



MONSANTO



AUSTRALIA

MONSANTO AUSTRALIA LIMITED
AUSTRALIAN PACKAGING COVENANT (APC)
2010-2015 ACTION PLAN



**A signatory to the
Australian Packaging Covenant**

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MONSANTO



1. EXECUTIVE SUMMARY

Monsanto Australia Limited was a signatory to the National Packaging Covenant (NPC) and has been invited to become a signatory to the Australian Packaging Covenant (APC). Monsanto Australia is a brandowner, a member of the packaging supply chain and as a signatory to the Covenant is required to submit an Action Plan for the period 2010- 2015 and ongoing Annual Reports.

The purpose of the Action Plan is to show how Monsanto Australia intends to contribute to the achievement of the Covenant's goals and to meet its obligations under the Covenant. The Three main performance goals of the Covenant are:

1. Design - Optimise packaging to use resources efficiently and reduce environmental impact without compromising product quality and safety
2. Recycling - Efficiently collect and recycle packaging
3. Product Stewardship - Demonstrate commitment of all signatories

In Australia Monsanto is the brand owner of Roundup® but is not directly involved in the manufacture, packaging or distribution of the product. Monsanto provides formulations, raw materials and specifications to Intec Industries Pty Ltd in Laverton North VIC which in turn purchases the primary, secondary and tertiary packaging. The packaged product is then shipped to Scotts Australia in Baulkham Hills NSW for distribution to the retail outlets and distribution centres.

Earlier in the year stakeholders met with its third party external consultant and participated in a workshop to review the requirements of the APC. As part of this review the stakeholders were taken through a 28 question questionnaire based on APC documentation and attendance at APC Workshops. The results of this review are documented in the Action Plan and the actions arising from this review are summarised in the Action Plan Table.

Monsanto Australia has carried out a preliminary review of the skills required to meet the requirements of the Australian Packaging Covenant. We have identified the key departments required to have input and will create a team to work on this key project as part of our ongoing efforts to address packaging. This Action Plan is to be followed up by regular meetings of the APC Team where we will continue to address the issues raised throughout the Plan. The Team will endeavour to facilitate a timely implementation of the Action Plan and will ensure data is stored in an auditable manner in a centralised APC audit database.

Mr. John McGregor, RoundUp and Glyphosphate Business Manager ANZ, is responsible for Monsanto's commitment to the Australian Packaging Covenant and reports directly to Mr Peter Okeeffe , Country Lead, Monsanto Australia Limited, on all issues relating to the Covenant. This Action Plan has been endorsed by Mr Okeeffe.



2. COMPANY PROFILE

2.1 MONSANTO AUSTRALIA AT A GLANCE

Monsanto is a leading provider of agricultural solutions to growers worldwide. We provide biotechnology traits for insect protection and herbicide tolerance, and our Roundup® branded products are the world's best selling herbicides. Monsanto is committed to the responsible development of innovative new technologies for the agricultural industry. We believe that agriculture can be both more productive and more environmentally sustainable and we are working to develop products that can contribute to these goals in a socially responsible way.

The original Monsanto Company began its operations in Australia in 1928 with a focus on the commodity chemicals business before expanding into agricultural products in the 1950s. In 2000, the original company entered into a merger and changed its name to Pharmacia Corporation. Pharmacia Corporation then formed a new subsidiary for its agricultural business and called it Monsanto Company. The new Monsanto Company began operating as a business in 2000 and was spun off as an independent company in 2002. This new company is the Monsanto we know today.

Monsanto's products have become indispensable to Australian agriculture. For example, the original Monsanto introduced Roundup® agricultural herbicide in the 1970's and went on to help Australian farmers lead the way in developing conservation tillage techniques which help minimise soil erosion.

Our Brands



Monsanto is the brand owner of Roundup® but is not directly involved in the manufacture, packaging or distribution of the product.

Monsanto provides formulations, raw materials and specifications to Intec Industries Pty Ltd in Laverton North VIC which in turn purchases the primary, secondary and tertiary packaging. The packaged product is then shipped to Scotts Australia in Baulkham Hills NSW for distribution to the retail outlets and distribution centres. Nufarm Australia Limited has the distribution rights for bulk packaged Roundup® and is not subject to the requirements of the APC.



3. COVENANT CONTACT OFFICER

Mr. John McGregor, RoundUp and Glyphosphate Business Manager ANZ, is responsible for Monsanto’s commitment to the Australian Packaging Covenant and reports directly to Mr Peter Okeeffe Country Lead, Monsanto Australia Limited, on all issues relating to the Covenant. This Action Plan has been endorsed by Mr Peter Okeeffe.

Mr. McGregor’s contact details are as follows:

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3.1 OUR APC TEAM

Monsanto Australia has carried out a preliminary review of the skills required to meet the requirements of the Australian Packaging Covenant. We have identified the key departments required to have input and will create a team made up of the following individuals or their selected delegates to work on this key project as part of our ongoing efforts to address packaging:

| Name: | Responsibility: |
|---------------|---|
| Sylvia Tan | Monsanto Quality |
| | Monsanto Manufacturing |
| | Monsanto Packaging Development |
| Neil Anderson | Intec Manufacturing Manager |
| John McGregor | Roundup and Glyphosphate Business Manager ANZ |

Intec Industries Pty Ltd as the RoundUp® toll packer is charged with the responsibility of writing up packaging plant experiments and performing testing and trials.

The APC Team is responsible for developing an internal project plan to co-ordinate all tasks required to implement the Action Plan. This list is not exhaustive and individuals may not be involved in all twelve strategies relating to the Sustainable Packaging Guidelines.

This Action Plan is to be followed up by regular meetings of the APC Team where we will continue to address the issues raised throughout this plan. The Team will endeavour to facilitate a timely implementation of the Action Plan and will ensure data is stored in an auditable manner in a centralised APC audit database.



4. SCHEDULE FOR PACKAGING REVIEWS

4.1 TYPES OF PACKAGING USED

Ready to use SKU's are in trigger packs and all concentrates are in bottles that have a measuring device integral in the cap. All closures for ready to use and concentrates have child resistant caps.

4.2 TIMETABLE FOR REVIEW

| Review Period: | % of Product Lines Reviewed | |
|----------------|-----------------------------|----------|
| | New | Existing |
| Year 1 | 25% | 50% |
| Year 2 | 50% | 100% |
| Year 3 | 75% | 100% |
| Year 4 | 100% | 100% |
| Year 5 | 100% | 100% |



5. ACTION PLAN

5.1 INTRODUCTION

The purpose of the Action Plan is to show how Monsanto Australia intends to contribute to the achievement of the Covenant's goals and to meet Monsanto Australia's obligations under the Covenant. The Three main performance goals of the Covenant are:

1. Design - Optimise packaging to use resources efficiently and reduce environmental impact without compromising product quality and safety
2. Recycling - Efficiently collect and recycle packaging
3. Product Stewardship - Demonstrate commitment of all signatories

Earlier in the year Monsanto Australia stakeholders met with its third party external consultant and participated in a workshop to review the following overarching requirements of the APC:

- Determine Action Plan requirements for Monsanto
- Assist in establishing an APC Team
- Provide overview / training for the APC Team
- Develop a project plan for development of the Action Plan
- Develop auditable document and filing system for managing the requirements

As part of this review the stakeholders were taken through a 28 question questionnaire based on APC documentation and attendance at APC Workshops. The results of this review are documented in the following sections and the actions arising from this review are summarised in the Action Plan Table.

5.2 DESIGN

5.2.1 COVENANT GOALS

- Review existing procedures for new packaging design or manufacture and integrate with requirements of Sustainable Packaging Guidelines;
- Determine timetable for "packaging review" of existing packaging to meet requirements of Sustainable Packaging Guidelines; and
- Identify and determine targets and actions for Plan.

5.2.2 OUTCOME

The outcome should be packaging designed to:

- Avoid or minimise the use of materials and other resources;
- Optimise recyclability and recycled content; and
- Reduce litter impacts.



5.2.3 KEY PERFORMANCE INDICATOR

The Key Performance Indicator for Design will be evidence that Monsanto Australia is implementing the Sustainable Packaging Guidelines (SPG) for design or manufacture of packaging.

5.2.4 CURRENT AND PLANNED ACTIONS

5.2.4.1 Monsanto Australia does not have a documented policy and procedure for evaluating and procuring packaging using the SPG.

5.2.4.2 The most logical categorisation of **existing** packaging is by product as listed in section 4.1.

5.2.4.3 Monsanto has a formalised process for developing **new** packaging. New packaging undergoes a Packaging Plant Experiment (Management of Change), which requires approval by Monsanto Quality, Manufacturing and Packaging Development of the Packaging Plant Experiment plan, followed by the approval of test results. There is a matrix that outlines possible changes, e.g. an existing formulation in a new bottle and the testing required to evaluate that change. Monsanto also does regular Quality Audits to evaluate existing packaging and the performance thereof.

5.2.4.4 Monsanto Australia will establish a centralized data base for all issues relating to the APC including:

- All decisions and the underlying evidence for those decisions;
- Packaging review reports; and
- An auditable trail for decisions made in relation to the SPG.



5.3 RECYCLING

5.3.1 COVENANT GOALS

- Review and document existing recovery systems;
- Review and document existing Buy Recycled Policies; and
- Identify and determine actions and targets for Plan.

5.3.2 OUTCOME

The outcome should be:

- Improved recovery of recycled materials from the premises of Monsanto Australia; and
- Increased secondary markets for recovered packaging materials.

5.3.3 KEY PERFORMANCE INDICATOR

The Key Performance Indicator for Recycling will be evidence that Monsanto Australia is implementing the on-site recovery of packaging, and an increase in the level of recycled content in purchases made by Monsanto Australia.

5.3.4 CURRENT AND PLANNED ACTIONS

5.3.4.1 Monsanto Australia doesn't have a packaging waste reduction goal as manufacture and distribution are carried out by third party providers.

5.3.4.2 There are no employee education programs about recycling and waste reduction as there are no employees apart from the Contact Officer. All the other members of the APC Team are located off-site.

5.3.4.3 There are no recycling activities other than shared office recycling of packaging.

5.3.4.4 The polymers used for the manufacture of containers, caps, triggers, etc. are recyclable; however, herbicide contamination precludes the recycling of these containers into standard recycling programs. In addition all SKU's have child resistant closures which cannot be removed to allow for triple rinsing.

5.3.4.5 The disposal of Roundup® packaging must conform to the requirements of the Australian Pesticides and Veterinary Medicines Authority (www.apvma.gov.au) and the labels have the following message:

"Dispose of empty container by wrapping in paper, placing in a plastic bag and putting in the garbage".

The collection and recycling of plastic containers under the jurisdiction of the Australian Pesticides and Veterinary Medicines Authority could be an interesting project for APC Project funding.

5.3.4.6 Monsanto Australia does not have a buy recycled policy.



5.4 PRODUCT STEWARDSHIP

5.4.1 COVENANT GOALS

- Review and document existing Product Stewardship procedures;
- Review existing Supply Contracts for take back;
- Review existing Waste Management contracts; and
- Identify and determine actions and targets for Plan.

5.4.2 OUTCOME

The outcome should be:

- To improve the design and recycling of packaging; and
- Reduce the overall level of litter created by packaging.

5.4.3 KEY PERFORMANCE INDICATORS

The key performance indicators for product stewardship are;

- Have formalised procedures in place to work with others to improve design and recycling of packaging;
- To engage in other initiatives that show product stewardship such as education, sponsorship of initiatives etc; and
- To reduce the occurrence of litter in their operations and encourage clients to properly dispose of the packaging on products to remove them from the litter stream.

5.4.4 CURRENT AND PLANNED ACTIONS

5.4.4.1 Monsanto Australia does not have a documented policy to review all packaging against the SPG.

5.4.4.2 Monsanto Australia does not have supply contracts that require take back and recycling of packaging or waste management contracts that require collection and recycling of packaging as these services are negotiated by Monsanto Australia's third party packaging provider.

5.4.4.3 Monsanto Australia does not require Intec to participate in reducing packaging through regular meetings or product reviews.



5.5 ACTION PLAN TABLES

*Please note that the responsibilities for individual Actions will be allocated when the APC Team next meets.

| Covenant Performance Goals | Actions | *Responsibility | Timeline | Targets | Evidence |
|---|---|-----------------|--|--|---|
| <p>1. Design - optimise packaging to achieve resource efficiency and reduction in quantity required. The design efforts should reduce environmental impact without compromising product quality and safety.</p> <p>KPI 1. Proportion of signatories in the supply chain implementing the Sustainable Packaging Guidelines for design or procurement of packaging.</p> | <p>Establish documented policy and procedure for evaluating and procuring packaging using the SPG</p> <p>Review all new products using the SPG</p> <p>Review all existing products using the SPG</p> <p>Advise Monsanto that Monsanto Australia is a signatory to the APC and its commitments and obligations</p> <p>Arrange Meeting with Monsanto Quality Manager when next in Australia to discuss Monsanto packaging procedures and protocols</p> <p>Establish centralised data base</p> | APC Team | <p>March 2012</p> <p>Refer 4.2</p> <p>Refer 4.2</p> <p>June 2011</p> <p>When next in Australia</p> <p>Dec 2011</p> | <p>Documented policy and procedure completed</p> <p>Refer 4.2</p> <p>Refer 4.2</p> <p>Draft and send to Monsanto</p> <p>Meeting</p> <p>100% compliance by all stakeholders</p> | <p>Policy and Procedure Document</p> <p>SPG Reviews</p> <p>SPG Reviews</p> <p>Copy of correspondence</p> <p>Minutes of meeting</p> <p>Centralised data base</p> |



| Covenant Performance Goals | Actions | *Responsibility | Timeline | Targets | Evidence |
|---|---|-----------------|---|---|--|
| <p>2. Recycling – efficiently collect and recycle packaging</p> <p>KPI 2. Not required by individual signatories.</p> <p>KPI 3. Proportion of signatories with on-site recovery systems for recycling used packaging.</p> <p>KPI 4. Proportion of signatories with a policy to buy products made from recycled packaging.</p> <p>KPI 5. Not required by individual signatories.</p> | <p>Review and recommend improved on-site recycling and buy recycled policies</p> <p>Not applicable</p> <p>Not applicable</p> | APC Team | Dec 2011 | Review completed | Review Report with recommendations |
| <p>3. Product Stewardship – demonstrate commitment of all signatories</p> <p>KPI 6. Proportion of signatories that have formal processes for working with others to improve packaging design and recycling.</p> <p>KPI 7. Proportion of signatories demonstrating other product stewardship outcomes for packaging.</p> <p>KPI 8. Reduction in the number of packaging items in litter.</p> | <p>Review and recommend formal processes for working with others, other product stewardship outcomes for packaging and reducing litter</p> <p>Formulate a documented policy to review all packaging against the SPG and develop a suppliers questionnaire to assist in answering the questions raised in the SPG</p> <p>Investigate opportunities to negotiate supply contracts that require take back and recycling of packaging with third party toll packaging provider</p> <p>Investigate opportunities to include supplier participation in reducing packaging through regular meetings or product reviews as part of Monsanto Australia's toll packaging relationship with Intec</p> <p>Investigate other product stewardship opportunities</p> <p>Not applicable</p> | APC Team | <p>Dec 2011</p> <p>Dec 2011</p> <p>March 2012</p> <p>March 2012</p> <p>June 2011 – Dec 2015</p> | <p>Review completed</p> <p>Documented policy and questionnaire completed</p> <p>Investigation completed</p> <p>Investigation completed</p> <p>A minimum of one new initiative per annum</p> | <p>Review Report with recommendations</p> <p>Documented policy</p> <p>Investigation Report with recommendations</p> <p>Investigation Report with recommendations</p> <p>Annual Reports</p> |