



Australian Packaging Covenant

Oliver Footwear Pty Ltd ACTION PLAN

This Action Plan has been prepared by WheatonBeer Consulting based on information provided by Oliver Footwear

July 2010 – June 2015



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Contact and endorsement details

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This APC Action Plan is hereby endorsed on behalf of Oliver Footwear. Appropriate resources are being made available to allow Oliver Footwear to pursue the actions set out in this plan.



Phillip Hughes, CEO

31 March 2011

Date



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Executive Summary

Oliver Footwear is a brand owner for the purposes of the APC. Oliver Footwear is Australia's leading producer of industrial and safety footwear, manufacturing a range of footwear styles and importing other safety products for sale in the Australian market.

Oliver Footwear is committed to the APC and has prepared an Action Plan for the 5-year period from July 2010 to June 2015. This Action Plan contains 18 actions which have been grouped under the three performance goals of Design, Recycling, and Product Stewardship. Oliver Footwear will use the Sustainable Packaging Guidelines (SPG) in its packaging design and procurement process, both at its Australian facility and its outsourced overseas facilities. Oliver Footwear will also review all existing packaging against the SPG.

Oliver Footwear has also committed to extending existing recycling systems and addressing product stewardship issues as part of this Action Plan.

All APC requirements have been met and references have been provided to the relevant pages in our Action Plan. The APC minimum requirements checklist has been included on page 10.





1 Background Information

1.1 Company Overview

Oliver Footwear was an Australian-owned family company, founded in 1887 in Ballarat, Victoria. In 2010, Oliver Footwear became a part of the KSW (King's Safety Wear) Group, the third largest branded safety footwear company in the world.



Since its establishment, Oliver Footwear has grown to be Australia's largest producer of industrial and safety footwear. The business remains based in Ballarat with expansions made to include a modern manufacturing plant and a warehouse facility. As a manufacturer of safety boots and occupational footwear, there is a strong focus on product innovation and manufacturing technology within Oliver Footwear. This has resulted in significant improvements to Oliver Footwear's products and continuous improvement in its manufacturing technology.

Oliver Footwear currently employs 75 people across Australia.



1.2 Brands

Brands owned by Oliver Footwear for the purposes of the APC

Brands	Summary
	<ul style="list-style-type: none"> ▪ A range of specialty and safety footwear that is engineered for comfort and fit for purpose
	<ul style="list-style-type: none"> ▪ A range of safety eye wear designed to offer the best value for money without compromising the technical and performance characteristics required in international standards ▪ King's also offers a range of footwear which may be introduced to the Australian market in the future

1.3 Position in the Supply Chain

Oliver Footwear is a brand owner for the purposes of the APC.

Oliver Footwear manufactures and distributes footwear, mainly safety footwear, and accessories in the Australian market. Oliver Footwear also imports and distributes a limited range of eye wear. Distribution of products to end consumers occurs through distributors and retailers.



2 Action Plan Requirements

2.1 Introduction

The Australian Packaging Covenant sets out specific requirements for all signatories. These sit beneath a set of Covenant Aims requirements which apply to the industry as a whole, as represented by the APC Covenant Council and the APC Industry Association / Secretariat. The relationship between these two sets of requirements is summarised below and shown 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. Whilst 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 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 for signatories

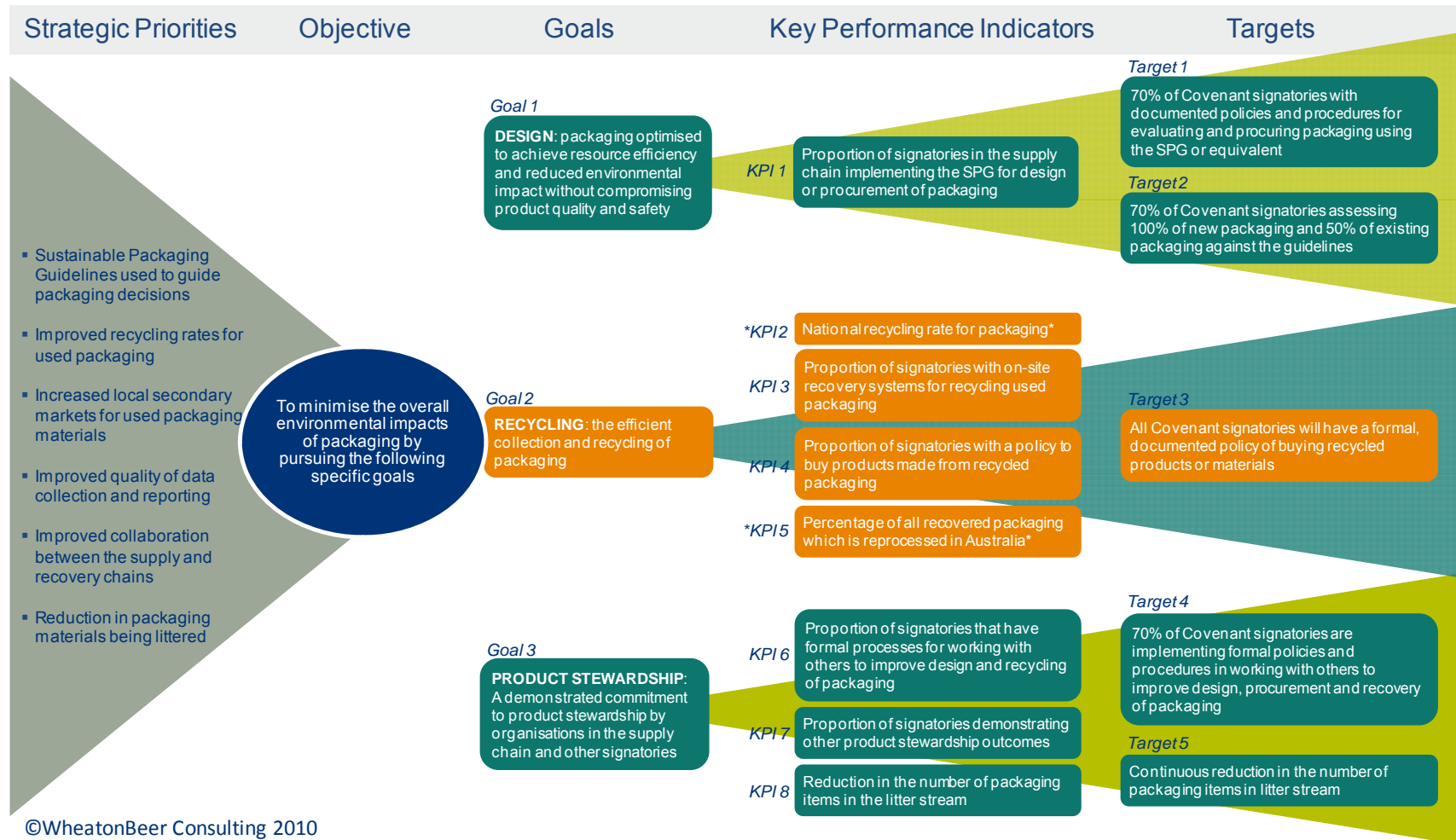
The APC sets out the minimum requirements which must be contained within the Action Plans of each signatory.





2.2 Covenant Aims

The following diagram sets out the overriding aims of the Covenant. This includes the 6 strategic priorities set out in the Strategic Plan, the single objective, the 3 goals, and the 8 KPI's.



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2.3 Oliver Footwear Aims

The following table sets out the specific APC obligations of each signatory.

	Oliver Footwear KPI's		Additional Requirements
Design	KPI 1	Have the Sustainable Packaging Guidelines (SPG) been implemented for the design or procurement of packaging?	The plan must indicate how the SPG will be used for the design or procurement of all new packaging. It will also need to show a timetable for reviewing existing packaging
Recycling	KPI 3	Has an on-site recovery system been established for recycling used packaging?	The plan must indicate whether there is a recovery system in place. If not, it must outline the timetable for establishment of a recovery system for used packaging
	KPI 4	Is a policy in place to buy products made from recycled packaging?	The plan must indicate whether there is an existing policy or procedure (such as a Buy Recycled policy). If not, it must outline a timetable for establishing such a policy or procedure
Product Stewardship	KPI 6	Are there formal processes for working with others to improve design and recycling of packaging?	The plan must include actions to improve packaging design and increase the recycling of used packaging. For example: <ul style="list-style-type: none"> ▪ A documented policy to review all packaging against the SPG (KPI 1); ▪ Supply contracts that require take-back and recycling of packaging; ▪ Waste management contracts that require collecting and recycling packaging
	KPI 7	Are there other demonstrated product stewardship outcomes for packaging?	The plan must outline any other product stewardship actions that the signatory will take to support the Covenant's objectives and goals
	KPI 8	Are there actions in place to reduce the number of packaging items in litter?	The plan must outline actions that the signatory will take to reduce litter



2.4 APC Minimum Requirements Checklist for Signatories

The following table sets out the APC minimum requirements which must be contained within Oliver Footwear Action Plan. References are provided to the page within this Action Plan which fulfils each requirement.

Requirement	Included in Action Plan	Page No. Reference
1. The name of the organisation and its subsidiaries (<i>Oliver Footwear does not have any subsidiaries</i>)	✓	2
2. The nature of the organisation (what it does, its size or turnover)	✓	5
3. Brands owned by the organisation	✓	6
4. The place of the organisation in the supply chain	✓	6
5. Packaging materials and formats used by the organization	✓	14
6. The period covered by the plan	✓	1
7. Contact details for the person responsible for implementing the plan (Covenant contact officer)	✓	2
8. The specific actions for implementing the commitments under the Covenant and supporting the achievement of the Covenant's objective and goals 1, 2 & 3	✓	17-18, 20, 23-24
9. Baseline data for all performance indicators	✓	13, 19, 21
10. Formal commitment by the Chief Executive Officer, or equivalent, to implement the action plan	✓	2



3 Actions

3.1 Scope

With the exception of a limited number of accessories which are used by distributors or retailers to supplement existing Oliver Footwear products, all Oliver Footwear products are sold to the consumer market and are in scope for the APC.

Accordingly, the actions set out below relate to all Oliver Footwear’s consumer products. These include approximately 65 different types of footwear, 6 types of eye wear products, and 15 types of accessories.

Actions have been grouped as follows:

Design	Includes actions required to establish packaging reviews for new and existing products, and actions relating to the reviews themselves
Recycling	Includes actions required to establish appropriate policies and systems
Product Stewardship	Included actions required to identify issues and potential alliances/relationships, and actions to address those issues



3.2 Design Actions

3.2.1 Preamble

There are 3 product categories within Oliver Footwear. These are Footwear, Eye wear, and Accessories. Eye wear and Accessories are recent additions to Oliver Footwear's product range and represent a small proportion of its product sales. Most accessories are for use by distributors or retailers and not packaged for sale to the consumer market. Footbeds represent the only accessory which is packaged for sale to the consumer market.

In relation to Footwear and Accessories, design and development of the products and packaging is controlled by and undertaken within Oliver Footwear's Australian facilities. Manufacturing of these products is done through the Australian manufacturing facility and outsourcing arrangements with manufacturing facilities overseas.

All Eye wear products sold by Oliver Footwear are manufactured in Taiwan and imported as fully finished goods. Control over design, development and manufacturing of Eye wear products and packaging rests with the overseas owner, King's, which is an affiliate organisation owned by the KSW Group.

Product categories and packaging formats are very simple within Oliver Footwear although packaging materials are sourced from different suppliers depending on the manufacturing location of the corresponding product. For products manufactured within Australia, packaging materials are sourced locally from AMCOR and are currently made of 100% recycled material. Other Oliver Footwear products that are manufactured overseas are imported as pre-packaged, fully finished goods. These primary and secondary packaging materials are sourced by overseas manufacturers.



3.2.2 KPI's

Design KPI's		Baseline Data	Comments	Related Actions
KPI 1	Have the Sustainable Packaging Guidelines (SPG) been implemented for the design or procurement of packaging?	No	The SPG will be used in the design and procurement of new packaging, as well as for reviews of existing packaging	5-6

3.2.3 Additional Design Requirements

Additional Requirements	Comments	Related Actions
<ul style="list-style-type: none"> The plan must indicate how the SPG will be used for the design or procurement of all new packaging. It will also need to show a timetable for reviewing existing packaging 	-	1-6 7-8



3.2.4 Packaging Materials and Formats

3.2.4.1 Packaging Materials

The principal materials utilised in the packaging of our products include:

- Plastics – Oriented polypropylene (OPP) bags and shrink wrap
- Paper and cardboard – swing tags, tissue, cardboard backing card, cardboard box and carton boxes

Note: cardboard sourced locally within Australia are made of 100% recycled materials

3.2.4.2 Packaging Formats

Product Category	Primary packaging	Secondary packaging	Tertiary packaging
Footwear (<i>sourced locally</i>)	Swing tag, Tissue, Cardboard box (3 sizes)	Cartons	Pallets and shrink wrap
Footwear (<i>sourced overseas</i>)	Swing tag, Tissue, Cardboard box (3 sizes)	Cartons	Pallets and shrink wrap
Eye wear	Oriented polypropylene (OPP) bag	Cardboard boxes Cartons	Pallets and shrink wrap
Accessories	Cardboard backing card, Plastic bag	Cartons	Pallets and shrink wrap

Note: shrink wrap is used only where order quantities are large



3.2.5 Packaging Reviews

3.2.5.1 Summary of current processes

New Footwear and Accessories products are designed and developed by the Quality Manager. Following this, the standard procedure is to fit the footwear product in one of three different sizes of shoeboxes. As a result, Oliver Footwear currently does not have any processes around the development or design of packaging. With the exception of footbeds, all accessories are not packaged for sale to the consumer market.

Existing products are reviewed annually based on their sales performances. Again, this does not currently involve any consideration for packaging.

New product development processes and reviews of existing product and packaging for Eye wear occurs overseas and Oliver Footwear's involvement in these is limited at this stage.

3.2.5.2 Logical groupings

For every product category, there is one packaging format. Oliver Footwear has 3 product categories and hence the logical grouping for packaging reviews to be undertaken is by product category. These are set out in section 3.2.4.2 above.

3.2.5.3 Approach for packaging reviews

New packaging

In the event where new packaging formats are introduced in Footwear and Accessories, the intention is for the SPG to be used in the design process that takes place locally and the procurement process that takes place both locally and at outsourced overseas manufacturers. This will be achieved by adapting and customising an SPG questionnaire that is relevant for Oliver Footwear.

Where products are imported from Oliver Footwear's overseas affiliate, King's, new packaging formats will be incorporated into existing packaging reviews as design and development of packaging rests with King's.

Existing packaging

There are 3 product categories within Oliver Footwear. Packaging reviews will be carried out according to the timetable below.



3.2.5.4 Timetable for existing packaging reviews

Timeframe	Product Categories reviewed
March 2011 – December 2011 (pilot)	Footwear (local)
December 2011 – June 2012	<i>Incorporating and adopting the SPG; Addressing gaps in packaging materials and formats</i>
July 2012 – June 2013	Footwear (overseas), Eye wear
July 2013 – June 2014	Accessories

See section 3.2.4.2 for details around packaging formats.



3.2.6 Specific Design Actions

Actions	Responsibility	Timeframe	Target	Evidence
1. Establish a pilot packaging review team	- Marketing Coordinator	By 30 June 2011	Packaging review team established	-
2. Run a pilot packaging review against an existing packaging format, e.g. Footwear (local)	- Packaging review team	By 31 December 2011	Pilot conducted	-
3. Following the pilot, adapt the SPG strategies and questions for use within Oliver Footwear	- Packaging review team	By 30 June 2012	SPG customised	Two sets of customised SPG questionnaires – for both new and existing packaging
4. Develop documentation templates to record the use of SPG against new packaging formats and reviews of existing packaging against the SPG	- Packaging review team	By 30 June 2012	Documentation templates developed	Two sets of documentation templates
5. Consider the SPG in design of new packaging formats for Footwear and Accessories	- Quality Manager	1 July 2012 to 30 June 2015	SPG used against 100% of new packaging formats	Outcome documented using templates (see Action 4)
6. Request overseas manufacturers under outsourcing arrangements to consider the SPG in the procurement of new packaging materials	- Quality Manager	1 July 2012 to 30 June 2015	SPG used against 100% of new packaging formats	Outcome documented using templates (see Action 4)



Actions	Responsibility	Timeframe	Target	Evidence
7. Undertake packaging reviews for existing packaging formats according to the timetable set out in section 3.2.5.4 to identify potential improvements	- Packaging review team	1 July 2012 to 30 June 2015	Packaging formats for at least 25% of SKU's reviewed per annum	Improvements and outcome documented using templates (see Action 4)
8. Implement changes or improvements to packaging formats that arise	- Marketing Coordinator - Solutions Design & Quality Manager	1 July 2012 to 30 June 2015	-	Changes and improvements documented in future APC Annual Reports



3.3 Recycling Actions

3.3.1 KPI's

Recycling KPI's		Baseline Data	Comments	Related Actions
KPI 3	Has an on-site recovery system been established to recycle used packaging?	Yes	Recovery systems for metal, cardboard and plastic currently exist in Oliver Footwear's manufacturing and warehouse facilities. Efforts will be made to extend this to our office facility	9-10
KPI 4	Is a policy in place to buy products made from recycled packaging?	No	-	11

3.3.2 Additional Requirements

Additional Requirements	Comments	Related Actions
<ul style="list-style-type: none"> The plan must indicate whether there is a recovery system in place. If not, it must outline the timetable for establishment of a recovery system for used packaging 	See KPI 3	9-10
<ul style="list-style-type: none"> The plan must indicate whether there is an existing policy or procedure (such as a Buy Recycled policy). If not, it must outline a timetable for establishing such a policy or procedure 	See KPI 4	11



3.3.3 Specific Recycling Actions

Actions	Responsibility	Timeframe	Target	Evidence
9. Implement a paper and cardboard recycling system within Oliver Footwear's office facility	- Marketing Coordinator	By 30 June 2011	Paper and cardboard recycling system implemented	-
10. Investigate potential recycling opportunities within Oliver Footwear's office facility, particularly glass and plastic recycling	- Marketing Coordinator	By 30 June 2012	At least 2 investigations carried out	Investigations documented and filed
11. Establish a policy to facilitate the purchase of products made from recycled materials (and in particular, recycled packaging)	- Supply Chain Manager	By 30 June 2011	Policy established	Documented sourcing policy showing consideration for recycled materials



3.4 Product Stewardship Actions

3.4.1 Preamble

The following packaging product stewardship issues have been identified:

- Proper recycling of shoeboxes by consumers
- Improving the reuse or recycling options of shoeboxes
- Plastic bags used to package Eye wear and Accessories may present potential litter issues

3.4.2 KPI's

Product Stewardship KPI's		Baseline Data	Comments	Related Actions
KPI 6	Are there formal processes for working with others to improve design and recycling of packaging?	No	-	12-13
KPI 7	Are there other demonstrated product stewardship outcomes for packaging?	No	-	14-17
KPI 8	Are there actions in place to reduce the number of packaging items in litter?	No	-	18



3.4.3 Additional Requirements

Additional Requirements	Comments	Related Actions
<ul style="list-style-type: none"> ▪ The plan must include actions to improve packaging design and increase the recycling of used packaging. For example: <ul style="list-style-type: none"> ▪ A documented policy to review all packaging against the SPG (KPI 1); ▪ Supply contracts that require take-back and recycling of packaging; ▪ Waste management contracts that require collecting and recycling packaging 	-	12-13
<ul style="list-style-type: none"> ▪ The plan must outline any other product stewardship actions that the signatory will take to support the Covenant's objectives and goals 	-	14-17
<ul style="list-style-type: none"> ▪ The plan must outline actions that the signatory will take to reduce litter 	-	18



3.4.4 Specific Product Stewardship Actions

Actions	Responsibility	Timeframe	Target	Evidence
12. Work with packaging suppliers and logistics providers to implement improvements identified through packaging reviews	<ul style="list-style-type: none"> – Quality Manager – Supply Chain Manager 	To 30 June 2015	Improvements implemented	Improvements documented and filed
13. Work with overseas manufacturers to implement improvements identified through packaging reviews	<ul style="list-style-type: none"> – Quality Manager 	To 30 June 2015	Improvements implemented	Correspondence with overseas manufacturers documented and filed
14. Identify relevant suppliers, industry groups, customers, competitors and other third parties with common interests in packaging product stewardship	<ul style="list-style-type: none"> – Marketing Coordinator 	By 30 June 2011	A shortlist of 6 parties with common interests	Shortlist of parties with common interests
15. Work with relevant suppliers, industry groups, customers, competitors and other third parties to identify product stewardship issues of common interest	<ul style="list-style-type: none"> – Marketing Coordinator 	By 30 June 2012	A list of 1 to 5 product stewardship issues of common interest	Identified product stewardship issues
16. Identify specific product stewardship actions which can be taken collaboratively	<ul style="list-style-type: none"> – Marketing Coordinator 	By October 2012 Reviewed annually	1 to 5 product stewardship actions each year	Future APC Annual Reports containing identified actions
17. Work with retailers to investigate opportunities to take back shoeboxes for recycling or reuse, e.g. establish drop-off points at retail outlets	<ul style="list-style-type: none"> – Marketing Coordinator 	By 30 June 2013	Carry out 3 investigations	Correspondence with customers documented and filed



Actions	Responsibility	Timeframe	Target	Evidence
18. Investigate specific litter actions which can be taken by Oliver Footwear, for example: <ul style="list-style-type: none"> ▪ Printing messages on packaging likely to become litter to encourage responsible disposal 	– Marketing Coordinator	By 30 June 2012	Carry out 3 investigations	Evidence of research documenting investigations for printing options





This document has been prepared by WheatonBeer Consulting based on information provided by Oliver Footwear

The underlying data has not been verified by WheatonBeer

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