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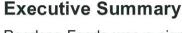


Australian Packaging Covenant

Action Plan 2011- 2015

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Peerless Foods was a signatory of the original National Packaging Covenant from its inception and remains committed to minimising the environmental impact resulting from the disposal of packaging. Enclosed is Peerless Foods Australian Packaging Covenant Action Plan. The company is mindful of ensuring products sold into the market place utilise environmentally friendly and sustainable packaging options incorporating, wherever possible, recycled or recyclable materials.



As a brand owner, Peerless Foods services domestic and export retail, food service, industrial and bakery customers. The types of packaging materials used include cardboards, plastic and steel.



The following plan sets out Peerless Foods' goals and KPI's under the new Australian Packaging Covenant. Peerless Foods is committed to achieving the outcomes of its Australian Packaging Covenant action plan and to work with other signatories to promote the principle of product stewardship for packaging.







Peerless Holdings Pty Ltd



Braybrook, Victoria, 3019





tablelands

Vita·lite*

Our Business



Corporate Profile

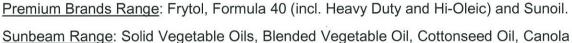
Peerless Foods is the largest privately owned manufacturer and marketer of edible oils, fats and margarines in Australia, employing around 175 people across two sites within Victoria.

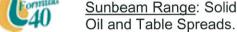
Peerless Foods is committed to caring for the environment and utilising the Environmental Code of Practice for Packaging to both drive reductions in packaging waste and encourage the use of recyclable packaging.



The Peerless brands

Pura Signature Range: Six Crowns and Tuscan Blend.





Food Service & Retail Ranges: Gold Leaf Oleo SPD Spread Vita Lite Canola

<u>Food Service & Retail Ranges:</u> Gold Leaf Oleo, SPD Spread, Vita Lite Canola, Tablelands, Miracle, Gold Standard, Chef's Hat, Countrywide, Copha and Fairy.

Bakery range: EOI Bakery Range, Probake Bakery Range.

The major packaging formats used to maintain the integrity of our products include:



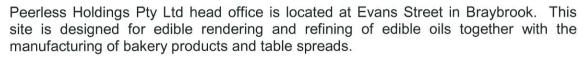
- paper
- corrugated cardboard outers
- polypropylene tubs and lids
- HDPE liners
- LDPE wrappers
- steel drums



Peerless is customer service focussed and is committed to working in partnership with its trade customers throughout Australasia. The company strongly values its customers and works to develop brands that will continually satisfy the customers' needs and lifestyle.



Office locations and production facilities



A second site at Holcourt Road, Laverton, Victoria was established to manufacture hydrogenated oils for the use in the refinery at Braybrook.



Our Environment

Peerless is committed to its Environment and Procurement policies both of which support the principles of the Australian Packaging Covenant.

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An ongoing focus on waste reduction ensures that materials are reused or recycled wherever feasible or alternatively, disposed of in the most environmentally sound manner possible. Peerless recognises that good product stewardship makes good business sense and seeks to improve material recovery across the organisation with the assistance of its supply chain.

Vita·lite°

Peerless is strongly committed to fulfilling its requirements to meet the Australian Packaging Covenant responsibilities.





Covenant Contacts

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tablelands

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal One - Design: Optimise packaging to use resou	rces efficiently and reduce env	rironmental impact wi	thout compromi	sing product qua	ality and safety
KPI One: Proportion of signatories in the supply chair	implementing the SPG for de	sign or procurement o	f packaging		
Establish APC team to review existing packaging against Sustainable Packaging Guidelines (SPG)	General Manager Operations	June 2011	No APC team in place	Adoption of term of reference by APC team	Term of reference. Minutes taken from meetings.
Implement process to review all new formats to be consistent with the SPG	Packaging Technologist APC team	December 2011	Reviews to date were conducted ad hoc	100% conformance	Documentation of review process
Review all current packaging against SPG	APC team Packaging Technologist	2015	Previous reviews were ad hoc	25% of formats reviewed annually. 100% completed by 2015	Register of all packaging reviews conducted and percentages reviewed to date. SPG packaging reports completed for each review. Documentation of SKU's modified.
Develop, implement & communicate a process to enable complaints to be recorded and rectified on packaging consistent to the SPG.	APC team	Dec 2012	Quality issues only, not consistent with SPG.	A system to process and review complaints according to SPG.	Documentation of complaints report

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Two - Recycling: The efficient collection and rec	ycling of packaging				
KPI Two - National Recycling Rate for Packaging					
Establish and implement active collection process for used paper, cardboard, tinplate, clean polypropylene (PP) tubs and lids for recycling	Environmental Engineer APC team	2015	Stationary and cardboard collection currently in place	80% recycling of all nominated materials.	Documentation of system set up. Report of amount of packaging recycled.

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Two – Recycling: The efficient collection and re	cycling of packaging	.1		J,	The state of the s
KPI Three – Proportion of signatories with on-site reco	overy systems for recycling use	d packaging			
Establish on-site recovery systems for recycling of used paper, cardboard, tinplate, clean plastic tubs and lids.	Environmental Engineer APC team	2015	90% of packaging paper & cardboard is recycled.	70% recycling of all nominated materials.	Review proportion of waste which are recycled through on-site recovery system, based on packaging group type. Annual report of tonnage of recycled material by group type.

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Two - Recycling: The efficient collection and re-	cycling of packaging	<u> </u>			, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
KPI Four – Proportion of signatories with a policy to bu	y products made from recycle	d packaging			
Develop and implement formal "Buy Recycled" policies and programs	Planning Manager Packaging Technologist	December 2012	No formal policy across all packaging group types	Formal policy set up with packaging suppliers.	Preference for recycled content included in supplier agreements.

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Two - Recycling: The efficient collection and re	ecycling of packaging				
KPI Five – Additional tonnes of material reprocessed	in primary and secondary mark	ets as a result of Cover	nant-funded pro	jects	
Peerless Holdings Pty Ltd is not involved in any Covenant-funded projects.					

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Three – Product Stewardship: A demonstrated of	l commitment to product stewa	rdship by the supply cl	nain and signato	ries	
KPI Six - Proportion of signatories that have formal pro	ocesses for working with other	rs to improve packagin	g design and rec	cycling of packag	ging
Implement formal processes for working with suppliers to include recyclable materials in packaging.	Planning manager Packaging Technologist	2015	No formal process	Formal process set up with all suppliers	Supplier specifications and documentation.
Contact all brand owners of co-packed products to request joint review of packaging consistent with the SPC.	Marketing manager	2015	1 brand owner by Oct 2011	All brand owners involved in packaging review.	Documentation and review of process.

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Three - Product Stewardship: A demonstrated	commitment to product stew	 vardship by the suppl	y chain and signate	ories	
KPI Seven - Proportion of signatories demonstrating of	other stewardship outcomes				
Review product specifications of all cardboard and plastic tubs and lids purchases with suppliers to increase recycled content where possible.	Packaging Technologist Planning manager	2015	1 format to be reviewed by Oct 2012	All formats reviewed	Documentation of meetings Percentage of recycled content in current and new formats reviewed.

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Action	Responsibility	Timeframe	Baseline	Target	Evidence
Goal Three - Product Stewardship: A demonstrated	commitment to product stev	vardship by the supply	chain and signat	ories	
KPI Eight - Reduction in the number of packaging item	s in the litter stream				
Encourage innovation that recover used packaging consistent with SPC	Marketing manager	2015	0	20 SKU's by 2015	Labelling to encourage responsible disposal or recycling of packaging. Register of packaging with labels

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