



Brilliant Lighting (Australia) Pty Ltd

Australian Packaging Covenant
ACTION PLAN 2013 - 2015

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1.0 EXECUTIVE SUMMARY

Brilliant Lighting (Australia) Pty. Ltd has recently become a signatory to the Australian Packaging Covenant (APC). As a signatory to the APC, Brilliant Lighting is required to submit an Action Plan for the period 2012 – 2017.

The purpose of this Action Plan is to show how Brilliant Lighting intends to contribute to the achievement of the Covenant’s Goals and to meet Brilliant Lighting’s obligations under the Covenant. The three main performance goals of the Covenant are:

Design

Optimise packaging to use resources efficiently and reduce environmental impact without compromising product quality and safety.

Recycling

Efficiently collect and recycle packaging.

Product Stewardship

Demonstrate commitment of all signatories.

Brilliant Lighting will work to build a strong culture of environmental awareness and has already implemented many initiatives in some areas of the business. These initiatives include recycling of waste packaging into fill material for safe product distribution and communications to consumers within product collateral that recommend thoughtful disposal of packaging materials.

The key departments have been identified that will drive and implement the actions outlined to meet the requirements of the Australian Packaging Covenant.

The officer charged with the responsibility of the coordinating, implementing and reporting on the Packaging Covenant Action Plan and Annual Reports is Ben King.

This Action Plan has been endorsed by Managing Director, Mr. Norman Levin.

2.0 COMPANY OVERVIEW

Brilliant Lighting (Australia) Pty. Ltd is a brand owner, importer and wholesaler of a wide range of interior and exterior lighting products. The company was established over 25 years ago and is acknowledged as an innovator in the field of domestic lighting in Australia.

Brilliant Lighting works with quality international suppliers to develop market appropriate lighting products for sale in major mass market, specialist retailers and electrical trade stores.

Brilliant has become one of the nation's largest and most respected names in the lighting industry and maintains a range of over 1500 items. The business has a national sales network and distribution operating out of three facilities.

Brilliant Lighting employs over 100 people in management, product development, sales and distribution across Australia.

Brilliant Lighting is a new signatory to the Australian Packaging Covenant and is committed to environmental preservation through minimising the amount of waste generated in the course of business and is encouraging the recycling of materials at every opportunity. Brilliant Lighting will embrace the principles of the Australian Packaging Covenant and will establish and maintain data to enable effective reporting each year and work to achieve the APC key performance indicators as required by the covenant.






2.1 POSITION IN THE SUPPLY CHAIN

Brilliant Lighting product is received finished from suppliers in Asia and distributed through major retail chains in Australia.

2.2 PACKAGING STYLES

2.2.1 External packaging styles

PACKAGING STYLE	IMAGE	RETAILER/CHANNEL	PACKAGING STYLE	IMAGE	RETAILER/CHANNEL
Colour box		<ul style="list-style-type: none"> • Mass Merchandisers • Independent lighting stores • Electrical Wholesalers 	Poly bag		<ul style="list-style-type: none"> • Mass Merchandisers • Independent lighting stores • National Homewares Retailers • Electrical Wholesalers
White box		<ul style="list-style-type: none"> • Independent lighting stores • Electrical Wholesalers 	Label on outer carton		<ul style="list-style-type: none"> • Mass Merchandisers
White outer carton		<ul style="list-style-type: none"> • National Homewares Retailers 	Swing tag		<ul style="list-style-type: none"> • Independent lighting stores • National Homewares retailers
Brown outer carton		<ul style="list-style-type: none"> • National Homewares Retailers • Independent lighting stores 	Blister pack		<ul style="list-style-type: none"> • Mass Merchandisers

2.2 PACKAGING STYLES

2.2.2 Internal Packaging Styles

PACKAGING STYLE	IMAGE	RETAILER/CHANNEL
Card board		All
Expanded styrene foam		All
Combination of cardboard and poly styrene		All

3.0 ACTION PLAN REQUIREMENTS

3.1 Introduction

The Australian packaging covenant sets out specific requirements for all signatories. These sit beneath a set of Covenant Aims required which apply to industry as whole as represented by the APC Covenant Council and the APC Industry association/ Secretariat. The relationship between these two sets of requirements is summarized below and show in detail on the following pages.

Covenant Aims

The APC sets out a single overriding objective, 3 performance goals and 8 KPI's. The APC strategic plan sets out 6 priorities for the period 2010 to 2015. While these are not directly relevant to individual APC signatories they are nevertheless indirectly relevant. In particular, it is a requirement of the APC that the actions contained in the action plan of each signatory must "reflect the relevant priorities of set out in the strategic plan prepared by the Covenant Council" and "each action must be linked to the performance indicators and targets set out in the covenant".

Signatory Aims

Whilst there are no specific KPI's for APC signatories, there are 6 implied KPI's which are required to support the 8 Covenant KPI's. In addition, there are a number of additional requirements set out in the APC.

APC Minimum requirements Checklist

The APC sets out the minimum requirements which must be contained within the Action Plans of each signatory.

4.0 AUDIT SCHEDULE FOR EXISTING PACKAGING

GROUP	PRODUCTS INCLUDED	ASSESSMENT SCHEDULED
Retail packaging - blister packaging	All mass market domestic lighting products. Applicable independent channel products	Q3 2013
Retail packaging - poly bag with header cards	All mass market domestic lighting products. Applicable independent channel products	Q3 2013
Inner packaging	All applicable products	Q4 2013
Shipping outer cartons	All products	Q4 2013
Retail packaging - single colour boxes compressed card style	All independent channel domestic lighting products	Q3 2014
Retail packaging - corrugated boxes single colour corrugated boxes	All mass market domestic lighting products. Applicable independent channel products	Q3 2014
Retail packaging - full colour boxes	All mass market domestic lighting products. Applicable independent channel products	Q3 2015

5.0 COVENANT CONTACT OFFICER

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6.0 ACTION PLAN

6.1 Introduction

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

Design – Optimise the packaging to use resources efficiently and reduce environmental impact without compromising product quality and safety.

Recycling – Efficiently collect and recycle packaging

Product Stewardship – Demonstrate commitment of all signatories

6.2.1 Design

The Action Plan on the following pages details the steps and timing that Brilliant Lighting will take with existing packaging design and design of new product packaging to establish company policy and base line data so that decisions can be made about optimising resource efficiency and reduction of environmental impact.

6.2.2 Recycling

The Action Plan on the following pages details the steps and timing that Brilliant Lighting will take to review on-site recovery systems and recycling to establish company policy and base line data so that decisions can be made about optimising resource efficiency and reduction of environmental impact.

6.2.3 Product Stewardship

The Action Plan on the following pages details the steps and timing that Brilliant Lighting will take to develop and implement policies in working with other companies to improve design, procurement and recovery of packaging.

The Action plan also details the steps and timing as to how Brilliant Lighting will become an advocate of the APC to educate our partner businesses and consumers regarding the APC and its aims.

Performance Goals & KPI's	Actions	Responsibility	Baseline Data	Target or Performance Goal	Timeline or Milestones
1. DESIGN - Optimise packaging to achieve resource efficiency and reduce environmental impact					
Outcomes: Packaging designed to:					
- Avoid or minimise the use of materials and other resources					
- Optimise recyclability and recycled content					
- Reduce Litter Impacts					
KPI 1. Proportion of signatories in the supply chain implementing the Sustainable Packaging Guidelines for design or procurement of packaging.	How will you address this KPI? (review existing packaging against SPGs)	Which department, person or team will be looking after this?	Current status e.g 'no baseline data'' existing requires modification etc	What you aim to achieve (should directly address the target for existing packaging by 2015)	When do you aim to achieve your target
	Establish a documented policy for evaluating existing product packaging against the SPGs.	Product Development and Marketing teams will develop the Brilliant Lighting Sustainable Packaging Policy.	No baseline data currently exists.	Complete Brilliant Lighting's Sustainable Packaging Policy Document.	Sustainable Packaging Policy Document to be completed by Q4 2013.
	Product development team members will be briefed on the Sustainable Packaging Policy and provided with the SPGs, explanatory information and checklist to be used for evaluating each product in the team members category.	Product Development manager will coordinate briefing of team members.	No baseline data currently exists	Product development team to have full understanding of the SPG's and have received the checklists to enable them to complete the product evaluations within their category.	Team member briefings and explanatory information communicated to PD team by Q4 2013.
	All existing products will be evaluated against the SPGs during the period of the action plan. Product ranges will be assessed each year as per the Audit Schedule set out for existing packaging.	Product Development team will assess existing products packaging.	No baseline data currently exists. Baseline data to be established by conducting an existing product packaging audit to identify opportunities for resource efficiency and reduction of environmental impact.	90% complete Dec 2014 100% complete Dec 2015	Existing products packaging evaluation to be completed by Q4 2015.
	Data will be collated on a central data base for review and assessment. This data will be used to make decisions to implement the SPGs.	Product Development team will construct and maintain the database and report on the findings.	No baseline data currently exists.	Central database with all findings completed, reviewed and assessed with any necessary actions implemented.	Q4 2015.
	How will you address this KPI? (assess new packaging against SPGs)	Which department, person or team will be looking after this SPGs)	Current status e.g 'no baseline data'' existing requires modification etc	What you aim to achieve (should directly address the target for new packaging by 2015)	When do you aim to achieve your target.
	The SPG's will be used as a reference against which all new packaging is assessed.	The Product Development department will create the internal documentation, implement and execute the program.	No baseline data exists.	Utilising the internal Product Packaging Evaluation form, implement a system integrated with the development process that allows the design of 100% of new packaging to achieve resource efficiency and reduce environmental impact.	Q4 2015

Performance Goals & KPI's	Actions	Responsibility	Baseline Data	Target or Performance Goal	Timeline or Milestones
	Brilliant Lighting Purchasing department will be briefed on the implementation of the action plan and their role in the process of implementing the action plan.	The Purchasing Department will be responsible for assessing and documenting the information provided by suppliers.	No baseline data exists.	Brilliant Lighting purchasing department will assess all new packaging design and procurement as per the SPG's.	Q4 2015
	The Purchasing Department role will be to direct the supplier to provide a checklist on the packaging materials used to ensure resource efficiency and reduction in environmental impact is achieved.	Purchasing Department	No baseline data exists.	All suppliers to provide checklists with each product and it's packaging materials so the Brilliant Lighting Purchasing department ensures the materials are in accordance with the SPGs.	Q4 2015
2. RECYCLING - The efficient collection and recycling of packaging					
Outcomes: A contribution to improved recovery of packaging from households and away-from-home sources.					
KPI 3. Proportion of signatories with on-site recovery systems for recycling used packaging.	How will you address this KPI? (have in place an on-site recovery system)	Which department, person or team will be looking after this?	Current status e.g 'no baseline data' existing requires modification etc	What you aim to achieve (should directly address the target for on-site recovery)	When do you aim to achieve your target
	<p>An existing recovery system is in place for outer cartons, packaging and fill material. The recovered packaging is recycled into fill material and used for local distribution as required.</p> <p>This process is not currently documented. Documentation and measurements will allow assessment of increases in efficiency of the system. It is likely that the system can be expanded to encompass and store damaged and returned packaging. This possibility will be assessed and implemented if viable.</p> <p>An audit will be undertaken to identify if there is other packaging entering the on site waste stream to determine if it can be introduced into the recovery system.</p>	The Distribution Department will implement this action with input from Product Development and Purchasing.	No baseline data exists.	<p>Document the existing process for on-site recovery systems for outer cartons, packaging and fill material so it can be measured and assessed.</p> <p>Include a report documenting the percentage of total packaging waste that is currently being recycled, broken down by waste type. Use the findings as baseline data to compare to, once recovery system is optimised in 2015.</p> <p>If viable, expand the recovery system to encompass store damaged and returned packaging.</p> <p>Audit completed and any other packaging entering the on-site waste stream to be introduced into the recovery system as determined.</p>	<p>Recovery system to be documented by Q4 2014</p> <p>Report documenting % of waste being recycled to be complete by Q1 2015</p> <p>Recovery system to be optimised by Q4 2015</p>

Performance Goals & KPI's	Actions	Responsibility	Baseline Data	Target or Performance Goal	Timeline or Milestones
KPI 4. Proportion of signatories with a recycle policy to buy products made from recycled packaging. All Covenant signatories will have a formal, documented policy of buying recycled products or materials.	How will you address this KPI? (have in place a formal documented policy)	Which department, person or team will be looking after this?	Current status e.g 'no baseline data'' existing requires modification etc	What you aim to achieve (should directly address the target for having a formal policy)	When do you aim to achieve your target
	There is currently no buy recycled policy, although much of the consumer packaging and secondary and tertiary packaging is manufactured offshore using recycled materials. A policy will be developed and documented with regard to the purchase of recycled and recyclable packaging materials and other products including office consumables.	Product Development and Purchasing.	No baseline data, no current documented policy.	Develop, document and implement formal Buy Recycle Policy within the business. This document will include the percentage of packaging and other products that currently contain recycled material. The baseline data found will be used to identify if there are further opportunities to increase the amount of recycled content when buying packaging and other products. ie: office consumables.	The Buy Recycle Policy will be documented by Q4 2014. Explore opportunities to increase the amount of recycled content in packaging and other products by Q2 2015. The Buy Recycle Policy will be implemented by Q4 2015.
3. PRODUCT STEWARDSHIP - Demonstrated commitment to product stewardship Outcomes: Signatories in the supply chain working with others to improve design and recycling of packaging.					
KPI 6. Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging.	How will you address this KPI? (have in place a formal documented process)	Which department, person or team will be looking after this?	Current status e.g 'no baseline data'' existing requires modification etc	What you aim to achieve (should directly address the target for having a formal process)	When do you aim to achieve your target
	Brilliant Lighting will evaluate waste management contracts that require collection and recycling of packaging.	Purchasing and Product Development departments will be responsible for this action.	No baseline data currently exists	Evaluation of waste management contracts. Data collected from evaluation will be used to continue to improve the packaging design and increase the recycling of packaging.	Q4 2014
	A formal documented procedure will be developed to work with suppliers in the assessment of packaging. It should be noted that all of Brilliant Lighting packaging producers are contracted by offshore suppliers.	Purchasing and Product Development departments will be responsible for this action.	No baseline data currently exists	Develop documented procedures to work with suppliers in the assessment of packaging, to improve design and recycling of packaging.	Q4 2014
Develop packaging specifications with clear links to our APC KPI's for reduction of waste, clearer markings and increased recyclability.	Product Development departments will be responsible for this action.	Packaging specifications currently exist and will be modified to improve design and recycling of packaging.	Packaging specifications revised to include specific checks related to our APC KPI's and issued to relevant staff, existing and all new suppliers for use moving forward.	Q1 2015	

Performance Goals & KPI's	Actions	Responsibility	Baseline Data	Target or Performance Goal	Timeline or Milestones
	Incorporate packaging sustainability criteria into supplier contracts through required adherence to the Packaging Specifications.	Product Development and Purchasing Department will be responsible for this action.	Current supplier contracts don't include adherence to the Packaging Specifications.	Supplier contracts modified to incorporate required adherence to the Packaging Specifications.	Q1 2015
KPI 7. Proportion of signatories demonstrating other product stewardship outcomes.	How will you address this KPI? (manage the broader impacts of your products)	Which department, person or team will be looking after this?	Current status e.g 'no baseline data' existing requires modification etc	What you aim to achieve (should directly address the target for demonstrating outcomes)	When do you aim to achieve your target
	Brilliant Lighting will become an advocate of the Australian Packaging Covenant by educating consumers in appropriate ways of managing and recycling our product packaging, using in product collateral and through other corporate communication vehicles and working with suppliers on ways to maximise efficiency of packaging.	Product Development and Marketing Department will be responsible for this action.	No baseline data currently exists	All new products and website to have appropriate consumer message advocating environmentally sound packaging disposal.	Q4 2014
	Educate staff internally regarding the APC and other environmental issues. Welcome input and suggestions from staff that may contribute to environmental sustainability or bring to our attention activities that are already being undertaken.	Product Development and Marketing Department will be responsible for this action.	No baseline data currently exists	Corporate communication to all staff on APC advocacy, strategy and the companies position in relation to environmental issues. Process set up and communicated to all staff should they wish to suggest any new or existing initiatives.	Q1 2015
KPI 8. Reduction in the number of packaging items in litter	How will you address this KPI? (develop actions to address litter)	Which department, person or team will be looking after this?	Current status e.g 'no baseline data' existing requires modification etc	What you aim to achieve (should directly address the target for reducing litter)	When do you aim to achieve your target
	Brilliant Lighting will take action to reduce litter caused by the packaging used with our products through redesigning packaging where possible (taking into consideration the fragile nature of much of the company's product) and through consumer education message on and in our product.	Product Development and Marketing Department will be responsible for this action.	No baseline data currently exists	All existing and new packaging to feature relevant recycling and disposal advise and logos where as applicable.	Q4 2014
	Participate in a Business Clean Up Day on an annual basis with an aim to reduce site litter and rubbish, promoting recycling of litter where available. Aim to increase participation year on year through internal promotions.	APC Officer will be responsible for driving this initiative. All staff will be encouraged to participate.	No baseline data currently exists	BCUD promoted annually. Number of staff participating and number of bags filled documented and reported.	First BCUD to take place in 2015. Date TBA, to be set by Q1 2015.

POSITIONS/DEPARTMENTS RESPONSIBLE

The Product Development department will drive the Brilliant Lighting Action Plan. Brilliant Lighting Purchasing and Marketing Department will assist with implementation of specific elements of the Action Plan as detailed in the tables under section 6 of this document.

SUPPLY CHAIN COLLABORATION

Brilliant Lighting will work with our suppliers to implement elements of the Action Plan however it should be noted that all our suppliers are independent businesses and are located off-shore.

DIRECTOR APPROVAL

This action plan has been approved by the Managing Director.



1 February 2013

Norman Levin

Date