company progression against the framework over time.

The main relationships and outputs of the online-assessment tool are provided in Figure 13. As shown, the Packaging Self-Assessment Tool (PSAT) is guided by the APCO Strategic Plan where the framework, criteria and KPIs draw heavily on APCO strategic directions for



improving packaging sustainability. The PSAT will be located in an online database and manage the reporting processes for member signatories and for monitoring performance by APCO. APCO member organisations will have access to their own data and to benchmarking data and will be able to produce several different types of reports. APCO will have administrative access to the database and will be able to access and edit the live data tables of member organisations.

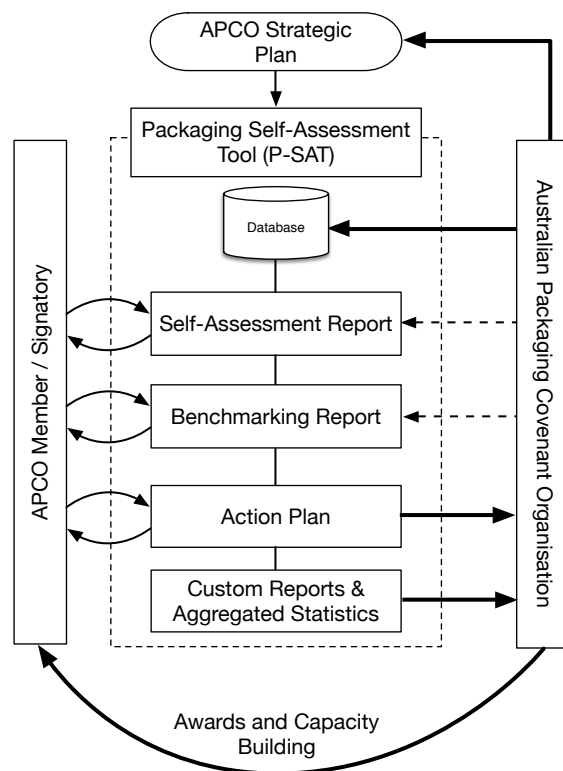


Figure 13: Packaging Self-Assessment Tool (flows and relationships)

The proposed structure of the online self-reporting tool is depicted above in Figure 13. As indicated the self-assessment tool incorporates an online database for hosting and storing company data and therefore includes the underlying packaging framework for assessing company performance. When APCO members login to PSAT they will be able to undertake a number of different functions.

1. Complete the APCO packaging self-assessment questionnaire;
2. Review and edit live-data (until a certain deadline)
3. Print a self-assessment PDF report on organizational performance against the packaging framework including recommendations;

4. Undertake a benchmarking exercise with other APCO signatories and print a report on company benchmarking performance;
5. Complete Action Plans and submit those action plans to APCO through the online self-assessment tool.

APCO staff will be given administrative access to the database and will be able to undertake the following functions:

1. Edit live data within the database
2. View any company's self-assessment report, benchmarking report or action plan
3. Download all data in a number of different formats
4. Perform custom reports and pivot tables on the data

## 8 CONCLUSIONS AND NEXT STEPS

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This report has described the methods, results and outcomes from the first phase of the APCO packaging sustainability research project. The main product of this research was the development of a packaging sustainability framework and self-assessment tool. The framework and tool will allow APC signatories to report on their progress towards meeting packaging sustainability targets and receive recommendations on how they can improve packaging sustainability outcomes.

The feedback that was received from the pilot-study, survey and workshop led to a number of improvements. The final framework is provided in Appendix A with detailed guidelines provided in Appendix B for each specific criteria. Phase II of this research will implement the packaging sustainability framework as an online tool and database.

# A. APCO PACKAGING SUSTAINABILITY FRAMEWORK

			Performance Level					
			1	2	3	4	5	
Criteria	Description	References / links	Getting started	Good progress	Advanced	Leading	Beyond best practice	
<b>Leadership</b>								
<b>1</b>	<b>Packaging sustainability strategy</b> (Additive criterion)	Packaging sustainability plan with packaging targets, monitoring and reporting	APCSP KPI 1A <sup>iv</sup> , EUROOPEN <sup>v</sup> GPP <sup>vi</sup>	A packaging sustainability strategy is in place, that commits to using the SPG.	The strategy is integrated in business processes	The strategy includes specific, measurable, and time-based targets	Progress against the targets in the plan is publicly reported	There is a process in place to measure and ensure continuous improvement.
<b>2</b>	<b>Closed loop collaboration</b>	Company is collaborating with stakeholders to close the loop (improve recovery) for specific materials	APCSP KPI 1B	Investigating options for joining or starting a collaborative program	Joined at least one existing initiative or working with others to set up at least one program	Data is being collected to monitor the outcomes of closed loop collaboration(s)	Program(s) can demonstrate tangible outcomes e.g. % waste recovered, % consumer access	There is a formal process in place to continually identify new opportunities for collaboration or to improve existing initiatives
<b>3</b>	<b>Consumer engagement</b> (Additive criterion)	Company is informing and educating consumers about packaging sustainability, including through on-pack labels		Consumers are provided with some additional information on the sustainability of packaging through the company's website or other publications	All products have on-pack claims or labels on packaging sustainability (excluding disposal/recycling labels, which are covered under criteria 9).	>50% of products have labelling that encourages active consumer engagement in packaging sustainability.	Company engages consumers, through packaging design to reduce impacts of consumption e.g. less food waste	The company engages consumers in packaging sustainability through marketing campaigns e.g. advertising, social media

		Performance Level						
			1	2	3	4	5	
Criteria	Description	References / links	Getting started	Good progress	Advanced	Leading	Beyond best practice	
<b>4</b>	<b>Industry leadership</b> (Additive criterion)	Company is involved in other packaging-related sustainability initiatives (e.g. litter reduction, marine plastics initiative, sharing knowledge with peers, education)		Company is investigating at least one program or initiative (list of options to be provided).	Company is involved in one program or initiative (list of options to be provided). OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)	Company is involved in at least one program or initiatives (list of options to be provided) OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)	Company is involved in one programs or initiatives (list of options to be provided). OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)	Company is involved in at least one programs or initiatives (list of options to be provided) OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)
<b>Packaging processes &amp; outcomes</b>								
<b>5</b>	<b>Packaging design &amp; procurement</b>	Procedures that integrate the SPG or equivalent into packaging design or procurement	APCSP KPI 1A ISO/TR 14062 <sup>vii</sup>	There is a documented procedure requiring use of the SPG or equivalent to evaluate all packaging through either in-house design or procurement.	0<20% of products have had their packaging designed or reviewed with reference to the SPG.	Between 20<50% of products have had their packaging designed or reviewed with reference to the SPG.	Between 50<80% of products have had their packaging designed or reviewed with reference to the SPG.	Between 80%<100% of products have had their packaging designed or reviewed using an LCA or similar life cycle tool to consider packaging sustainability.
<b>6</b>	<b>Packaging materials efficiency</b>	Optimising packaging material efficiency by	GRI 301-1 (Material used by weight or volume), GPP	The company is developing a plan or investigating	Data showing 0<20% of products have reduced packaging weight	Data showing 20<50% of products have reduced packaging	Data showing >50% of products have been optimised for	Data showing all products have been optimised for product-packaging efficiency.

Criteria		Description	References / links	Performance Level				
				1	2	3	4	5
				Getting started	Good progress	Advanced	Leading	Beyond best practice
		optimising weight and volume	and 18602 <sup>viii</sup> (optimisation)	opportunities to optimise material efficiency.	or 0<20% of products have been optimised for product-packaging efficiency.	weight or 20<50% of products have been optimised for product-packaging efficiency.	product-packaging efficiency.	
<b>7</b>	<b>Recycled &amp; renewable materials</b>	Optimising use of recycled and renewable materials	APCSP 1A GRI 301-2 (Recycled input materials)	Company is developing a plan or investigating opportunities to optimise the use of recycled or renewable materials in product packaging.	Data showing 0<20% of product packaging incorporates recycled or renewable content or 0<20% have been optimised for recycled or renewable content.	Data showing 20<50% of product packaging incorporates recycled or renewable content or 20<50% have been optimised for recycled or renewable content.	Data showing at least 50% of products have optimised recycled or renewable content, or have achieved sector-specific targets	Data showing all products have optimised the renewable/recycled content of packaging.
<b>8</b>	<b>Post-consumer recovery of packaging</b>	Optimising the proportion of consumer packaging that can be recovered through reuse, recycling, composting or energy recovery	ISO 14021 GRI 301-3 (Reclaimed products & packaging)	Company is developing a plan or investigating opportunities to optimise the recoverability of packaging.	Data showing 0<20% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value	Data showing 20<50% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value	Data showing 50<100% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value	Data showing 100% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value
<b>9</b>	<b>Consumer labelling</b>	Proportion of consumer packaging with an on-pack label for	APCSP KPI 2A AS/NZS ISO 14021	Company is developing a plan or investigating opportunities to	0<20% of products have packaging labels for disposal or recovery	20<50% of products have packaging labels for disposal or recovery	Between 50<100% of products have labels for disposal or recovery	100% of products are labelled for disposal or recycling in compliance with ISO/AS 14021.

Criteria		Description	References / links	Performance Level				
				1	2	3	4	5
				Getting started	Good progress	Advanced	Leading	Beyond best practice
		disposal or recovery		improve on-pack labelling for disposal or recovery.				
<b>10</b>	<b>Product-packaging innovation</b>	Company is rethinking product-packaging systems (design, delivery systems, business models) to achieve sustainability outcomes	EUROPEN GPP	Some progress in product-packaging system innovation to improve sustainability (at least one case study)	The company has a documented commitment to innovation in product-packaging systems to improve sustainability.	A procedure is in place to evaluate the sustainability of whole product-packaging systems to identify potential innovations, e.g. through LCA, and the company is reporting on these.	Between 50<100% of products have been evaluated using LCA or similar life cycle approach to identify potential innovations and packaging outcomes have been optimised using new packaging design, delivery systems or new business models to achieve sustainability outcomes.	All products have been evaluated using LCA or similar life cycle approach to identify potential innovations and all packaging has been optimised using a documented process.
<b>Operations</b>								
<b>11</b>	<b>Business-to-business packaging</b>	Reduction in single use B2B packaging to customers over the past 3 years	APCSP KPI 2B	Some progress is being made in reducing single use B2B packaging to customers (at least one case study).	Data showing 0<20% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months.	Data showing 20<50% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months.	Data showing 50<100% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months.	There is zero single use B2B packaging going to customers, i.e. it is all reusable.

Criteria		Description	References / links	Performance Level				
				1	2	3	4	5
				Getting started	Good progress	Advanced	Leading	Beyond best practice
							Packaging is optimised for transport.	
<b>12</b>	<b>On-site waste diversion</b>	Diversion of on-site waste from landfill i.e. to reuse, recycling, composting, energy recovery (excl. incineration)	GRI 306-2 (Waste by type & disposal method)	Data showing 0<20% on-site solid waste diverted from landfill	Data showing 20<50% on-site solid waste diverted from landfill	Data showing 50<100% on-site waste diverted from landfill	Data showing zero on-site solid waste to landfill (100% diversion)	Data showing 100% of on-site solid waste is recovered through systems that achieve highest potential environmental value
<b>13</b>	<b>Supply chain influence</b>	Influence on supply chain to achieve sustainability goals	ISO 20400	Packaging sustainability goals and packaging guidelines are communicated to all tier 1 suppliers	Support is provided to tier 1 suppliers to improve their understanding of packaging sustainability goals and strategies, e.g. through training	The company is collaborating with key tier 1 suppliers to share knowledge and improve packaging sustainability	The company has processes in place to evaluate supply chain risks and opportunities for influence throughout the entire supply chain (beyond tier 1 for both upstream and downstream suppliers and customers)	The company has processes in place to monitor and track compliance with key packaging sustainability requirements throughout the entire supply chain (full traceability)



## B. DETAILED DESCRIPTIONS OF CRITERIA

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### 1. Packaging sustainability strategy

**Objective:** Integrate packaging sustainability goals and targets in corporate strategy, including use of the Sustainable Packaging Guidelines (SPG) or equivalent.

**Definitions:**

'Equivalent' means the same principles (doesn't have to be word for word) are being addressed.

A 'report' is any publicly available information.

A 'packaging sustainability plan' is any formal document that is publicly available and used to communicate packaging sustainability goals and monitor performance over time. The plan can be an internal or publicly facing document.

'Sustainable materials' are materials that support a circular economy for packaging and other sustainability outcomes, e.g. that are renewable; contain recycled content; have the potential to be recovered for reuse, recycling, composting or energy recovery; minimise toxic or hazardous components; and/or meet third party certified standards in their supply chain.

This criterion is additive, which means a signatory can select any one of the five options below in any order to receive credit. Additional credits can be achieved through more specific actions under the first level.

**Levels:**

**Clause 1:** *The company has a packaging sustainability plan.* A plan that has been approved by senior management sends a clear message to employees and stakeholders that packaging sustainability is a priority for the organisation. Minimum requirements are a high-level commitment to improve the sustainability or environmental performance of the company's packaging and to review packaging using the Sustainable Packaging Guidelines (SPG). Additional credits can be gained if the packaging sustainability strategy includes one or more of the following:

- Commitment including specific targets to review new products against the SPG or equivalent
- Commitment including specific targets to review existing products against the SPG or equivalent

- Commitment including specific targets to reduce (optimise) the quantity of material used in packaging recognising the role of packaging in product protection (e.g. to prevent food waste) and to put systems in place to optimise product-packaging performance, e.g. by using LCA to evaluate the whole system.
- Commitment including specific targets to reduce (optimise) the quantity of material used in packaging
- Commitment including specific targets to improve the recoverability of packaging through strategies such as reuse, recycling or alternative waste technologies
- Commitment including specific targets to use renewable and recyclable materials etc.
- Commitment including specific targets for on-pack labelling for disposal or recovery
- Commitment including specific targets to reduce on-site waste sent to land-fill
- Commitment including specific targets to improve packaging sustainability through procurement processes and working closely with suppliers and customers to improve packaging sustainability.
- Specific targets to reduce (optimise) B2B packaging and optimise packaging for transport efficiency.

**Clause 2:** *The plan includes specific, measurable and time-based targets.* These targets should not be set in isolation. Packaging is integral to a product's sustainability profile, which in turn contributes to a company's sustainability goals.

Examples of packaging targets:

- '100% of fibre-based packaging from certified or recycled sources by 2020'
- 'Reduce packaging by 5% between 2010 and 2020'.

**Clause 3:** *The strategy is integrated in business processes.* A strategy will only be effective if its objectives and targets are integrated in other plans and processes, such as a business plan, marketing plan, product development processes or procurement procedures. Staff within the organisation must be accountable for implementation, for example through their position descriptions and performance reviews.

**Clause 4:** *Progress against the plan is publicly reported.* Transparency builds trust and allows you to share your packaging sustainability journey with stakeholders. Progress can be reported through an APC Annual Report, corporate Sustainability Report, corporate website or other avenues that are appropriate for each organisation.

**Clause 5:** *There is a process in place to ensure continuous improvement.* Management processes that promote continuous improvement usually reflect the Deming PDCA cycle - Plan, Do, Check, Act<sup>ix</sup>. After the planning phase:

**PLAN:** Establish the objectives and processes necessary to deliver results in accordance with the expected output (target goals) by establishing output expectations.

**DO:** Ensure that adequate resources, processes and systems are in place to deliver the strategy and meet the targets that have been set.

**CHECK:** Ensure regular reviews are conducted to check the validity of targets. Monitor and measure performance and share this information internally or externally.

**ACT:** This phase should take the learnings from the CHECK phase to address the effectiveness of the sustainability strategy. During this phase, ACT to determine whether the policies, objectives or other systems are relevant to your goals and repeat the process for continuous improvement.

**Links to resources:** EUROOPEN and ECR Europe, SPG, SPG case studies, AS/ISO 14000 series, AS/ISO 9000 series, links to existing company plans e.g. Unilever

### Sector variation guidelines:

- Packaging suppliers: 'Packaging Sustainability Strategy' should be amended to 'Sustainability Strategy'. There will be different examples provided for level 2. The strategy should include actions to improve the sustainability of operations, e.g. energy efficiency, and renewable energy, water efficiency and reuse, cleaner production etc.
- Retailers: Criterion remains the same but clarify that the strategy should address all areas within the company's sphere of influence, including the design of own-brand products, procurement requirements (e.g. for shelf-ready packaging), retail and fresh produce bags etc.
- Global companies: if the company has a sustainability strategy that is developed by head office, without country-specific objectives, the commitment to use the SPG can be documented in another formal document that has been adopted by management in Australia.

## 2. Closed loop collaboration

**Objective:** Encourage supply chain solutions to recover packaging and create sustainable closed loop economies.

**Definitions:** Closed loop collaborations bring industry together to identify the barriers to the recovery and reuse of waste packaging, develop strategies to address and build innovation across industry sectors and the supply chain<sup>xi</sup>. Examples could include collaboration to establish a collection program for used packaging; to develop a new application or market for a recyclable material; or to develop an industry standard for collection or recovery, etc.

**Getting started:** *The company is investigating options for joining or starting a collaborative closed loop program.* This company has taken some initial, exploratory steps to join or start a collaborative program.

**Good progress:** *Joined at least one existing initiative or working with others to set up at least one collaborative closed loop program.* Collaboration could be with competitors/peers, local councils, community group, university, recycler etc. The project does not necessarily have to be completed or operational yet.

**Advanced** *Data is being collected to monitor the outcomes of closed loop collaboration(s).* Data is important for monitoring and reporting outcomes, e.g. the amount of product collected, the recycling rate, tonnes of recycled material used in manufacture of new products etc.

**Leading:** *Program(s) can demonstrate tangible outcomes e.g. % waste recovered, % consumer access.* Data is available that demonstrates real, tangible outcomes such as tonnes or percentage of packaging collected, the percentage of consumers that have access to a recovery system, or tonnes of recycled material used in products etc.

**Beyond best practice:** *There is a formal process in place to continually identify new opportunities for collaboration or to improve existing initiatives.* Examples of formal processes could include a documented strategy to continue to look for new opportunities or improved outcomes from existing initiatives. The process may be documented internally within your organisation, or within the organisation responsible for managing it.

### Sector variations guidelines:

**Packaging suppliers:** This criterion refers to initiatives to improve recoverability of their products, i.e. the packaging materials and components they supply to customers.

**Links to resources:** Case studies, APCO special interest groups

### 3. Consumer engagement

**Objective:** To inform and educate consumers about sustainability through packaging.

**Definitions:**

'Labelling' can be in the form of a statement, symbol or graphic<sup>xii</sup>.

'Products' can be SKUs, groups of products<sup>29</sup> or some other categorisation that is meaningful for the company.

This criterion is additive, which means a signatory can select any one of the five options below in any order to receive credit.

**Levels:**

**Clause 1:** Consumers are provided with information on the sustainability of packaging through the company's website or other publications (in addition to disposal/recycling information). This could include environmental information on key packaging formats, or environmental outcomes such as the percentage of recycled content, renewable materials, certified sustainably supply chains (e.g. FSC or PEFC certified fibre), innovation in packaging design, material savings (e.g. '10% less material') etc.

**Clause 2:** All products have on-pack claims or labels on packaging sustainability (excluding disposal/recycling labels, which are covered under criteria 9). This information could relate to outcomes such as the percentage of recycled content, use of renewable materials and their source, certified sustainable supply chains (e.g. FSC or PEFC certified fibre), innovation in packaging design, material savings (e.g. '10% less material') etc.

**Clause 3:** Greater than 50% of products have labelling that encourages active consumer engagement in packaging sustainability. Labelling that encourages consumers to change their behaviour can have a significant impact on sustainability issues such as food waste or over-use/waste of consumables (detergents, paint, etc.). Examples of consumer engagement through packaging could include advice on how to store food correctly, tips for minimising waste, how to use products efficiently, etc.

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<sup>29</sup> For groups of products, at least 80% of products within a group must meet the clause.

**Clause 4:** The company actively engages consumers, through packaging design, to reduce impacts of consumption e.g. less food waste. Design initiatives could include portion control or resealable packaging designed to reduce waste.

**Clause 5:** The company engages consumers in packaging sustainability and sustainability more broadly through marketing campaigns e.g. advertising, social media. On-pack information to engage consumers to reduce the impacts of consumption can be supported by other forms of communication. Partnerships with environment or community organisations can help to get the message to consumers.

### Sector variation guidelines

Packaging suppliers: The criterion refers to business customers rather than end consumers

## 4. Industry leadership

**Objective:** To promote other initiatives within Australia that improve packaging sustainability through collaborations and industry leadership.

### Definitions:

‘Other initiatives’ is intended to capture initiatives that have not been covered under other criteria. Examples could include programs to reduce litter (clean-ups, sponsoring Clean Up Australia etc.) or reduce the impacts of marine plastics; awards received for packaging sustainability; sharing sustainability knowledge with peers; involved in public education etc.

‘Involved’ means that the company has committed significant resources to the program or initiative (to be further defined).

This criterion is additive which means a signatory can select any one of the seven options in any order to receive credit. The maximum score for this criterion is 5.

### Levels:

**Option 1:** The company is investigating at least one program or initiative.

**Option 2:** The company is involved in one program or initiative.

**Option 3:** The company is involved in one additional program or initiatives.

**Option 4:** The company is involved in one additional program or initiatives.

**Option 5:** Within the last 12 months the company has received an award or external recognition for packaging sustainability.

**Option 6:** Within the last 12 months the company has received an award or external recognition for packaging sustainability.

**Option 7:** The company is actively engaging with peers to promote packaging sustainability and share sustainability knowledge for non-commercial purposes (e.g. evidence for holding workshops, providing training, sharing of intellectual property etc.)

**Sector variation guidelines:** This will apply to all sectors.

## 5. Packaging design and procurement

**Objective:** Ensure that the Sustainable Packaging Guidelines (SPG) or equivalent is being used to evaluate all packaging.

### **Definitions:**

Packaging evaluations should be conducted at the appropriate time, e.g.:

- during design or procurement processes for new or updated products/packaging
- during regular product or packaging reviews that are undertaken as part of a normal business process.

'Procedures' refers to any set of rules that people need to follow. These could include policies, charters, systems, standards, templates etc.<sup>xiii</sup>.

'Equivalent' means the same principles (does not have to be word for word) are being addressed. Some companies may already have a global tool to guide or measure packaging sustainability that is equivalent to the SPG. Some companies may use a quantitative LCA-based tool.

The data that is being requested is cumulative and conditional on meeting each prior level, i.e. for packaging that has been designed or reviewed with reference to the SPG at any time (not just in the past 12 months).

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.

### **Levels:**

**Getting started:** There is a documented procedure on using the SPG or equivalent to evaluate and improve packaging. This procedure could take many different forms, e.g.

- a step-by-step procedure for new product development that shows when and how the SPG must be applied
- a procurement policy or procedure that requires procurement staff or packaging suppliers to review all new packaging against the SPG and to identify potential improvements
- a commitment to consider the sustainability performance of packaging during product/packaging reviews undertaken as part of a normal business process

Ideally the SPG will be used as early as possible in these processes, when there is scope to make design changes. It can also be used to review outcomes prior to market launch.

**Good progress:** In total 0<20% of products have had their packaging designed or reviewed with reference to the SPG or equivalent.

**Advanced:** Between 20<50% of products have had their packaging designed or reviewed with reference to the SPG or equivalent.

**Leading:** Between 50<-80% of products have had their packaging designed or reviewed with reference to the SPG or equivalent.

**Beyond best practice:** 100% of products have had their packaging designed or reviewed using a life cycle assessment (LCA) or similar life cycle tool to consider packaging sustainability.

**Sector variation guidelines:**

- Packaging suppliers: The criterion refers to design procedures for packaging around their products (i.e. used to transport packaging products to customers)
- Retailers: The criterion applies to the design of own-brand product packaging and retail packaging (e.g. shopping bags, produce bags) only. Retailers without own-brand products can focus on the packaging they give to consumers to carry products home.

**Links to resources:** SPG, ISO/TR 14062: 2002



## 6. Packaging material efficiency optimisation

**Objective:** To reduce material consumption and associated environmental impacts in the packaging life cycle by optimising the volume and weight of packaging.

### Definitions:

'Material efficiency' aims to minimise the quantity of packaging used for a product. This is achieved by reducing the weight or volume of the package.

'Optimised' means that no further improvement in packaging material efficiency is possible at the present time, considering interactions between the packaging and product (e.g. impacts on product waste), regulatory restrictions etc. ISO18602 refers to 'critical areas' - specific performance criteria that prevent further reduction of weight or volume without endangering functional performance, safety and user acceptability. Includes: product protection, packaging manufacturing processes, packing/filling process, logistics, product presentation/marketing, user/consumer acceptance, information, safety, legislation, other (this should be specified for each product).

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.

### Levels:

**Getting started:** The company is developing a plan or investigating opportunities to optimise material efficiency. At a minimum these activities should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control.

**Good progress:** Data showing 0<20% of products have reduced packaging weight or 0<20% of products have been optimised for material efficiency. Improved material efficiency can be achieved through a range of strategies including lightweighting materials, shifting to a lighter material, eliminating unnecessary layers or components, etc.

**Advanced:** Data showing 20<50% of products have reduced packaging weight or 20<50% of products have been optimised for product-packaging efficiency. Data is being collected on the weight of packaging for each product (retail and distribution packaging) to monitor changes over time.

**Leading:** *Data showing >50% of products have been optimised for product-packaging efficiency . This can be demonstrated by providing proof of the methodology used to evaluate optimisation, e.g. based on ISO 18602. The process should determine and substantiate the single performance criterion that prevents further reduction in quantity (weight or volume) of the materials used.*

**Beyond best practice:** *Data showing all products have been optimised for product-packaging efficiency. This can be demonstrated by providing proof of the methodology used to evaluate optimisation. The process should determine and substantiate the single performance criterion that prevents further reduction in quantity (weight or volume) of the materials used. ISO 18602 refers to 'Critical areas': specific performance criteria that prevent further reduction of weight or volume without endangering functional performance, safety and user acceptability. Includes: product protection, packaging manufacturing processes, packing/filling process, logistics, product*

#### Sector variation guidelines:

- Packaging suppliers: The criterion refers to efficiency of packaging around their products (i.e. used to transport packaging products to customers)
- Retailers: The criterion applies to the design of own-brand product packaging and retail packaging (e.g. shopping bags, produce bags) only. Retailers without own-brand products can focus on the packaging they give to consumers to carry products home
- Importers, distributors and brand owners that do not design their own packaging, i.e. they rely on suppliers to provide 'off the shelf' packaging (i.e. have no influence on packaging design through design or procurement processes): this criterion is not applicable.

**Links to resources:** Global Packaging Protocol (GPP), ISO 18602, a template for evaluating optimisation based on 18602 (to be developed by APCO)

## 7. Recycled and renewable materials

**Objective:** To support a circular economy for packaging by optimising the quantity of materials that are renewable and/or contain at least some recycled content.

#### Definitions:

'Renewable' means material that is composed of biomass from a living source and that can be continually replenished<sup>xiv</sup>. Renewable materials include paper and cardboard from sustainably grown wood fibre, or a biopolymer from a sustainable source.

'Recycled content' is the proportion, by mass, of pre-consumer and post-consumer recycled material in packaging (AS/ISO 14021). 'Pre-consumer' is material diverted from the waste stream during manufacturing (excluding rework). 'Post-consumer' material is material waste generated by households or by commercial, industrial and institutional facilities.

The amount of renewable or recycled material is expressed as a percentage of the quantity of packaging material put onto the market.

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.

'Sector specific targets' will be developed by APCO.

'Optimised' means that the percentage of renewable and recycled materials cannot be increased without impacting negatively on functionality, legal compliance etc.

### Levels:

**Getting started:** The company is developing a plan or investigating opportunities to optimise the amount of recycled and/or renewable materials in packaging. At a minimum, these activities should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control. Companies must identify appropriate strategies or targets for recycled and renewable materials, taking into account their broader sustainability goals, regulatory/technical constraints and trade-offs with other performance objectives.

**Good progress:** Data showing 0<20% of product packaging incorporates recycled or renewable content or 0<20% has been optimised for recycled or renewable content. Fibre-based packaging materials are generally regarded as renewable, although certification (e.g. FSC, PEFC) ensures that the fibre is from a sustainable source. Most packaging materials can incorporate a percentage of recycled material, and in some cases, up to 100%. Check with packaging suppliers to identify improvement opportunities. Companies must identify appropriate strategies or targets for recycled and renewable materials, taking into account their broader sustainability goals, regulatory/technical constraints and trade-offs with other performance objectives.

**Advanced:** Data showing 20<50% of product packaging incorporates recycled or renewable content or 20<50% have been optimised for recycled or renewable content. Fibre-based packaging materials are generally regarded as renewable, although certification (e.g. FSC, PEFC) ensures that the fibre is from a sustainable source. Most packaging materials can incorporate a percentage of recycled material, and in some cases, up to 100%. Check with packaging suppliers to identify improvement opportunities. Companies must identify appropriate strategies or targets for recycled and renewable materials, taking into account their broader sustainability goals, regulatory/technical constraints and trade-offs with other performance objectives.

**Leading:** Data showing at least 50% of products have optimised the renewable/recycled content of packaging. Fibre-based packaging materials are generally regarded as renewable, although certification (e.g. FSC, PEFC) ensures that the fibre is from a sustainable source. Most packaging materials can incorporate a percentage of recycled material, and in some cases, up to 100%. Check with packaging suppliers to identify improvement opportunities. Companies must identify appropriate strategies or targets for recycled and renewable materials, taking into account their broader sustainability goals, regulatory/technical constraints and trade-offs with other performance objectives.

**Beyond best practice:** Data showing all products have optimised the renewable/recycled content of packaging. 100% renewable or recycled content is often not achievable. In some case the amount of recycled (reprocessed) material is limited by performance requirements, e.g. for material strength or appearance. It can also be restricted by regulations e.g. for packaging in contact with food. Companies should have a process in place to evaluate whether these materials have been optimised and that no increase is currently feasible. Evidence of this process must be provided to support achievement at this level.

#### Sector variation guidelines:

- Packaging suppliers: The criterion refers to materials used to make packaging for their products (i.e. used to transport packaging products to customers)
- Retailers: The criterion applies to the design of own-brand product packaging and retail packaging (e.g. shopping bags, produce bags) only. Retailers without own-brand products can focus on the packaging they give to consumers to carry products home.
- All non-brand owners: can estimate rather than calculate percentages.

- Importers, distributors and brand owners that do not design their own packaging, i.e. they rely on suppliers to provide 'off the shelf' packaging or to develop the packaging: this criterion is not applicable.

## 8. Post-consumer recovery

**Objective:** To increase the proportion of packaging that can be recovered for reuse, recycling, composting or energy recovery in Australia and show that outcomes are being met.

**Definitions:** 'Recoverability' of packaging refers to the availability of systems for reuse, recycling, composting or energy recovery of packaging in Australia. 'Recyclable' means that there is an existing system to collect and recycle the packaging in Australia (see ISO 140121 for more detail). 'Compostable' means the packaging has been certificated compostable according to AS 4736, AS 5810 or a similar standard. 'Reusable' means it can be collected through an existing system for reuse.

The recovery rate is expressed as a percentage of total packaging weight put on the market<sup>xv</sup>.

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.

The 'waste hierarchy' places the highest priority on **avoidance** (action to reduce the amount of waste generated followed by **resource recovery** (reuse followed by recycling, reprocessing and then energy recovery, consistent with the most efficient use of the recovered resources); and finally, **disposal** in the most environmentally responsible manner<sup>xvi</sup>.

'Highest potential environmental value' means that recovery is occurring at the optimal level of the waste hierarchy, based on available recovery systems and sustainability impacts of alternative recovery options (e.g. composting vs recycling, or recycling vs energy recovery). Reuse is encouraged prior to recovery where there is evidence that it extends the life of the packaging and achieves positive sustainability outcomes.

Scoring: at each level companies can achieve additional credit if they can extend the life of packaging prior to recovery through reuse, for either the existing purpose or an alternative purpose.

### **Levels:**

**Getting started:** *The company is developing a plan or investigating opportunities to optimise the recoverability of packaging. At a minimum, these activities should apply*

to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control. To check the recoverability of packaging, a company needs to check the availability of systems to collect (e.g. kerbside, drop-off) and reuse, recycle, compost or recovery energy from packaging in Australia. Recoverability can be improved, for example, by switching from a non-recyclable to a recyclable material, or by eliminating components that inhibit recycling (e.g. incompatible labels, mixed materials etc.).

**Good progress:** *Data showing 0<20% packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value.* See description under “getting started” of how to check recoverability. Highest potential environmental value means that the waste hierarchy has been applied to ensure that the value of the embodied materials and/or energy is retained as much as possible and for as long as possible, e.g. through closed loop recycling (e.g. bottle to bottle) or by recycling into another high value product that can itself be recycled a second time. Case-by-case analysis is required to determine whether the highest value has been achieved.

**Advanced:** *Data showing 20<50% packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value.* See description under “getting started” of how to check recoverability. See description under “good progress” for highest environmental value.

**Leading:** *Data showing 50<100% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value.* See description under “getting started” of how to check recoverability. See description under “good progress” for highest environmental value.

**Beyond best practice:** *Data showing 100% of packaging can be recovered through existing systems that achieve highest potential environmental value.* See description under “getting started” of how to check recoverability. See description under “good progress” for highest environmental value.

#### **Sector variation guidelines:**

- Packaging suppliers: The criterion refers to recoverability of packaging around their products (i.e. used to transport packaging products to customers)

- Retailers: The criterion applies to the design of own-brand product packaging and retail packaging (e.g. shopping bags, produce bags) only. Retailers without own-brand products can focus on the packaging they give to consumers to carry products home.
- All non-brand owners: can estimate rather than calculate percentages

**Links to resources:** ISO 14021; PREP; Planet Ark Recycling Near You website

## 9. Consumer labelling

**Objective:** Encourage the use of on-pack labels that equip consumers to easily determine the correct disposal method for post-consumption packaging<sup>xvii</sup>

### Definitions:

'Labelling' can be in the form of a statement, symbol or graphic<sup>xviii</sup>.

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.

### Levels:

**Getting started:** *The company is developing a plan or investigating opportunities to improve on-pack consumer labelling for disposal or recovery. At a minimum, this activity should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control.*

**Good progress:** *Data showing 0<20% of products have packaging labels for disposal or recovery. The purpose of a disposal/recycling label is to assist the consumer to decide how the package should be disposed of, e.g. to a recycling or rubbish bin. Commonly used labels include the chasing arrow recycling symbol ('Mobius loop') or anti-litter logo ('Tidyman'). Written advice can be more specific, e.g. 'Please recycle' or 'Rinse and recycle' where appropriate. It will assist consumers if general statements such as 'Please dispose of thoughtfully' are supported with more specific advice on disposal or recovery options. Note: The Plastics Identification Code is not a recycling symbol (it indicates the type of plastic used).*

**Advanced:** *Data showing 20<50% of products have packaging labels for disposal or recovery. Look for opportunities to add disposal/recycling labels or to make them more specific or easier to follow. See above for a description of labels.*

**Leading:** *Between 50<100% of products have labels for disposal or recovery.* Look for opportunities to add disposal/recycling labels or to make them more specific or easier to follow. See above for a description of labels.

**Beyond best practice:** 100% of products are labelled for disposal or recovery in compliance with ISO/AS 14021 Standard for self-declared environmental claims. See above for a description of labels.

The principles and guidelines in ISO 14021 aim to promote labelling that is clear, effective and unambiguous. Misleading claims and labels (e.g. saying that a package is recyclable when there is no system to collect and recycle it in Australia, is contrary to the Australia Consumer Law.

### Sector variation guidelines:

- Packaging suppliers: The ‘consumer’ is their customer, e.g. a brand owner. Labelling only applies to B2B packaging.
- Retailers: The criterion applies to the design of own-brand product packaging and retail packaging (e.g. shopping bags, produce bags) only. Retailers without own-brand products can focus on the packaging they give to consumers to carry products home.
- All non-brand owners: can estimate rather than calculate percentages
- Importers, distributors: this criterion is not applicable (refer to Criteria X – procurement)
- Brand owners that do not design their own packaging, i.e. they rely on suppliers to provide ‘off the shelf’ packaging or to develop the packaging: this criterion is not applicable

**Links to resources:** ISO/AS 14021, Guide to commonly used logos (to be developed by APCO), downloadable versions of the Mobius Loop (various) and Tidyman symbols.

## 10. Product-packaging innovation

**Objective:** To reduce the life cycle environmental impact of packaging through innovation in the design of the product-packaging system

### Definitions:

The ‘product-packaging system’ includes the product and all associated packaging (retail and distribution).



'Innovation' could involve changes in the product format (e.g. concentrated to reduce size and weight), product delivery system (e.g. from physical delivery to digital download), or business model (e.g. from product to service).

'Optimised' means that no further improvements in packaging sustainability are possible, considering interactions between the packaging and product (e.g. impacts on product waste), regulatory restrictions etc.

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.

### Levels:

**Getting started:** *Some progress in product-packaging system innovation to improve sustainability (at least one case study).* The company can provide at least one example of a product innovation that is under development or completed, which improves the sustainability of the packaging system.

**Good progress:** *The company has an explicit commitment to innovation in product-packaging system innovation to improve sustainability.* This commitment could be expressed in a formal company document, e.g. sustainability strategy or business plan, website or other publication.

**Advanced:** *A documented procedure is in place to evaluate the sustainability of whole product-packaging systems to identify opportunities for innovation and the company is reporting on progress.* This procedure utilises life cycle assessment (LCA) or a similar life cycle approach and considers impacts of the product and all its packaging.

**Leading:** *Between 50<100% of product-packaging systems have been evaluated using LCA or similar life cycle approach to identify opportunities for innovation and packaging outcomes have been optimised.* There is documentary evidence that life cycle reviews of the product-packaging system have been undertaken and that no further improvements are feasible at the current time.

**Beyond best practice:** *All product-packaging systems have been evaluated using LCA or similar life cycle approach to identify opportunities for innovation and all packaging has been optimised using a documented process.* There is documented evidence that life cycle reviews of the product-packaging system have been undertaken and that no further improvements are feasible at the current time.

### Sector variation guidelines

- Packaging suppliers: The criterion applies to materials used to make packaging for their products (i.e. used to transport packaging products to customers)
- Retailers: The criterion applies to the design of own-brand product packaging and retail packaging (e.g. shopping bags, produce bags) only. Retailers without own-brand products can focus on the packaging they give to consumers to carry products home.
- Importers, distributors and brand owners with no control of product/packaging development: this criterion is not applicable

## 11. Business-to-business (B2B) packaging

**Objective:** Reduce the amount of single-use B2B packaging<sup>xix</sup>

### Definitions:

B2B packaging is packaging used to distribute products to business customers.

‘Absolute consumption’ means the weight of packaging material.

‘Relative consumption’ means the weight of packaging material relative to a measure of business activity, e.g. turnover.

‘Reusable’ means a characteristic of packaging that has been conceived and designed to accomplish within its life cycle a certain number of trips or uses for the same purpose for which it was conceived<sup>xx</sup>.

### Levels:

**Getting started:** *Some progress is being made in reducing single use B2B packaging to customers (at least one case study).* This can be achieved, for example, by improving packaging efficiency (weight or volume), switching to bulk distribution, by reusing incoming packaging for distribution to customers, or by introducing reusable packaging (e.g. plastic drums or crates). While each opportunity needs to be evaluated on a case-by-case basis, the preferred strategies from a sustainability perspective are likely to be reduction/elimination followed by multi-use systems. A systems approach, for example by using LCA, is essential to ensure that reuse achieves an overall sustainability benefit.

**Good progress:** *Data showing 0<20% reduction in absolute or relative consumption of single use B2B packaging to customers over the last 12 months.* This can be

achieved, for example, by improving packaging efficiency (weight or volume), switching to bulk distribution, by reusing incoming packaging for distribution to customers, or by introducing reusable packaging (e.g. plastic drums or crates). While each opportunity needs to be evaluated on a case-by-case basis, the preferred strategies from a sustainability perspective are likely to be reduction/elimination followed by multi-use systems. A systems approach, for example by using LCA, is essential to ensure that reuse achieves an overall sustainability benefit.

**Advanced:** *Data showing 20<50% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months. See above for description of how this can be achieved.*

**Leading:** *Data showing 50<100% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months. See above for description of how this can be achieved.*

**Beyond best practice:** *There is zero single use B2B packaging going to customers, i.e. it is all reusable. A systems approach, for example by using LCA, is essential to ensure that reuse achieves an overall sustainability benefit.*

### Sector variation guidelines

- Packaging suppliers: The criterion refers to B2B packaging they use to transport products to customers
- Retailers: The criterion applies to B2B packaging from suppliers, with a focus on packaging under their control, i.e. own-brand products and fresh produce.
- All non-brand owners: can estimate rather than calculate percentages.

**Links to resources:** Case studies

## 12. On-site waste diversion rate

**Objective:** Increase the recovery of packaging waste generated on-site. A proxy measure is used, i.e. total waste diversion from landfill, as most companies do not measure packaging waste separately from other waste.

### Definitions:

The 'waste hierarchy' places the highest priority on **avoidance** (action to reduce the amount of waste generated followed by **resource recovery** (reuse followed by recycling,

reprocessing and energy recovery, consistent with the most efficient use of the recovered resources); and finally, **disposal** in the most environmentally responsible manner<sup>xxi</sup>.

‘Highest potential environmental value’ means ‘that recovery is occurring at the optimal level of the waste hierarchy, based on available recovery systems and sustainability impacts of alternative recovery options (e.g. composting vs recycling, or recycling vs energy recovery).

### Levels:

**Getting started:** *0<20% solid waste is being diverted from landfill.* The total weight of solid waste generated at the company’s facilities (factories, warehouses, offices, retail stores etc.) is being measured, with a breakdown of the following where applicable:

- Reuse
- Recycling
- Composting
- Recovery, including energy recovery
- Incineration (mass burn)
- Landfill.

The diversion rate is measured by dividing the quantity recovered for reuse, recycling, composting or energy recovery by the total quantity generated in a particular year.

**Good progress:** *Data showing 20<50% solid waste diverted from landfill.* The total weight of solid waste generated at the company’s facilities (factories, warehouses, offices, retail stores etc.) is being measured, with a breakdown of the following where applicable:

- Reuse
- Recycling
- Composting
- Recovery, including energy recovery
- Incineration (mass burn)
- Landfill.

The diversion rate is measured by dividing the quantity recovered for reuse, recycling, composting or energy recovery by the total quantity generated in a particular year.

**Advanced:** *Data showing 50<100% solid waste diverted from landfill.* See above for how this is to be measured.

**Leading:** *Data showing zero solid waste to landfill (100% diversion).* See above for how this is to be measured.

**Beyond best practice:** *100% of packaging is recovered for highest potential environmental value (circular economy).* This means that the waste hierarchy has been applied to ensure that the value of the embodied materials and/or energy is retained as much as possible and for as long as possible, e.g. through Closed loop recycling (e.g. drum to drum) or by recycling into another high value product that can itself be recycled a second time. Case-by-case analysis required.

### Sector variation guidelines:

Some differences in scope, i.e.:

- Packaging suppliers: On-site was to be defined as all solid waste generated in manufacturing facilities, distribution centres (DCs) and offices
- Retailers: On-site waste to be defined as all waste generated in distribution centres (DCs) retail stores and offices

**Links to resources:** GRI 309 (Effluent and waste)<sup>xxii</sup>, APCO template (Excel) on how to calculate the diversion rate (to be developed)

## 13. Supply chain influence

**Objective:** Engage with suppliers to build support for and capacity to achieve packaging sustainability goals.

**Definitions:** A tier 1 supplier provides goods or services directly to the procuring entity.<sup>xxiii</sup>

### Levels:

**Getting started:** Packaging sustainability goals and packaging guidelines are communicated to your entire supply chain, but in particular immediate upstream (tier 1 suppliers) and downstream contacts (customers). Packaging sustainability goals (e.g. in your Packaging Sustainability Plan and any associated policies) and packaging guidelines (SPG or equivalent) could be shared with upstream and downstream contacts in the supply chain.

**Good progress:** Support is provided to suppliers to improve their understanding of packaging sustainability goals and strategies, e.g. through regular dialogue or training. Initiatives that build knowledge and capacity amongst suppliers, particular SMEs, will improve the organisation's ability to achieve its packaging sustainability goals. These initiatives could be the provision of detailed guidelines or training sessions.

**Advanced:** The company collaborates with tier 1 key suppliers to share knowledge and improve packaging sustainability. Companies should harness suppliers' sustainability expertise to identify opportunities for improvement. At a minimum, this can be achieved through regular face-to-face meetings to share information and ideas for improvement. Collaboration goes beyond the duration of an individual contract, e.g. it could involve longer term initiatives to develop a new packaging material or packaging format, etc.

**Leading:** The company has processes in place to evaluate supply chain risks and opportunities for influence throughout the entire supply chain (tier 1 and below). Risks and opportunities can be evaluated in different ways, for example by analysing individual suppliers, risks/opportunities in their supply chain and capacity to influence. Alternatively, or in addition, purchase categories could be mapped against key sustainability issues to identify risks and opportunities.

**Beyond best practice:** The company has processes are in place to monitor and track compliance with key packaging sustainability requirements throughout the entire supply chain (e.g. beyond tier 1 and both up and down the supply chain) (full traceability). This could be done, for example, by developing a scorecard methodology to monitor sustainability criteria along with service, quality, delivery, cost etc. Regular review meetings with suppliers will provide an opportunity for both parties to communicate, share concerns and foster a good business relationship.

#### **Sector variation guidelines:**

- Packaging suppliers: The criterion refers to procurement of packaging for their products (i.e. used to transport packaging products to customers)
- Retailers: The criterion applies to the design of own-brand product packaging, retail packaging (e.g. shopping bags, produce bags) and retail-ready packaging. Questions to focus on all 3 categories – RRP, own brands, carry bags.

**Links to resources:** ISO 20400, case studies

## C. PILOT STUDY PARTICIPANTS

Company	Sector	Size	State	First Name	Surname	self-assess tool returned	Attended Workshop
Asahi Beverages	Food & Beverage	L	VIC	Natalie	Tabone	y	y
Australian Postal Organisation	Shipping	M	VIC	Dai	Forterre	y	y
Best & Less Pty Ltd	Retailer	M	NSW	Rosita	van Vuuren	y	y
British American Tobacco Australia	Tobacco	L	NSW	Jason	Dunn	y	
Candan Industries Pty Ltd	Fuel	S*	QLD	Charmaine	Bondeson	y	
Canohm	Homeware	S*	VIC	Dave	Coultas	y	
CHEP	Not Applicable	S	NSW	Lachlan	Feggans	y	y
Country Road Group Pty Ltd	Clothing	M	VIC	Lucy	King	y	
Cripps Nubake Pty Ltd	Food & Bev	S	TAS	Stephen	Harvey	y	
CSR Building Products Limited	Hardware	S*	NSW	Linden	Birch	y	
Dell Australia Pty Ltd	Communications / Electronics	M	NSW	Susan	Poh	y	y
Emirates Leisure Retail	Food and Beverage	S	VIC	Joyce	Maret	y	
Imperial Tobacco Australia Limited	Tobacco	M	NSW	Sami	Hakim	y	y
Inghams Enterprises Pty Limited	Food & Beverage	M	NSW	Julia	Seddon	y	
ITW AAMTech, a division of ITW Australia Pty Ltd	Fuel	S*	VIC	Anne-Marie	Strike		
Kathmandu Pty Ltd	Clothing	M	VIC/ NZ	Oliver	Milliner	y	
Kentucky Fried Chicken Pty Ltd T/A KFC	QSR (Food & Bev)	L	NSW	Sarah	Collier		
Kodak Alaris Australia Pty Ltd	Comms & Elec	S	VIC/ UK	Greg	Batts	y	y
LEGO Australia Pty Ltd	Homeware	M	NSW	Bernard	Lee	y	
Lindt & Sprungli	Food & Beverage	M	NSW	Steve	Wren	y	y
Martin Brower (McDonald's Australia Limited)	QSR (Food & Bev)	L	NSW	Susanne	Craig	y	
Nestlé Australia Limited	Food & Bev	L	NSW	Jacky	Nordsvan	y	y
OfficeMax	Homesware	M	VIC	Cameron	Milnes	y	y
PACT Group (VIP Packaging)	Packaging Manufacturer	M	VIC	Amber	Pawsey	y	
Parmalat Australia Ltd	Food & Bev	L	QLD	Nathan	Landon		
Philips Electronics Australia Limited	Comms & Elec	M	NSW	Phillip	Roberts		
Podravka International Pty Ltd	Food & Bev	S*	NSW	Sara	Ocepek	y	y
Sanofi-Aventis Healthcare Pty Ltd	Pharm	M	QLD	Lonnie	Toia		
Sealed Air Australia Pty Ltd - Food Care	Packaging Manufacturer	M	VIC	Alan	Adams	y	
SingTel Optus Pty Ltd	Comms & Elec	S	NSW	Nik	Comito		
Southern Australia Wool Products TA Minijumbuk	Homeware	S*	SA	Kate	Gill		
The Smith's Snackfoods Company Limited & Sakata Rice Snacks Australia Pty Ltd	Food & Bev	L	NSW	Janine	Cannell	y	y
Virgin Australia Airlines Pty Ltd	Airline	S*	NSW	Jodi	Litzenberger	y	y
Wellman Packaging Pty Ltd	Packaging Manufacturer	S*	NSW	Tracey	Buckley	y	y
Wesfarmers Limited	Retailer	L	WA	Fiona	Lawrie	y	
Confidential	Food and Beverage	M	NSW	-	-	y	y
Confidential	Tobacco	M	VIC	-	-	y	y
<b>Total</b>						<b>30</b>	<b>16</b>

## D. RESPONSES TO CHALLENGES: PHASE 1

This document shows how ISF, in consultation with APCO, decided to respond to feedback from participants in the workshop and from survey and pilot tool responses.

Category	Issue detail	Resolution	Rationale
Specific criteria amendments	Packaging sustainability strategy (1) The order of the performance levels does not match how businesses operate	The order of performance levels has been amended.	Amended to more accurately represent how businesses operate. Some criteria has been converted to additive rather than conditional i.e. the company will score points for each thing they are doing within the criteria independent of order.
	Packaging sustainability strategy (1) A small business said formal plans and annual reports are not relevant.	Guidance to specify equivalence for a small business. i.e. Strategy = any formal doc setting out company’s vision/goals, Reporting = any publically available information. The definition of reporting will be added to the guidance to make this clearer	
	Packaging sustainability strategy (1) A global company said plans are done globally so do not incorporate country guidelines.	Commitment to use the SPG can be documented in another formal document that has been adopted by management in Australia.	There has to be some evidence of commitment by Australian management to use the SPG.
	Product-packaging innovation (2) The tool should try to factor in the different ways companies approach sustainability and how they assess their areas of greatest impact. The tool currently incorporates a little on product/packaging optimisation, but for leading companies, that may not be sufficient. For example, companies that consider the sustainability of a product, or a group of products, holistically e.g. balancing food waste objectives and packaging sustainability objectives, rather than considering packaging in isolation.	This has been addressed through the following criteria:  Product-packaging innovation (2) Packaging material efficiency optimisation (10)  These criteria have been amended to allow for better recognition of holistic life-cycle analysis of whole of product (including packaging) sustainability.	This allows for greater coverage of the range of current practices, from a focus on light-weighting for companies at the beginning of the process, to whole of product sustainability optimisation for companies who are further advanced.



Category	Issue detail	Resolution	Rationale
	Consumer engagement (3) Not applicable to Tobacco (& Airlines/Pharma?) companies. Or packaging companies.	Companies do not need to respond to questions that are not relevant. Reporting options should allow for comparison/benchmarking to similar companies. Specific guidance has been developed for packaging companies.	Allows for greater relevance while retaining comparability.
	Consumer engagement (3) Some businesses did not understand that this is about broader sustainability, or did not think it should be in scope (eg. fair trade, MSC).	Criteria is now more clearly focused on packaging sustainability to demonstrate relevance. References to product ecolabels e.g. Fair Trade & MSC removed. Guidance has been provided to clarify.	Keeps the main focus on packaging sustainability, while acknowledging that packaging can be used to influence broader sustainability issues e.g. food waste..
	Consumer engagement (3) The order of the performance levels does not match how businesses operate	The order of performance levels has been amended.	Amended to more accurately represent how businesses operate.
	Consumer engagement (3) Need to clarify how to quantify. Each individual product, packaging types, etc.	Quantification based on products, i.e. ' <i>&gt;50% of products have packaging...</i> '	It is more logical for companies to collect data on number of products rather than packaging
	Closed loop collaboration (4) and Industry leadership (5) Consider combining Closed loop collaboration (4), Consumer engagement (3) and Other product stewardship programs (previously 20) into one 'other' category <ul style="list-style-type: none"> <li>allow companies to tick the box for specific initiatives and to provide other examples</li> <li>recognise contributions to APCO initiatives, e.g. mentoring other signatories or participating in working groups</li> </ul>	The overall structure of the framework has been amended and criteria have been re-grouped under more relevant categories. These criteria have been grouped under Leadership. Closed Loop collaboration and Consumer Engagement have been retained as separate criteria.  Product stewardship has been changed to industry leadership (5) and the requirements modified.  A 'free form' section will be provided for companies to provide information on additional initiatives that will not be included in scoring for the first iteration of the tool.	Closed loop collaboration is important for APCO to track and the other two criteria are designed to recognise leadership from companies on packaging sustainability.
	Closed loop collaboration (4) May be about joining rather than developing programs? The order of the performance levels does not match how businesses operate.	The wording and order of performance levels has been amended.	Amended to more accurately represent how businesses operate.
	Closed loop collaboration (4) Can this include global?	Australian initiatives only are relevant	APCO is only interested in Australian impacts.

Category	Issue detail	Resolution	Rationale
	Closed loop collaboration (4) More isn't necessarily better. Total size of impact is what matters. Level 5 could encourage perverse behaviour to score better.	The criterion now incorporates improvement of existing initiatives at level 5.	This reflects new or enhanced performance.
	Closed loop collaboration (4) What if you only use packaging that is already recyclable? (ie. could there ever be an N/A for this criteria?)	No change	There is scope for companies to support closed loop recovery in others ways, e.g. R&D to increase quality/use of recycled materials, or improved infrastructure to collect packaging
	Packaging design or procurement procedures (6) Some businesses said formal policy/procedures not relevant.	Guidance clarifies what is relevant.	The guidance covers a range of types of documents/procedures that could be considered relevant.
	Packaging design or procurement procedures (6) For design criterion, there is confusion for companies that only buy rather than design packaging, therefore limited or no influence	Criteria for design and procurement using SPG have been combined into one criterion (6)	This makes the tool easier to follow and recognises that not all companies design their own packaging. Avoids the need to have separate criteria for this critical performance requirement or to make one of them 'not applicable'.
	Packaging design or procurement procedures (6) Not all businesses would run LCA on every product, but potentially classes of product.	Guidance covers what is required to meet LCA level, including review of classes of product.	Guidance reflects how businesses implement LCA.
	Packaging design or procurement procedures (7) Some companies have almost no new products, others have thousands of new products and cannot track them all.	The criterion now covers products/packaging that have either been designed or reviewed (i.e. through normal business processes) within the last 12 months	The period is time bound and incorporating review of products means that even companies who have no new products are likely to be able to respond to the question. It also means that not all existing products need to be included, only those under review.

Category	Issue detail	Resolution	Rationale
	Packaging design or procurement implementation (7) Calculating this is difficult for some companies, difference between product/product lines, etc.	Guidance clarifies that this applies to new products that were launched during the year; packaging that was updated or refreshed during the year; and/or product or packaging reviews that were undertaken during the year as part of a normal business process. Guidance clarifies that companies can choose the way they collect data, i.e. 'Product' can be SKUs, groups of products or some other categorisation that is meaningful for the company.	As above This provides greater flexibility in how implementation is measured (SKUs, groups of products etc.) to accommodate different business processes.
	Packaging design or procurement procedures (7) What happens for companies that procure rather than design packaging?	The criterion now incorporates procurement.	The criterion covers both design and procurement so it should be relevant to all companies.
	Packaging material efficiency policy (8) What happens for companies that procure rather than design packaging?	Companies will be benchmarked against relevant companies e.g. those in the same sector with similar issues.	Companies that procure may still have some degree of control over what they procure and over distribution (B2B) packaging. Flexible benchmarking allows comparison of like companies.
	Packaging material efficiency optimisation (10) Need more clarity / criteria on the 'sustainability' of materials and the trade-off between heavier weight and longer life i.e. full lifecycle of packaging. For example, just because packaging is heavier does not necessarily mean it is less sustainable because it might last longer.	This criterion has been amended to focus less on quantity (product/packaging ratio) and instead on optimisation of packaging quantity.	This acknowledges that quantity optimisation does not always equate to least or lightest packaging. The higher performance levels of the criterion now focus on optimisation rather than reduction, because this represents a more holistic approach.
	Packaging material efficiency optimisation (10) For the packaging efficiency outcome criteria, there were concerns that 'optimisation' is difficult to demonstrate. Any relative measure e.g. relative to turnover or product weight, can be misleading and both numerator and denominator change over time.	The first few levels focus on reduction and 2 higher levels on optimisation.	This recognises that material reduction is the primary goal of this criterion, but that optimisation is the ultimate goal. The process to demonstrate optimisation is based on the relevant ISO standard.
	Post consumer recovery (11) Consider whether the framework should give more emphasis to the waste hierarchy – avoid first, reuse, etc	Performance level 5 requires that recovered packaging is optimised to highest value. The waste hierarchy is detailed in the guidance notes to illustrate the preference order for recovery. We will add this to the guidance.	Optimised to highest value implies the waste hierarchy is applied

Category	Issue detail	Resolution	Rationale
	Post consumer recovery (11) Need to be clear on definitions of terms.	Guidance provides clarity on definitions	
	Post consumer recovery (11) Need to clarify how to quantify. 'Product lines' not relevant for all businesses.	Guidance clarifies that companies can choose the way they collect data, i.e. 'Product' can be SKUs, groups of products or some other categorisation that is meaningful for the company.	This provides greater flexibility in how implementation is measured (SKUs, groups of products etc.) to accommodate different business processes.
	Post consumer recovery (11) Volumes (maybe even %s because they can be reverse engineered) of material types are commercially sensitive for some companies.	Commercially sensitive data will not be made public. Only % data (not raw figures) will be reported,	APCO is very aware of the need for confidentiality.
	Post consumer recovery (11) For some companies waste collection is third party, they have no visibility.	The criterion is not about how much is recovered but about how much is recoverable. Companies can choose not to answer questions that are not relevant.	Flexible benchmarking allows comparison of like companies.
	Use of renewable or recycled materials (12) Concerns by companies that take holistic view of sustainability, that recycled should not be a target (because increasing weight of cardboard improves score). Need to clarify how level 5 is related specifically to this criteria for example packaging can be optimised without getting 100% applicable packaging from renewable/recycled.	This criterion encourages renewable <b>or</b> recycled material, recognising that recycled content is not always possible or advantageous. The highest performance levels now focus on optimisation, which recognises legitimate constraints.	This acknowledges the trade-offs required for optimisation.
	Use of renewable or recycled materials (12) Concern that this favours companies with board/fibre and penalises companies that use plastic, because there is limited supply of RPET or rHDPE.	The highest performance levels now focus on optimisation, which recognises legitimate constraints.	
	Consumer labelling (13) Not applicable to all companies e.g. Tobacco (& Airlines/Pharma?) companies, packaging companies.	Companies do not need to respond to questions that are not relevant. Reporting options should allow for comparison/benchmarking to similar companies. Specific guidance has been developed for packaging companies.	Allows for greater relevance while retaining comparability.

Category	Issue detail	Resolution	Rationale
	<p>B2B packaging (14)                      B2B packaging needs more emphasis in the framework. Consider combining criteria for B2B packaging <u>from</u> suppliers (12) and B2B packaging <u>to</u> customers (13). Differences between modules could be:</p> <ul style="list-style-type: none"> <li>• Brand owners to focus on B2B <b>to</b> customers</li> <li>• Retailers to focus on B2B <b>from</b> customers but only for products they control (own brands &amp; fresh produce)</li> <li>• Packaging companies to focus on product development (new applications for reusable packaging) – reward innovation and collaboration</li> </ul> <p>B2B may not be applicable to other sectors</p>	<p>These criteria have been combined and the criterion on B2B packaging (14) now asks only about packaging to customers (to avoid double counting), apart from retailers (<u>from</u> customers)</p>	<p>It was agreed that focusing on reducing B2B <u>to</u> customers better reflects what is within the control of companies. The exception is retailers, who can influence incoming packaging for own brand products and fresh produce, as well as retail ready packaging for other products. The guidance will reflect how the criterion is to be applied for different sectors.</p>
	<p>B2B packaging (14)                      Refocus on APCO’s core objective of reducing single use B2B packaging rather than quantitative data from everyone. Target companies with ability to influence, i.e. brand owners.</p>	<p>The criterion is now targeted to reflect influence.</p>	<p>See above.</p>
	<p>B2B packaging (14)                      APCO to consider how they can measure (or amend) the KPI in their strategic plan: ‘reduced single use B2B packaging as a proportion of turnover’. Companies will not supply turnover data.</p>	<p>The criterion no longer asks for turnover.</p>	<p>It was agreed that turnover is not a useful measure.</p>
	<p>On-site waste diversion rate (16)                      For the Waste management target criteria reconsider whether it is necessary for companies to have a specific target for packaging waste (most companies do not differentiate from other waste).</p>	<p>Criterion now asks for total waste diversion (16) from landfill as a proxy measure</p>	<p>Most companies do not measure packaging waste separately from other waste and the cost of doing so was deemed to outweigh the benefit.</p>
Criteria - general	<p>Do we need stretch criteria? What if we only have core, recommended and free form sections (or core and non-core)?</p>	<p>The framework will have two sections. It has been amended to include core and non-core criteria</p>	<p>Stretch criteria were deemed to be an unnecessary and unhelpful distinction.</p>
	<p>Criteria need to also capture what the company is planning to do, at the moment the metrics are backward looking.</p>	<p>There will be a free form section in the tool to allow companies to provide information on future plans. This will be included in the report but will not be incorporated into scoring.</p>	<p>This allows acknowledgement of intentions while scoring current performance.</p>

Category	Issue detail	Resolution	Rationale
	Consider the order of certain criteria, where companies indicated they could answer earlier and later levels, but not middle levels.	All criteria have been reviewed and adjusted where considered necessary. Some criteria will be based on a cumulative score for the number of outcomes achieved for those criteria, rather than on a progressive performance scale. This will be subject to further review and feedback.	This balances progressive scoring, where this is possible (in the majority of cases) with the need for an alternative where progressive scoring does not make sense e.g. where performance may be based on the number or type of initiatives implemented.
<b>Modules: adapting the framework for different sectors</b>	The modularity could be based on power/influence/control over packaging outcomes. For example, a company with a vertically integrated supply chain or a large, highly influential company may have a lot more control over this than an SME. Companies that do not produce anything may also have much less control than brand owners. A series of upfront questions about the nature of the business could help direct companies to relevant subsequent questions, with higher expectations from those with more control. Participants commented that the tool seemed to focus on product manufacturers.	Companies will have the option to not answer questions that are not relevant for them Design and procurement criteria have been combined. We are proposing a reporting system that allows companies to select categories for benchmarking based on which questions have been answered by other companies who select the same category.	It was agreed that the tool needs to reflect the different ways in which companies operate and the degree of control they have over packaging decisions, in a way that does not penalise them for having less control.
	Options for modularisation include: Taking each question and tailoring it to suit the needs of each 'sector' (and potentially sub-sector. Re- wording could reduce the need for modularisation. If there are criteria that do not make sense for a particular type of company, could try to come up with a commensurate replacement criteria first, before dropping it entirely. Have some additional recommended criteria only for specific companies.	<p>The aim is to have one generic tool that is applicable to as many companies as possible, with the option to not answer questions that are not relevant.</p> <p>There will be different versions of the tool for key sectors in the supply chain: packaging suppliers, brand owners (majority of members), retailers, importers &amp; distributors</p> <p>Some specific criteria will be worded differently for some companies and some sectors will have additional specific questions, relevant only to them.</p> <p>Other differences, e.g. specific sub-sectors, can be accommodated through guidelines on how they can/should answer certain questions.</p>	Sufficient modularisation without creating multiple versions of the tool and questions, to reduce complexity and increase comparability of results.

Category	Issue detail	Resolution	Rationale
	Give the option for companies to decide themselves if a criteria / question is relevant and then ask for justification for why that question is not relevant. All companies must answer the 'core' criteria but the 'recommended' section could be opt-in / modularised for different companies.	All companies are required to answer core criteria, all non-core criteria are optional. Justification will not be required for not answering questions.	Requiring all companies to answer core criteria allows for comparison of performance against APCO's core objectives. It would be too onerous to require justification and review of these for unanswered questions.
	How do we create a framework that is relevant for a global company with many product lines? Do we reduce the amount of quantitative data they collect, or do we have a lower bar for the quality of the data?	Global companies will be expected to respond for their local Australian operations, where possible. All companies will be required to provide the same data commensurate with the scale of their operations, with some variations for sectors.	We anticipate that over time as systems are developed, data collection will become easier. Requiring the same data from all companies allows for comparison within sectors, it also helps to identify data gaps.
Quantitative data	Make it fit for purpose i.e. don't ask for more data than APCO needs right now	Data requirements have been carefully considered for each criteria and criteria have been amended accordingly to ensure that it meets APCO's needs while reducing the burden of data collection.	The aim is to ensure that only sufficient, relevant and necessary data is collected.
	Many companies expressed a preference for reporting percentages rather than raw data.	All criteria have been carefully considered for data requirements to distinguish between data that APCO needs to aggregate and criteria for which an estimation would suffice. In some cases, criteria requiring data have been replaced with new process criteria.  For some criteria brand owners will be required to provide raw data while others will be allowed to provide estimates	Raw data is now only required for criteria that APCO needs to be able to aggregate results for reporting to Government against KPIs, to reduce the burden of data collection.
	Consider including extra checkboxes for data and case studies that say "this should not be made public" etc. (And this could be expanded to include "Is this a good case study for other companies to mimic?", "Do you think this should be considered for additional criteria?" etc)  For reporting only calculated percentages should be presented, not raw data.	Companies will be able to indicate any information provided that should not be made public.  Raw data will never be made public.	APCO recognises the importance of confidentiality and will not make public any confidential information or data.

Category	Issue detail	Resolution	Rationale
	Only ask for packaging data for products that a company controls, i.e. it's their brand. This is only relevant to brand owner and retailer modules	Several criteria now only ask for data for products that companies control.  Brand owners have to provide raw data but other companies can estimate percentage changes.	This recognises the difficulties in providing data for packaging a company has little or no control over.
	Allow companies to choose which metric they use to measure efficiency improvement, e.g.. relative to products, employees or customers. This allows them to pick a metric that is appropriate for their business, and may address some confidentiality concerns (employees/customers less sensitive and easier to collect data for than production), however it may reduce comparability.	Ratios are no longer requested. The focus is on case studies (L1), the number of products that have reduced the amount of packaging (L2 & 3) and optimisation processes (L4 & 5)	The metric recognises initiatives that reduce the quantity of packaging, while ensuring that the focus is ultimately on optimisation.
	Confidentiality must be guaranteed	APCO understands the need for confidentiality and will not make public any confidential data.	
	Review data requirements for non-brand owners. They could estimate rather than calculate, using a tool provided by APCO.	Brand owners have to provide raw data but other companies can estimate percentage changes.	As above.
	When we are aggregating, we need to understand estimation rules of thumbs/data quality e.g. collect data on the quality of the accuracy of the information to ascertain its reliability (e.g. low – med – high quality data).	The final tool will include supplementary questions on data quality where relevant to particular criteria (low-med-high).	Allows APCO to evaluate overall data quality
Scoring and Reporting	Continue to allow companies to comment on and qualify/explain responses – this was deemed useful by companies although APCO would need to consider how this information will be used.	Each question will include an additional space for companies to add further explanation if they wish.	Provides an opportunity for companies to explain their responses (e.g. reasons for action or non-action).
	We should consider the option of allowing companies to tick something like, 'no change since previous year' to speed up reporting for process questions, and for evidence. In other words, reporting more by exception, rather than repeating the same info every year.	This functionality will be incorporated into the online tool	This will save companies time in completing the tool in subsequent years.



Category	Issue detail	Resolution	Rationale
	We need to be clear what the score is being used for. CEOs will use for comparison, but essentially it is for improving self-performance and for benchmarking with similar companies. Not necessary for a logistics company to be compared with a tobacco company. Benchmarking can be done separately to scoring. So it would not necessarily matter if each company's score was out of a different denominator.	We aim to provide reporting options that provides benchmarking choices based on category self-selections (e.g. sector, level of control over packaging design) and the highest number of questions answered by companies in the self-selected category.	Flexibility in benchmarking should allow for more meaningful comparison of scores.
	We need to review scoring and make sure companies get credit for what they are doing if they do not get to 'progress' in present system.	Criteria have been reviewed to ensure that the progression logic is sound and where necessary, cumulative scoring has been used instead of progressive.	This should allow for appropriate recognition.
	Design criteria could be weighted higher than other metrics because if you get design right then all other metrics don't matter as much.	Criteria are not weighted.	Good process does not always lead to good outcomes. Good outcomes help to verify good design. Weighting criteria leads to overly complex and less transparent and less justifiable scoring.
	Given the potential complexity of scoring, consider scoring 'bands' i.e. use the score to place the company on e.g. a traffic light spectrum.	Recommendations on scoring and reporting options will be provided in the final report.	
	Lots of companies said they want cumulative scoring (a point for any criteria met), but the scoring discussion table ended up deciding that progressive is probably best for scoring. There were some suggestions for resolving this: 1) review the order of criteria, and make sure they are logical, 2) allow companies to answer later questions and have the responses go into their automatic report, but not count against their score. Conditional scoring versus cumulative scoring?	The order of progressive scoring has been reviewed and amended where identified as problematic by feedback. Where appropriate, cumulative scoring has been included.	Progressive scoring retains simplicity and comparability and the cumulative criteria are still progressive but based on the number of initiatives implemented.
	Macro level indicators could be considered to provide context to overall results.	Recommendations on scoring and reporting options will be provided to give context.	The final benchmarking report will give companies a sense of how they are performing relative other organisations within the same industry
	If companies are not required to publish the final report, we should work out what should and should not go into the report in order to encourage them to publish. Encourage transparency.	Recommendations on reporting options will be provided in the final report.	

Category	Issue detail	Resolution	Rationale
	Provide some examples of Best Practice to assist with the journey to the next stage (focus on this rather than data collection).	Guidance, including examples of Best Practice, will be built into the first iteration of the tool.	
	The structure of the tool could be changed to have both a quantitative section (contributes to scores) and a 'free form' response section (will not be used for scoring but will be used in the final report). The free form response section may be used to provide similar functionality to the present action plans and companies can report forward looking plans. This could also allow companies the option to include other information/case studies not covered by the framework, in such a way that APCO could use it to identify common areas/trends that could eventually be incorporated into the framework.	The tool will include a free form section that will allow companies to report on other measures they are undertaking, that will not contribute to scoring, but which may be incorporated into later versions of the framework and tool.	Allow companies to report on other measures while retaining comparability in scoring.
	We need to be clear about global versus local reporting (e.g. is a global company answering on behalf of whole company or just local aspects. Companies were answering for both global and local during their responses)	APCO has stated that companies should report on their local (Australian) operations.	APCO is interested in Australian impacts and progress.
	The tool should allow flexibility in choosing which period to report for as (particularly for global companies), data may not be available for the exact reporting period.	The tool allows flexibility in reporting e.g. the last 12 months for which data is available.	
Other issues	It would be good if the reporting process can be used by APCO to connect companies to work collaboratively on solutions. This was suggested by participants – maybe identify suppliers who are also APC signatories and connect them with the companies they supply. Can APCO build in some type or collaborative cycle at the end of each reporting round to come to a set of shared/industry findings and recommendations?		

Category	Issue detail	Resolution	Rationale
	APCO should consider setting out a pathway for review and evolution of the tool/framework e.g. v1 will be in place for the first 3 years, then reviewed, then reviewed every 5 years thereafter, to take account of evolving technology, processes etc. Can increase requirements over time as capacity & APCO knowledge improves		
	APCO could also consider the role of leading companies e.g. can they be encouraged to participate more as a mentor for companies at the opposite end of the spectrum (additional criteria capturing this)?		
	Uploading of evidence should not be collected during self-reporting stage, just a link or description of evidence. Collecting evidence in first year will be more significant than following years so that a baseline can be created and verified.	Evidence will not be required at the time of tool completion. Sources will be required and evidence will be required if the company's responses are audited. In the first year, a more rigorous checking process should take place to establish a robust baseline.	This will save companies time in completing the tool in subsequent years and will reduce the administrative burden on APCO.
	Self-reporting - APCO might need to audit 'all' companies in the first year to confidently establish the baseline, and then do auditing on an exception- and random- basis		

## E. RESPONSES TO CHALLENGES: SECOND ROUND OF FEEDBACK

This document shows how ISF, in consultation with APCO, decided to respond to feedback from the second round of feedback from 6 companies.

Category	Issue detail	Resolution	Rationale
Specific criteria and amendments	<p><b>1. Packaging sustainability strategy</b></p> <p><b>L3:</b> Who assesses achievable and realistic e.g. company stating by 2018 all packaging recyclable. Capture/assess those who talk but don't walk. Global targets e.g. PESN, CT-Pack, Oceania roadmap.</p> <p><b>L4:</b> Should this not be related to performance?</p> <p><b>L5:</b> How do you capture companies who recognise the role of packaging in preventing food waste, using LCA perspective? How do you cater for a choice of packaging which individually is worse.</p> <p>Continuous improvement should be at any level e.g. ISO 14001...not a guarantee for having good performance. Suggest to "demonstrate continuous improvement over a period...(e.g. 5 years)"</p>	<p>Deleted 'achievable and realistic'. PESN, CT-Pack, Oceania roadmap references in detail section.</p> <p>Criteria 1 amended to provide credit for a life cycle, systems approach</p> <p>No change</p>	<p>We accept that 'achievable and realistic' are subjective.</p> <p>Aim of this level was to have system in place rather than demonstrated outcome. Criteria scoring is additive so this is just one option rather than a high level of performance.</p>
	<p><b>2. Closed loop collaboration</b></p> <p>No feedback</p>		

Category	Issue detail	Resolution	Rationale
	<p><b>3. <u>Product-packaging innovation</u></b></p> <p>Would not call this innovation. Should be core criteria – relates to the function of packaging. Talk about integrating LCA with respect to the product/packaging system</p> <p>Apply levels from criteria 6 to criteria 3</p> <p>‘Product-packaging innovation’ seems like it should fit under packaging design. I understand it could be viewed as leadership in that it is the best practice approach to sustainable design but I think it should be part of design.</p> <p>Under ‘product-packaging’ innovation it states: ‘Brand owners that do not design their own packaging, i.e. they rely on suppliers to provide ‘off the shelf’ packaging or to develop the packaging: this criterion is not applicable’. Could you elaborate on what it means to develop the packaging?</p>	<p>Minor changes</p> <p>No change</p> <p>Criteria has moved to packaging processes &amp; outcomes category</p> <p>Deleted ‘or to develop the packaging’ and more explanation added</p>	<p>LCA is already referenced in the criteria</p> <p>LCA not realistic for most companies so couldn’t measure in the same way as criteria 3</p> <p>Agree that while representing leadership it also fits well under packaging category</p> <p>Previous wording was ambiguous. The changes reinforce the intent, which is to exempt companies that have no influence on packaging design</p>
	<p><b>4. <u>Consumer engagement</u></b></p> <p>L1: How to measure? Too subjective. Provide environmental information on key packaging formats (in terms of sales).</p> <p>L5: Why is on pack the best way of communicating? Packaging sustainability is complex; social media can be a better format.</p> <p>Through packaging design itself e.g. portion control, resealability, Different ways of engaging.</p>	<p>Criteria re-worked to allow for multiple options to engage consumers. Companies can now select the number of initiatives they are engaged in, i.e. the criteria is additive rather than progressive</p>	<p>Agree that labelling will not always be appropriate or most effective way to engage consumers</p>

Category	Issue detail	Resolution	Rationale
	<p><b>5. <u>Industry leadership</u></b></p> <p>L5: Why is that better??? Why is the number important? What about relating back to % sales... producing tangible outcomes</p>	No change	We recognise the limitations of this performance measure, but it is difficult to find a more quantitative measure until best practices are better understood. The criteria could be amended over time to reflect best practice, e.g. by being more specific about which leadership activities will be recognised
	<p><b>6 <u>Packaging design or procurement</u></b></p> <p>Why limit to new packaging? Should be the entire packaging portfolio. Review packaging to identify potential.</p> <p>Can you do this in % # sales # retail units... rather than % packaging formats....?</p> <p>What if LCA demonstrates that SPG is worse. LCA guiding principles, SPG is the toolbox.</p>	<p>'New' removed from description (have already made the change to levels/detail).</p> <p>Minor changes to objective to ensure that the criteria covers new and existing packaging, e.g. to cover regular product/packaging reviews rather than just design or procurement.</p> <p>No substantive change required but edited to clarify that this is measured by % products</p> <p>Definitions changed to state that LCA could be used as alternative to SPG.</p>	<p>This criterion already applied to all packaging but wording in the matrix description didn't reflect this</p> <p>The criterion has already been changed to % products (as defined by the company)</p> <p>SPG is based on life cycle thinking. LCA is a quantitative methodology based on similar principles to the SPG.</p>
	<p><b>6. <u>Packaging materials efficiency</u></b></p> <p>L5: Reviewing packaging formats is within sphere of influence...acting on all of them...it's definitely a stretch target. "And actions have been taken where possible". ISO – identify critical areas and identify the factor that permits you that going further...</p> <p>If you go through the process for all pack formats – that is very good progress.</p>	No change required	This is consistent with what we've proposed, i.e. optimised means they've gone through the process to review efficiency and have actioned 'where possible', but requires justification e.g. through ISO method

Category	Issue detail	Resolution	Rationale
	<p><b>7. <u>Renewable and recycled material</u></b></p> <p>Remove – takes this in isolation, already covered by the LCA...</p>	<p>Retained but criteria tightened to cover renewable/recycled materials only (partly to address Virgin’s feedback under criteria 9). Name changed to reflect new focus and more explanation in detail that this is only one aspect that can’t be viewed in isolation.</p>	<p>Renewable/recycled materials an APCO KPI. Focus on ‘optimisation’ recognises that it shouldn’t be done in isolation from other sustainability and commercial criteria.</p> <p>Other aspects of ‘sustainable materials’ in the previous description are covered more explicitly in the packaging sustainability strategy and the SPG.</p> <p>Over time this criterion could be amended to include other more sustainable materials, as knowledge and best practice evolve.</p>
	<p><b>9. Post-consumer recovery of packaging</b></p> <p>This presumably is where businesses should be able to demonstrate rates of recycling. However as currently framed, it seems to relate more to the potential to recover based on material selection, e.g. potential recovery, rather than actual recovery. As material selection and use is covered elsewhere (criteria 8) this criteria should be amended to make it clear it relates to actual recovery rates.</p> <p>Only employ reuse if it makes environmental sense vs. alternatives.</p> <p>Reuse is not a recovery option...Any reusable packaging should be recoverable.</p> <p>Add energy recovery – recognised recovery option.</p> <p>L5: add ‘environmental’</p> <p>L5: Identified by LCA considering the entire product system.</p> <p>L5: Collected at 100% and valorised through the best end of life alternative....</p>	<p>No change.</p> <p>This criterion is intended to cover potential to recover based on material selection and design. To avoid overlap with criterion 8:</p> <ul style="list-style-type: none"> <li>- Criterion 8 tightened to focus on renewable/recycled content only (see above)</li> <li>- Criterion 9 detail amended to provide more explanation</li> </ul> <p>Clarified in detail section that reuse extends packaging life rather than being a recovery option in itself</p> <p>Companies can now get an additional credit point for extending life through reuse</p> <p>Agree- added to matrix and descriptions</p> <p>Agree – added to matrix and descriptions</p> <p>No change</p> <p>No change</p>	<p>Simplifies the criterion and avoids overlap</p> <p>LCA not the only way to consider waste hierarchy, but include as an option in detail section</p> <p>Already accommodated by existing wording. ‘Best’ is not as clear as ‘highest potential environmental value’ with reference to waste hierarchy</p>

Category	Issue detail	Resolution	Rationale
	<p><b>10. Consumer labelling</b></p> <p>In our operation whilst there are certain opportunities to improve labelling. The ability for our customers to actually recycle products is very limited due to collection in flight. Our recycling processes occur through our staff and back at our catering facilities, so there is a limited extent to which labelling would be useful. More applicable for us would be staff training and recycling systems and processes.</p> <p>At this point it's not clear if CHEP can de-select the consumer labelling section but would assume this is the case as this was key feedback from CHEP. However performance levels 3-5 do cater for advanced circular business models like CHEP's well.</p> <p>The separation of consumer labelling into non-core criteria allows tobacco to not report on this section. If we are unable to report on this will the score be eliminated from our end score?</p> <p>Is this already a requirement as a member of the APC – but no one has been specifying what they are doing.</p> <p>L5: Make sure this proportion is judged per sku.</p>	<p>Can deselect as not relevant</p> <p>Can deselect as not relevant</p> <p>Already addressed in scoring system</p> <p>No change suggested??</p> <p>Companies already have the choice of measuring by SKU (explained in detail section)</p>	<p>No change required</p>
	<p><b>10. Business-to-business packaging</b></p> <p>Upstream influence is not as impactful as downstream...</p> <p>What is single use – not definable, even the EC can't define it. If meant as "packaging used once and then reprocessed..." – doesn't make sense, not LCA thinking.</p> <p>B2B is not considering the full LCA; ....not system thinking.</p>	<p>No change</p> <p>No change</p> <p>Reworded detail section to encourage LCA/systems approach</p>	<p>B2B packaging is an APCO KPI</p> <p>APCO KPI is expressed as single use packaging. It could be defined in terms of not reusable (see definition in detail section), but this would exclude reduction due to efficiency rather than reuse</p>



Category	Issue detail	Resolution	Rationale
	<p><b>11. On-site waste diversion</b></p> <p><b>Imperial:</b> Under ‘onsite waste diversion’ could there be an additional section which looks at reducing waste as well as this is a key aspect of waste management</p> <p>Nestle: L5 add ‘environmental’ Level 6 [5?] potential as per previous criteria.</p>	<p>No change.</p> <p>Agree</p> <p>Not sure what’s suggested here – probably to use similar wording to criterion 9 L5 (agreed)</p>	<p>On-site waste not considered a priority by APCO, so an additional criterion is not justified at the present time</p>
	<p><b>12. Supply chain influence</b></p> <p><b>Nestle:</b> Messy levels.</p> <ol style="list-style-type: none"> <li>1. Demonstrate that your entire supply chain but in particular immediate up and downstream contacts are aware of your guidelines and making decisions.</li> <li>2. You have a systematic dialogue around choices of suppliers and customers and the consequences of this.</li> <li>3. Implementing initiatives...</li> <li>4. Demonstrate that you have delivered on a project in collaboration with your supply chain.</li> </ol> <p>Thinking beyond your backyard.</p> <p>Talk about up and downstream</p>	<p>Criterion changed to be additive rather than progressive.</p> <p>Focus shifted to both upstream and downstream</p>	<p>Agree that companies will adopt different strategies and not necessarily in this order.</p>
Criteria -	<p>Level 5 ‘Towards sustainability’ - sustainability is not an end point. Needs to always reflect above average performance and be hard to achieve</p>	<p>Agree – have modified in some criteria</p>	<p>Changed the final level to “beyond best practice” but this just a placeholder and can be modified as required.</p>

Category	Issue detail	Resolution	Rationale
general	<p>There should be more free text fields to provide the ability to articulate industry specific challenges to facilitate collaboration on finding solutions.</p> <p>For example, in aviation, we have 2 challenges. One, we lose visibility in the airport, two is quarantine. Commercial and regulatory and problematic in our ability to control them.</p>	Recommend free form section for each criterion to be included in the final tool	Important to allow companies to report qualitatively how they are addressing packaging sustainability
	<p>CHEP: I believe performance level 5 – Leading lends itself to projects around natural capital assessments. However, as the Natural capital protocol is still in its infancy it's too early to incorporate this. However, CHP is investigating this approach.</p>	Recommend for consideration for future versions of the framework	We need to allow room for companies to stretch themselves within the framework.
	<p>The delivery of the tool has not been discussed (apologies if I missed this) the current APC tool is online and I assume the next tool will be too. I would suggest that a good amount of effort and \$\$ goes into the look and feel of the tool on the screen i.e. live dashboards, easy to read / interpret layout etc. This will help the board section of users engage with the tool more effectively and reduce the feeling of compliance.</p> <p>Overall, I think the framework and criteria are improved however looking at the performance criteria for each section appears to be quite challenging. I think a lot of signatories will initially sit in the 'getting started' or 'good progress' area, which could be quite a change in position compared to the old reporting framework and their previous scores. In particular 20% reduction in B2B packaging for 'good progress' would be a challenge for most signatories.</p>	<p>Recommend consideration in design of tool</p> <p>Levels for criteria 7-10 have been adjusted to accommodate suggestion</p>	The tool will be online. We will ensure the tool is professional and easy to use.

Category	Issue detail	Resolution	Rationale
	It is likely signatories will score better in 'on-site waste diversion' (non-core), compared to 'B2B packaging' (core)	APC has focused on on-site waste since inception – now a lower priority as most companies have systems in place. New focus on B2B therefore its core	
	There could be more emphasis in the first 2 levels on 'developing a plan' and 'investigating opportunities' to improve. Some of the criteria are quite broad for each performance level i.e. under 'packaging materials efficiency' level 3 requires <50% products have reduced packaging weight. This would capture signatories who have achieved 40% products reduced and those with only 2% product reduced, which is quite broad.	Agree – criteria 7-10 adjusted so that L1 is 'developing a plan or investigating opportunities' and L2 is <20%, L3 20<50%	Removes overlap between policy/commitments (now covered more explicitly under criteria 1), and accommodates a lower level of quantified performance at L1
	Tobacco companies are also limited in design of packaging due to Tobacco Plain Packaging Act which will restrict innovation and some of the packaging design criteria  Having a space to comment on our restrictions will be useful to justify our response.	Recommend free form section for each criterion (similar suggestion from Virgin)	Qualitative section will be added to allow companies to describe what they are doing.
	Is there opportunity for the report and recommendations to be downloaded in a more usable format than pdf, for example a Word Document or Excel which could then be the basis of signatory actions plans, or be easily copied into another format.	Recommend consideration in design of tool	Report will be downloaded as PDF document.
	How will composite materials be accounted for in reporting, i.e. our primary packaging is considered a composite given the foil liner is glued to the board package or should these be reported separately?	Add composite materials as a category in the quantitative data section of the tool (non-scored)	We need to capture all material types.
	Suggest collecting tonnes waste rather than percentages to enable easy collation of data to work out overall industry figures	No change	Tonnes requested in first (non-scored) section

Category	Issue detail	Resolution	Rationale
	<p>Imperial: Need to set out expectations of signatories score using the tool. What is the target and by when?</p> <p>What are the consequences if signatories do not score well?</p>	<p>APCO to address in communications</p>	<p>APCO will provide communications to members.</p>
	<p>Has the focus on litter and buying recycled been removed from the new APC approach/ or how will this be addressed in the new strategy</p>	<p>Litter covered under 'industry leadership' (5)</p> <p>Buying recycled covered under 'Packaging materials sustainability' (8)</p>	<p>We need to include full life-cycle effects.</p>

## F. SELF ASSESSMENT TOOL (PHASE 1 PILOT VERSION)



### Introduction

The Australian Packaging Covenant Organisation (APCO) has commissioned the Institute for Sustainable Futures (ISF) of the University of Technology Sydney in partnership with Dr Helen Lewis, to develop and pilot the Packaging Sustainability Framework ('the Framework') and associated Signatory Self-Assessment Tool.

### Objectives of the Framework and Self-Assessment Tool

The final Framework and Tool aim to:

- Provide a more consistent and transparent way for APCO to evaluate and report on signatory performance.
- Add value to individual signatories by providing feedback on their performance and suggested opportunities for further improvement.
- Reduce the administrative burden of reporting for both signatories and APCO.
- Provide aggregated data for APCO to evaluate and report its own performance.

### Objectives of this Pilot

The pilot aims to:

- Provide participating signatories with the opportunity to have a say in how all signatories will be asked to report in future. This includes which criteria and metrics are used to assess progress towards packaging sustainability, and what evidence is required to substantiate self-assessment.
- Ensure that the Framework meets the needs of all APC signatories.

- Provide APCO and ISF with detailed feedback and recommendations on how the draft Framework and draft Tool can be improved and finalised for signatories.

Please note that the primary purpose of the pilot is to obtain feedback on the contents of the draft framework, and the self-assessment process, not on the usability of this draft Excel tool. Pilot participants who complete this tool in full (ie. Self-Assessment Questions and Feedback Survey) will receive an extension on their 2017 reporting to 15 May 2017.

### Structure of this Tool

This draft excel tool contains the following 7 sections:

1. **Instructions:** Please read the Instructions worksheet before attempting to respond to the Self-Assessment Questions.
2. **Packaging Sustainability Framework:** This sets out the structure of the Framework on which the self-assessment tool is based and explains the principles underpinning the framework.
3. **Company details:** This page should be completed before the Self-assessment Questions.
4. **Self-assessment questions:** 5 Sheets of questions, with tabs labelled from A to E.
5. **Final score:** Final Score: This provides your organisation's overall score, calculated by the self-assessment tool, with an explanation of how it is calculated. It also provides recommendations for achieving the next level on all criteria.
6. **Feedback survey:** We request all pilot participants complete the survey.
7. **Appendix:** This explains what your score means in more detail, and gives a summary of the Packaging Sustainability Framework.

### Help

## Instructions for completing this tool

Please complete and return the self-assessment tool for your organisation to the Institute for Sustainable Futures at [packaging@isf.uts.edu.au](mailto:packaging@isf.uts.edu.au) by 31 March 2017.

### Overview

**How long will it take to complete?** It is difficult to estimate how long it will take you to complete the self-assessment tool as this is likely to vary by organisation. It may take longer to complete the self-assessment tool than would typically be required for APC reporting because it includes additional criteria.

**Complete as many questions as you can within a reasonable timeframe and keep going to the end of the tool.** All feedback is valuable as it will help APC develop resources. If you are unable to complete any of the questions, this is useful for us to know. If you are unable to answer questions or find it challenging to do so within a reasonable timeframe, please note this in the space provided for comments next to the question.

If you are unable to answer questions or find it challenging to do so within a reasonable timeframe, please note this in the space provided for comments next to the question. Please do not be discouraged or put off by being unable to or having difficulty answering Yes to questions – we anticipate that companies will not have all of the information or data required to answer all the questions and this knowledge will be helpful in refining the final self-assessment tool.

### Getting Started

[Step 1: Please review the Framework to provide context before completing the self-assessment questions.](#)

[Step 2: Please complete the Company Details worksheet, including the question on consent.](#)

### Self-Assessment

**Step 3:** Please complete the **Self-assessment Questions**.

#### How the questions are organised

There are 5 worksheets of self-assessment questions, organised by the 5 categories of the Framework:

[A. Corporate Strategy](#)

[B. Design](#)

[C. Supply Chain](#)

[D. Operations](#)

[E. Industry Leadership](#)

Each category contains one or more criteria and there are **20 criteria in total**. Each criterion is translated into 3-5 self-assessment questions. Responses to these questions allow the tool to automatically assign a performance level for each criteria and an overall performance level/score.

### Which criteria to respond to

Across the 5 categories, the 20 criteria relate to a designated hierarchy:

- **Core criteria:** The core criteria broadly align with APCO's Strategy and KPIs. These criteria are mandatory for all signatories.
- **Recommended criteria:** These criteria go beyond what is currently required by APCO but will be relevant to companies that are interested in pursuing a more comprehensive packaging sustainability strategy. Over time some of them they may become core criteria.
- **Stretch criteria:** Stretch criteria go beyond current best industry practice and aim to encourage more ambitious outcomes in packaging sustainability.

For this pilot, participants are requested to **respond to all criteria question**, regardless of their status. When the final Framework and Tool are rolled out in 2018, however, signatories will have the choice whether to report against Recommended and Stretch criteria.

### Which questions to respond to

Each criterion has between 3-5 related self-assessment questions. These questions correspond to an escalating performance level and are additive, ie. you must satisfy Level 1 and Level 2 to receive the Level 2 rating. Please answer as many questions as you can within each criterion. The more questions you are able to answer Yes to for each criterion, the higher performance rating you will be assigned for that criterion. As you answer each question the next relevant question will be shaded white.

### How to respond to questions

Where necessary, questions include more details/explanations directly below the question. Please read these before answering the question, as they will indicate how a question should be answered.

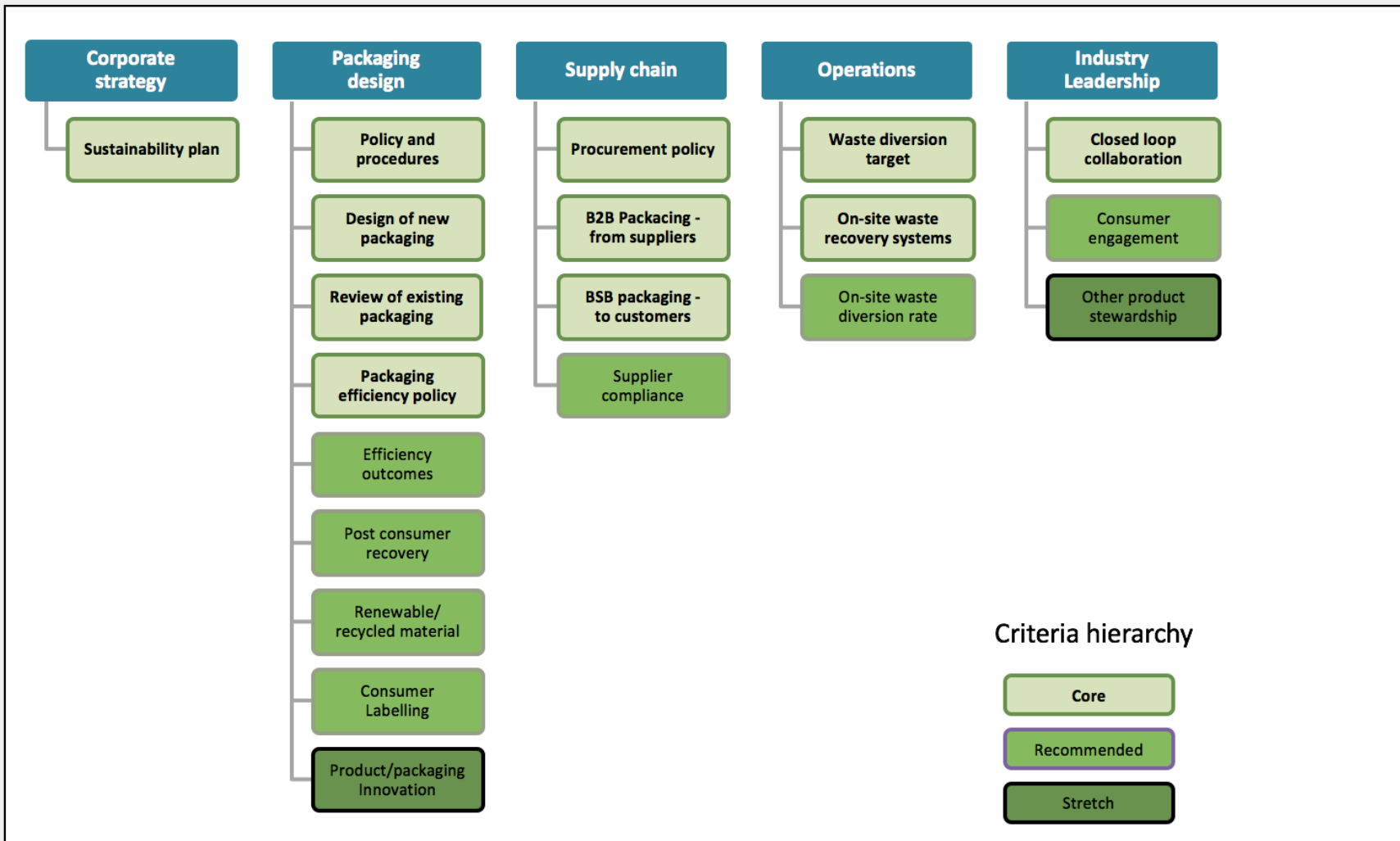
Most questions require a Yes/No answer. However some ask for actual data in specific units. If you are unable to provide the data, you have the option to provide an estimate. If you have similar data (say, measuring the same thing but in different units, eg. SKUs rather than tonnes) we'd appreciate you noting this where indicated (as well as providing estimates) as this will inform the data required for the finalised Framework and Tool.

For this pilot, you will not be required to provide any supporting evidence to validate your responses in the self-assessment tool. However, you will be asked to indicate whether you would be able to provide specific types of evidence to validate your responses to specific questions. This will help ISF and APCO determine what kinds of supporting evidence companies should be able to provide when the tool is rolled out. Therefore when you see comment boxes for questions that say, for example, "Would you be able to provide a link to an internal doc?", for the pilot you are not required to provide the link, instead we ask that you answer: yes, no or maybe in the comment boxes.



# APCO Packaging Sustainability Framework: DRAFT FOR PILOT

## FRAMEWORK CRITERIA



## FRAMEWORK PRINCIPLES

The framework has been designed to comply with the following principles:

1. **Align with APC goals and KPIs** to support implementation of the strategic plan.
2. Be structured in a way that is **logical for the user** by aligning KPIs with conventional business functions and processes.
3. Add value to signatories by providing them with a **structured process for continuous improvement** in packaging sustainability.
4. Align with **existing international standards** wherever possible, including definitions, metrics, business processes and certification schemes.
5. Encourage signatories to consider packaging within a **broader sustainability strategy** that includes products and operations.
6. Encourage signatories to implement a **management system** for packaging sustainability based on the PDCA (plan-do-check-act) quality model.
7. Provide a **transparent framework** for signatory reporting and evaluation.
8. Minimise the administrative load on signatories by allowing them to use **existing policies/procedures/certifications** etc. as evidence of performance where possible.
9. Be tailored, where appropriate, for **different sectors or groups** to improve the framework's relevance and usability. Please note: the pilot version of the tool is generic and not tailored for different sectors or groups. The final version of the tool will include tailored modules, incorporating feedback from this pilot process."

## Overview

The framework includes **20 criteria** grouped into **5 categories** - corporate strategy, design, supply chain, operations and leadership. The criteria measure packaging sustainability processes (e.g. plans or policies) as well as outcomes (e.g. policy implementation or packaging changes).

Eleven of the criteria are **core** (mandatory) for all APC signatories. An additional **7 recommended** criteria are relevant to companies that are interested in pursuing a more comprehensive packaging sustainability strategy. There are also **2 stretch** criteria that go beyond current best industry practice and aim to encourage more ambitious outcomes in packaging sustainability.

You will be asked a series of questions for each criterion, which will be used to measure your organisation's progress on a five-point scale from 1 (getting started) through to 5 (towards sustainability). The different performance levels for each criteria are shown in the appendix.

## Company details

### Overview

Company name:	
Contact name:	
Contact phone number:	
Contact email:	

### Consent

Please read the following information, and **indicate your consent below** if you are happy to proceed.

Do you consent for your organisation’s responses to the self-assessment tool to be used for the purposes outlined below?

<b>Consent:</b>	
Name:	
Position:	
Date:	

If you have any concerns about consent, please contact ISF at [packaging@isf.uts.edu.au](mailto:packaging@isf.uts.edu.au).

### Use and handling of data

Information obtained from the pilot process will be used to improve the relevance and useability of the framework, which will then be developed into a final self-assessment tool. Individual company responses to the self-assessment tool will be provided to APCO for their information and review as part of the research process.

Responses given in the self-assessment tool may be quoted in the report to APCO, and articles for academic journals, and attributed to your organisation, unless otherwise requested.

The above-mentioned publications will be available to the general public. You have the right to request that specific comments or data are not attributed to your organisation and remain anonymous or are de-identified. All participating organisations will be acknowledged in the final report, unless otherwise requested. No individuals will be identified in the report.

ISF will ensure data obtained from responses to the self-assessment tool is securely stored and available only to ISF staff and the project research team. At the end of the research project, ISF will make the research data available to APCO.

By participating in this project you agree that you have the authority to act on behalf of the organisation/ participant and thereby give consent to APCO, UTS, their agents, contractors or assigns to use the information you provide for any purpose associated with the project and as outlined in this document. You may withdraw this consent at any time in writing.

**Who can I contact if I have questions or concerns?**

If you have any concerns or questions about the research you can contact Dr Scott Kelly at the Institute for Sustainable Futures on +61 (0)2 9514 4881 or Scott.Kelly@uts.edu.au. You may also raise concerns or questions with any project researcher you speak to.

Studies undertaken by the Institute for Sustainable Futures have been approved in principle by the University of Technology Sydney, Human Research Ethics Committee. If you have any complaints or reservations about any aspect of your participation in this research you may contact the ISF Ethics Coordinator, Dr Keren Winterford (+61 (0)2 9514 4972) or the ISF Deputy Director, Professor Cynthia Mitchell (+61 (0)2 9514 4953).

You may also contact the UTS Ethics Committee through the Research Ethics Officer (+61 (0)2 9514 9615). Any complaint you make will be treated in confidence and investigated fully and you will be informed of the outcome.

## A. Corporate strategy

Please provide consent on 'comp details' tab before proceeding

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

### 1. Sustainability Plan

[CORE]

Score 0 / 5

**1 Does your company have a Sustainability Strategy that commits to using the APC Sustainable Packaging Guidelines (or equivalent)?**

*Commitment to use the SPG or equivalent included in a Sustainability plan, policy or strategy, corporate plan, sustainability section of website etc*

Yes	No

Would you be able to provide evidence, e.g. sustainability plan, policy or strategy corporate plan, website

Yes	No	Comment (optional)

**2 Does the Sustainability Strategy have measurable targets for packaging sustainability?**

*Specific, measurable, time-related targets e.g. By 2020: % reduction in packaging weight, 100% recyclable packaging or eliminate PVC*

Yes	No

Would you be able to provide specific, measurable, time related targets e.g. by 2020 you will achieve %.

Yes	No	Comment (optional)

**3 Is the Sustainability Strategy integrated into corporate processes?**

*Eg. integrated with Business plan, marketing plan, job descriptions, performance incentives, etc*

Yes	No

Would you be able to provide evidence of how this is integrated into a sustainability plan?

Yes	No	Comment (optional)

**4 Do you publicly report on progress against your packaging sustainability targets?**

*Eg. Reported in Sustainability/environment report, website, company's annual report*

Yes	No

Would you be able to provide evidence of a public report, website, annual report?

Yes	No	Comment (optional)

**5 Is your sustainability strategy integrated in a quality system for continuous improvement?**

*Eg. Quality system, EMS*

Yes	No

Would you be able to provide evidence e.g. EMS?

Yes	No	Comment (optional)

Total Score (A) 0 / 5

Core (A) 0 / 5

## B. Packaging Design

Please provide consent on 'comp details' tab before proceeding

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in

### 2. Design policy & procedures

[CORE]

Score

0 / 5

**1 Do you have a product development policy (or similar) that references the SPG or equivalent?**

*This means that the Sustainable Packaging Guidelines (SPG) or equivalent are referred to in a corporate document, e.g. packaging policy, New Product Development (NPD) procedure etc. 'Equivalent' means the same principles (doesn't have to be word for word) are being addressed.*

Yes	No

Would you be able to provide evidence of the SPG referred to in a corporate document?

Yes	No	Comment (optional)

**2 Has the policy been communicated to all relevant staff?**

*Relevant staff include management, marketing, design etc. Communication could be via internal newsletter, emails, training, meetings etc.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**3 Is the SPG included in a documented product development procedure?**

*E.g. the SPG could be referenced in a written step-by-step procedure for product development, showing the process from marketing brief through to concept, prototype, testing, production, launch etc. The procedure would indicate at which point and how the SPG must be used to evaluate sustainability.*

Yes	No

Would you be able to provide evidence, e.g. through a web link or by attaching the document?

Yes	No	Comment (optional)

**4 Is SPG implementation being monitored and controlled?**

*E.g. There may be a requirement for formal sign-off by the relevant person that an SPG review was completed, with 'escalation' to management in cases of non-compliance with the SPG or corporate policy*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**5 Do you require the use of Life cycle assessment (LCA) or a similar life cycle based tool to evaluate and optimise the life cycle impacts of all packaging?**

*The tool could be LCA software, PIQET, EcodEX or similar; or an in-house LCA tool etc used to review and optimise existing and new packaging.*

Yes	No

Would you be able to provide evidence of the requirement to use LCA or similar?

Yes	No	Comments (optional)

3. Design of new packaging

[CORE]

Score 0 / 5

1 Did you place any new products on the market in the last 12 months?

Yes	No

*Note: If you did not place any new products on the market then you will not be measured against this criteria.*

2 Do you have data on the number of new product lines placed on the market in the past 12 months for which you used the SPG or equivalent to consider sustainability criteria during the design process?

Yes	No

*Past 12 months means your most recent relevant reporting year. If you did not release any new product lines, please answer YES, and then answer 0 (zero) to both sub-questions below.*

3 How many new product lines in total were placed on the market in the past 12 months?

No. of product lines

4 How many new product lines placed on the market in the past 12 months used the SPG or equivalent to consider sustainability criteria?

No. of product lines

*These two figures will be used to calculate what percentage of new packaging (by product line) has been reviewed*

5 (If no to Q3.2) Can you estimate the percentage of new product lines for which the SPG or equivalent was used to consider sustainability criteria in the past 12 months?

%	No

*Past 12 months means your most recent relevant reporting year*

6 In the past 12 months did you use LCA or a similar life cycle tool to consider sustainability criteria for all new product lines?

Yes	No

*The tool could be LCA software, PIQET, EcodEX or similar; or an in-house LCA tool etc used to review and optimise existing and new packaging.*

Would you be able to provide evidence to support this data, e.g. how it was calculated?

Yes	No	Comment (optional)

Would you be able to provide evidence e.g. list of products assessed, dates of assessment, outcomes?

Yes	No	Comment (optional)

Would you be able to provide evidence, i.e. to show you estimated the percentage?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

**4. Review of existing packaging**

[CORE]

Score 0 / 5

**1 Do you have data on the number of existing product lines that have been reviewed using the SPG or equivalent in the past 2 years?**

*APC obligates members to review existing packaging using the SPG or equivalent to identify opportunities. Members are encouraged to group packaging for assessment, e.g. by SKU, material type, product category etc. This criteria monitors progress using product lines for consistency across all members.*

Yes	No

**2 How many product lines does your company produce or sell?**

No. of product lines

**3 How many of your existing product lines have been reviewed in the past 2 years?**

*These two figures will be used to calculate what percent of existing packaging (by product line) has been reviewed*

No. of product lines

**4 (If no to Q4.1) Can you estimate the percentage of existing product lines reviewed using the SPG or equivalent in the past 2 years?**

%	No

**5 Do you have a process in place to periodically review existing packaging (continuous improvement)?**

*Eg. After the initial review has been undertaken, follow up reviews should be scheduled periodically to consider new technologies, new recovery systems, new labelling schemes etc*

Yes	No

Would you be able to provide evidence e.g. list of products assessed, dates of assessment, outcomes?

Yes	No	Please list reviewed lines (optional)

Would you be able to provide evidence, i.e. to show you estimated the percentage?

Yes	No	Comment (optional)

Would you be able to provide evidence that you have a continuous improvement process?

Yes	No	Comment (optional)



**5. Packaging efficiency policy** [CORE] Score **0 / 5**

**1 Do you measure the quantity of packaging you put into the market?**

*Quantity of packaging material placed on the market by weight (tonnes)*

Yes	No

Would you be able to provide evidence to support this data, e.g. how it is calculated?

Yes	No	Comment (optional)

**2 Does your company have a target(s) to reduce total material consumption for packaging?**

*Target to reduce the quantity of packaging material placed on the market by weight (tonnes). There may be different targets for different materials / product*

Yes	No

Would you be able to provide evidence that you have a target?

Yes	No	Comment (optional)

**3 Is the target integrated in business processes?**

*Eg. New product development, procurement, business plans, performance KPIs*

Yes	No

Would you be able to provide evidence that the target is integrated in business processes?

Yes	No	Comment (optional)

**4 Is progress against the target publicly reported?**

*Eg. Sustainability/environment report, company's website, company's annual report*

Yes	No

Would you be able to provide evidence (e.g. link)?

Yes	No	Comment (optional)

**5 Does your company have a policy or target to optimise its product-packaging efficiency?**

*Product-packaging efficiency considers the efficiency of both the packaging and the product together. Efficiency is the ratio of the weight of packaging compared to the weight of the product or functional unit delivered. Some companies measure the ratio for individual products; others for overall production/sales (i.e. corporate measure as total packaging to total products).*

Yes	No

Would you be able to provide evidence (e.g. policy or target)?

Yes	No	Comment (optional)

6. Packaging efficiency outcomes

[RECOMMENDED]

Score 0 / 5

1 How much packaging did you place on the market in the last 12 months?

Tonnes of all packaging components sold (or used) for products sold in the last 12 months. Please note that this cell is used for credit elsewhere in this tool.

Tonnes	Unknown

Please explain how you calculated the weight (optional):

2 And in the 12 months prior to that?

Tonnes of all packaging components sold (or used) for products sold for the period between 24 and 12 months ago

Tonnes	Unknown

3 How much product did you place on the market in the last 12 months?

Tonnes of all products sold in the most recent 12 months.

Tonnes	Unknown

Please explain how you calculated the weight (optional):

4 And in the 12 months prior to that?

Tonnes of all products sold for the period between 24 and 12 months ago.

Tonnes	Unknown

Product packaging ratio	tonnes/tonnes	% change
Past 12 months	tbc	tbc
Past 24-12 months	tbc	

7 (If no data for Q6.1-6.4) Can you estimate the percentage reduction in packaging materials in the last 12 months?

Estimate the % change in packaging materials placed on the market per tonne of product

%	No

Would you be able to provide evidence, e.g. how the evidence was calculated?

Yes	No	Comment (optional)

5 Can you provide examples of packaging redesign within the last year that improved packaging efficiency?

'Efficiency' is the extent to which the quantity of packaging material has been optimised, i.e. it is fit for purpose with no excess material, weight or volume. Case studies don't necessarily have to be a success story, e.g. they could be about a trial undertaken, R&D etc

Yes	No

Would you be able to provide evidence, e.g. case studies showing how your packaging has changed?

Yes	No	Comment (optional)

8 Based on detailed analysis, has the efficiency of all your packaging been optimised (i.e. no further improvements possible)?

All opportunities for optimisation through source reduction towards achieving a minimum adequate packaging weight and/or volume have been identified and considered; minimisation of the packaging material has been achieved while still meeting the necessary packaging functions (ISO 18602). The ISO standard refers to 'Critical areas': specific performance criteria that prevent further reduction of weight or volume without endangering functional performance, safety and user acceptability. Includes: product protection, packaging manufacturing processes, packing/filling process, logistics, product presentation/marketing, user/consumer acceptance, information, safety, legislation, other (specify).

Yes	No

Would you be able to provide evidence that your packaging has been optimised, e.g. the process/criteria that you used?

Yes	No	Comment (optional)

7. Post consumer recovery

[CORE]

Score 0 / 5

1 Can you provide examples of any changes to your packaging in the past 12 months to increase the amount of material that is recoverable through current post-consumer systems?

Yes	No

Recoverable' means reusable, recyclable or compostable. 'Recyclable' means it has been designated as recyclable by a tool that provides rigorous assessment of recyclability of packaging and its components. 'Compostable' means the packaging has been certificated compostable according to AS 4736, AS 5810 or a similar standard. 'Reusable' means it can be collected through an existing system for reuse.

2 Do you have data on the amount of packaging placed on the market in the last 12 months that is recoverable in some way?

Yes	No

Tonnes of packaging. 'Recyclable' means it has been designated as recyclable by a tool that provides rigorous assessment of recyclability of packaging and its components. 'Compostable' means the packaging has been certificated compostable according to AS 4736, AS 5810 or a similar standard. 'Reusable' means it can be collected through an existing system for reuse.

3 Recyclable  
4 Compostable  
5 Reusable

Tonnes
Total Sum
to be calculated
Measure of total packaging placed on market
pre-filled

Would you be able to provide evidence, e.g. case studies that show how your packaging has changed?

Yes	No	Comment (optional)

Comment (optional)

These figures will be used to calculate the proportion of packaging that is recoverable.

Recoverable Packaging  
Past 12 months

% Recoverable
to be calculated

7 (If no to Q 7.2), can you estimate what percentage of your packaging placed on the market in past 12 months can be recovered through an existing reuse, recycling or composting system?

Yes	No

Can be recovered' means reusable, recyclable or compostable. 'Recyclable' means it has been designated as recyclable by a tool that provides rigorous assessment of recyclability of packaging and its components. 'Compostable' means the packaging has been certificated compostable according to AS 4736, AS 5810 or a similar standard. 'Reusable' means it can be collected through an existing system for reuse.

Would you be able to provide evidence, e.g. how you estimated the percentage?

Yes	No	If no, do you have a similar type of data?

8 Recyclable

9 Compostable

10 Reusable

Percentage %

Recoverable Packaging

Past 12 months

% Recoverable
to be calculated

11 Is 100% of the packaging you put on to the market in the past 12 months recoverable in some form through existing systems, and optimised to highest value?

*'Optimised to highest value' means that the value of the embodied materials and/or energy are retained as much as possible and for as long as possible, e.g. through Closed loop recycling (e.g. bottle to bottle) or by recycling into another high value product that can itself be recycled a second time. Case-by-case analysis required.*

Yes	No

Would you be able to provide evidence, e.g. for how you calculated the recoverability of your packaging?

Yes	No	Comment (optional)

**8. Renewable or recycled materials** [RECOMMENDED] Score 0 / 5

**1 Can you provide examples of any changes to packaging in the past year to increase the amount of renewable or recycled material?**

*Renewable' means material that is composed of biomass from a living source and that can be continually replenished. An example is FSC-certified paper/cardboard. 'Recycled content' is post-consumer and pre-consumer recycled material as defined by AS/ISO 14021 used in packaging. 'Pre-consumer' is material diverted from the waste stream during manufacturing (excl. rework). 'Post-consumer' material is material generated by households or by commercial, industrial and institutional facilities.*

Yes	No

Would you be able to provide evidence, e.g. case studies that show how your packaging has changed?

Yes	No	Comment (optional)

**2 Do you have data on the amount of packaging placed on the market in the past 12 months that is made from renewable content or recycled content?**

*Tonnes of renewable material and recycled content material used in packaging (as per definitions for 8.1). Avoid double counting between renewable and recycled.*

Yes	No

Would you be able to provide evidence to support your data on renewable and recycled content packaging?

Yes	No	Comment (optional)

**3 Packaging made from virgin, renewable material?**

**4 Packaging made with recycled content material?**

Total packaging from renewable or recycled content

Measure of total packaging placed on market

Tonnes
to be calculated
pre-filled

Please describe materials (optional)


Renewable or recycled  
Past 12 months

% Renewable or Recycled
to be calculated

**5 If no, can you estimate what % of your packaging placed on the market in last 12 months is made from virgin renewable, or recycled content?**  
*Definitions as per 8.1*

Yes	No

Would you be able to provide evidence, e.g. how you estimated renewable and recycled content packaging?

Yes	No	Comment (optional)

**6 Packaging made from virgin, renewable material?**

**7 Packaging made with recycled content material?**

Percentage

Renewable or recycled  
Past 12 months

% Renewable or Recycled
to be calculated

**8 Has all your packaging material been optimised from a recycled/renewable content perspective?**

*This takes into account any restrictions due to regulation/functionality, e.g. that restrict the use of recycled materials. Where recycled materials can be used, is the maximum amount being used? For virgin materials, is the fibre from a certified sustainable source, e.g. FSC or PEFC?*

Yes	No

Would you be able to provide evidence e.g. list products certified to FSC/PEFC, why unable to use recycled content?

Yes	No	Comment (optional)

9. Consumer labelling

[RECOMMENDED]

Score 0 / 5

1 Do you have data on the amount of recoverable packaging placed on the market in last 12 months, that has an on-pack label indicating whether the packaging can be recovered?

Yes	No

Recoverable means recyclable, reusable or compostable. An on-pack label could be a recycling symbol (e.g. Mobius Loop), or words such as 'Please recycle', 'Please compost in your home composting system' etc. Excludes labelling with the Plastics Identification Code, which is not a recycling symbol (it indicates the type of plastic used). Excludes other eco-labels, e.g. Fair Trade, GECA. Definitions of reusable/recyclable/compostable as per Q7.2.

2 How much recoverable packaging did you place on the market in last 12 months with an on-pack label for recovery?

Tonnes
pre-filled
to be calculated

Measure of total packaging placed on market

Percentage of recoverable packaging placed on the market in the last 12 months with an on-pack label for recovery

3 (If no to Q9.1) Can you estimate the percentage of product lines placed on the market in the last 12 months that are recyclable, reusable or compostable; and that are labelled as such?

%	No

4 Is 100% of your on-pack disposal/recovery labels compliant with a recognised labelling standard?

Yes	No

e.g. ISO/AS 14021 Standard for self-declared environmental claims, Planet Ark Australian Recycling Label, etc.

Would you be able to provide evidence to support this data, e.g. detailed data, how it was calculated?

Yes	No	Comment (optional)

Would you be able to provide evidence e.g. list the materials or products with label?

Yes	No	Comment (optional)

Would you be able to provide evidence that all products are compliant?

Yes	No	Comment (optional)

10. Product-packaging innovation

[STRETCH]

Score 0 / 5

1 Has your company made a commitment to review and improve the sustainability of product-packaging systems as a whole?

*Design for sustainability of product-packaging systems considers the interaction between the product and the packaging and involves step change innovation, e.g. redesign of the product to reduce packaging, redesign of the packaging to reduce product waste, or a significant change in the product delivery system to reduce environmental impacts. 'Commitment' means it has been written into an internal or published corporate document.*

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Would you be able to provide evidence (e.g. web link or attachment)?

Yes	No	Comment (optional)
<input type="checkbox"/>	<input type="checkbox"/>	

2 Do you evaluate the sustainability of the product and packaging together?

*This considers the interaction between the product and the packaging and involves step change innovation, e.g. redesign of the product to reduce packaging, redesign of the packaging to reduce product waste, or a significant change in the product delivery system to reduce environmental impacts.*

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Would you be able to provide evidence?

Yes	No	Comment (optional)
<input type="checkbox"/>	<input type="checkbox"/>	

3 Can you provide at least one example of product-packaging redesign implemented during the last 12 months that improved sustainability?

*Specifically involving a step change innovation as per above.*

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Would you be able to provide evidence, e.g. case studies that show how product-packaging systems have changed?

Yes	No	Comment (optional)
<input type="checkbox"/>	<input type="checkbox"/>	

4 For how many product lines have you redesigned the product-packaging system for improved sustainability?

*Involving a step change innovation as per above*

No. of products
<input type="text"/>

Would you be able to provide evidence?

Yes	No	Comment (optional)
<input type="checkbox"/>	<input type="checkbox"/>	

5 Based on detailed analysis, do you think your product-packaging sustainability has been optimised across all products (i.e. no further improvements possible)?

*All opportunities for optimisation through product/packaging redesign, minimisation of materials and use of more sustainable materials have been identified and considered. No further improvements are possible within current technological and other constraints.*

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Would you be able to provide evidence?

Yes	No	Comment (optional)
<input type="checkbox"/>	<input type="checkbox"/>	

Total Score (B) 0 / 45

Core (B) 0 / 30

Recommended (B) 0 / 10

Stretch (B) 0 / 5

**C. Supply Chain**

Please provide consent on 'comp details' tab before proceeding

**Instructions:**

Yes / No responses can be marked with an "X".

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For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

**11. Procurement policy**

[CORE]

Score 0 / 5

**1 Do you have a process in place to ensure suppliers review packaging against the SPG or equivalent?**

*Sustainable Packaging Guidelines (SPG) or equivalent, or an SPG checklist given to all suppliers*

Yes	No

**2 Do you include SPG requirements in documentation to suppliers?**

*E.g. supplier manual, supplier code of practice, product specifications etc*

Yes	No

**3 Do you monitor supplier compliance with the SPG and your requirements?**

*E.g. You may require suppliers to report on SPG or equivalent requirements, you may survey suppliers on their compliance, or discuss compliance at regular supplier meetings etc. Suppliers may be evaluated or scored against packaging sustainability criteria, or the SPG used as one of the evaluation criteria*

Yes	No

**4 Do you actively support suppliers to implement packaging sustainability expectations?**

*E.g. do you provide training for suppliers on your packaging sustainability requirements, or give awards to good performers?*

Yes	No

**5 Do you have a continuous improvement process in place to achieve ongoing improvements in packaging sustainability from your suppliers?**

*E.g. a requirement that suppliers suggest innovations at quarterly or annual review meetings*

Yes	No

Would you be able to provide evidence, e.g. internal document or web link?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. web link or by attaching documentation provided to suppliers?

Yes	No	Comment (optional)

Would you be able to provide evidence e.g. correspondence with suppliers, procedures, action taken to address non-compliance, etc?

Yes	No	Comment (optional)

Would you be able provide evidence, e.g. description of activities undertaken to support suppliers?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. document describing the continuous improvement process or procedure?

Yes	No	Comment (optional)



12. B2B Packaging from suppliers

[CORE]

Score 0 / 5

1 Can you provide at least one example of reduction in single use B2B packaging from suppliers (ie containing materials or components) in the last 12 months?

*Initiatives that have reduced the amount of single use B2B packaging received from suppliers into your sites and facilities*

Yes	No

2 Are you collecting data on the amount of B2B packaging received from suppliers?

Yes	No

3 How much single use B2B packaging did you receive from suppliers in the last 12 months?

Tonnes

4 And for the 12 months prior to that?

Tonnes

5 What was your company's turnover in the last 12 months?

*Please note: this answer is used elsewhere so please answer if you can.*

\$

6 What was your company's turnover in the 12 months prior to that?

*Please note: this answer is used elsewhere so please answer if you can.*

\$

Packaging from suppliers as ratio of turnover	Tonnes/\$	% Change
Past 12 months	tbc	tbc
Past 24-12 months	tbc	tbc

Would you be able to provide evidence, e.g. case studies showing how packaging has been reduced?

Yes	No	Comment (optional)

13. B2B Packaging to customers

[CORE]

Score 0 / 5

1 Can you provide at least one example of reduction in single use B2B packaging going from your sites and facilities to customers (e.g. manufacturers or retailers) in the last 12 months?

*Initiatives that have reduced the amount of single use B2B packaging that went to your customers from your sites and facilities*

Yes	No

2 Are you collecting data on the amount of B2B packaging you provide to customers, and how much is single use vs reusable?

Yes	No

3 How much single use B2B packaging went to your customers from your sites and facilities in the last 12 months?

Tonnes

4 And for the 12 months prior to that?

Tonnes

5 What was your company's turnover in the last 12 months [prefilled]

\$
0

6 What was your company's turnover in the 12 months prior to that [prefilled]

\$
0

B2B packaging to customers as ratio of turnover

	Tonnes/\$	% Change
Past 12 months	tbc	tbc
Past 24-12 months	tbc	

Would you be able to provide evidence, e.g. case studies showing how packaging has been reduced?

Yes	No	Comment (optional)

**14. Supplier compliance with SPG** [RECOMMENDED] Score 0 / 5

1 Do you collect data on what percentage of suppliers are complying with the SPG or equivalent?

Yes	No

2 What percentage of your product/packaging suppliers are complying with the SPG or equivalent sustainability requirements?

%

3 If no, can you estimate what percentage of suppliers are complying with the SPG or equivalent?

*This applies to both product and packaging suppliers*

%	No

4 Are you working collaboratively with suppliers to find innovative packaging sustainability solutions that go beyond the current guidelines?

*The SPG establishes minimum requirements. 'Going beyond the guidelines' could include projects with suppliers to develop or co-fund innovative materials, systems or business models.*

Yes	No

Would you be able to provide evidence, e.g. list of suppliers that are compliant?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. how you estimated the percentage?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

**Total Score (C) 0 / 20**

Core (C) 0 / 15

Recommended (C) 0 / 5

**D. Operations**

Please provide consent on 'comp details' tab before proceeding

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

**15. Waste mangaeament target**

[CORE]

Score 0 / 5

1 Do you have a corporate commitment to recover your on-site packaging waste for reuse, recycling or composting (i.e. divert from landfill)?

Yes	No

2 Do you have a clear and measurable target for diversion of on-site packaging waste (or total waste) from landfill?

Yes	No

3 Are you collecting data on packaging waste generated on site, reused, recycled or sent to landfill?

Yes	No

4 Is this data publicly reported?

Yes	No

5 Do you have a policy in place to recover all packaging waste for its highest value?

Yes	No

*From a sustainability perspective it is important to retain as much of the embodied energy and material value as possible, e.g. focus on reuse rather than recycling; 'closed loop' recycling rather than downcycling; recycling rather than incinerating; donating waste food rather than composting. Case-by-case analysis required.*

Would you be able to provide evidence (e.g. web link or attachment)?

Yes	No	Comment (optional)

Would you be able to provide evidence (e.g. target, page number in corporate document)?

Yes	No	Comment (optional)

Would you be able to provide evidence, i.e. where the data is reported?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

16. On-site waste recovery systems

[CORE]

Score 0 / 5

1 Do you have data on the number of packaging waste types that are recovered from all of your sites and facilities?

*Data should cover all facilities i.e. offices, factories, warehouses, stores etc. Packaging waste types could include clear plastic film, coloured plastic film, plastic pallet strap, steel pallet strap, paper and cardboard, etc.*

Yes	No

2 How many types of packaging waste are generated at your sites and facilities?

*A 'type of packaging' could be clear plastic film, coloured plastic film, plastic pallet strap, steel pallet strap, paper and cardboard, etc.*

Number

3 For how many of these types of packaging waste is there a recovery system in place at all of your sites and facilities?"

*Identify which ones are collected for reuse, composting or recycling*

Number

Percentage of onsite packaging for which there is a recovery system in place

% onsite recovery
to be calculated

4 If no, is any of your on-site packaging waste collected for reuse, recycling or composting? Please provide examples.

*Identify which ones are collected for reuse, composting, recycling*

Yes	No

5 Do the recovery systems that you have in place for onsite packaging waste achieve the highest potential recovered value?

*From a sustainability perspective it is important to retain as much of the embodied energy and material value as possible, e.g. focus on reuse rather than recycling; 'closed loop' recycling rather than downcycling; recycling rather than incinerating; donating waste food rather than composting. Case-by-case analysis required.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

Would you be able to provide evidence of packaging types?

Yes	No	Comment (optional)

Would you be able to provide evidence of the packaging types that are recovered?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

17. On-site packaging waste diversion rate

[RECOMMENDED]

Score 0 / 5

1 Do you collect data on how much on-site packaging waste is diverted from landfill?

Yes	No

2 How much packaging waste did you generate at your sites and facilities in the last 12 months? (tonnes or volume)

Tonnes	Volume (m3)

*Packaging waste includes incoming distribution packaging e.g. clear plastic film, coloured plastic film, plastic pallet strap, steel pallet strap, paper and cardboard, pallets etc.; as well as consumer packaging from the canteen and office. It includes packaging waste that is generated at your sites and facilities and is reused, recycled, incinerated, composted or sent to landfill. Provide data as either tonnes or volume.*

3 How much on-site packaging waste did you reuse, recycle, compost or send to an energy-from-waste facility in the last 12 months? (tonnes or volume)

Tonnes	Volume (m3)

*This includes packaging waste that was reused, recycled, incinerated with energy recovery or composted. Excludes waste that was incinerated without energy recovery. Provide data as either tonnes or volume.*

Percentage of onsite packaging that was recovered in last 12 months

% onsite recovery
to be calculated

4 If no, can you estimate what % of on-site packaging waste you reused, recycled, composted or sent to an energy from waste facility in the last 12 months?

% recovered

*Packaging waste includes incoming distribution packaging e.g. clear plastic film, coloured plastic film, plastic pallet strap, steel pallet strap, paper and cardboard, pallets etc.; as well as consumer packaging from the canteen and office. It includes packaging waste that is generated at your sites and facilities and is reused, recycled, incinerated, composted or sent to landfill.*

5 If zero waste to landfill has been achieved, are you optimising all recovered on-site packaging waste for its highest value?

Yes	No

*From a sustainability perspective it is important to retain as much of the embodied energy and material value as possible, e.g. focus on reuse rather than recycling; 'closed loop' recycling rather than downcycling; recycling rather than incinerating; donating waste food rather than composting. Case-by-case analysis required.*

Can you provide supporting documentation (e.g. reports from contractors), if not why?

Yes	No	Comment (optional)

Can you provide supporting documentation (e.g. reports from contractors), if not why?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. basis for the estimate?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

Total Score (D) 0 / 15

Core (D) 0 / 10

Recommended (D) 0 / 5

**E. Industry Leadership** Please provide consent on 'comp details' tab before proceeding

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

**18. Closed loop collaboration** [CORE] Score 0 / 5

**1 Have you investigated options for a new closed loop initiative?**

Yes	No

*For example have you investigated recovery options for packaging materials or formats that currently can't be included in a kerbside or drop-off system? This question is about initial, exploratory steps taken.*

Would you be able to provide evidence, e.g. detail on the steps taken to develop a closed loop initiative?

Yes	No	Comment (optional)

**2 Are you, or have you been involved in setting up any closed loop collaborative initiatives?**

Yes	No

*Collaboration with others to develop or improve recovery options for packaging materials that don't currently have a recovery system in place. Collaboration could be with competitors/peers, local councils, community group, university, recycler etc. Project does not necessarily have to be completed or operational yet.*

Would you be able to provide evidence, e.g. detail on the initiative(s), how you collaborated?

Yes	No	Comment (optional)

**3 Have you helped develop any closed loop collaborative initiatives that are successfully operating?**

Yes	No

*Initiatives that have evidence of successful (ongoing) operation, e.g. R&D resulted in a product using more recycled material, a collection & recycling program established for a particular material*

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

**4 Have you helped develop any closed loop collaborative initiatives that can demonstrate tangible (quantitative) outcomes?**

Yes	No

*E.g., the initiative has data on amount of product collected or recycling rate, tonnes of recycled material used in manufacture of new products etc*

Would you be able to provide evidence, e.g. project reports with quantitative outcomes?

Yes	No	Comment (optional)

**5 How many closed loop collaborative initiatives have you helped develop that are demonstrating tangible (quantitative) outcomes?**

Yes	No

*Initiatives that have evidence of some tangible outcomes e.g. tonnes of packaging collected, or tonnes of recycled material used in products etc*

Would you be able to provide evidence, e.g. project reports with quantitative outcomes?

Yes	No	Comment (optional)

19. Consumer engagement

[RECOMMENDED]

Score 0 / 5

1 Do you provide consumers with any additional information on the sustainability of packaging (in addition to recycling logos)?

*E.g. text on the packaging or website explaining sustainability benefits or impacts of packaging, e.g. explaining FSC/PEFC, encouraging consumers to reuse, recycle or compost (other than simply through a loan)*

Yes	No

2 Does any of your packaging include third party certified labels for products or packaging e.g. FSC, PEFC, Fair Trade, MSC etc?

*Ecolabels that are applicable to Australia, which could include FSC, PEFC, Fair Trade, Good Environmental Choice etc. Excludes ecolabels that are specific to a market outside Australia, e.g. Green*

Yes	No

3 Do you collect data on the number of product lines with some form of sustainability label or information (in addition to recycling)?

*Includes information on sustainability of packaging or products. Excludes recycling/recovery symbols or instructions, which are covered under criteria 9.*

Yes	No

How many product lines do you manufacture or sell

Number
pre-populated

6 How many of your product lines include some form of sustainability label or information (in addition to recycling logos)?

Number

Proportion of products with sustainable packaging labels or information

% products
to be calculated

7 Do you actively engage consumers through packaging to reduce the broader sustainability impacts of the product or consumption in general?

*'Active engagement' encourages consumers to take action or change behaviour. On-pack labelling could include advice on how to minimise consumption or reduce food waste, or it could direct consumers to a website with more information on the sustainability of the product or packaging, etc. E.g. to reduce impacts of consumption, reduce food waste, increase awareness of sustainability impacts of ingredients*

Yes	No

8 Do you support your on-pack sustainability education with marketing campaigns?

*Marketing campaigns could include advertising, promotion through social media, events, etc. to encourage more sustainable consumption. E.g. advertising, social media*

Yes	No

Would you be able to provide evidence, e.g. list of products, type of information provided?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. list of products with labels, type of label?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. list of product lines with labels?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)



20. Other product stewardship outcomes

[STRETCH]

Score

0 / 5

**1 Have you investigated any options with a view to developing a product stewardship initiative that achieves outcomes relating to new recycle markets, fugitive packaging, or information sharing with peers?**

Yes	No

*E.g. have you investigated options for development of new market for recycled material, litter program, marine plastics project, community education program relating to packaging sustainability*

**2 Are you, or have you been involved in setting up any collaborative product stewardship initiatives?**

Yes	No

*Collaboration with others to develop or improve projects that achieve outcomes in the above or other relevant areas of sustainability.. Project does not necessarily have to be completed or operational yet.*

**3 Have you helped develop any collaborative product stewardship initiatives that are successfully operating?**

Yes	No

*Initiatives that have evidence of successful (ongoing) operation, in the above or other relevant areas of sustainability.*

**4 Have you helped develop any collaborative product stewardship initiatives that can demonstrate tangible (quantitative) outcomes?**

Yes	No

*I.e. the initiative has data on outcomes in the above or other relevant areas of sustainability.*

**5 How many collaborative product stewardship initiatives have you helped develop that are demonstrating tangible (quantitative) outcomes?**

Number

*Initiatives that have evidence of some tangible outcomes in the above or other relevant areas of*

Would you be able to provide evidence, e.g. internal document or link?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. description of what you have done, outcomes so far?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports with quantitative outcomes?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports with quantitative outcomes?

Yes	No	Comment (optional)

**Total Score (E)** 0 / 15

Core (E) 0 / 5

Recommended (E) 0 / 5

Stretch (E) 0 / 5

## FINAL SCORE

### Overall score

Overall:

Total:  /100    Core:  /60    Rec'd:  /25    Stretch:  /10

### Last years score

Overall:

Total:  /100    Core:  /60    Rec'd:  /25    Stretch:  /10

### Criteria scores

Note: descriptions of what these scores mean on Appendix page

Criteria	Performance Level				
	Getting Started	Good Progress	Advanced	Leading	Towards Sustainability
1. Sustainability plan	0	0	0	0	0
2. Design policy & procedures	0	0	0	0	0
3. Design of new packaging	0	0	0	0	0
4. Review of existing packaging	0	0	0	0	0
5. Packaging efficiency policy	0	0	0	0	0
6. Packaging efficiency outcomes	0	0	0	0	0
7. Post-consumer recovery	0	0	0	0	0

### How the scores are calculated

The framework includes 20 criteria grouped into 5 categories - corporate strategy, design, supply chain, operations and leadership. There are 5 performance levels that range from 'getting started' to 'towards sustainability'. There are 13 core criteria, 5 recommended criteria and 2 stretch criteria.

The tool automatically assigns a performance level for each criteria based on the responses that you provide. Criteria are assigned as 'core', 'recommended' or 'stretch' and are tallied to give an overall score. Last year's scores are shown for comparison purposes. Examples of performance at each level are provided below.

**No Action:** The company is not aware of the issues, they are not seen as important, or they are yet to do anything about it.

**Getting started:** The company has made some commitments to improve packaging sustainability and can show a degree of progress, e.g. through packaging case studies.

**Good Progress:** The company has packaging sustainability targets, data is being collected to track progress and suppliers are engaged.

**Advanced:** The company has embedded packaging sustainability in corporate strategy and processes, supply chain compliance is being monitored and good packaging outcomes are being achieved.

**Leading:** The company is achieving ambitious targets such as zero waste, is considering the sustainability of product-packaging systems and is publicly reporting on outcomes.

**Towards sustainability:** The company is focused on innovation and continuous improvement, follows circular economy principles, and packaging is optimised for criteria such as efficiency and recyclability.

### Recommendations to get to next level

The following recommendations represent what your company needs to do in order to progress to the next level.

Develop a Sustainability Plan that commits to using SPG.
Create a product development policy that references the SPG or equivalent.
Use the SPG to consider sustainability when designing new packaging and capture in case studies.
Undertake packaging reviews for existing product lines, and capture in case studies.
Measures the amount of material used in packaging.
Capture case studies on efforts to increase packaging efficiency by reducing material use.
Capture case studies on efforts to increase amount of packaging material that can be recovered through existing post-consumer systems.

8. Renewable or recycled materials	0	0	0	0	0	Capture case studies on efforts to increase amount of packaging material that comes from renewable or recycled materials.
9. Consumer labelling	0	0	0	0	0	Ensure that less than 20% of product lines labelled for either disposal or recycling.
10. Product-packaging innovation	0	0	0	0	0	Make an explicit commitment to innovation in product-packaging systems.
11. Procurement policy	0	0	0	0	0	Put in place a process to improve packaging sustainability in the supply chain, e.g. using SPG.
12. B2B packaging from suppliers	0	0	0	0	0	Initiate a process to reducing B2B packaging from suppliers (case studies).
13. B2B packaging to customers	0	0	0	0	0	Initiate a process to reducing B2B packaging to customers (case studies).
14. Supplier compliance with SPG	0	0	0	0	0	Make progress so that 20% of suppliers comply with your company's standards
15. Waste management target	0	0	0	0	0	Implement a corporate commitment to divert on-site packaging from land-fill.
16. On-site waste recovery systems	0	0	0	0	0	Start building recovery systems for on-site packaging recovery.
17. On-site packaging waste diversion rate	0	0	0	0	0	Divert at least 20% of packaging from landfill.
18. Closed loop collaboration	0	0	0	0	0	Start to investigate options for a collaborative program.
19. Consumer engagement	0	0	0	0	0	Provide consumers with additional information on the sustainability of packaging (other than recycling logos).
20. Other product stewardship outcomes	0	0	0	0	0	Start to investigate options for new stewardship programs.

**Key:**  
Core
Rec'd
Stretch

## Feedback

### Self assessment questions

1 Overall, how easy/difficult was it to complete the self-assessment questions?

- Very easy
- Somewhat easy
- Somewhat hard
- Very hard

2 Did you complete all of the self-assessment questions in full, in the 3 week timeframe provided?

- Yes
- No

a Approximately how long did it take you to complete all of the self-assessment questions (including time spent collecting answers, data and evidence?)

Time (hrs)

3 Which questions did you have most difficulty answering, and why? Were there any you were unable to answer?

a Please indicate which of the following applied? (You may select more than one)

- Too time consuming
- Data not available
- Appropriate person not available
- Other:

b If you indicated that you needed more time to answer these questions, please estimate how much more time in total you would need to complete these questions. (eg. less than a week, 1-3 weeks, more than 3 weeks.)

Time (weeks)

5 For the pilot, you were not required to provide supporting evidence, but we asked about types of evidence you could provide. In future reporting, do you think signatories should be required to upload supporting evidence with their responses?

### Score and recommendations

## Score and recommendations

6 The self-assessment tool generated a total packaging sustainability score for your organisation.

a Do you feel this score accurately reflects your organisations commitment to packaging sustainability? If not, why not?

b How useful did you find the score information?

- Very useful
- Somewhat useful
- Not so useful
- Not at all useful

Why?

7 The self-assessment tool generated a set of recommendations for improving packaging sustainability in your organisation.

a Do you feel these recommendations are accurate? If not, why not?

b How useful did you find this information?

- Very useful
- Somewhat useful
- Not so useful
- Not at all useful

Why?

8 Please suggest how the score and/or recommendations could be made more useful for your organisation. (Optional) (open ended question).

## What your results mean

		Performance Level					
		1	2	3	4	5	
Criteria	Description	Getting started	Good progress	Advanced	Leading	Towards Sustainability	
1	<b>Sustainability plan</b>	Sustainability plan with packaging targets, monitoring and reporting	A sustainability plan is in place, that commits to using the SPG.	The plan has clear, measurable targets for packaging sustainability	The plan is integrated into a corporate strategy	Progress against the plan is being publicly reported	The plan is integrated in a quality system for continuous improvement
2	<b>Design policy and procedures</b>	Design policy & procedures that integrate the SPG or equivalent	There is a product development policy that references the SPG or equivalent.	The policy has been communicated to all relevant staff	The SPG is included in a documented product development procedure	Action is being taken to ensure compliance with the policy	Policy requires LCA or similar tool to be used to evaluate and optimise life cycle impacts of packaging
3	<b>Design of new packaging</b>	Using the SPG or equivalent to consider sustainability criteria when designing new packaging	Some progress in using the SPG to consider sustainability when designing new packaging in the past year.	Data showing 0<50% of new packaging was designed with reference to the SPG or equivalent in the past year	50 < 100% of new packaging was designed with reference to the SPG or equivalent in the past year	100% of new packaging was designed with reference to the SPG or equivalent in the past year	LCA or a similar life cycle tool was used to consider sustainability in the design of 100% of new packaging in the past year
4	<b>Review of existing packaging</b>	Packaging reviews using the SPG or equivalent for existing packaging	Some progress in undertaking packaging reviews for existing packaging.	Data showing 0<50% of existing packaging lines have been reviewed against SPG or equivalent within the past 2 years	50 < 100% of existing packaging lines has been reviewed against SPG or equivalent within the past 2 years	100% of existing packaging lines has been reviewed against SPG or equivalent within the past 2 years	Existing packaging is periodically reviewed (continuous improvement)
5	<b>Packaging efficiency policy</b>	Policy to optimise product-packaging efficiency	Company measures the amount of material used in packaging.	There is a target to reduce material use in packaging	Packaging efficiency target is integrated in corporate plans	Progress towards packaging efficiency target is publicly reported	There is a policy or target to optimise efficiency of the product-packaging system as a whole (i.e. minimum packaging to meet
6	<b>Packaging efficiency outcomes</b>	Amount and proportion reduction in material use	Some progress in packaging efficiency (case studies).	Data showing 0<10 % reduction in relative material consumption in past 12 months	10-50% reductions in relative material consumption in past 12 months	>50% reductions in relative material consumption have been achieved in past 12 months	All packaging has been optimised (no further efficiency improvement possible)
7	<b>Post-consumer recovery</b>	Proportion of consumer packaging that is reusable, recyclable or compostable	Some progress in recoverable packaging (case studies).	Data showing 0<50% packaging can be recovered through existing systems	50<80% of packaging can be recovered through existing systems	80<100% of packaging can be recovered through existing systems	100% of packaging can be recovered through existing systems, optimised to highest value
8	<b>Renewable or recycled materials</b>	Proportion of packaging made from recycled or renewable content	Some progress in recycled or renewable content (case studies).	Data showing 0<50% incorporating recycled / renewable content	50%<80% of applicable packaging from recycled or renewable materials, or achieved sector-specific targets	80<100% of applicable packaging made from recycled or renewable content	All packaging has been optimised (no further improvement possible)
9	<b>Consumer labelling</b>	Proportion of consumer packaging with an on-pack label for disposal or recovery	There is <20% of product lines labelled for disposal or recycling.	20<50% of product lines labelled for disposal or recycling	50<80% of product lines labelled for disposal or recovery	80<100% of product lines is labelled for disposal or recovery	100% of product lines labelled for disposal or recycling in compliance with ISO 14021 and/or other relevant

		Performance Level					
		1	2	3	4	5	
Criteria	Description	Getting started	Good progress	Advanced	Leading	Towards Sustibility	
10	<b>Product-packaging innovation</b>	Company is rethinking product-packaging system to achieve sustainability outcomes	The company has an explicit commitment to innovation in product-packaging systems.	A process is in place to evaluation the sustainability of whole product-packaging systems	Some progress in redesigning whole product-packaging (at least one case study)	Product-packaging redesign implemented across multiple products	Product-packaging systems optimised (no further improvement possible)
11	<b>Procurement policy</b>	Policy and procedures require implementation of the SPG by suppliers	Process in place to improve packaging sustainability in the supply chain, e.g. using SPG.	SPG is included in key documents e.g. supplier manual, product specs	Supplier compliance with SPG is tracked and monitored	Support is provided to suppliers e.g. through training, awards	Continuous improvement process in place to achieve ongoing improvements
12	<b>B2B packaging from suppliers</b>	Reduction in single use B2B packaging from suppliers (ie containing materials or components) over the past 3	Some progress is being made in reducing B2B packaging from suppliers (case studies).	Data showing single use B2B packaging/ turnover from suppliers has reduced <20% over last 12 months	Single use B2B packaging/turnover from suppliers has reduced 20<50% over last 12 months	Single use B2B packaging/turnover from suppliers has reduced 50<100% over last 12 months	Zero single use B2B packaging coming in from suppliers, i.e. its all reusable
13	<b>B2B packaging to customers</b>	Reduction in single use B2B packaging going to customers (e.g. manufacturers or retailers)	Some progress is being made in reducing B2B packaging to customers (case studies).	Data showing single use B2B packaging/ turnover going to customers has reduced <20% over past 3 years	Single use B2B packaging/ turnover going to customers has reduced 20<50% over past 3 years	Single use B2B packaging/ turnover going to customers has reduced 50<100% over past 3 years	Zero single use B2B packaging going to customers, ie its all reusable
14	<b>Supplier compliance with SPG</b>	Supplier compliance with the SPG or equivalent	Between 0<20% of suppliers currently comply.	20<50% of suppliers currently comply	50<80% of suppliers currently comply	80<100% of suppliers currently comply	100% comply and collaborating with key suppliers for innovative solutions beyond current guidelines. e.g. shared fundine
15	<b>Waste management target</b>	A target to direct own packaging waste to non-landfill options	There is a corporate commitment to direct on-site packaging waste to non-landfill options	There is a clear and measurable target for diversion of packaging waste (or total waste) from landfill	Data is being collected to monitor the quantity of on-site packaging waste recovered and sent to landfill	Progress against the target is publicly reported	There is a policy to recover all packaging waste for highest value (circular economy)
16	<b>On-site waste recovery systems</b>	Systems in place to recover used packaging generated at company's facilities and sites	There are recovery systems in place for some types of on-site packaging (case studies)	There is a recovery system in place for <50% of packaging types	There is a recovery system in place for 50<100% of packaging types	There is a recovery system in place for all packaging types	There is a recovery system in place to achieve highest value from recovered packaging
17	<b>Packaging diversion rate</b>	Diversion of on-site packaging waste from landfill i.e. to reuse, recycling, composting, waste to enerav (excl. incineration)	0<20% packaging diversion from landfill	20<50% packaging diversion from landfill	50<100% packaging diversion from landfill	Zero packaging waste to landfill (100% diversion)	100% of packaging is recovered for highest value (circular economy)
18	<b>Closed loop collaboration</b>	Company is collaborating with stakeholders to close the loop (improve recovery) for specific materials	Investigating options for collaborative program	Working with others to set up at least one program	Assisted in development of at least one program that is currently operating	Program(s) can demonstrate tangible outcomes e.g. % waste recovered, % consumer access	The company has been involved in more than one successful closed loop initiative
19	<b>Consumer engagement</b>	Company is engaging consumers in sustainable consumption through packaging	Consumers are provided with some additional information on the sustainability of packaging (other than recvcling logos)	At least some packaging includes third party certified labels for products or packaging e.g. FSC, Fair Trade, MSC	>50% of packaging includes some form of sustainability label or information (in addition to recvcling)	Company actively engages consumers, through packaging, to reduce impacts of consumption e.g. less food waste	Company supports on-pack education with marketing campaigns e.g. advertising, social media
20	<b>Other product stewardship outcomes</b>	Company has achieved other outcomes (eg. New recycle markets/ infrastructure, Fugitive packaging. Sharing with peers.	Investigating options for programs	Working with others to set up at least one programs	Assisted in development of at least one program that is currently operating	Program demonstrates tangible outcomes e.g. % waste recovered, % consumer access	Involved in more than one program demonstrating tangible outcomes

## G. SELF ASSESSMENT TOOL (FINAL)



### Introduction

The Australian Packaging Covenant Organisation (APCO) has commissioned the Institute for Sustainable Futures (ISF) of the University of Technology Sydney in partnership with Dr Helen Lewis, to develop and pilot the Packaging Sustainability Framework ('the Framework') and associated Signatory Self-Assessment Tool.

### Objectives of the Framework and Self-Assessment Tool

The final Framework and Tool aim to:

- Provide a more consistent and transparent way for APCO to evaluate and report on signatory performance.
- Add value to individual signatories by providing feedback on their performance and suggested opportunities for further improvement.
- Reduce the administrative burden of reporting for both signatories and APCO.
- Provide aggregated data for APCO to evaluate and report its own performance.

### Objectives of this Pilot

The pilot aims to:

- Provide participating signatories with the opportunity to have a say in how all signatories will be asked to report in future. This includes which criteria and metrics are used to assess progress towards packaging sustainability, and what evidence is required to substantiate self-assessment.
- Ensure that the Framework meets the needs of all APC signatories.
- Provide APCO and ISF with detailed feedback and recommendations on how the draft Framework and draft Tool can be improved and finalised for signatories.

Please note that the primary purpose of the pilot is to obtain feedback on the contents of the draft framework, and the self-assessment process, not on the usability of this draft Excel tool. Pilot participants who complete this tool in full (ie. Self-Assessment Questions and Feedback Survey) will receive an extension on their 2017 reporting to 15 May 2017.

## Structure of this Tool

This draft excel tool contains the following 7 sections:

1. **Instructions:** Please read the Instructions worksheet before attempting to respond to the Self-Assessment Questions.
2. **Packaging Sustainability Framework:** This sets out the structure of the Framework on which the self-assessment tool is based and explains the principles underpinning the framework.
3. **Company details:** This page should be completed before the Self-assessment Questions.
4. **Self-assessment questions:** 5 Sheets of questions, with tabs labelled from A to E.
5. **Final score:** Final Score: This provides your organisation's overall score, calculated by the self-assessment tool, with an explanation of how it is calculated. It also provides recommendations for achieving the next level on all criteria.
6. **Feedback survey:** We request all pilot participants complete the survey.
7. **Appendix:** This explains what your score means in more detail, and gives a summary of the Packaging Sustainability Framework.

## Help

We would like participants to complete the tool as far as possible without help from the research team, to test its use in practice. If, for example, you have difficulty understanding what a specific question is asking, we would prefer you to provide feedback on that via the survey or workshop rather than requesting help to understand it during the pilot. However, if you encounter major problems in using and completing the tool, please contact us so that we can help you resolve the issue.

[packaging@isf.uts.edu.au](mailto:packaging@isf.uts.edu.au)



## Instructions for completing this tool

Please complete and return the self-assessment tool for your organisation to the Institute for Sustainable Futures at [packaging@isf.uts.edu.au](mailto:packaging@isf.uts.edu.au) by 31 March 2017.

### Overview

**How long will it take to complete?** It is difficult to estimate how long it will take you to complete the self-assessment tool as this is likely to vary by organisation. It may take longer to complete the self-assessment tool than would typically be required for APC reporting because it includes additional criteria.

**Complete as many questions as you can within a reasonable timeframe and keep going to the end of the tool.** All feedback is valuable as it will help APC develop resources. If you are unable to complete any of the questions, this is useful for us to know. If you are unable to answer questions or find it challenging to do so within a reasonable timeframe, please note this in the space provided for comments next to the question.

If you are unable to answer questions or find it challenging to do so within a reasonable timeframe, please note this in the space provided for comments next to the question. Please do not be discouraged or put off by being unable to or having difficulty answering Yes to questions – we anticipate that companies will not have all of the information or data required to answer all the questions and this knowledge will be helpful in refining the final self-assessment tool.

### Getting Started

[Step 1: Please review the Framework to provide context before completing the self-assessment questions.](#)

[Step 2: Please complete the Company Details worksheet, including the question on consent.](#)

### Self-Assessment

**Step 3:** Please complete the **Self-assessment Questions**.

#### How the questions are organised

There are 5 worksheets of self-assessment questions, organised by the 5 categories of the Framework:

- [A. Corporate Strategy](#)
- [B. Design](#)
- [C. Supply Chain](#)
- [D. Operations](#)
- [E. Industry Leadership](#)

Each category contains one or more criteria and there are **20 criteria in total**. Each criterion is translated into 3-5 self-assessment questions. Responses to these questions allow the tool to automatically assign a performance level for each criteria and an overall performance level/score.

### Which criteria to respond to

Across the 5 categories, the 20 criteria relate to a designated hierarchy:

- **Core criteria:** The core criteria broadly align with APCO's Strategy and KPIs. These criteria are mandatory for all signatories.
- **Recommended criteria:** These criteria go beyond what is currently required by APCO but will be relevant to companies that are interested in pursuing a more comprehensive packaging sustainability strategy. Over time some of them they may become core criteria.
- **Stretch criteria:** Stretch criteria go beyond current best industry practice and aim to encourage more ambitious outcomes in packaging sustainability.

For this pilot, participants are requested to **respond to all criteria question**, regardless of their status. When the final Framework and Tool are rolled out in 2018, however, signatories will have the choice whether to report against Recommended and Stretch criteria.

### Which questions to respond to

Each criterion has between 3-5 related self-assessment questions. These questions correspond to an escalating performance level and are additive, ie. you must satisfy Level 1 and Level 2 to receive the Level 2 rating. Please answer as many questions as you can within each criterion. The more questions you are able to answer Yes to for each criterion, the higher performance rating you will be assigned for that criterion. As you answer each question the next relevant question will be shaded white.

### How to respond to questions

Where necessary, questions include more details/explanations directly below the question. Please read these before answering the question, as they will indicate how a question should be answered.

Most questions require a Yes/No answer. However some ask for actual data in specific units. If you are unable to provide the data, you have the option to provide an estimate. If you have similar data (say, measuring the same thing but in different units, eg. SKUs rather than tonnes) we'd appreciate you noting this where indicated (as well as providing estimates) as this will inform the data required for the finalised Framework and Tool.

For this pilot, you will not be required to provide any supporting evidence to validate your responses in the self-assessment tool. However, you will be asked to indicate whether you would be able to provide specific types of evidence to validate your responses to specific questions. This will help ISF and APCO determine what kinds of supporting evidence companies should be able to provide when the tool is rolled out. Therefore when you see comment boxes for questions that say, for example, "Would you be able to provide a link to an internal doc?", for the pilot you are not required to provide the link, instead we ask that you answer: yes, no or maybe in the comment boxes.

Where you have any difficulties understanding or completing questions, or have comments/suggestions on data and evidence required, you can note this in the comment box provided. This feedback will be essential to ensuring that the final Tool is usable by all Signatories.

### Finishing off

[Step 4: When you have completed as many self-assessment questions as you can, please review your organisation's Final Score and Appendix.](#)

[Step 5: Please complete the Feedback Survey.](#)

**Step 6:** Email your completed Self-assessment tool to:

[packaging@isf.uts.edu.au](mailto:packaging@isf.uts.edu.au)

A reminder that pilot participants who complete this tool in full (ie. Self-Assessment Questions and Feedback Survey) will receive an extension on their 2017 reporting to 15 May 2017.

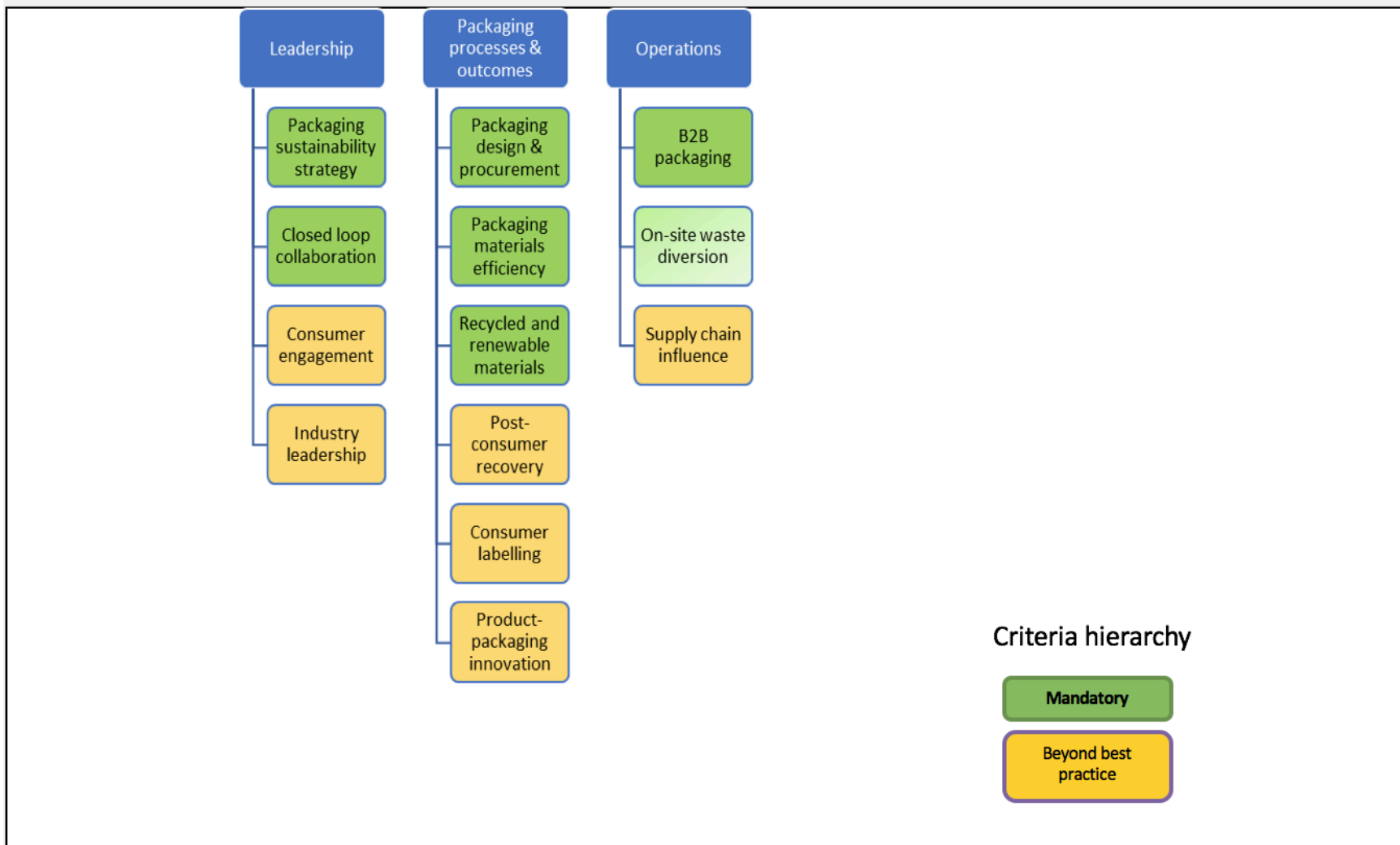
### HELP

We would like participants to complete the tool as far as possible without help from the research team, to test its use in practice. If, for example, you have difficulty understanding what a specific question is asking, we would prefer you to provide feedback on that via the survey or workshop rather than requesting help to understand it during the pilot. However, if you encounter major problems in using and completing the tool, please contact us so that we can help you resolve the issue.

[packaging@isf.uts.edu.au](mailto:packaging@isf.uts.edu.au)

## APCO Packaging Sustainability Framework: DRAFT FOR PILOT

### FRAMEWORK CRITERIA



## FRAMEWORK PRINCIPLES

The framework has been designed to comply with the following principles:

1. **Align with APC goals and KPIs** to support implementation of the strategic plan.
2. Be structured in a way that is **logical for the user** by aligning KPIs with conventional business functions and processes.
3. Add value to signatories by providing them with a **structured process for continuous improvement** in packaging sustainability.
4. Align with **existing international standards** wherever possible, including definitions, metrics, business processes and certification schemes.
5. Encourage signatories to consider packaging within a **broader sustainability strategy** that includes products and operations.
6. Encourage signatories to implement a **management system** for packaging sustainability based on the PDCA (plan-do-check-act) quality model.
7. Provide a **transparent framework** for signatory reporting and evaluation.
8. Minimise the administrative load on signatories by allowing them to use **existing policies/procedures/certifications** etc. as evidence of performance where possible.
9. Be tailored, where appropriate, for **different sectors or groups** to improve the framework's relevance and usability. Please note: the pilot version of the tool is generic and not tailored for different sectors or groups. The final version of the tool will include tailored modules, incorporating feedback from this pilot process."

## Overview

The framework includes **13 criteria** grouped into **3 categories** - Leadership, packaging design, and operations. The criteria measure packaging sustainability processes (e.g. plans or policies) as well as outcomes (e.g. policy implementation or packaging changes).

Six of the criteria are mandatory for all APC signatories. An additional **7 stretch** criteria are relevant to companies that are interested in pursuing a more comprehensive packaging sustainability strategy. These represent global best practice strategies for packaging sustainability.

You will be asked a series of questions for each criterion, which will be used to measure your organisation's progress on a five-point scale from 1 (getting started) through to 5 (Beyond Best Practice). The different performance levels for each criteria are shown in the appendix.

## Company details

### Overview

Company name:	<input type="text"/>
Contact name:	<input type="text"/>
Contact phone number:	<input type="text"/>
Contact email:	<input type="text"/>
Business Address:	<input type="text"/>
ABN:	<input type="text"/>

## Packaging data

The following information is requested to assist APCO to monitor packaging consumption levels and recycling rates at a national level.

The data will also help APCO to identify 'problem packaging types' that could be addressed through APC initiatives.

The data will remain confidential and will only be used in an aggregated form.

**How many tonnes of packaging did your company place on the Australian market in the last 12 months?**

Material	Tonnes (last 12 months)	Data quality
Glass		
Steel		
Aluminium		
Paper/cardboard		
PET		
HDPE		
LDPE/LLDPE		
PVC		
PP		
PS		
EPS		
Other plastic		
Timber		
Composite material		
Other		
<b>Total</b>		

**A. Leadership**

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

**1. Sustainability Plan [MANDATORY] Score 0 / 5**

**1 Does your company have a packaging sustainability plan that commits to using the APC Sustainable Packaging Guidelines (SPG) (or equivalent)?**

*Commitment to use the SPG or equivalent included in a packaging plan, policy or strategy, corporate plan, sustainability section of website etc. A plan that has been approved by senior management sends a clear message to employees and stakeholders that packaging sustainability is a priority for the organisation. Minimum requirements are a high-level commitment to improve the sustainability or environmental performance of the company's packaging, and broad objectives such as a reduction in packaging weight, improved recyclability, use of recycled or renewable materials etc.*

Yes	No

Would you be able to provide evidence, e.g. sustainability plan, policy or strategy corporate plan, website

Yes	No	Comment (optional)

**2 Commitment to specific targets**

- a. Specific targets to review **new** products against the SPG or equivalent  
e.g. What proportion of new products will reviewed against the SPG each year
- b. Specific targets to review **existing** products against the SPG or equivalent  
e.g. What proportion of existing products will reviewed against the SPG each year
- c. Specific targets to reduce (optimise) the quantity of material used in packaging  
e.g. What % improvement in amount of tonnes do you expect to save, or what % of products will be optimised
- d. Specific targets to improve recoverability of packaging (e.g. reuse, recycling, recoverability)  
e.g. How will you packaging to be recoverable
- e. Specific targets to improve sustainability of packaging materials  
e.g. how will you improve the sustainability of materials being used
- f. Specific targets to include on-pack labelling for disposal or recovery  
e.g. What % of products will have on-pack labelling for disposal or recovery
- g. Specific target to reduce on-site waste sent to land fill  
e.g. what % of waste will be diverted from landfill
- h. Specific targets to improve packaging sustainability through procurement processes  
e.g. What % of suppliers meet packaging sustainability policies and criteria
- i. Specific targets to improve packaging sustainability through procurement processes  
e.g. What % of suppliers meet packaging sustainability policies and criteria
- j. Specific targets to reduce (optimise) B2B packaging  
e.g. How will you reduce B2B packaging (e.g. optimie packing on crates, trucks, reduce protective packaging etc)

Target published in public document	Reporting annual progress against targets in public document

What is the target?

**3 Does the packaging sustainability plan include SMART targets for packaging sustainability?**

*Targets should be specific, measurable, , achievable, realistic and time-related targets e.g. By 2020: % reduction in packaging weight, 100% recyclable packaging or eliminate PVC*

Yes	No

**4 Is the Sustainability Strategy integrated into business processes?**

*Eg. integrated with Business plan, marketing plan, product development processes or procurement procedures, job descriptions, performance incentives, etc. A strategy will only be effective if its objectives and targets are integrated in other plans and processes, such as a business plan, marketing plan, product development processes or procurement procedures. Staff within the organisation must be accountable for implementation, for example through their position descriptions and performance*

Yes	No

**5 Do you publicly report on progress against your packaging sustainability targets?**

*Transparency builds trust and allows you to share your packaging sustainability journey with stakeholders. Progress can be reported through an APC Annual Report, corporate Sustainability Report, corporate website or other avenues that are appropriate for each organisation.*

Yes	No

**6 Is your packaging sustainability plan integrated in a quality system for continuous improvement?**

*Management processes that promote continuous improvement usually reflect the Deming PDCA cycle - Plan, Do, Check, Act. Examples include a Quality system or EMS.*

Yes	No

Would you be able to provide specific, measureable, time related targets e.g. by 2020 you will achieve %.

Yes	No	Comment (optional)

Would you be able to provide evidence of how this is integrated into business processes?

Yes	No	Comment (optional)

Would you be able to provide evidence of a public report, website, annual report?

Yes	No	Comment (optional)

Would you be able to provide evidence e.g. EMS?

Yes	No	Comment (optional)



**2. Closed loop collaboration**

**[MANDATORY]**

**Score 0 / 5**

**1 Have you investigated options for joining or starting a collaborative closed loop initiative?**

Yes	No

*Closed loop collaborations bring industry together to identify the barriers to the recovery and reuse of waste packaging, develop strategies to address and build innovation across industry sectors and the supply chain. Examples could include collaboration to establish a collection program for used packaging; to develop a new application or market for a recyclable material; or to develop an industry standard for collection or recovery, etc. This question is about initial, exploratory steps taken.*

Would you be able to provide evidence, e.g. detail on the steps taken to develop a closed loop initiative?

Yes	No	Comment (optional)

**2 Have you joined at least one existing initiative or worked with others to set up at least one program ?**

Yes	No

*Closed loop collaborations bring industry together to identify the barriers to the recovery and reuse of waste packaging, develop strategies to address and build innovation across industry sectors and the supply chain. Examples could include collaboration to establish a collection program for used packaging; to develop a new application or market for a recyclable material; or to develop an industry standard for collection or recovery, etc. Collaboration could be with competitors/peers, local councils, community group, university, recycler etc. The project does not necessarily have to be completed or operational yet.*

Would you be able to provide evidence, e.g. detail on the initiative(s), how you collaborated?

Yes	No	Comment (optional)

**3 Is data being collected to monitor the outcomes of closed loop collaboration(s)?**

Yes	No

*Data is important for monitoring and reporting outcomes, e.g. the amount of product collected, the recycling rate, tonnes of recycled material used in manufacture of new products etc.*

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

**4 Have you joined or worked with others to set up any closed loop collaborative initiatives that can demonstrate tangible (quantitative) outcomes?**

Yes	No

*The data can demonstrate real, tangible outcomes such as tonnes of packaging collected, or tonnes of recycled material used in products etc.*

Would you be able to provide evidence, e.g. project reports with quantitative outcomes?

Yes	No	Comment (optional)

**5 Is there a formal process in place to continually identify new opportunities for collaboration on closed loop initiatives or to improve existing initiatives?**

Yes	No

*Examples of formal processes include a documented strategy to continue to look for new opportunities or improved outcomes from existing initiatives. The process may be documented internally within your organisation, or within the organisation responsible for managing it.*

Would you be able to provide evidence, e.g. project reports with quantitative outcomes?

Yes	No	Comment (optional)

**3. Consumer engagement** [RECOMMENDED] Score 0 / 5

**1 This criterion considers actions to inform and educate consumers about packaging sustainability through packaging. Is this activity relevant to your company?**  
If no, please proceed to Q X

Yes	No

**1 Do you provide consumers with any information on the sustainability of packaging (in addition to recycling logos)?**

*This question relates to information published through websites or other public media, rather than on-packaging. The information could relate to outcomes such as the % of recycled content, renewable materials, certified sustainably supply chains (e.g. FSC or PEFC certified fibre), innovation in packaging design, material savings (e.g. '10% less material'), or other packaging sustainability*

Yes	No

Would you be able to provide evidence, e.g. list of products, type of information provided?

Yes	No	Comment (optional)

**2 Does any of your packaging include on-pack claims or labels on packaging sustainability (in addition to disposal/recycling)?**

*This information could relate to outcomes such as the percentage of recycled content, use of renewable materials and their source, certified sustainable supply chains (e.g. FSC or PEFC certified fibre), innovation in packaging design, material savings (e.g. '10% less material') etc. Excludes ecolabels that are specific to a market outside Australia, e.g. Green Dot.*

Yes	No

Would you be able to provide evidence, e.g. list of products with labels, type of label?

Yes	No	Comment (optional)

**3 Approximately what % of your products have packaging with some form of sustainability label or information (in addition to disposal/recycling) in compliance with ISO/AS 14021 Standard for self-declared environmental claims?**

*See previous question for examples of relevant information. 'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.*

% of products

OR How many products do you manufacture or sell?

Number

**3 How many of your products have packaging with some form of sustainability label or information (in addition to disposal/recycling) in compliance with ISO/AS 14021 Standard for self-declared environmental claims?**  
*'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.*

Number

Would you be able to provide evidence, e.g list of product lines with labels?

Yes	No	Comment (optional)

Proportion of products with sustainable packaging labels or information

% products

**4 Does your company actively engage consumers, through packaging labels, to reduce impacts of consumption e.g. less food waste?**

*'Active engagement' encourages consumers to take action or change behaviour. Examples of consumer engagement through packaging could include advice on how to store food correctly, tips for minimising waste, how to reduce water or energy consumption etc... or it could direct consumers to a website with more information on the sustainability of the product or packaging.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**5 Does your company support on-pack sustainability education with marketing campaigns?**

*Marketing campaigns could include advertising, promotion through social media, events, etc. to encourage more sustainable consumption. E.g. advertising, social media. On-pack information to engage consumers to reduce the impacts of consumption can be supported by other forms of communication.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**4. Industry leadership** [RECOMMENDED] Score 0 / 5

**1 This criterion considers other initiatives taken by your company within Australia to improve packaging sustainability through collaborations and industry leadership. Is this relevant to your company?**

If no, please proceed to Q X

Yes	No

**1 Have you investigated any other packaging sustainability initiatives that have not been covered under other criteria?**

*E.g. have you investigated programs to reduce litter (clean-ups, sponsoring Clean Up Australia etc.) or reduce the impacts of marine plastics; received awards for packaging sustainability; shared sustainability knowledge with peers; been involved in public packaging sustainability education etc.?*

Yes	No

**2 Are you, or have you been involved in any other initiatives?**

*See previous question for examples of other initiatives. 'Involved' means that the company has committed significant resources to the program or initiative.*

Yes	No

**3 If yes, how many of these other initiatives has your company been involved in? (max 3)**

*See previous question for examples of other initiatives.*

Number

**4 Has your company received external recognition for its contribution to packaging sustainability?**

*E.g. this recognition can be in the form of an industry or government award or similar. See previous question for examples of other initiatives. 'Involved' means that the company has committed significant resources to the program or initiative.*

Yes	No

**3 If yes, how many awards has your company been involved in? (max 2)**

Number

**4 Are you actively engaging with peers to promote packaging sustainability and share sustainability knowledge for non-commercial purposes (e.g. evidence for holding workshops, providing training, sharing**

*E.g. this recognition can be in the form of an industry or government award or similar. See previous question for examples of other initiatives. 'Involved' means that the company has committed significant resources to the program or initiative.*

Yes	No

Would you be able to provide evidence, e.g. internal document or link?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. description of what you have done, outcomes so far?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. project reports?

Yes	No	Comment (optional)

Core (E) 0 / 5  
 Recommended (E) 0 / 5  
 Stretch (E) 0 / 5

## B. Packaging process and outcomes

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

### 5. Packaging design or procurement procedures

[MANDATORY]

Score 0 / 5

**1 Do you have a documented procedure on using the SPG or equivalent to evaluate and improve packaging?**

*This means that the Sustainable Packaging Guidelines (SPG) or equivalent are referred to in a corporate document, e.g. packaging policy or product development procedure etc. This procedure could take many different forms, e.g. a step-by-step procedure for new product development that shows when and how the SPG must be applied a procurement policy or procedure that requires procurement staff or packaging suppliers to review all new packaging against the SPG and to identify potential improvements. 'Equivalent' means the same principles (doesn't have to be word for word) are being addressed.*

Yes	No

Would you be able to provide evidence of the SPG referred to in a corporate document?

Yes	No	Comment (optional)

**2 How many products do you currently have in the market?**

*'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company.*

No. of products	

Would you be able to provide evidence o?

Yes	No	Comment (optional)

**3 How many of these products have had their packaging reviewed using the SPG or equivalent to consider sustainability criteria?**

*These two figures will be used to calculate the percentage of products that have had their packaging reviewed using the SPG, including new products that were launched; packaging that was updated or refreshed; and/or product or packaging reviews that were undertaken as part of a normal business process. The data is cumulative, i.e. for packaging that has been designed or reviewed with reference to the SPG at any time (not just in the past 12 months).*

No. of products	

Would you be able to provide evidence e.g. list of products assessed, dates of assessment, outcomes?

Yes	No	Comment (optional)

**4 Have you used LCA or a similar life cycle tool to consider sustainability criteria for packaging of all products currently on the market?**

*The tool could be LCA software, PIQET, EcodEX or similar; or an in-house LCA tool etc used to review and optimise existing and new packaging.*

Yes	No

Would you be able to provide evidence, i.e. to show you estimated the percentage?

Yes	No	Comment (optional)

6. Packaging materials efficiency optimisation

[MANDATORY]

Score 0 / 5

1 Has your company developed a plan, or are you investigating opportunities, to optimise the quantity of material used for packaging?

*At a minimum, this activity should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control.*

Yes	No

Would you be able to provide evidence to support this?

Yes	No	Comment (optional)

3 How many products do you currently have in the market?

--

4 How many of these products have achieved a reduction in material weight

*'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company. These two figures will be used to calculate what percentage of products that have achieved an efficiency improvement.*

No. of products	

Would you be able to provide evidence e.g. critical areas that prevent further reduction in weight or volume?

Yes	No	Comment (optional)

Reduced material quantities

% Reduced
to be calculated

4 How many of these products have optimised the material efficiency of their packaging? (e.g. not further weight reductions possible without impacting the sustainability of outcomes)

*These two figures will be used to calculate what percentage of products that have achieved an efficiency improvement, or for which efficiency has been optimised. 'Optimised' means that no further improvement in packaging material efficiency is possible, considering interactions between the packaging and product (e.g. impacts on product waste), regulatory restrictions etc. ISO18602 refers to 'critical areas' - specific performance criteria that prevent further reduction of weight or volume without endangering functional performance, safety and user acceptability. Includes: product protection, packaging manufacturing processes, packing/filling process, logistics, product presentation/marketing, user/consumer acceptance, information, safety, legislation, other (this should be specified for each*

No. of products	

Yes	No	Comment (optional)

Optimised

% optimised
To be calculated

7. Recycled and renewable materials

[MANDATORY]

Score 0 / 5

**1 Has your company developed a plan, or are you investigating opportunities, to optimise the quantity of materials that are renewable and/or contain recycled content?**

Yes	No

*At a minimum, this activity should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control.*

*Renewable' means material that is composed of biomass from a living source and that can be continually replenished. Renewable materials include paper and cardboard from sustainably grown wood fibre, or a biopolymer from a sustainable source*

*Recycled content' is the proportion, by mass, of pre-consumer and post-consumer recycled material in packaging (AS/ISO 14021). 'Pre-consumer' is material diverted from the waste stream during manufacturing (excluding rework). 'Post-consumer' material is material waste generated by households or by commercial, industrial and institutional facilities.*

Would you be able to provide evidence to support this?

Yes	No	Comment (optional)

**3 How many products do you currently have in the market?**

Pre-populated	
No. of products	

**4 How many of these products incorporate some recycled or renewable material content, or have achieved sector specific targets?**

*These two figures will be used to calculate what percentage of products have packaging with recycled or renewable content, or the percentage of recycled or renewable content has been optimised. 'Optimised' means that the percentage of renewable and recycled materials cannot be increased without impacting negatively on functionality, legal compliance etc.*

Would you be able to provide evidence e.g. critical areas that prevent further increase in recycled or renewable content?

Yes	No	Comment (optional)

Recoverable	% Recycled or renewable
	to be calculated

**5 Has all your packaging material been optimised from a recycled/renewable content perspective?**

*This takes into account any restrictions due to regulation/functionality, e.g. that restrict the use of recycled materials. Where recycled materials can be used, is the maximum amount being used? For virgin materials, is the fibre from a certified sustainable source, e.g. FSC or PEFC?*

Yes	No

Would you be able to provide evidence e.g. list products certified to FSC/PEFC, why unable to use recycled content?

Yes	No	Comment (optional)

8. Post consumer recovery

[RECOMMENDED]

Score 0 / 5

**1 This criterion considers actions to increase the proportion of packaging that can be recovered for reuse, recycling, composting or energy recovery in Australia and show that outcomes are being met. Is this activity relevant to your company?**

If no, please proceed to Q X

Yes	No

Would you be able to provide evidence, e.g. a copy of the relevant document?

Yes	No	Comment (optional)

**2 Has your company developed a plan, or are you investigating opportunities, to optimise the recoverability of packaging?**

At a minimum, this activity should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control.

Yes	No

Recoverability' of packaging refers to the availability of systems for reuse, recycling, composting or energy recovery of packaging in Australia. 'Recyclable' means that there is an existing system to collect and recycle the packaging in Australia (see ISO 140121 for more detail). 'Compostable' means the packaging has been certificated compostable according to AS 4736, AS 5810 or a similar standard. 'Reusable' means it can be collected through an existing system for reuse.

Would you be able to provide evidence showing the methodology for how this number has been calculated?

Yes	No	Comment (optional)

**3 How many products do you currently have in the market?**

No. of products	

Would you be able to provide evidence showing the methodology for how this number has been calculated?

Yes	No	Comment (optional)

**4 How many of these products have packaging that can be recovered through existing systems?**

These two figures will be used to calculate what percentage of products have packaging that can be recovered through an existing system, e.g. kerbside collection.

No. of products	

Recoverable	% Recoverable
	to be calculated

Would you be able to provide evidence, e.g. for how you calculated the recoverability of your packaging?

Yes	No	Comment (optional)

**5 Can 100% of the packaging you put on to the market in the past 12 months be recovered through existing systems that achieve highest potential environmental value?**

This means that the waste hierarchy has been applied to ensure that the value of the embodied materials and/or energy is retained as much as possible and for as long as possible, e.g. through closed loop recycling (e.g. bottle to bottle) or by recycling into another high value product that can itself be recycled a second time. Case-by-case analysis is required to determine whether the highest value has been achieved.

Yes	No

9. Consumer labelling

[RECOMMENDED]

Score 0 / 5

1 This criterion considers the use of on-pack labels that equip consumers to easily determine the correct disposal method for post-consumption packaging. Is this activity relevant to your company?

If no, please proceed to Q X

Yes	No

2 Has your company developed a plan, or are you investigating opportunities, to improve on-pack consumer labelling for disposal or recycling?

At a minimum, this activity should apply to packaging of products that the company controls, i.e. it's their own branded product and/or distribution packaging that they control.

'Labelling' can be in the form of a statement, symbol or graphic

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

3 How many products do you currently have in the market?

No. of products	

Would you be able to provide evidence showing the methodology for how this number has been calculated?

Yes	No	Comment (optional)

4 How many of these products have packaging labelled for disposal or recovery?

'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company. These two figures will be used to calculate what percentage of products have packaging labelled for disposal or recovery.

No. of products	

Would you be able to provide evidence showing the methodology for how this number has been calculated?

Yes	No	Comment (optional)

Labelled for disposal or recovery

% Labelled
to be calculated

5 Is 100% of the packaging you put on to the market in the past 12 months labelled for disposal or recovery in compliance with AS/NZS ISO 14021 Standard for self-declared environmental claims?

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)



10. Product-packaging innovation

[RECOMMENDED]

Score 0 / 5

**1 This criterion considers actions to reduce the life cycle environmental impact of packaging through innovation in the design of the product-packaging system. Is this activity relevant to your company?**

*The 'product-packaging system' includes the product and all associated packaging (retail and distribution).*

*'Innovation' could involve changes in the product format (e.g. concentrated to reduce size and weight), product delivery system (e.g. from physical delivery to digital download), or business model (e.g. from product to service).*

If no, please proceed to Q X

Yes	No

**2 Has your company made any progress in redesigning whole product-packaging systems e.g. can you provide at least one example of a product innovation that is under development or was fully implemented during the last 12 months which improves the sustainability of the product-packaging system?**

*The 'product-packaging system' includes the product and all associated packaging (retail and distribution). 'Innovation' could involve changes in the product format (e.g. concentrated to reduce size and weight), product delivery system (e.g. from physical delivery to digital download), or business model (e.g. from product to service).*

Yes	No

Would you be able to provide evidence, e.g. case studies that show how product-packaging systems have changed?

Yes	No	Comment (optional)

**3 Has your company made an explicit (documented) commitment to innovation in product-packaging systems?**

*'Commitment' means it has been written into an internal or published corporate document.*

Yes	No

Would you be able to provide evidence (e.g. web link or attachment)?

Yes	No	Comment (optional)

**4 Does your company have a documented procedure in place to evaluate the sustainability of whole product-packaging systems and is your company reporting on this?**

*This procedure would use life cycle assessment (LCA) or a similar life cycle approach and consider impacts of the product and all its packaging.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**5 Approximately what % of your products have been evaluated using LCA or similar life cycle approach and have had packaging optimised?**

*There should be documented evidence that life cycle reviews of the product-packaging system have been undertaken and that no further improvements are feasible at the current time.*

*'Products' can be SKUs, groups of products or some other categorisation that is meaningful for the company. 'Optimised' means that no further improvements in packaging sustainability are possible, considering interactions between the packaging and product (e.g. impacts on product waste), regulatory restrictions etc.*

% of products

Would you be able to provide evidence?

Yes	No	Comment (optional)

Total Score (D) /  
 Core (D) /  
 Recommended (D) 0 / 0



### C. Operations

**Instructions:**

Yes / No responses can be marked with an "X".

When you answer yes to a question the next relevant question will turn white and you should keep responding until there are no more relevant questions. When you answer no to a question you should skip to the next relevant question which will be shown in white

If an incompatible answer is entered, a warning in red text will provide instructions for what you need to do.

For comment boxes below that mention supporting evidence you are not required to provide the evidence for this pilot, instead please indicate whether or not you would be able to provide evidence by answering yes or no or providing a comment in the boxes.

#### 11. B2B Packaging to customers

[MANDATORY]

Score 0 / 5

**1 Can you provide at least one example of reduction in single use B2B packaging going from your sites and facilities to customers (e.g. manufacturers or retailers) in the last 12 months?**

*Business-to-business (B2) packaging is packaging used to distribute products to business customers. Reduction can be achieved, for example, by improving packaging efficiency (weight or volume), switching to bulk distribution, by reusing incoming packaging for distribution to customers, or by introducing reusable packaging (e.g. plastic drums or crates). While each opportunity needs to be evaluated on a case-by-case basis, the preferred strategies from a sustainability perspective are likely to be reduction/elimination followed by multi-use systems.*

Yes	No

Would you be able to provide evidence, e.g. case studies showing how packaging has been reduced?

Yes	No	Comment (optional)

**2 Are you collecting data on the amount of B2B packaging you provide to customers, and how much is single use vs reusable?**

*Single use means that the packaging can only be used for one trip. 'Reusable' means a characteristic of packaging that has been conceived and designed to accomplish within its life cycle a certain number of trips or uses for the same purpose for which it was conceived*

Yes	No

**3 How many tonnes of single-use B2B packaging did you send to customers in the last 12 months?**

Tonnes

**3 And in the 12 months prior to that?**

Tonnes

Change in single-use B2B packaging

% change
To be calculated

**4 Are you collecting data on the amount of B2B packaging you provide to customers, and how much is single use vs reusable, as a ratio of the quantity of**

Yes	No

4 Are you collecting data on the amount of B2B packaging you provide to customers, and how much is single use vs reusable, as a ratio of the quantity of	Yes	No
5 What was the ratio of single-use B2B packaging provided to customers (tonne) relative to product delivered in the last 12 months (tonnes)?	Ratio	
5 And in the 12 months prior to that?	Ratio	
Change in single-use B2B packaging ratio	% change	
	To be calculated	

12. On-site waste diversion

[RECOMMENDED]

1 This criterion considers actions to increase the recovery of packaging waste generated on-site. Is this activity relevant to your company?

Yes	No

If no, please proceed to Q X

1 Do you collect data on the rate of on-site solid waste diversion from landfill?

Yes	No

The total weight of solid waste generated at the company's facilities (factories, warehouses, offices, retail stores etc.) is being measured, with a breakdown of the following where applicable:

- Reuse
- Recycling
- Composting
- Recovery, including energy recovery
- Incineration (mass burn)
- Landfill.

The diversion rate is measured by dividing the quantity recovered for reuse, recycling, composting or energy recovery by the total quantity generated in a particular year.

2 How much solid waste did you generate at your sites and facilities in the last 12 months? (tonnes or volume)

Tonnes	Volume (m3)

3 How much on-site solid waste did you reuse, recycle, compost or send to an energy-from-waste facility in the last 12 months? (tonnes or volume)

Tonnes	Volume (m3)

This includes solid waste that was reused, recycled, incinerated with energy recovery or composted. Excludes waste that was incinerated without energy recovery. Provide data as either tonnes or volume.

Percentage of onsite solid waste that was recovered in last 12 months

% onsite recovery
to be calculated

4 If no to question 1, can you estimate what % of on-site solid waste you reused, recycled, composted or sent to an energy from waste facility in the last 12 months?

% recovered

5 If zero waste to landfill has been achieved, are you optimising all recovered on-site solid waste for its highest value?

Yes	No

This means that the waste hierarchy has been applied to ensure that the value of the embodied materials and/or energy is retained as much as possible and for as long as possible, e.g. through Closed loop recycling (e.g. bottle to bottle) or by recycling into another high value product that can itself be recycled a second time. Case-by-case analysis required

Can you provide supporting documentation (e.g. reports from contractors), if not why?

Yes	No	Comment (optional)

Can you provide supporting documentation (e.g. reports from contractors), if not why?

Yes	No	Comment (optional)

Would you be able to provide evidence, e.g. basis for the estimate?

Yes	No	Comment (optional)

Would you be able to provide evidence?

Yes	No	Comment (optional)

13 Supply chain influence

[RECOMMENDED]

**1 This criterion considers actions to eEngage with suppliers to build support for and capacity to achieve packaging sustainability goals. Is this activity relevant to your company?**

If no, please proceed to Q X

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**1 Does your company communicate your packaging sustainability goals and packaging guidelines to all tier 1 suppliers and downstream contacts**

*Packaging sustainability goals (e.g. in your Packaging Sustainability Plan and any associated policies) and packaging guidelines (SPG or equivalent) could be shared with suppliers through face-to-face meetings or presentations, and/or included in procurement documentation.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**2 Does your company provide support to tier 1 suppliers and customers to improve their understanding of packaging sustainability goals and strategies?**

*Initiatives that build knowledge and capacity amongst suppliers, particular SMEs, will improve the organisation's ability to achieve its packaging sustainability goals. These initiatives could be the provision of*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**3 Does your company collaborate with tier 1 key suppliers and customers to share knowledge and improve packaging sustainability?**

*Companies should harness suppliers' sustainability expertise to identify opportunities for improvement. At a minimum, this can be achieved through regular face-to-face meetings to share information and ideas for improvement. Collaboration goes beyond the duration of an individual contract, e.g. it could involve longer term initiatives to develop a new packaging material or packaging format, etc.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**4 Does your company have processes in place to evaluate supply chain risks and opportunities for influence throughout the entire supply chain (tier 1 and below)?**

*Risks and opportunities can be evaluated in different ways, for example by analysing individual suppliers, risks/opportunities in their supply chain and capacity to influence. Alternatively, or in addition, purchase categories could be mapped against key sustainability issues to identify risks and opportunities.*

Yes	No

Would you be able to provide evidence?

Yes	No	Comment (optional)

**5 Does your company have processes in place to monitor and track compliance with key packaging sustainability requirements throughout the entire supply chain (full traceability)?**

*This could be done, for example, by developing a scorecard methodology to monitor sustainability criteria along with service, quality, delivery, cost etc. Regular review meetings with suppliers will provide an opportunity for both parties to communicate, share concerns and foster a good business relationship.*

Yes	No

Total Score (D) /  
Core (D) /  
Recommended (D) 0 / 5

**D. Free Form Section**

**Instructions:**

This section of the tool allows you to describe initiatives or practices that your organisation is implementing with regards to packaging sustainability. This section will not be scored but will be included in your final document and may be used for your action plans. It will be separated into two sections. The first section will provide you with an opportunity to discuss what initiative you have implemented over the last 12 months to improve packaging sustainability with your organisation. The second part of this form will all you to describe what you are planning to implement over the next 12 months and any longer term plans for improvement.

**1 Describe initiatives, processes or practices that you have implemented over previous 12 months that have improved packaging sustainability**

**2 Describe any initiatives, processes or practices that you are planning to implement over the short term (12 months) and what you hope to accomplish over the long term (5-10 years)**

**FINAL SCORE**

**Overall score**

Overall:

Total:  #REF! Core:  Rec'd:  Stretch:

**Last years score**

Overall:

Total:  Core:  Rec'd:  Stretch:

**Criteria scores**

Note: descriptions of what these scores mean on Appendix page

Criteria	Performance Level				
	Getting Started	Good Progress	Advanced	Leading	Beyond Best Practice
1. Sustainability plan					
2. Design policy & procedures					
3. Design of new packaging					
4. Review of existing packaging					
5. Packaging efficiency policy					
6. Packaging efficiency outcomes					
7. Post-consumer recovery					
8. Renewable or recycled materials					
9. Consumer labelling					

**How the scores are calculated**

The framework includes 20 criteria grouped into 5 categories - corporate strategy, design, supply chain, operations and leadership. There are 5 performance levels that range from 'getting started' to 'Beyond Best Practice'. There are 13 core criteria, 5 recommended criteria and 2 stretch criteria. The tool automatically assigns a performance level for each criteria based on the responses that you provide. Criteria are assigned as 'core', 'recommended' or 'stretch' and are tallied to give an overall score. Last year's scores are shown for comparison purposes. Examples of performance at each level are provided below.

No Action: The company is not aware of the issues, they are not seen as important, or they are yet to do anything about it.

Getting started: The company has made some commitments to improve packaging sustainability and can show a degree of progress, e.g. through packaging case studies.

Good Progress: The company has packaging sustainability targets, data is being collected to track progress and suppliers are engaged.

Advanced: The company has embedded packaging sustainability in corporate strategy and processes, supply chain compliance is being monitored and good packaging outcomes are being achieved.

Leading: The company is achieving ambitious targets such as zero waste, is considering the sustainability of product-packaging systems and is publicly reporting on outcomes.

Beyond Best Practice: The company is focused on innovation and continuous improvement, follows circular economy principles, and packaging is optimised for criteria such as efficiency and recyclability.

**Recommendations to get to next level**

The following recommendations represent what your company needs to do in order to progress to the next level.


10. Product-packaging innovation		
11. Procurement policy		
12. B2B packaging from suppliers		
13. B2B packaging to customers		
14. Supplier compliance with SPG		
15. Waste management target		
16. On-site waste recovery systems		
17. On-site packaging waste diversion rate		
18. Closed loop collaboration		
19. Consumer engagement		
20. Other product stewardship outcomes		

**Key:**  
Core
Rec'd
Stretch



What your results mean

Criteria	Description	Reference/ Links	Performance Level					
			1 Getting started	2 Good progress	3 Advanced	4 Leading	5 Towards Sustainability	
<b>Leadership</b>								
1	<b>Packaging sustainability strategy</b> (Additive criterion)	Packaging sustainability plan with packaging targets, monitoring and reporting	APCSP KPI 1A <sup>[i]</sup> , EUROPEAN <sup>[ii]</sup> GPP <sup>[iii]</sup>	A packaging sustainability strategy is in place, that commits to using the SPG.	The strategy is integrated in business processes	The strategy includes specific, measurable, and time-based targets	Progress against the targets in the plan is publicly reported	There is a process in place to measure and ensure continuous improvement.
2	<b>Closed loop collaboration</b>	Company is collaborating with stakeholders to close the loop (improve recovery) for specific materials	APCSP KPI 1B	Investigating options for joining or starting a collaborative program	Joined at least one existing initiative or working with others to set up at least one program	Data is being collected to monitor the outcomes of closed loop collaboration(s)	Program(s) can demonstrate tangible outcomes e.g. % waste recovered, % consumer access	There is a formal process in place to continually identify new opportunities for collaboration or to improve existing initiatives
3	<b>Consumer engagement</b> (Additive criterion)	Company is informing and educating consumers about packaging sustainability, including through on-pack labels		Consumers are provided with some additional information on the sustainability of packaging through the company's website or other publications	All products have on-pack claims or labels on packaging sustainability (excluding disposal/recycling labels, which are covered under criteria 9).	>50% of products have labelling that encourages active consumer engagement in packaging sustainability.	Company engages consumers, through packaging design to reduce impacts of consumption e.g. less food waste	The company engages consumers in packaging sustainability through marketing campaigns e.g. advertising, social media
4	<b>Industry leadership</b> (Additive criterion)	Company is involved in other packaging-related sustainability initiatives (e.g. litter reduction, marine plastics initiative, sharing knowledge with peers, education)		Company is investigating at least one program or initiative (list of options to be provided).	Company is involved in one program or initiative (list of options to be provided). OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)	Company is involved in at least one program or initiatives (list of options to be provided) OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)	Company is involved in one programs or initiatives (list of options to be provided). OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)	Company is involved in at least one programs or initiatives (list of options to be provided) OR has received external recognition for their contribution to packaging sustainability in last 12 months (e.g. awards, external advisors etc)
<b>Packaging processes &amp; outcomes</b>								
5	<b>Packaging design &amp; procurement</b>	Procedures that integrate the SPG or equivalent into packaging design or procurement	APCSP KPI 1A <a href="#">ISO/TR 14062</a> <sup>[iv]</sup>	There is a documented procedure requiring use of the SPG or equivalent to evaluate all packaging through either in-house design or procurement.	0<20% of products have had their packaging designed or reviewed with reference to the SPG.	Between 20<50% of products have had their packaging designed or reviewed with reference to the SPG.	Between 50<80% of products have had their packaging designed or reviewed with reference to the SPG.	Between 80%<100% of products have had their packaging designed or reviewed using an LCA or similar life cycle tool to consider packaging sustainability.
6	<b>Packaging materials efficiency</b>	Optimising packaging material efficiency by optimising weight and volume	<a href="#">GRI 301-1 (Material used, by weight or volume)</a> , <a href="#">GPP and 18602</a> <sup>[v]</sup> (optimisation)	The company is developing a plan or investigating opportunities to optimise material efficiency.	Data showing 0<20% of products have reduced packaging weight or 0<20% of products have been optimised for product-packaging efficiency.	Data showing 20<50% of products have reduced packaging weight or 20<50% of products have been optimised for product-packaging efficiency.	Data showing >50% of products have been optimised for product-packaging efficiency.	Data showing all products have been optimised for product-packaging efficiency.
7	<b>Recycled &amp; renewable materials</b>	Optimising use of recycled and renewable materials	APCSP 1A GRI 301-2 (Recycled input materials)	Company is developing a plan or investigating opportunities to optimise the use of recycled or renewable materials in product packaging.	Data showing 0<20% of product packaging incorporates recycled or renewable content or 0<20% have been optimised for recycled or renewable content.	Data showing 20<50% of product packaging incorporates recycled or renewable content or 20<50% have been optimised for recycled or renewable content.	Data showing at least 50% of products have optimised recycled or renewable content, or have achieved sector-specific targets	Data showing all products have optimised the renewable/recycled content of packaging.

Criteria	Description	Reference/ Links	Performance Level					
			1 Getting started	2 Good progress	3 Advanced	4 Leading	5 Towards Sustainability	
8	<b>Post-consumer recovery of packaging</b>	Optimising the proportion of consumer packaging that can be recovered through reuse, recycling, composting or energy recovery	ISO 14021 GRI 301-3 (Reclaimed products & packaging)	Company is developing a plan or investigating opportunities to optimise the recoverability of packaging.	Data showing 0<20% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value	Data showing 20<50% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value	Data showing 50<100% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value	Data showing 100% of packaging can be recovered through existing post-consumer recovery systems that achieve highest potential environmental value
9	<b>Consumer labelling</b>	Proportion of consumer packaging with an on-pack label for disposal or recovery	APCSP KPI 2A AS/NZS ISO 14021	Company is developing a plan or investigating opportunities to improve on-pack labelling for disposal or recovery.	0<20% of products have packaging labels for disposal or recovery	20<50% of products have packaging labels for disposal or recovery	Between 50<100% of products have labels for disposal or recovery	100% of products are labelled for disposal or recycling in compliance with ISO/AS 14021.
10	<b>Product-packaging innovation</b>	Company is rethinking product-packaging systems (design, delivery systems, business models) to achieve sustainability outcomes	EUROPEN GPP	Some progress in product-packaging system innovation to improve sustainability (at least one case study)	The company has a documented commitment to innovation in product-packaging systems to improve sustainability.	A procedure is in place to evaluate the sustainability of whole product-packaging systems to identify potential innovations, e.g. through LCA, and the company is reporting on these.	Between 50<100% of products have been evaluated using LCA or similar life cycle approach to identify potential innovations and packaging outcomes have been optimised using new packaging design, delivery systems or new business models to achieve sustainability outcomes.	All products have been evaluated using LCA or similar life cycle approach to identify potential innovations and all packaging has been optimised using a documented process.
<b>Operations</b>								
11	<b>Business-to-business packaging</b>	Reduction in single use B2B packaging to customers over the past 3 years	APCSP KPI 2B	Some progress is being made in reducing single use B2B packaging to customers (at least one case study).	Data showing 0<20% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months.	Data showing 20<50% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months.	Data showing 50<100% reduction in absolute or relative consumption of single use B2B packaging to customers over last 12 months. Packaging is optimised for transport.	There is zero single use B2B packaging going to customers, i.e. it is all reusable.
12	<b>On-site waste diversion</b>	Diversion of on-site waste from landfill i.e. to reuse, recycling, composting, energy recovery (excl. incineration)	GRI 306-2 (Waste by type & disposal method)	Data showing 0<20% on-site solid waste diverted from landfill	Data showing 20<50% on-site solid waste diverted from landfill	Data showing 50<100% on-site waste diverted from landfill	Data showing zero on-site solid waste to landfill (100% diversion)	Data showing 100% of on-site solid waste is recovered through systems that achieve highest potential environmental value
13	<b>Supply chain influence</b>	Influence on supply chain to achieve sustainability goals	ISO 20400	Packaging sustainability goals and packaging guidelines are communicated to all tier 1 suppliers	Support is provided to tier 1 suppliers to improve their understanding of packaging sustainability goals and strategies, e.g. through training	The company is collaborating with key tier 1 suppliers to share knowledge and improve packaging sustainability	The company has processes in place to evaluate supply chain risks and opportunities for influence throughout the entire supply chain (beyond tier 1 for both upstream and downstream suppliers and customers)	The company has processes in place to monitor and track compliance with key packaging sustainability requirements throughout the entire supply chain (full traceability)

[i] [Australian Packaging Covenant Strategic Plan 2017-2022 \(APCSP\)](#)  
 [ii] [The European Organization for Packaging and the Environment \(EUROPEN\) and ECR Europe \(n.d.\), Packaging in the sustainability agenda: a guide for corporate decision makers, ECR Europe, Brussels](#)  
 [iii] [The Consumer Goods Forum \(2011\), Global Protocol on Packaging Sustainability 2.0](#)  
 [iv] [ISO/PDTR 14062: 2002, Environmental management – Integrating environmental aspects into product design and development](#)  
 [v] [ISO 18602: 2013, Packaging and the Environment; optimisation of the packaging systems](#)  
 [iii] [The Consumer Goods Forum \(2011\), Global Protocol on Packaging Sustainability 2.0](#)  
 [iv] [ISO/PDTR 14062: 2002, Environmental management – Integrating environmental aspects into product design and development](#)  
 [v] [ISO 18602: 2013, Packaging and the Environment; optimisation of the packaging systems](#)  
 [v] [ISO 18602: 2013, Packaging and the Environment; optimisation of the packaging systems](#)



